

The Honorable Ron Wyden
221 Dirksen Senate Office Building
Washington, DC 20510

November 28, 2017

The Honorable Jeff Merkley
313 Hart Senate Office Building
Washington, DC 20510

Dear Senators Wyden and Merkley,

As leaders in Oregon's conservation community, we write you to voice our deep concerns regarding the "Resilient Federal Forests Act" (HR 2936) and other dangerous legislation that seeks to exploit legitimate public concerns over fire to undermine protections for America's public lands.

The backers of this incredibly destructive legislation do not seek to make our forests healthier or more resilient, but rather to elevate the aggressive logging of our public lands above all other uses. To do this, the bill calls for a dramatic increase in timber extraction from public forests and creates massive regulatory loopholes in our bedrock environmental laws, making our forests less healthy and more prone to extreme fire.

We would like to highlight the primary reasons we oppose HR 2936 and any similar legislation:

1. The Threat to Bedrock Environmental Laws

Legislation like HR 2936 seeks to exploit legitimate concerns over forest fire to attack America's most foundational environmental laws. The "Resilient Federal Forests Act," which passed the House on November 1, seeks to radically expand Categorical Exclusions (CE's), which would allow the Forest Service to bypass the public involvement and environmental analysis required by the National Environmental Policy Act (NEPA).

These new CE's would be over 400 times larger than the 70-acre exemptions currently allowed, effectively eliminating any meaningful scientific analysis or environmental review on logging projects up to 30,000 acres. For context, *that's nearly 50 square miles, or the size of Eugene city limits*. The intent behind these CE expansions is simple: to systematically reduce the role that science and citizen oversight play in the decision-making on public lands.

HR 2936 also undermines another foundational law, the Endangered Species Act (ESA), by allowing the Forest Service and the Bureau of Land Management to carry out logging projects without consulting the experts at the US Fish and Wildlife Service or National Marine Fisheries Service about potential harm to endangered species, as required by ESA.

The bill further erodes our environmental laws by limiting citizen oversight and government accountability. If this bill were to pass, members of the general public would lose their access to the courts to make sure their government complies with our nation's most important environmental laws. Such a provision not only undermines the efficacy of these laws, but also our nation's core democratic values that ensure public accountability.

We oppose any bill that would weaken the role that these science-based policies and the general public play in the management of our public lands.

2. The Threat to Oregon's Cherished Public Lands

HR 2936 is the latest in a long series of attacks on America's public lands. ***The legislation would shrink the Cascade-Siskiyou National Monument*** by rescinding protections for Oregon and California (O&C) Railroad Lands within the Monument and requiring that these lands be managed for the primary purpose of logging. This provision misinterprets the O&C Act because it eliminates current requirements for watershed protection, recreation, and community stability found in the Act. It's no coincidence that the Trump administration is currently reviewing the Cascade-Siskiyou for the same purpose, and that logging interests have launched numerous lawsuits seeking to strip protections from old-growth forests within the boundaries of the Monument.

The bill also mandates that Oregon's public forests on O&C land produce half a billion board feet per year. ***This new minimum requirement would be roughly triple the current logging levels on these public lands***, which is a goal that can only be met by aggressively clear-cutting old-growth forests, polluting streams and rivers, and emitting large amounts of greenhouse gases. With only 10% of Oregon's old-growth forests remaining, we must actively oppose any legislation that opens our ancient forests up to industrial logging.

3. The Threat to Forest Health and Resilience

Despite their cynical attempt to co-opt the term "forest health," bills like HR 2936 would actually degrade the health of our forests and make them more prone to extreme fire by targeting Oregon's fire-resistant old-growth forests. Old-growth trees have thick bark and tall trunks that hold most of their limbs and needles ("fuel") high above the ground, whereas smaller, younger trees have thin bark and canopies close to the ground, making them more flammable.

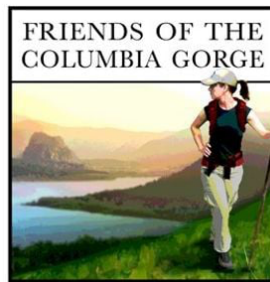
The bill fails to address the role that climate change and industrial logging practices have played in making fires worse, arguing that logging our public forests more aggressively will somehow improve forest health and resilience. Science tells us that restoring and protecting old-growth characteristics in our forests is the best way to improve resilience to fire and a changing climate.

To be sure, not all forest management is detrimental to these ecosystems. In some instances, responsible management, such as carefully thinning small trees, can help restore forests degraded by decades of destructive logging and fire suppression; however, simply citing the threat of wildfire as an excuse to dramatically increase the scope and scale of logging in Oregon's remote, backcountry forests is another matter entirely.

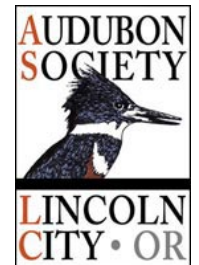
Instead, ***we must be more strategic in how we focus thinning treatments*** in fire-prone forests adjacent to at-risk communities in the Wildland Urban Interface (WUI), while working to re-establish the natural fire regimes that have historically kept the mighty conifer forests of the Pacific Northwest in balance. We appreciate your efforts to address this issue by introducing the "Wildland Fire Act" (S. 1991). This bill is a more productive approach and we look forward to working with you in the coming weeks to make it better.

We applaud you for basing your past policies on science and ask that you continue doing so by preserving the integrity of our bedrock environmental laws. We urge you to stand up for the scientific process, our country's democratic values, and Oregon's iconic public lands by opposing HR 2936 and any related legislation.

Thank you,



Cascade Volcanoes
Broadband
Willamette Valley
Broadband



...and the Benton Forest Coalition