

May 20, 2010

Leslie Weldon, Regional Forester
Northern Region
P.O. Box 7669
Missoula, MT 59807-7669

Dear Regional Forester Weldon,

On behalf of Wildlands CPR, I would like to thank you for your support and nomination of the Southwestern Crown of the Continent Collaborative Forest Landscape Restoration Program (Southwestern Crown) proposal. The proposal comes from a strong collaborative effort among a wide range of stakeholders. It promotes a clear vision to achieve a sustainable landscape that provides for the full array of ecosystem services and economic and social benefits.

Wildlands CPR's mission is to revive and protect wild places by promoting watershed restoration that improves fish and wildlife habitat, provides clean water and enhances community economies. We therefore support the Southwestern Crown Proposal because it will address ecologically damaging roads, improve water quality and provide for wildlife linkages/corridors that connect to other important areas outside the Southwestern Crown.

We have a special interest in the program's potential for landscape-scale watershed restoration. One of Wildlands CPR's priorities is the reduction of unnecessary, redundant and environmentally harmful portions of the national forest transportation system. Poorly located roads, high-density road systems, poor road drainage and faulty stream crossings deliver sediment to streams, impair groundwater movement and block movement of fish and other aquatic species. They also continue to hamper the Forest Service's ability to provide clean drinking water and healthy fish and wildlife populations. We believe that one of the primary goals of Forest Service land management should be reducing the impacts from the oversized, under-maintained road system. This will require the identification of the minimum necessary road system, and then the implementation of that minimum system by reclaiming unneeded roads, and fixing culverts and other maintenance problems on the remainder of the transportation system across national forest lands.

In any comprehensive forest restoration approach, including the Southwestern Crown, we urge the agency to evaluate how fire may compound problems in at-risk watersheds within heavily roaded and managed landscapes. We support your the goal to reduce fuels to better accommodate low severity or mixed severity fire regimes, but such efforts should be prioritized in landscapes with high watershed function. Clearly fire plays an important and beneficial role in this region's ecosystems. However, in watersheds or landscapes that are already degraded because of high road densities, grazing or other activities fire doesn't necessarily produce "natural" results and may result, for example, in mass wasting events that can cause severe damage to streams and aquatic species.

The Forest Service has a mandate to provide clean drinking water for thousands of communities, which will only become more challenging in light of climate change. Wildlands CPR requests that the agency carefully consider vegetative management actions to reduce fire risk or re-create more "natural" fire regimes in light of the uncertainty surrounding climate change and the fragility of our aquatic systems.

Forest and watershed restoration can be accomplished in many ways, not just through vegetative management. We believe this consideration should be key to projects spinning from the proposed Southwestern Crown Project. Further, we support that the Southwestern Crown project specifically builds in a significant amount of non-vegetative/fire components and we hope that their comprehensive approach increases their competitiveness as the Forest Service and USDA choose the final projects to be funded. However, vegetative management and fire management should derive from objectives that protect and improve watershed health.

Again we want to thank you for nominating the Southwest Crown proposal, and we hope that with your support, this proposal will be chosen by the Washington Office/USDA as one of the projects to receive funding.

Sincerely,

/s/ Bethanie Walder
Bethanie Walder
Executive Director
Wildlands CPR

Cc: The Honorable Tom Vilsack, Secretary of Agriculture
Tom Tidwell, Chief of the Forest Service
William Timko, Deputy Director of Forest Management Staff