

July 23, 2007

Ms. Claire Harper
U.S. Forest Service, Cooperative Forestry
Mail Stop Code 1123
1400 Independence Avenue SW
Washington, D.C. 20250-1123

Dear Ms. Harper:

This letter is in response to the solicitation for comments on the draft U.S. Forest Service Open Space Conservation Strategy that was published in the June 22, 2007 issue of the *Federal Register* Vol. 72, No. 120.

Western Pennsylvania Conservancy (WPC) is a 501(c)3 non-profit conservation organization which has been active in the region since 1932. Our mission is to protect, conserve and restore land and water for the diversity of the region's plants, animals and their ecosystems. Through science-based strategies, collaboration, leadership and recognition of the relationship between humankind and nature, WPC achieves tangible conservation outcomes for present and future generations. Over the course of our 75-year history, Western Pennsylvania Conservancy has achieved the conservation of 211,000 acres of important habitat.

We would like to thank the U.S. Forest Service for recognizing the need for a national, coordinated open space strategy, and for correctly identifying the causes of the problems facing forestland and open space areas. We share the Forest Service's concern about the increasing rate at which our nation's natural resources, including open space and forest habitat, are disappearing.

Forestland Fragmentation

Pennsylvania's forests are valuable for many reasons including clean water, clean air and recreation. Development and related activities such as road building often lead to extinction of native species and invasive species colonization. Forest slopes and riparian zones are some of the key environments for many species, including, but not limited to, forest interior birds and riparian herbaceous plants.

One of the greatest threats to our privately held forests and the functions they provide is fragmentation. Fragmentation of contiguous blocks of forest has been demonstrated to have a substantial negative impact on the indigenous wildlife and natural resources. Many species, such as forest interior birds, including dozens of species of warblers, tanagers, thrushes and vireos rely on uninterrupted forest habitat to maintain their global populations. Species such as the scarlet tanager, depend upon Pennsylvania forests to supply at least 18% of the species' breeding habitat. A primary conservation objective for both public management agencies and non-governmental conservation groups is to maintain large expanses of forest habitat; studies have shown that bird and other wildlife populations suffer when forested landscapes are divided by significant unnatural fragmenting features, such as highways and encroaching developments.

Water Quality

Additionally, the stewardship of watersheds in the region is best accomplished by keeping forest cover on those lands to protect water quality and quantity. Protecting forests from fragmentation is vital to maintaining excellent water quality. Regardless of whether drinking water comes from surface water or ground water, it is simply the most effective way to maintain water quality and quantity. The ability of the forest to absorb, store, and filter water is a proven way to bring clean water to Pennsylvania citizens and aquatic life. How our forests are managed and protected has a profound effect on the quality of our watersheds and our water supplies.

U.S. Forest Service requested feedback on these specific topics:

Are there major actions or concepts missing in the draft strategy?

The draft strategy outlined in the document is thorough and comprehensive. However, without adequate federal funding dedicated to achieving open space and forestland conservation priorities, many of the actions could be difficult to implement. We recommend the addition of strong funding components to be included in the draft strategy.

Calling for robust forestry and land preservation programs and authorizations in periodic broad pieces of legislation such as the farm, energy, and transportation bills will create the financial tools needed to support a comprehensive open space strategy. Existing successful programs such as Land and Water Conservation Fund and Forest Legacy should always be recommended for funding at the highest available levels, with the ultimate goal being funding at their fully-authorized levels or, for programs without funding limits, levels that will meet the average annual national demand. New and dedicated sources of funding for land preservation and open space conservation should be sought.

Furthermore, the U.S. Forest Service should promote, whenever possible, the leveraging of federal investments in open space by working with state and regional funding sources, providing for matching funds to complement and stretch taxpayer dollars.

Also, stewardship of existing protected open space land should also be an area of attention. Protection and land conservation is only the first step. Once preserved, lands must be carefully and thoughtfully managed in order to protect the important ecological, scenic, recreational and social values for which the lands were identified for conservation in the first place, as well as to safeguard the public investment in these efforts.

Has the draft strategy outlined strategic priorities that will best leverage Forest Service expertise, resources, and partnerships to conserve open space?

Western Pennsylvania Conservancy feels that the U.S. Forest Service is well-suited and well-positioned to assume a leadership role on the national issue of open space conservation.

We are supportive of the U.S. Forest Service's intention to expand its role to include dealing with socially-important lands, expanding and connecting open spaces in cities, towns and suburbs, and dealing with the stated strategy of reducing impacts of development. In addition to adding staff expertise and capacity to fulfill these new challenges, the Forest Service should seek to establish and nurture new partnerships with organizations and coalitions with experience in these areas.

Are the proposed priority actions feasible and complementary to other conservation efforts?

Overall, the priority actions proposed are feasible and complement well other conservation efforts in our area.

A. Convene partners to identify and protect priority open space

USFS is well-suited to convening partners to identify and protect priority open space. Partners already look to the Service for data derived from sources like the Forest Inventory and Analysis (FIA). The FIA process is improving, with annual data gathering and full reports generated every five years on the status and health of forestland. At the same time, improvements could be made in data collection and tracking of ownership changes and parcelization or fragmentation of forestland. This would aid in the tracking of development and conversion trends.

Furthermore, the Forest Service should continue to support and enhance existing regional efforts like the Eastern Forest Partnership that share complementary goals of increasing funding for forest conservation in the rapidly urbanizing eastern United States.

Also, U.S. Forest Service may consider undertaking an update, in conjunction with partner states, to Forest Legacy Program assessment of need documents to ensure a consistent state process and focus on protecting priority forestland, as well as aligning state and national strategies.

Additionally, streamlining land adjustments for acquisitions within national forest boundaries will be critical to securing these important open spaces. The U.S. Forest Service will need to work with partners to develop mechanisms to protect these National Forests from other factors like oil, gas, and mineral development that threaten to fragment and convert existing national forestland.

B. Promote national policies and markets to help private landowners conserve open space.

We commend the USFS for taking a leadership role in the promotion and development of markets for ecosystem services. We feel that initial efforts and focus should be on valuation of these services.

Congress has recently taken an interest in expanding tax incentives for donations of conservation easements by individuals. However, the tax benefit is often described as available to “farmers and ranchers” despite being more broadly accessible. The Forest Service should augment these efforts by promoting the expanded tax incentives specifically to the audience of eligible forestland owners.

Landowner assistance has been led and promoted by the Forest Service in partnership with the states for years, although its results have been mixed. The Forest Service needs to re-evaluate and improve this mechanism if it is to have success in conserving open space in the future. Assistance and incentives will need to be targeted to priority areas and not on a “first-come first-served” basis. Dollars allocated need to be more consistent and secure in order to deliver the programs and facilitate landowners’ interest in them.

C. Provide resources and tools to help communities expand and connect open spaces.

In addition to our work in land conservation, Western Pennsylvania Conservancy also has a 35 year old community greenspace and garden program. Each year, with the assistance of over 4,000 volunteers, WPC facilitates the planting of over 135 gardens in 19 counties across western Pennsylvania. We recently began planning to expand this program to offer much broader and diverse programs than floral gardens. Early projects include the Mt. Washington Emerald Link, a community-based park and greenspace mapping and linkage project, and the Ghost Town Trail improvements.

Green infrastructure and urban forestry assistance will improve our ability to deliver new programming in this area and will be complementary to our expanded goals. We look forward to the potential of working with the Forest Service in these new areas and in this new capacity.

Regional Priorities

Based on the USFS's own report *Forests on the Edge*, the problem of open space and disappearing forestland is the most serious in the eastern United States. Therefore, in our view, it is justifiable and appropriate to devote the majority of the attention, resources and deployment of strategies to this region. The U.S. Forest Service should take into account its own assessment of the most critical watersheds and the most at-risk expanses of contiguous forest when considering policies and actions or providing technical or other forms of assistance. By guiding and directing efforts to the most threatened forests, the U.S. Forest Service can prevent the imminent and irreplaceable loss of wildlife habitat, recreational opportunities and ecosystem services, like clean water and clean air, which benefit all Americans.

Overall, Western Pennsylvania Conservancy feels that the U.S. Forest Service has produced a draft strategy that reflects the long-term commitment to open space preservation for which the agency has become known. The emphases on regional priorities, broad stakeholder involvement and multiple tools are the hallmarks of sound and successful public policy.

Thank you for this opportunity to formally comment. I can be reached at 412-288-2777 or at bgallagher@paconserve.org if you require further information related to our suggestions and recommendations.

Sincerely,

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