



September 30, 2011

The Honorable Robert Abbey
Director, Bureau of Land Management
1849 C Street NW, Rm. 5665
Washington, DC 20240

RE: Merger of the Forests and Woodlands Management Division and the Rangeland Resources Division

Dear Director Abbey:

On behalf of the Society of American Foresters (SAF), please accept the following comments regarding the Bureau of Land Management's (BLM) suggested Division merger of the Forests and Woodlands Management Division and the Rangeland Resources Division. SAF is the national scientific and educational organization representing the forestry profession in the United States. As the largest professional society for foresters with over 14,000 members, we are chartered to advance the science, education, technology, and practice of forestry for the benefit of society and to ensure the health and use of forest ecosystems.

SAF strongly values the BLM's support of our organization, and recognizes that BLM employees are an integral component of SAF's success. Experience shows that when leaders are engaged and supportive of professional societies, employees will pursue opportunities to continue their education, build their professional development skills, and seek leadership positions. The BLM has generously contributed to major SAF meetings and your employees have played and continue to play key leadership roles at all levels within our organization. We are truly grateful for all that the BLM has done to support SAF.

SAF was made aware of the Washington Office division merge earlier this year. While we strongly support both professional forest and rangeland management, we are concerned that shifting resources and leadership from forestry will also reduce the role of forestry in the Washington Office.

For decades, the BLM has maintained a significant commitment to the forestry profession through leadership headquartered in the Forests and Woodlands Division. The division management of 60 million acres of forests and woodlands in the West and Alaska provide a magnitude of multiple-use benefits for communities, wildlife, water resources, and more. To continue the excellence required to effectively lead and manage these landscapes, we urge the agency to maintain strong forestry leadership and presence in the Headquarters Office.

SAF's main concerns are expressed below.

- 1) There are clear, established, and enacted differences in the enabling legislation that guides the two programs. The BLM range management program is carried out through implementation of the 1934 Taylor Grazing Act, while the majority of BLM's forestry program is guided by the Oregon and California Lands Act (O&C Act) of 1937. Implementation of these different statutes and their supplementary regulations requires specific expertise and knowledge.

- 2) Although the fundamental management objectives for forestry and range apply the principles of multiple-use and sustained yield, the methods and practices applied in timber and range management programs are significantly different. For example: forest inventory methods; methods to quantify timber harvest volume; methods for authorizing timber sale, service, and stewardship contracts; methods for monitoring forest vegetation and operational practices; methods for addressing forest insect, disease, and fire risk; and methods for evaluating regenerated harvested areas all require technical capacity and expertise that differs from the Rangelands Division.
- 3) The critical infrastructure required and consequently maintained by each Division includes varying materials. Range infrastructure involves fencing, water developments, seeding, and roads of significantly different standards than forestry to provide necessary access. Forestry infrastructure includes roads, bridges, and culverts that require substantial engineering and construction standards, as well as associated road-use fees and maintenance schedules.
- 4) Finally, we believe the merger of the divisions will lead to decreased capacity in both programs, as budgets and positions are cut in this climate of deficit reduction. This will likely create an overall backlog of work that will result in decreased infrastructure development, outdated information, and gaps in essential program knowledge.

Both programs are critical within the BLM, and both separately provide a multitude of benefits to other professional entities and the public. As the accrediting body for university forestry programs across the nation, SAF ensures that the future workforce, including BLM employees, obtains the necessary skill set to effectively perform professional forestry duties. We strongly recommend continuing the Forests and Woodlands Division as a separate entity from the Rangeland Resources Division to provide for strong leadership in forest management and the agency's long-term commitment to professional forestry. Today your support is more important than ever, and we encourage the BLM to continue promoting the importance of active participation in SAF and other professional societies by your employees.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael T. Goergen Jr.", written in a cursive style.

Michael T. Goergen Jr.
Executive Vice-President and CEO
Society of American Foresters