



3.19.2021

From: National Wilderness Stewardship Alliance
American Hiking Society
American Rivers
American Whitewater
Appalachian Trail Conservancy
Arizona Trail Association
Back Country Horsemen of America
Bob Marshall Wilderness Foundation
Continental Divide Trail Coalition
Friends of Scotchman Peaks Wilderness
Great Old Broads for Wilderness
Idaho Trails Association
Lewis and Clark Trust Inc.

North Country Trail Association
Pacific Crest Trail Association
Partnership for the National Trails System
River Management Society
Selway-Bitterroot Frank Church Foundation
Society of Wilderness Stewardship
Southern Environmental Law Center
Ventana Wilderness Alliance
Washington Trails Association
Washington Wild
Wild and Scenic Rivers Coalition
Wilderness Society
Wilderness Watch

To: Vicki Christiansen, Chief
USDA Forest Service

Dear Chief Christiansen,

The above groups of the Wilderness and Wild & Scenic Rivers community respectively wish to express our strong support for transforming the Wilderness and Wild & Scenic River Director position into a Congressionally and Administratively Designated Special Areas Director. After careful consideration and discussion, we believe that further empowering this directorate, rather than dissolving it into another with the National Forest System (NFS) will allow these areas to receive the critical support they deserve as well as facilitate meeting agency legal requirements for special legislative, presidential, and administrative designations. We further believe that this updated directorate would better align with the Biden Administration's conservation and equity goals, assisting the Forest Service Leadership in these areas and providing agency leadership for these programs. We strongly oppose the absorption of the Wilderness and Wild & Scenic River Directorate into another within the NFS.

We are providing our rationale below for your consideration as you make this important decision.

Special Areas Director Alternative

Rather than eliminate the Wilderness and Wild & Scenic Rivers (WWSR) Director, the NFS deserves a strong voice and dedicated leadership for all the Congressionally and Administratively identified special areas, including, National Monuments, National Scenic and Historic Trails, and Roadless Areas. Enhancing, rather than eliminating the responsibilities for this directorate would give these special areas the emphasis within the agency that they deserve, while also improving fulfillment of the special collection of laws and responsibilities that come with managing them.

A stronger portfolio may also warrant a Senior Executive Service (SES) position. These Special Areas play an outsized role in climate change resiliency, habitat restoration/preservation and other ecosystem services provided by natural areas. They should therefore be elevated, rather than potentially side-lined and de-emphasized. The successes of the separate WWSR Directorate can be replicated across these other special areas if they are brought together under this reimagined position. While we do have concerns about diffusing the responsibilities of the WWSR Director, we see the strength that can result from bringing these special area programs together.

Major Accomplishments of the WWSR Program during the last Two Decades

Since establishing the Wilderness and Wild & Scenic River Directorate in 2004, a number of significant accomplishments have occurred that would not likely have happened if the programs had remained within the Recreation Directorate.

Increased resource visibility. There is increased visibility of the Wilderness and Wild & Scenic Rivers programs, including recognition of their contribution to the science of biophysical and human resource management. This has mainly been the result of the Wilderness and Wild & Scenic Rivers Director working directly with the Deputy Chief, budget office, and other NFS program areas to secure funds for Wilderness Character Monitoring, Wilderness Stewardship Challenge, Wild & Scenic River grant program and data collection partnerships, and 50th Anniversary Celebrations. The program staff has grown from roughly four people in 2000 to 12 people today.

An evolving and increasingly successful mentoring and training program for employees. This has resulted from both the development of topic-related content and increased public outreach efforts. Examples include the 50th Anniversary commemoration of the Wilderness Act and Wild & Scenic Rivers Act; the initiation and growth of the Wild & Scenic River Training Center, Wilderness Ranger Academies, and Wilderness Skills Institutes; formation of the saw program certification for employees and partners; train-the-trainer efforts which have leveraged rich expertise and perspectives for interagency and citizen audiences; the growth and maintenance of the wilderness.net and rivers.gov websites and their valuable products and resources. The creation of the Wilderness Advisory Group (WAG), and Wilderness Information Management Steering Team (WIMST) would not have happened without Director emphasis, resulting in improved products, networking of employees, and valuable career training opportunities for many agency employees.

Increased efforts with partners. Engagement with the Wilderness and Wild & Scenic Rivers Director has created river advocacy partners, notably the formation of and provision of resources to organizational members of the Wild & Scenic Rivers Coalition and partner funding with River Network and Adventure Scientists. Establishment of the National Wilderness Stewardship Alliance, and its network of stewardship partners accomplishing needed work throughout the Wilderness System would not have happened without this Director leadership. The exceptionally strong partnership between the Wilderness and Wild & Scenic Rivers Director and the Society for Wilderness Stewardship has resulted in exponential growth of management targets met within Wilderness Stewardship Performance, most notably with Wilderness Character Monitoring and the establishment of the national Wilderness Character Monitoring Central Team.

Establishment of National Wilderness Workshops. Initiated in 2014 with the 50th Anniversary of the Wilderness Act, National Wilderness Workshops have become the annual touchpoint for Wilderness-focused agency employees, partner organizations, and stakeholders. Workshops address emerging wilderness management issues on a national scale and have served as a platform for NFS goals and actions (including the Chief's Wilderness Awards) and established a direct connection between the

WWSR Director and thousands of constituents. Workshop outcomes have furthered wilderness policy and science.

Support for continued interagency collaboration. The interagency Wilderness Steering Committee (WSC), Interagency Wilderness Policy Council (IWPC), and Interagency Wild & Scenic Rivers Coordinating Council (IWSRCC) all depend on leadership from the Wilderness and Wild & Scenic Rivers Director. These long-standing interagency bodies have been incredibly fruitful in preparing policy materials, training, and helping build consistency between the agencies in wholistic management of the National Wilderness Preservation System and the Wild & Scenic Rivers System.

Success in meeting non-recreation management targets. The 10 Year Wilderness Stewardship Challenge and the Wilderness Stewardship Performance framework have significantly elevated non-recreation Wilderness and Rivers resources and management goals across the agency. The management of invasive species, air quality, the natural role of fire, water, fish and wildlife, and plants, have been elevated since the establishment of the WWSR Directorate in 2004. Moving WWSR under Recreation again would often place these important resource considerations at odds with recreation management goals.

Chief's Wilderness Awards. This award program provides a platform for recognizing excellence in Wilderness stewardship, while also building relationships with partners and other agencies. The high profile of these awards has been instrumental in generating agency goodwill.

Program-specific advocacy. Having a Wilderness and Wild & Scenic Rivers Director means that outside organizations that have an overall interest in recreation, but not specifically Wilderness or Wild & Scenic Rivers (such as International Mountain Biking Association, America Outdoors Association (outfitters and guides), Back Country Horsemen of America, Access Fund, etc.) would meet regularly to discuss and negotiate issues and policies with a Director focused specifically on these two programs. Without question, the existence of a Wilderness and Wild & Scenic Rivers Director has made these groups more sensitive (and responsive) to the special and unique resource and management needs of wilderness and wild and scenic rivers and has saved on conflict and litigation costs.

Major policy initiatives. Policy modernization of the 2320 Manual, creating a saw policy that included volunteer certification, and planning rule direction for Wilderness evaluation and river planning would not have been as successful without Wilderness and Wild & Scenic Rivers Director oversight.

Why the Wilderness and Wild & Scenic Rivers Staff Should Remain Separate

History

The Wilderness and Wild & Scenic Rivers Director was established in 2004. The key objectives for creating the separate staff as articulated by Tom L. Thompson, then Deputy Chief of NFS include:

- “broaden our ownership of the wilderness and wild and scenic river resource, encouraging various staffs to give wilderness and wild and scenic rivers the integrated management they need and deserve;
- collaborate with partners and the National Forest Foundation to achieve the “10-year Wilderness Stewardship Challenge;”
- enhance our ability to meet our regulatory and stewardship responsibilities for Wild & Scenic Rivers;
- enhance our capacity for leadership within the National Wilderness Preservation System and within the global movement for protected area management;

- strengthen our relationships with nongovernmental and partner organizations that have long clamored for such a move; and
- raise public visibility of wilderness and wild and scenic rivers, thereby increasing understanding and support for these resources. “

"The national wilderness and wild and scenic rivers program director play's an essential role in helping the agency continue to protect and manage 35 million acres of wilderness as well as thousands of miles of wild and scenic rivers," said Chief Dale Bosworth in 2006 when Chris Brown was named Director. (Today there are 36.6 million acres of wilderness within the National Forests.)

The Director is responsible for oversight of 448 Wilderness Areas (20% of the National Forest System, and over a third of the total National Wilderness Preservation System) and more than 5,000 miles of the National Wild & Scenic River System. Wild & Scenic Rivers flow through 15% of the agency's Wilderness areas, meaning that stewardship mandates for both systems apply. Chief Bosworth and Deputy Chief Tom L. Thompson knew that the Forest Service needed to reclaim the Forest Service's tradition of leadership for Wilderness and Wild & Scenic Rivers by establishing the position in 2004.

These reasons are just as important today as they were two decades ago. Indeed, given the Biden Administration's commitment to a whole-of-government strategy to fighting climate change, special areas such as Wilderness and Wild & Scenic Rivers are likely to take on additional responsibilities not merely as recreational assets, but as carbon banks and climate refugia.

Leadership Considerations

Wilderness and Wild & Scenic Rivers make up over 20% of National Forest System acres. Adding Roadless Areas increases the impact to nearly 50% of the NFS. Wilderness is recognized as one of the main uses of the National Forests in the Multiple-Use Sustained Yield Act. They require significant investment and leadership to manage properly. This change will significantly reduce the visibility, and likely the efficacy of Wilderness and Wild & Scenic River programs within the agency, as it removes the Wilderness and Wild & Scenic Rivers Director from having at least an equal say in the management of the NFS as budget and policy decisions about the National Forest System are made. Deliberations about future Wilderness and WSR designations would also be enhanced.

Having both a Recreation and Wilderness and Wild & Scenic Rivers Director provides additional strength to the Forest Service in understanding the human dimension of forest uses, special area management, and the integration of natural processes with social needs and desires. Having two Directors versed in the human side of forest management brings better diversity to management of the National Forest System than a Director cadre focused almost exclusively on products and outputs from the Forest. If folded into Recreation, regulatory and stewardship responsibilities of Wilderness and Wild & Scenic Rivers not associated with recreation will likely suffer (if not disappear) among the other pressing demands from Recreation interest groups and programs that always require attention, like developed sites and concessionaires, special uses, ski areas, and travel management.

It is important that Wilderness and Wild & Scenic Rivers have a leadership position in the agency, with access to key leadership and a place at the table for budget and policy decision-making. The presence of a Director-level position for Wilderness and Wild & Scenic Rivers conveys volumes to the hundreds of USFS field staff who work in these programs. That the Forest Service has a Wilderness and Wild & Scenic Rivers Director says to these staff: "the universal pride that Forest Service leadership professes for its Wilderness and Wild & Scenic Rivers programs is backed by an organizational commitment to give prominence and a place at the table for these programs; it makes us proud."

A Director for WWSR also provides a strong statement to other agencies and the public about the significance the NFS places on the enduring resources of wilderness, now and for a future in which we will be challenged by a changing climate. Wilderness and Wild & Scenic River management are not done in the vacuum of the agency but are inter-agency efforts. The Interagency Wilderness Policy Council consists of top-tier Senior Executives from the National Park Service (NPS) (one of the Associate Directors), Bureau of Land Management (BLM) (Director for the National Landscape Conservation System), and US Fish and Wildlife Service (FWS) (Director of the National Wildlife Refuge System), as well as other USFS Directors from Research. Similarly, both individual National Scenic and Historic Trails and the National Trails System itself require a high degree of interagency coordination. While reducing the status of the Wilderness and Wild & Scenic Rivers leader within the Forest Service would send a negative message about the importance of interagency collaboration, promoting the Director to one for more special areas involving inter-agency work may strengthen those crucial management networks and help reclaim the Forest Service position as a leader amongst the other land management agencies. The Forest Service leadership of the Inter-Agency Wild & Scenic River Coordinating Council could be affected by this move.

Program Considerations

Wilderness and Wild & Scenic Rivers are much more than just recreational assets; they encompass all resources and should be managed in an interdisciplinary, wholistic and system wide manner.

The continued rise in potential impacts, new technologies, preservation of wilderness character, and protection of water quality and quantity will necessitate leadership time and energy. Proposed restoration efforts will need scrutiny in the form of trained staff and proactive mitigation to ensure wilderness character and river values are maintained. Director leadership can navigate key issues that have tendencies to become high-interest controversies, like predator damage management, interactions with fish and wildlife agencies in wilderness, White bark Pine restoration, fish stocking, grazing allotments, aircraft landings, the role of fire, and water quality degradation that are not recreation-focused but have key legislative, policy, and historical knowledge requirements. This also applies to management of roadless areas where strong advocacy for their role in climate resiliency is needed.

Soon, it is expected that new designation efforts for both Wilderness and Wild & Scenic Rivers will need leadership, not only for managing new legislation, but the planning challenges that will follow. Current Wilderness and Wild & Scenic River manual direction updates are needed as well to bring policy forward to meet today's challenges and to maintain consistency across programs and agencies as much as is possible. Additionally, ongoing litigation over compliance with wilderness and river laws and regulations requires a solid leadership presence in the Wilderness and Wild & Scenic Rivers staff to navigate the different laws and policies that apply. Managing the requirements of roadless areas also needs Director level attention.

Relationship Considerations

Wilderness and Wild & Scenic Rivers tap entirely different sets of stewardship and advocacy groups than Recreation. The history of shared leadership with managing Wilderness and Wild & Scenic Rivers points to continued need for leadership presence not diffused by recreation-focused groups. Partnerships produce a significant amount of training, field work, monitoring, stewardship activities, and community science in wilderness and wild and scenic rivers today, and this trend is likely to continue.

A key function of each National Forest System Director is to be the first point of contact for the CEOs of national environmental groups. For organizations like the above-signed, who have a special relationship with the Forest Service due, in part, to co-management of trust resource, a clear benefit has been

identified to the dedicated attention and expertise of a WWSR Director. The relationships the WWSR Director has developed with these groups has kept open important channels of communication, which benefit not only these programs but the entire Forest Service.

The future stewardship of these areas will depend on stewardship groups, increased field presence, more community science, increased volunteerism, revitalization of conservation corps efforts, and will require focused leadership.

Budget and Managerial Considerations

At first glance, it is not apparent how this move would promote any cost savings since the number of positions would stay the same. At most, it might reduce the staff reports to an associate deputy chief by one.

If the current Wilderness and Wild & Scenic Rivers Director is made a Deputy Director or Assistant Director within the Recreation staff, this demotes the employee and the program. The stated reason for considering the move is to create better integration of programs and less competition for recreation appropriations. However, both Wilderness and Wild & Scenic Rivers and Recreation get the majority of their funding from the same NFRW fund code. This is not likely to improve funding for wilderness and wild and scenic rivers, but will pit program against program, with each fighting against other recreation programs for a share of limited resources. Historically, the agency has focused more on front-country issues than backcountry because of perceived more-pressing issues, which puts Wilderness and Wild & Scenic Rivers on the consistent losing end of that fight.

Because Recreation and Wilderness and Wild & Scenic Rivers share the same fund code, there will continue to be competition for scarce federal dollars. Wilderness and Wild & Scenic Rivers should be multi-financed because of the interdisciplinary nature of wilderness and river work.

Even though Regional Wilderness and Wild & Scenic River Program leaders exist within a Recreation program staff, they operate through the direction of the Wilderness and Wild & Scenic Rivers Director. Coordination between the WO and Regions occurs thru the Recreation Directors. Disconnects in this trickle-down system usually result from a Recreation Director being un-engaged, being too distracted by other Recreation-related issues to dedicate time to Wilderness and Wild & Scenic Rivers issues or trying to micromanage their staffs. These are internal coordination issues that will not be solved by eliminating the Director position.

Political Considerations

President Biden's recent Executive Order 14008 declares it is *"the policy of my Administration to lead the Nation's effort to combat the climate crisis by example—specifically, by aligning the management of Federal procurement and real property, public lands and waters, and financial programs to support robust climate action."* Consolidating the Wilderness and Wild & Scenic Rivers directorate under Recreation seems to run counter to emphasizing these areas, especially with an Administration favorable to Special Areas and committed to "30 x 30 Initiative."

President Biden is also committed to putting more people to work in the outdoors. The Executive Order further states, *"It is the policy of my Administration to put a new generation of Americans to work conserving our public lands and waters." - "Creating a Civilian Climate Corps Initiative, within existing appropriations, to mobilize the next generation of conservation and resilience workers and maximize the creation of accessible training opportunities and good jobs. The initiative shall aim to conserve and restore public lands and waters, bolster community resilience, increase reforestation, increase carbon sequestration in the agricultural sector, protect biodiversity, improve access to recreation, and address*

the changing climate.” Wilderness and Wild & Scenic Rivers are critical resources for climate change stabilization and resiliency, and have built-in jobs for wilderness rangers, river rangers, trail crews, and conservation technicians that could easily be added with funding. After years of neglect, declining workforces are ripe for increases. Only a Wilderness and Wild & Scenic Rivers Director can help navigate this program emphasis.

Conclusion

The role of Wilderness and Wild & Scenic Rivers and other special areas will only continue to grow in value and prominence as the country struggles to deal with climate change, habitat resilience, restorations efforts, and ever-increasing recreation demands on the National Forests. To meet our collective goals for Wilderness and Wild & Scenic Rivers, (staffing kept at current levels, access between partner and stakeholders and the Chief, protection of all aspects of the resource, and continuation of appropriated funding to specifically support Wilderness and Wild & Scenic Rivers), and the Congressional intent for these special areas, focused leadership is needed. De-emphasizing these areas by eliminating a leadership position sends the wrong message about the importance of Wilderness and Wild & Scenic Rivers for shared stewardship, addressing the future needs of America’s public, and management of over 20% of the National Forest System.

The transformation of the Wilderness and Wild & Scenic Rivers Director into a Congressional and other Administratively Designated Areas Director (or “Special Areas Director”) is the best choice to ensure proper management of these and other multi-jurisdictional conservation areas. And if this is not possible, keeping Wilderness and Wild & Scenic Rivers as a separate Directorate is our desired option.

Questions about this letter can be addressed to Randy Welsh, Executive Director, National Wilderness Stewardship Alliance, at 801-808-2167 or randy@wildernessalliance.org

Cc: Chris French, Deputy Chief, NFS; Secretary Vilsack, USDA