Box 11, Folder 1: Correspondence - roadless rule policy (public responses), 1997-1998. 1997-1998

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Kirby

OFFICE OF THE EXECUTIVE SECRETARIAT, USDA
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MAS E

THE WILDERNESS SOCIETY • FOUNDED IN 1935 •

SOUTHERN APPALACHIAN FOREST COALITION

Southern Environmental Law Center

October 3, 1997

Action Office: fs
Referral Code: 35

* 3 1 4 3 7 6 5 *

Secretary Dan Glickman
Department of Agriculture
14th Street and Independence Avenue, SW
Washington, DC 20250

Dear Secretary Glickman:

Thank you for the opportunity to visit with your staff on October 6th. As we will discuss, conservation groups from the Southern Appalachians are requesting that the Forest Service discontinue timber sales and road construction in the roadless areas of the region's national forests. If adopted, this policy would result in many benefits for the people and the ecology of the area and would maintain important options for the agency, the public and Congress as upcoming forest plan revisions are completed and reviewed.

The Southern Appalachian Forest Coalition, a collaboration of national, regional, state and local conservation groups from Alabama to Virginia, was created in 1994 in response to emerging opportunities to protect the region's public lands and heritage. It is actively participating in the revisions of forest plans across the region. The Wilderness Society, founded in 1935 in the Southern Appalachians, is dedicated to the sound stewardship of America's federal lands. In concert with local groups, the TWS Atlanta office is seeking enduring protection for the region's remaining wildlands. Based in Charlottesville, VA, with a field office in Chapel Hill, NC, the Southern Environmental Law Center represents citizen groups across the region in efforts to safeguard natural areas, including forests, coasts, wetlands and rivers.

1.**Scarcity and Importance of Southern Appalachian Roadless Areas.** The eight national forests, totaling about 4.6 million acres, within the Southern Appalachian region feature beautiful and rugged mountains that are rich in biological diversity and very popular for hiking, fishing, rafting, hunting, fishing and other recreation. As noted in the 1996 interagency report on this 37 million acre region, called the Southern Appalachian

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Assessment (SAA), the rapid pace of development on private lands is "changing forever the character of the landscape."

This underscores the vital role of the national forests, only 12% of the region, in maintaining some of the last remaining large tracts of natural forest in the region, with distinctive opportunities for backcountry recreation and unfragmented wildlife habitat. At present, however, only 1% of the overall region is designated wilderness. Less than 8% of the Southern Appalachian national forests is wilderness, a considerably smaller percent than for the national forest system as a whole. Moreover, the national forest units are small, averaging less than 10,000 acres in size.

In the Southern Appalachian Assessment the Forest Service identifies a total of about 750,000 acres of roadless areas on the national forests, about another 2% of the overall land in the region. Another 1% of the region is potential national park wilderness, namely the recommendation by the National Park Service for the Great Smoky Mountains National Park. At only 3% of the region's land, the Southern Appalachian Assessment aptly terms roadless areas a "limited resource."

In addition to their essential role in meeting the region's growing demand for backcountry recreation, these roadless areas are recognized as ecologically significant. With their low road density and relative lack of fragmentation, Southern Appalachian roadless areas provide more secure black bear habitat than other forested land and hence higher populations; they afford large tracts of interior forest habitat and old growth forest important for declining populations of neo-tropical migratory songbirds, and they are often remote settings for high-quality trout streams. Roadless areas also contain many steep-sloped and highly erosive lands. Nineteen federally listed threatened and endangered species are found in the region's roadless areas.

2. Threats to Southern Appalachian Roadless Areas. In 1994, a coalition of groups, including the Southern Appalachian Forest Coalition, The Wilderness Society, and the Southern Environmental Law Center, requested that the Forest Service defer timber sales in roadless areas pending the upcoming forest plan revisions that will replace the outdated plans from the mid-1980's with their excessive timber goals. This request was prompted by an announcement of an extended timetable for the completion of the forest plan revisions. (Attached is a supportive editorial about that request from the Atlanta *Journal-Constitution*.) The Forest Service disappointingly denied this request, even while it admitted, as put by Chief Jack Ward Thomas, that "there is generally sufficient latitude under existing forest plans to modify, defer, and reschedule management practices in response to specific concerns that arise."

Since our request in 1994, there have been timber sales in areas that have been inventoried as roadless and listed in the SAA. In Georgia's Chattahoochee National Forest, for example, there have been sales in a number of SAA roadless areas, including Kelley Ridge, Pink Knob and Rocky Mountain. This year, the Forest Service approved

two sales in SAA roadless areas on Tennessee's Cherokee National Forest - in the Devil's Backbone and Slide Hollow tracts.

An appeal by a coalition of groups to the sale in Devil's Backbone was denied. In the decision, the Forest Service dismissed Chief Dombeck's counsel that sales avoid roadless areas as "merely comments until they are translated into policy through established administrative procedures."

With regard to the Slide Hollow area, conservationists appealed a sale of a million board feet entirely within a 4,400 acre roadless area. Despite plans to impact over 10% of the area and construct and use over two mile of roads, the Forest Service refused to prepare an Environmental Impact Statement and relied only on an Environmental Assessment. Despite the obvious and significant negative impacts of the sale on the naturalness and wild character of the area, the agency said that no EIS was needed because the area post-sale would still be below the threshold for road density and early age class allowed for roadless areas in the east.

This reasoning has been used across the region to justify the failure to prepare EIS's for roadless area sales, in contrast to the routine use of EIS's out west. These sales, such as the one in Slide Hollow, do significantly degrade the areas' naturalness and remoteness and thereby do "substantially alter the undeveloped character" of roadless areas, to borrow from the Forest Service Handbook. Thus, in addition to the damage to the scarce wildlands of the region, these sales plainly circumvent NEPA.

Moreover, it now appears that the Forest Service is extending the timeline still further for the completion of the forest plan revisions. The likely prospect is that plan revisions will not be completed until about 2001 or 2002. (Among other problems, this puts the plans at or over the legal limit of fifteen years under the NFMA for the use of first round of plans.) Thus, the roadless areas will continue to be at risk for another five or so years under outdated plans not based on principles of ecosystem management or the current data and findings in the recent Southern Appalachian Assessment.

In view of the further delay in planning and the record of roadless area sales, we request that the Forest Service discontinue selling timber and building roads in the Southern Appalachian roadless areas pending the completion of forest plan revisions and subsequent Congressional review of roadless area recommendations.

There is ample precedent for deferral of sales in sensitive areas, in this region aand elsewhere. In addition, there is nothing in the release language that accompanied the state-by-state wilderness bills of the 1980's that mandates timber sales in roadless areas.

In addition to the reasons and the benefits given, there would be virtually no impact on the region's timber supply from this moratorium. To begin with, less than 10% of the timber cut annually in the Southern Appalachian region comes from the national

forests. With regard to the national forests themselves, considerable portions of the roadless areas are not in the suitable base and thus not available for logging.

Moreover, often the lands that are deemed suitable for timber production are on steep slopes, are unroaded and of low productivity. With the agency's goals to minimize road construction and maintain cost-efficiency, these are the lands that should not be planned for timber sales. This moratorium thus ought not to interfere with viable timber sales programs on the Southern Appalachian forests.

3. Inadequacy of National Forest Roadless Area Inventory in Southern Appalachians. As noted, the 1996 Southern Appalachian Assessment lists an updated inventory of national forest roadless areas. However, the Forest Service failed to include many qualified areas due to flawed and misapplied criteria. These missed areas contain the same high-priority values for biodiversity and backcountry recreation as the inventoried areas; they should also be included in a policy that defers logging and roading. Following is a description of these flaws and a request for interim protection:

a. "Sights and sounds." In many instances across the region, the Forest Service dropped areas that fully meet the requirements for road density, naturalness and other criteria because "sights and sounds" from *outside* the boundaries could be perceived by users within the area. For example, they rejected the Flats Mountain area that is a logical extension to Citico Creek Wilderness on the Cherokee National Forest and cited the sounds of recreation from a lake outside the area. On the Jefferson National Forest, they also rejected the 5,000 acre Wilson Mountain area and pointed to the sights and sounds of a railroad, houses and highway in a valley on one side of the area.

In relying on this reason to eliminate areas even from study, the Forest Service acts contrary to long-standing direction from Congress, as plainly expressed in the 1978 Endangered American Wilderness Act:

"Further, many areas, including Lone Peak [outside Salt Lake City] ..., received lower wilderness quality ratings because the Forest Service implemented a 'sights and sounds' doctrine which subtracted points in areas where the sights and sounds of nearby cities (often many miles away) could be perceived from anywhere within the area. This eliminated many areas near population centers and has denied a potential nearby high quality wilderness experience to many metropolitan residents and is inconsistent with Congress' goal of creating parks and locating wilderness areas in close proximity to population centers. The Committee is therefore in emphatic support of the Administration's decision to immediately discontinue this 'sights and sounds' doctrine." House Report 95-540.

Similarly, the agency ignores the purpose of legislation such as the 1975 Eastern Wilderness Act that aimed at the preservation of wilderness close to population centers. This act featured a Congressional finding of the "urgent need" to find, study and include

eastern areas as wilderness. Hence, the use of outside "sights and sounds" to delete areas from the roadless inventory is especially inappropriate in the east.

b. "Semi-primitive" core. For the inventory of roadless areas in the Southern Appalachian Assessment, the Forest Service used the concept of "semi-primitive" acres as a measure for outstanding opportunities for solitude or backcountry recreation. These are acres found to be "semi-primitive" under the agency's Recreational Opportunity Spectrum (ROS.) Semi-primitive acres generally consist of natural settings that are more then a half-mile distant from a road. Forest Service staff termed these acres as semi-primitive "cores."

This measure has been used far beyond its intended purposes and limits; the result has been that many areas fully qualified as roadless were arbitrarily dropped. To begin with, the Regional Forester originally instructed that these cores were desirable, *not* essential. Yet, many planners viewed them as strict requirements and dismissed many tracts as not roadless because the cores did not have "sufficient" acres or a "suitable" shape -- even where the areas dropped passed the requirements for naturalness and road density found in the Forest Service Handbook.

Moreover, contrary to national guidelines for the ROS, planners in the Southern Appalachian region pulled back the semi-primitive boundaries a half-mile from closed roads that receive limited or no vehicle use and do not intrude on backcountry recreationists. As a result, semi-primitive cores were frequently underestimated in size and shape. Hence, it became doubly arbitrary to delete areas because cores had insufficient acres or nonsuitable shapes.

Furthermore, despite repeated requests, the Forest Service has failed to document that in the heavily forested and rugged Southern Appalachians that the half-mile pullback from a road for semi-primitive acres is essential to provide for solitude and backcountry recreation. Indeed, the one agency study in the region that we located and submitted to the Forest Service failed to support this key assumption about a half-mile pullback. (Moreover, the use of the half-mile pull-back from roads has resulted in inadequate and unmanageable boundaries for many inventoried roadless areas.)

Despite these serious flaws, the Forest Service deleted many areas that otherwise qualified as roadless due solely to the claimed absence of adequate semi-primitive "cores." On the Chattahoochee National Forest, for example, the Forest Service failed to identify the following areas as roadless for this reason: Grassy Mountain, Moccasin Creek, Three Forks, Duncan Ridge, Horse Gap, Windy Gap and others.

Indeed, in many instances, the Forest Service deleted areas as roadless for lack of adequate solitude or backcountry recreation even though existing forest plans expressly direct for those areas to provide semi-primitive solitude and recreation. Examples include Lynn Camp Creek on the Jefferson National Forest; Iron Mountain on the Cherokee National Forest; Moccasin Creek on the Chattahoochee National Forest, and others. In

fact, there is even an area (an 2,000 acre extension to Ellicott Wilderness on the Sumter National Forest in South Carolina) that the Forest Service previously studied and recommended *for wilderness designation* that they now find is not roadless, despite the complete lack of any roading or logging since the previous study.

Finally, the Forest Service has consistently overlooked the plain language of the Wilderness Act that areas qualify if they have "outstanding opportunities for solitude *or* a primitive and unconfined type of recreation." Section 2(c). There are many outstanding opportunities for backcountry recreation outside of the core of semi-primitive acres, as the region defines it under ROS. For example, many beautiful miles of the Appalachian Trail traverse the steep 2,344 acre Thunder Ridge Wilderness on the Jefferson National Forest and offer outstanding backcountry recreation, even though not an acre of this designated wilderness (that was recommended last decade by the Forest Service) is inventoried as "semi-primitive" under ROS.

3. Size Requirements. The Wilderness Act explicitly allows for areas less than 5,000 acres where they are of "sufficient size as to make practicable their preservation and use in an unimpaired condition." Contrary to this plain allowance for smaller areas that are manageable for wilderness, the Forest Service deleted many qualified areas for reasons of size alone. These included many smaller areas that are contiguous to existing wilderness and make logical extensions.

Many stand-alone areas were also wrongly dropped due to their small size. For example, the Jefferson National Forest rejected the 3,332 acre Stone Mountain (Cave Springs) area as "very small," despite the presence of a 2,500 acre semi-primitive core - with no finding that the area could not be managed to sustain its wilderness values. Likewise, staff on the Chattahoochee National Forest dropped the 3,400 acre Three Forks area as too small despite its outstanding wild character as the confluence of the three streams that join to begin the West Fork of the Wild and Scenic Chattanooga River. (Three Forks was previously inventoried in RARE II as roadless; there has been no logging or roading since, yet the area was found unqualified.)

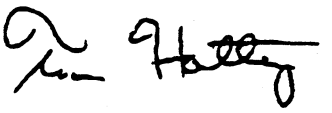
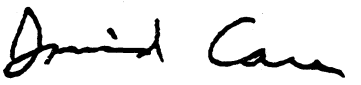
In view of the flaws in the roadless area inventory, we request that the Forest Service discontinue selling timber and building roads in areas that qualify under the Handbook's requirements for road density and naturalness during the time that the inventory of roadless areas is being corrected.

Our experience has been that all forests in the region omitted qualified areas, some more than others. At the most, a corrected inventory might include another 750,000 acres across the region, about the size of the current inventory. This would still be only another 1% of the overall region, a modest amount to retain in its natural state pending further study.

We urge the Clinton Administration and the Forest Service to adopt these measures for interim protection of roadless areas. With these modest steps, the federal

government can keep open options for wildlands preservation in the future, with multiple benefits in sustaining the rich biodiversity of the Southern Appalachians and in providing a wildlands legacy for its people and culture.

Sincerely,

Peter Kirby
Southeast Regional Director
The Wilderness Society

Tom Hatley
Campaign Director
Southern Appalachian
Forest Coalition

David Carr
Public Lands Director
Southern Environmental
Law Center

cc: Ann Kennedy, Special Assistant, Office of Secretary Glickman
Jim Lyons, Undersecretary for Natural Resources and Environment, USDA
Chief Mike Dombeck, USDA Forest Service
Bob Joslin, Deputy Chief, National Forest System, USDA Forest Service
T.J. Glauthier, Associate Director, Natural Resources and Environment Section, OMB
Dinah Bear, General Counsel, Council on Environmental Quality
Elizabeth Estill, Regional Forester, Southern Region

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To KATHLEEN McGINTY	From Steve Henson
Co. CHAIR, CEQ	Co. WWU
Dept.	Phone # 360-650-4843
Fax # 202-456-2710	Fax #

cc: Durch

JAN 12 1998

January 12,1998

The Honorable William Jefferson Clinton
President of the United States
The White House
Washington, D.C. 20500

Dear Mr. President:

It has come to our attention that your administration is in the process of developing a new scientifically based policy for the management of roadless areas on public forestlands. As economists who specialize in natural resource issues, we are writing to provide input regarding the economics of roadless areas.

As was pointed out in a recent letter to you signed by over 100 scientists, there is a substantial body of scientific evidence regarding the importance of roadless areas in protecting ecological systems (Henjum, et al. 1994; Quigley, et al. 1996; SNEP 1996; USDA, et al. 1993). Roadless areas are critical in maintaining water quality, biodiversity, and the ecological integrity of national forests. They provide essential habitat for sensitive plant and animal species. The fragile ecology of most roadless areas means that road construction and other forms of development within them pose serious threats to many of the economic goods and services that flow from public forestlands.

From an economic perspective, the ecological systems at issue are assets that provide economic value by satisfying a wide variety of human wants. Debates about the economics of public land use tend to focus on the commercial benefits of extractive activities such as timber harvesting, grazing, and mining. Such benefits are relatively easy to measure using market data. But this focus is too narrow. There are non-extractive uses for which markets are either incomplete or nonexistent, but which nonetheless provide significant economic value. For example, many people enjoy recreating in pristine forest environments. Although these activities may not be purchased in market transactions, the time and other goods that people give up in order to enjoy them provide evidence of their economic value. Existing wilderness areas in our national forests and national parks meet some of this recreational demand. But as these protected areas become increasingly congested, the recreational value increases for other roadless areas that are currently unprotected.

In addition to recreation and other non-extractive uses, pristine forestlands provide economic value that is independent of direct use. There is growing recognition that wilderness and biodiversity contribute to human well-being through their mere existence. Many Americans consider these to be important national treasures, the loss of which would diminish our well-being. This "existence value" is measurable in principle, and recent advances have improved its measurement in practice. In recognition of these advances, existence value is now included in damage assessments permitted by the Natural Resource Damage Assessment procedures implemented under the Oil Pollution Act and CERCLA. A growing body of empirical work in this area suggests that such values constitute a large portion of the total economic value of public forestlands. The substantial benefits from protecting roadless areas are documented in peer-reviewed scientific articles such as Walsh, Loomis, and Gillman (1984) and Pope and Jones (1990). Regarding the protection of Option 9 roadless areas, studies identifying the benefits of protecting spotted owl habitat include Rubin, Helfand, and Loomis (1991), Hagen, Vincent, and Welle (1992), and Brown, Layton, and Lazo (1994).

While the evidence suggests that protection of roadless areas would yield substantial benefits, such protection would also impose costs. At the national level, these costs may take the form of reductions in timber supply and resulting increases in wood product prices, while at the local level there is the potential for adverse impacts on employment and income in the timber industry. In particular, concerns recently have been expressed regarding potential job loss associated with protection of roadless areas covered under the spotted owl conservation plan (within which some timber harvesting is permitted under Option 9). The probable sale quantities of timber within these areas, however, represent only a very small share of total timber production within the region, and thus cannot be expected to have a substantial impact on industry employment or earnings, or on timber prices. The total roadless area in the affected national forests within Washington, Oregon and Northern California is just over 3 million acres, of which approximately 318,000 acres are suitable for timber production under Option 9 (Johnson, et al., 1993). The probable sale quantity for these areas is approximately .07 billion board feet per year (Johnson, et al., 1993, Table 19). This is less than one percent of the total annual timber harvest in Oregon and Washington alone (Warren, 1997, Table 16). These numbers should be kept in mind as your administration considers the inclusion of these lands in your roadless area initiative. The employment, income, and price impacts of protecting these areas are likely to be extremely small in percentage terms.

As wilderness becomes increasingly scarce, the recreational and existence values of our remaining roadless areas can be expected to increase over time relative to the value of extractive uses of these areas. Each acre that is lost makes preservation of the remaining acreage ever more valuable.

We commend you for your attention to the stewardship of our natural heritage, and we urge you to consider the economic benefits discussed above as you move toward a final decision on the management of our remaining unprotected roadless areas.

Sincerely yours,

Daniel A. Hagen
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Western Washington University

Steven E. Henson
Associate Professor of Economics
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Colorado State University

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Daniel P. Beard

2/8/99

Mike

I read your Missoula speech this weekend. All I can say is: "Brilliant!"

It really is a thoughtful and visionary speech. I'm very proud of the job you're doing. Keep it up.

Dan

[21 MARCH 2000]

WWF

FACSIMILE TRANSMITTAL FORM

Please deliver this sheet with message
Cover sheet plus 14 pages

To: Mike Dombeck

From: Jim Leape

Company:

Company: World Wildlife Fund-US

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World Wildlife Fund
1250 24th Street, N.W.
Washington, D.C. 20037-1175

WWF

March 20, 2000

The Honorable Helen Chenoweth-Hage
Chairman
Honorable Adam Smith
Ranking Member
Subcommittee on Forests and Forest Health of the Committee on Resources
U.S. House of Representatives
1337 Longworth House Office Building
Washington, DC 20515-6205

Dear Chairman Chenoweth-Hage and Representative Smith:

On March 14, 2000, a draft proposal from the World Wildlife Fund (WWF) to the Packard Foundation, dated January 24, 2000, which referenced a draft, unsigned Memorandum of Understanding (MOU) between WWF and the U.S. Forest Service, was a subject of discussion at a hearing of the Forests and Forest Health Subcommittee of the Committee on Resources. Because the draft proposal and MOU were not fully understood in either the hearing or in some news accounts, I am writing on behalf of WWF to clear up any misunderstanding. A copy of the draft MOU accompanies this letter. We ask that this letter and the attachments be made a part of the record of the March 14 hearing.

WWF is the largest privately supported international conservation organization in the world with more than one million members in the U.S. alone. WWF has helped protect 180 national parks and nature preserves worldwide; monitors international trade in wildlife; promotes ecologically sound development; assists local groups in conservation projects; conducts public policy research on natural resources issues; and promotes conservation of Earth's living resources.

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WWF recognizes the mutual influences of cultural values, communities, citizen participation processes, and human use of forest environments. As one of the founding organizations of the Forest Stewardship Council (FSC), WWF works on the promotion of responsible forestry practices on managed forest landscapes. WWF also advocates the use of the best available science to design and implement land management strategies resulting in sustainable ecosystems that incorporate human values and needs. Thus, in addition to its headquarters in Washington D.C., WWF has regional offices in the U.S. in Ashland, Oregon; Las Cruces, New Mexico; Nashville, Tennessee; Hollywood, Florida; and Marathon, Florida.

WWF is a science-based conservation organization. WWF advocates biodiversity conservation positions that reflect our mission and works to see those positions translated into public policy. WWF bases all its work on sound science. In particular, our roadless area conservation efforts are rooted in scientific research, facilitated through our mapping assessments.

To make our work more accessible to Members of Congress, we held a briefing on our conservation assessments and mapping projects on November 4, 1999, which was attended by staff of the Forests and Forest Health Subcommittee. We have also visited with a number of Congressional offices regarding these projects and our interest in protecting roadless areas. We have made the executive summary of our Comments on the Notice of Intent to prepare an Environmental Impact Statement available to numerous Members of Congress and attach a copy for your information.

Turning to the specific draft MOU that was discussed at the March 14 hearing, WWF proposed the MOU to the Forest Service in order to provide a framework for cooperation and coordination to promote the conservation of biological diversity on National Forest lands and to increase the public's knowledge, awareness, and appreciation of biological diversity as it relates to overall land management. In addition, the draft MOU would help facilitate the efficient sharing of databases that are needed to complete WWF's roadless area mapping assessment that will document the scientific importance of roadless areas to the protection of biological diversity. Upon completion of WWF's mapping assessment, this information would be made available to the public, Congress, and the Forest Service.

In addition to the sharing of databases proposed in the draft MOU, WWF has also proposed working with the Forest Service on a restoration project on the Applegate Ranger District in southwestern Oregon. WWF is working with local tribes to develop a project to restore a portion of the Applegate in order to protect medicinal plants of cultural significance to the tribes. The draft MOU would help facilitate a working relationship among the tribes, WWF, and the Forest Service regarding this project.

Finally, with regard to WWF's draft proposal to the Packard Foundation to support this project, WWF, like most non-profit organizations, routinely requests funding from foundations and other sources to support its work. In drafting such proposals, WWF makes as strong a case as possible for support of its work. Toward that end, the draft proposal expressed WWF's interest in using the map-based assessments to strengthen

roadless area protection. WWF will do so by submitting the assessments during the public comment period. WWF also plans to arrange briefings on the assessments and the need for roadless area protection for interested Members of Congress and the public.

WWF wishes to emphasize that the MOU is a draft. Either WWF or the Forest Service is free to revise the terms of the MOU before signing it, or not sign it at all. Similarly, the Packard Foundation is free to decide whether to fund the project. It is, of course, WWF's hope that the Forest Service will enter into the MOU and the Packard Foundation will fund WWF's work on the project.

WWF hopes that this clears up any misunderstanding regarding this issue. We look forward to working with the Committee to ensure that our National Forests are managed using the best available science and to ensure that roadless areas are protected.

Sincerely,

Dominick Della Sala, Ph.D
Director Klamath-Siskiyou Regional Program

Attachments

Cc:

The Honorable Don Young, Chairman, Committee on Resources
The Honorable George Miller, Ranking Member, Committee on Resources
Mr. Michael Dombeck, Chief, U.S. Forest Service

DRAFT

MASTER SERVICEWIDE MEMORANDUM OF UNDERSTANDING
between
WORLD WILDLIFE FUND – U.S.
and the
UNITED STATES DEPARTMENT OF AGRICULTURE FOREST SERVICE

This Master Servicewide Memorandum of Understanding (SMU) is made and entered into by and between World Wildlife Fund Inc., hereinafter known as WWF, and the United States Department of Agriculture, Forest Service, hereinafter known as the Forest Service.

I. PURPOSE

The purpose of the SMU is to provide a framework for cooperation and coordination to promote the conservation of biological diversity on National Forest System lands and other lands and to increase the public's knowledge, awareness, and appreciation of biological diversity as it relates to overall land management. This framework for cooperation is especially needed in the area of threatened, endangered and sensitive plants, animals, and biotic communities. Emerging issues of potential collaboration include filling critical knowledge gaps in roadless area inventories and assessments in the nation's publically-owned forests; synthesis and development of strategies for communicating findings and implications; investigation of opportunities for improved coordination of biodiversity protection efforts; direct scientific support; pilot watershed restoration projects in southwest Oregon; and shared data inventories.

II. STATEMENT OF MUTUAL INTEREST AND MUTUAL BENEFITS

There is a mutual need to discover the range of conditions of the biophysical and cultural environment and the levels of products and benefits that are sustainable through time.

Both WWF and the Forest Service have responsibilities and interests in the preservation, conservation, and management of biological diversity. There is a compelling need by both organizations to synthesize science and management to monitor, evaluate, and design and implement or support land management activities in a way that is ecologically sustainable. This mutual interest is desired at the pilot, regional and national levels, where WWF and the Forest Service have common programmatic interests (see below).

The Forest Service is a land management agency dedicated to the conservation and ecological management of the Nation's resources, and has major responsibility for the protection, management, and research of fish, wildlife, and plant habitats including providing special protection for threatened, endangered, and sensitive plant and animal species. Management strategies are oriented toward sustaining the characteristics of biological diversity, productive capacity, and ability to provide human benefits of the ecosystem within the Federal agency land stewardship context.

WWF is the largest private environmental non-governmental organization in the United States, and works worldwide to conserve biological diversity in concert with meeting human needs. WWF has helped protect 180 national parks and nature preserves worldwide; monitors international trade in wildlife; promotes ecologically sound development; assists local groups in conservation projects; conducts public policy research on natural resources issues; and promotes conservation of earth's living resources. WWF also works on the promotion of responsible forestry practices on managed forest landscapes as one of the founding organizations of the Forest Stewardship Council (FSC). To this end, we support or are involved in forestry projects on private lands that are based on FSC principles and on related conservation biology principles, such as ecosystem restoration.

WWF recognizes mutual influences of cultural values, communities, citizen participation processes, and human use of forest environments. WWF also advocates the use of the best available science to design and implement land management strategies that result in sustainable ecosystems that recognize human values and needs. While the U.S. organization of WWF is based in Washington D.C., it has regional program interests in several locations, including the Cascadia region and in southern Appalachia. The Cascadia region is bound by several ecoregions considered by WWF as having globally or regionally significant levels of biodiversity, including Klamath-Siskiyou (northwest California/southwest Oregon), Northern California Redwoods, Cascade Mountains, and Central Pacific Coastal Forests. Southern Appalachian ecoregions of high biodiversity value include the Blue Ridge Mountains, the mixed mesophytic Appalachian forests, and the highly biodiverse riverine systems of the Southeast U.S. Collectively, these ecoregions make up biomes of high interest to both organizations.

Now, THEREFORE, the parties agree as follows:

III. THE FOREST SERVICE AGREES TO:

1. Coordinate with WWF on potential opportunities for research on and conservation of biological diversity, land stewardship, and sustainable economic use where mutual benefits will be derived. Examples may be, on a case-by-case basis, as follows:

    - Analysis of existing and proposed programs to promote biological diversity conservation.

    - Development of creative management techniques to promote the conservation of biological diversity.

    - Development of training and workshop programs to improve biological diversity awareness and program implementation.

    - Cooperation with local non-government organizations in their efforts to conserve biological diversity.

- Cooperation with federally recognized tribal governments in their efforts to conserve biological diversity.

- Planning and coordination of initial efforts for development of a national biodiversity protection strategy.

- Examination of the viability of forest certification on select, pilot areas.

2. Make National Forest System lands available for the furtherance of this program, subject to applicable State and Federal laws, regulations, Forest Plans, and approval by the appropriate Forest Service official.

3. Enter into specific agreements or contracts to accomplish agreed-upon work projects, subject to appropriate statutes, regulations, Forest Plans and policies.

4. The Forest Service agrees to work cooperatively to integrate scientific information at the decision-making level where it can be directly used to affect the development of ecosystem management strategies. Examples may be, on a case-by-case basis, as follows:

   - Facilitate the Northwest Forest plan integrated with a basin-scale approach to collaborative watershed restoration in southwest Oregon

   - Provide technical assistance and resource information in the Ashland Creek watershed education, protection, and restoration project

   - Work cooperatively with WWF on the Upper Glade national stewardship pilot in southwest Oregon

   - Share databases on roadless area management and forest and aquatic restoration approaches

   - Work in cooperation with WWF and its regional partners to facilitate a strong biodiversity protection and roadless area program in parts of Appalachia where opportunities may exist to maintain and create functional, intact reserves

   - Coordinate with WWF to improve watershed protection qualities in key public forests and keystone watersheds in Appalachia

5. Conduct adaptive management and conservation workshops, particularly on policy initiatives of mutual interest (e.g., roadless area assessments, aquatic, and fire restoration initiatives).

IV. WORLD WILDLIFE FUND AGREES TO :

1. Cooperate fully with the Forest Service in carrying out identified projects, including bringing a global awareness of biodiversity to local and regional projects.

2. Enter into specific, separate agreements or contracts to accomplish agreed-upon work projects.

3. Cooperate with the Forest Service in identifying activities to facilitate development and implementation of programs for conserving biological diversity such as conservation assessments of roadless areas (both inventoried and un-inventoried) in the Cascadia and Appalachia regions, and in other regions of national concern.

4. Provide science-based assessments useful in design and implementation of land-management strategies nationally and regionally.

5. Work with the Forest Service on pilot and regional projects to broaden its technical capacity.

6. Integrate conservation of biodiversity with the sustainability of forest uses.

7. Conduct workshops in partnership with the Forest Service on transfer and application of scientific assessments and related outreach. Examples may be, on a case-by-case basis, as follows:

   - Integration of conservation and sustainable development/resource use
   - Landscape connectivity and forest fragmentation
   - Survey and manage species and other species of conservation concern
   - Fire ecology research and ecosystem restoration
   - Monitoring and indicator development and application
   - Aquatic ecosystem integrity protection
   - Roadless areas and other areas of high conservation value
   - Recognition of environmentally responsible business practices

V. IT IS MUTUALLY AGREED AND UNDERSTOOD BY AND BETWEEN THE PARTIES THAT:

1. Representatives from both parties will meet, as a minimum, quarterly to discuss completed projects, possible future programs, and/or status of current projects. Attendees will participate at their own expense.

2. Modifications within the scope of the instrument shall be made by mutual consent of the parties, by the issuance of a written modification, signed and dated by both parties, prior to any changes being implemented.

3. This instrument may be terminated in whole, or in part, at any time before the date of expiration, upon agreement of both parties. Termination shall be effected in writing with 60 days written notice.

4. Pursuant to section 22, Title 41, United States Code, no member or delegate to Congress shall be admitted to any share or part of this instrument, or any benefits that may arise therefrom.

5. This SMU in no way restricts any of the participants from participating in similar activities or arrangements with other public and private agencies, organizations, and individuals.

6. This instrument is neither a fiscal nor a funds obligation document. Specific work projects, activities or endeavors involving reimbursement or contribution of funds between the parties to this instrument will be handled in accordance with applicable laws, regulations, and procedures including those for Government procurement and printing. Such endeavors will be outlined in separate agreements that shall be made in writing by representatives of the parties and shall be independently authorized by appropriate statutory authority. This instrument does not provide such authority. Specifically, this instrument does not establish authority for noncompetitive award to World Wildlife Fund of any contract or other agreement. Any contract or agreement for training or other services must fully comply with all applicable requirements for competition.

7. Nothing in this SMU shall be construed as obligating the Forest Service to reveal information to WWF that is not available to the public, or render treatment that is preferential to WWF; nor shall WWF be construed as offering preferential treatment to the Forest Service.

8. This instrument is executed as of the last date shown below and expires no later than December 30, 2001, at which time it is subject to review, renewal, or expiration.

IV. PRINCIPAL CONTACTS:

USDA-FOREST SERVICE	WORLD WILDLIFE FUND, INC.
Nancy Green, Assistant Director Wildlife, Fish, and Rare Plants USDA Forest Service 14th & Independence SW Washington, D.C. 20250	Dr. Nick Brown, Manager U.S. Forest Conservation Campaign 1250 24th Street NW, Room 6062 Washington, DC 20037-1132 202.778.9572

IN WITNESS WHEREOF, this SMU is effective as of the last written date below.

MICHAEL DOMBECK, Chief
USDA-Forest Service

Date

KATHRYN FULLER, President
World Wildlife Fund, Inc.

Date

WWF

Importance of Roadless Areas in Biodiversity Conservation: A Scientific Perspective

Executive Summary

For the past 3 years, the World Wildlife Fund together with the Conservation Biology Institute (Corvallis, OR) have conducted one of the most comprehensive assessments of our nation's protected areas, including the ecological importance of roadless areas to national conservation efforts. The purpose of the assessments was to: (1) determine how much and how representative our nation's protected areas are of important wildlife habitat; (2) provide scientific documentation of the ecological importance of roadless areas; and (3) determine the extent of habitat fragmentation from road building and other disturbances in forested ecoregions where biodiversity is considered "globally outstanding." These studies are available in published reports and CD-ROM formats from WWF and CBI.

Nation's first comprehensive protected areas assessment - Since the designation of the nation's first national park, Yellowstone, in 1872, the United States has set aside more than 100 million acres in wilderness and national parks. However, most scientists agree that it will take far more land in protection to save what remains of nature's legacy from an increasing amount of road building, logging, urban development, and other disturbances. While the nation has some of the best examples of protected areas around the world, the current network of parks, wilderness, and wildlife refugees is not sufficient to insulate biodiversity from projected increases in human population, natural resource consumption, and global climate change extending into the next century. The main findings of this study are as follows:

- The nation has set aside only 5% of its land in "strict" protection (national parks and monuments) and another 5% in more "relaxed" protection categories (state parks and national wildlife refugees where more human activity occurs but not logging or mining).
- The vast majority (83% or 160 million acres) of our national forest lands are open to multiple-use management, including logging, mining, and livestock grazing - only about 17% or nearly 33 million acres are in protected status.

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- Protection across the nation varied widely from state to state with most states east of the Mississippi protecting less than 1% of their land area.
- Southern and mid-western states had the lowest levels of protection with only 0.2-0.4% protected.
- Most protected areas were concentrated in the western United States with Alaska (35%) and California (19%) having the highest levels of protection for the nation - Oregon has protected just 5.3% of its lands.
- Most protected areas (even those in Alaska) are at high elevation (rock and ice), missing key low-elevation areas of high conservation value where most wildlife and fish species occur.
- Nation-wide, protected areas averaged less than 25,000 acres, considered too small to insulate wildlife from development in the surroundings.

Ecological Importance of Roadless Areas - the importance of roadless areas was documented for both small (1,000-5,000 acres) and large (>5,000 acres) roadless areas under consideration in the Clinton roadless area environmental impact statement and for three case study regions (Klamath-Siskiyou, Appalachia/Blue Ridge, and Tongass National Forest) recognized by WWF for global biodiversity importance. The Klamath-Siskiyou region of northwest California and southwest Oregon has some of the highest diversity of conifers, endemic plants, and mollusks (terrestrial and freshwater snails and mussels) of any conifer forest in the world. Appalachia/Blue Ridge Forests of the southeastern US are among the world's most diverse deciduous forests in terms of plant richness, amphibians, butterflies, and tree species. The Tongass National Forest in southeast Alaska contains some of the largest, intact blocks of forest in North America and nearly ¼ of the world's temperate rainforest.

In general, large (>5,000 acres) roadless areas in these exceptionally diverse regions provide many ecological benefits that excel in comparison to roaded landscapes, including:

- Relative high levels of intact late-seral/old-growth forests
- Essential habitat for many species of conservation concern (including threatened ones)
- Broad array of habitat types and elevation bands
- "Buffer areas" from exotic species invasions and edge effects
- Critical winter range for ungulates
- Landscape and regional connectivity
- Aquatic strongholds for salmonids
- Areas most likely to have fire regimes operating within natural bounds

Small roadless areas share many of attributes in common with larger ones, including:

- Essential habitat for species key to the recovery of forests following disturbance such as herbaceous plants, lichens, and mycorrhizal fungi
- Habitat refugia for threatened species and those with restricted distributions (endemics)
- Aquatic strongholds for salmonids
- Undisturbed habitats for mollusks and amphibians
- Remaining pockets of old-growth forests
- Overwintering habitat for resident birds and ungulates
- Dispersal "stepping stones" for wildlife movement across fragmented landscapes

In the eastern United States most of the remaining intact forests and roadless areas are smaller than the 5,000-acre RARE II designations. Small roadless areas, however, are key to ecological restoration in these otherwise highly fragmented landscapes and when combined with strategic closure of roads (near roadless areas) the size and functionality of many small roadless areas could be restored.

Impacts of Roads on Biodiversity and Ecosystem Processes - roads are often the first major human disturbance into a forest, which is then followed by land clearing and other disturbances. Excessive road building may act directly or indirectly on wildlife population viability and/or ecosystem process as follows:

- dispersal bottlenecks for propagules of sensitive species, thereby fragmenting populations
- dispersal conduits for invasive species (e.g., roads and associated vehicular traffic are a major contributor to the spread of root rot fungus *Phytophoris lateralis* that is decimating Port Orford cedar forests in Oregon and California)
- impediments to hydrological properties and processes, particularly changes in drainage patterns and stream morphology
- degradation of fish habitat
- mass wasting events and slope instability (particularly road building on steep slopes)
- poaching, over-hunting, and trapping of wildlife
- collisions with wildlife - one study estimates more than 1 million vertebrates nation-wide are killed each day by collisions with vehicles -- roadkill is the leading cause of death of the endangered Florida panther and key deer
- alteration of fire patterns (e.g., increased risk of arson due to human access exacerbated by roads)
- soil and water pollution, air pollution, particularly a build up of nitrous oxides in soils and streams that has been associated with the spread of exotics

- erosion, stream sedimentation, edge effects, over collecting of rare plants and animals (e.g., cacti and reptiles), and elimination of snags for firewood or road safety.

In forested ecosystems, roads result in cumulative impacts, which when combined with other disturbances, can reduce habitat suitability for many species. This is well documented across a range of taxa from small mammals, amphibians, and carabid beetles to ungulates, large carnivores, and neotropical migratory songbirds. Large carnivores like grizzly bears and wolves typically drop out of an area when the density of roads increases beyond certain thresholds (usually >0.5 mi of roads/square mile of forest), salmon spawning habitat can be degraded by sediment from roads, and deer and elk lose important hiding and thermal cover when forests are fragmented by road building and clearcutting.

Roadless Areas and Fire Management/Access Issues - while roads are important to land managers concerned about access into the forest for fire control or pest management, not every acre of forest landscapes needs to be managed in order to ensure healthy forests. Many species cannot tolerate multiple use management or road building on every acre of the land and thus the presence of roads has been associated with loss of biodiversity and disruption of ecosystem processes. Too many roads in an area can elevate fire risks due to arson and accidental fires associated with greater access (more than 90% of all forest fires are arson or accidental related). Given the remoteness of most roadless areas and terrain and safety considerations, fire control in roadless areas is best carried out by helicopters and fixed wing aircraft than by vehicles. Observations of fire behavior indicate that when fires reach plantations they often spread rapidly (i.e., "blow up") due to contact with fine fuels produced by logging slash. This pattern suggests that plantations may, in fact, be more vulnerable to fires than roadless areas and that most fire management should be directed at managed landscapes. In comparison, many roadless areas, because of access problems, have not been subjected to fire suppression and thus fuel levels are typically within historic bounds. Roads are also a significant conduit for the transmission and spread of numerous invasive exotic species that contribute to forest health problems, including the extensive decline of Port-Orford cedar. Finally, given the preponderance of roads in most forested landscapes (more than 378,000 miles on federal lands alone) the cumulative forest health problems and fire risks of additional access will more than offset any benefits provided by access into roadless areas. Satellite images of forest regions throughout the US reveal an extensive network of roads crisscrossing and fragmenting most forested landscapes. Thus, roadless areas provide some of the last remaining intact forest key to the functionality and health of entire ecosystems.

Conclusions – the studies conclude that a responsible roads policy is one that is grounded in sound science, recognizing the importance of roadless protection, road repair, road maintenance, and the closing and decommissioning of unstable and high risk roads. Existing roads will continue to provide for local forest management and

access but roadless areas need to be protected for their unique benefits. Roadless areas are the "pearls" in a string of regional connectivity holding the many components of ecosystems together and are the underlining fabric for biodiversity and ecosystem services that healthy forests provide. Protecting all roadless areas of 1,000 acres or greater on federal lands from logging, mining, grazing, and motorized access is key to ensuring that forests remain viable and that ecosystem management practices are scientifically sound. This level of protection should become the basis for the environmental impact statement on roadless areas currently in preparation by the Forest Service.

For more information on these studies contact:

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