



March 23, 2006

Ms. Cynthia Swanson  
Assistant Director of Lands  
USDA Forest Service  
SRS Comments, Lands 4S  
1400 Independence Ave., SW., Mailstop 1124  
Washington, DC 20250-0003

Dear Ms. Swanson:

The Society of American Foresters (SAF), representing over 15,000 forest managers, researchers, and educators offers the following comments in response to the *Federal Register* notice and request for comments on the *Secure Rural Schools Land Sales Initiative, as dated February 28, 2006*.

SAF believes reauthorization of the Secure Rural Schools and Community Self-Determination Act of 2000 is a short term solution to the problem of declining revenues from federal land. These revenues have traditionally supported schools, roads, and other essential infrastructure in federal forestland communities. We strongly recommend a long-term solution that emphasizes the relationship between healthy sustainable forests and healthy communities—an emphasis greatly reduced with the enactment of this legislation and other federal forest policies.

The FY 2007 budget proposal to sell between 150,000 and 300,000 acres of federal forestland to cover the cost of partial reauthorization of the Secure Rural Schools legislation would only be a temporary funding fix. This approach would not offer communities options other than continued reliance on this funding. Additionally, one of the stated reasons for this concept is a desire to establish a tax base in communities dominated by federal land. Selling the lands currently targeted would fall short of this goal.

We do believe that disposing of or exchanging federal forestlands that clearly do not contribute to the overall goals of federal land ownership may be appropriate when these lands have been identified through forest planning processes with opportunity for public review and comment. If such lands are sold, the revenue generated should not be returned to the Treasury, but should be used to support federal conservation goals.

Communities have been economically and socially depressed by the significant reduction in revenues from federal timber harvesting, mining, and other land uses. This sudden decline in harvesting has also contributed to the closing of hundreds of wood processing and other utilization facilities which has dramatically reduced the nation's capacity to sustainably manage not only federal forests lands but also the thousands of neighboring private and small family forests.

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The Secure Rural Schools legislation has provided some limited relief from these problems and has also fostered local collaboration and on-the-ground work through Resource Advisory Committees (RACs). Unfortunately, this policy strategy is not sustainable, neither from a fiscal perspective nor a forestry perspective. The nation's debt continues to grow while forest health and long-term resiliency declines.

Alternatively, we urge consideration of a strategy that moves the nation's federal forests in the direction of sustainability. Current United States federal land management policies do not adequately recognize or integrate economic, environmental and social values—the key to sustainable forests—and as a consequence all potential values are significantly diminished on federal forests. It is possible to provide environmental benefits like clean water, wildlife habitat, and healthy forests, and at the same time generate income to cover the cost of providing these and other benefits. This in turn helps support local communities, which can then help maintain an infrastructure, workforce, essential community services, and society's acceptance of sustainable forest management.

Federal forest policy should strive towards sustainability, across all ownerships. We look forward to working with you to develop a better solution to this problem that will provide long-term benefits to the nation's forests and the American people.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael T. Goergen Jr.", with a stylized flourish at the end.

Michael T. Goergen Jr.  
Executive Vice-President, CEO