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RESOURCE COALITION

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600 New Hampshire Ave., NW Suite 500
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July 27, 2018

The Honorable Pat Roberts
The Honorable Mike Conaway

The Honorable Debbie Stabenow
The Honorable Collin Peterson

Dear Chairmen & Ranking Members:

The members of FFRC appreciate the long hours of work both of your committees have done to move differing Farm Bills to a bicameral conference committee. We appreciate the difficulties you have faced as you work towards a consensus bill on a host of thorny issues. We also appreciate the work that your committees did to support the enactment of a fire funding fix and common-sense forest management reforms earlier this year, as part of the 2018 Consolidated Appropriations Act (Omnibus).

The measures in the Omnibus were a good first step toward managing our federal forests to better address the continuing forest health crisis, increase fire resilience, maintain vital industry infrastructure, and support rural communities. Much more is needed and is possible. Over 70 million acres of federal forests have been designated at risk from insects and disease under the 2014 Farm Bill, and forest health threats continue to increase. It is important to build on the progress from the Omnibus to ensure that the 2018 Farm Bill has a robust and effective forestry title. The measures in the 2014 Farm Bill were adopted in part because Congress recognized that the Forest Service was unable to respond adequately to scale of the forest health crisis. Much progress has been made but the problem continues to outpace the ability of agencies to implement needed treatments.

We'd like to highlight several provisions which have enjoyed bipartisan support in the past, and which we believe ought to be included in the final conference report. The Committee should strongly consider applying all of the Federal forest reform equally to forest lands managed by the Bureau of Land Management. These lands suffer from many of the same challenges being experienced on the National Forests.

First, we strongly support expansion of the existing Farm Bill Insect & Disease Categorical Exclusion to include reduction of hazardous fuels; removal of invasive plants, and expand its application to Fire Regimes IV and V. In addition, the current CE should be expanded to 6,000 acres, increasing the impact of the current CE while

continuing the focus on forest health needs. We'd also urge the Conference Committee to adopt as broad a restoration Categorical Exclusion as possible as well. Such a CE should cover a range of objectives, including wildlife habitat (particularly Early Seral habitat), streamside restoration, hazardous fuels reduction, and invasive species control, on 6,000 acres. These are important tools to expand the functioning and vitality of federal forests.

Second, it is critical that the Farm Bill fully implements a fix to the Ninth Circuit's *Cottonwood* decision that was partially included in the Omnibus. The conference committee should adopt clarifying language that would allow needed projects to go forward without unnecessary consultation regarding the underlying forest plan, on the basis of allegedly new information brought forward by litigants who specialize in disrupting forest management projects.

Third, we want to work with you to adopt reforms that would clarify the authority provided under Good Neighbor Authority to ensure that States and new county and tribal partners can effectively implement needed forest management projects. Congress must clarify the authority of States to conduct timber sales and to retain receipts in order to secure the future of this program.

The committee should also incorporate measures to streamline NEPA and litigation for collaborative projects. Where the agencies and stakeholders invest so much time and resources in working toward consensus, there is no justification to hand a veto power to serial litigants who are opposed to active management on ideological grounds.

We also note that the House passed bill provides important relief for the Tongass National Forest. Unless reforms are adopted in the Farm Bill, the Alaska Region of the Forest Service is in jeopardy of losing additional management capacity as the one significant mill in the Region continues to struggle to survive.

We believe these widely-supported reforms are the prerequisite for a meaningful forestry title that is truly responsive to the needs of our federal forests and the desires of the public. We stand ready to work with you to achieve this shared objective.

Sincerely,



Bill Imbergamo
Executive Director