



October 16, 2007

The Honorable Raul Grijalva, Chair
Subcommittee on National Parks, Forests, and Public Lands
1324 Longworth House Office Building
Washington, DC 20515

Re: HR 1975, The Northern Rockies Ecosystem Protection Act

Dear Congressmen Grijalva:

Please accept this letter as testimony for the record as it relates to the hearing of H.R. 1975, the Northern Rockies Ecosystem Protection Act (NREPA) scheduled for Thursday, October 18, 2007 before your subcommittee. These remarks are made on behalf of the Society of American Foresters (SAF) and its more than 14,000 professional foresters and natural resource managers across the United States.

Wilderness preservation is one of the characteristics of our public lands that distinguishes the conservation efforts in the U.S. from other countries, and one in which we as citizens can be rightly proud. Wilderness is clearly an important output from our public lands, one that demands serious attention and consideration by both the federal land management agencies and ultimately by the Congress. However, while the SAF supports both the concept and designation of federal Wilderness, we can support neither the means nor the terms of HR 1975.

HR 1975 proposes to add some 24 million acres of wilderness in a single piece of legislation. This proposal would nearly double the existing (29.6 million) acres of national forest wilderness. The sheer scope of such a proposal entails a number of problems, both procedural and substantive, that do not recommend HR 1975 as a suitable means for contributing to the national forest wilderness system. We would urge the subcommittee to consider the following points:

-Wilderness is for all intents and purposes a permanent land use designation. It is rare in the extreme for wilderness to be "un-designated." For that reason, it is crucial that the wide-ranging future impacts of wilderness designations be fully evaluated by Forest Service resource professionals for due consideration by the Congress. In this case, this important role that the agency plays, as established by the provisions of the Wilderness Act more than 40 years ago, has been excised from the process.

-The sheer scope of the wilderness designations suggested by this bill implies considerable environmental impacts, both positive and negative. Unfortunately, there is no underlying analysis of what those impacts might be. In the highly entangled or "checkerboard" land ownership in the Rocky Mountain West, one can expect any substantial federal land use decision to impact adjoining non-wilderness federal, state, tribal, and private lands. The Forest Service would never seriously consider modifying its multiple-use mission to one of dominant use over





24 million acres, be that use wilderness, recreation, timber or otherwise, in one proposal without considerable analysis and public involvement within both the national forest planning process required by the National Forest Management Act (NFMA), and the environmental analysis process required by the National Environmental Policy Act (NEPA). There have been no such analyses conducted on this proposal. Even the best-intentioned goals of this legislation largely ignore the broader impacts to the ecosystems in question, particularly the human component of those ecosystems. There can be no presumption in this case that this vast, multi-state wilderness designation is of benefit to any particular ecosystem.

-At a time when there are forest management uncertainties surrounding global climate change and the means of mitigating for it, it behooves prudent land stewards to maintain management options, not to foreclose them as this bill would suggest. Likewise, in the midst of an increasing trend in the scope and severity of catastrophic wildfires and insect infestations on public lands, it is equally unreasonable to suggest limiting management responses to those events as this unprecedented wilderness designation proposal suggests.

-HR 1975 does not reflect support from the effected states and communities that should be critical components in a wilderness designation of this scale. None of the listed sponsors of the bill are from the districts in which the wilderness would be located. There has been no public process of any sort, and no collaborative efforts with the states that would be impacted, particularly insofar as state water rights are concerned. This proposal negates the forest planning process that has been in place for 30 years, it circumvents the processes established by the Wilderness Act, and it undermines the efforts that have been made by federal land management agencies over the last decade to encourage collaborative decision-making processes among the public.

In light of these serious procedural omissions, and the lack of recognition for the immediate and uncertain forest management requirements to meet the threats of climate change and severe wildfires, this bill is a reckless, nay nearly negligent effort at precluding management options from a considerable portion of the national forests of the inland Rockies. For these reasons, we urge you to oppose the passage of HR 1975.

Thank you again for accepting these comments on behalf of the Society of American Foresters.

John P. McWhorter

