June 1, 2015

Dear Under Secretary Bonnie, Assistant Secretary Schneider, Chief Tidwell and Director Kornze:

The undersigned organizations represent millions of hunters and anglers across the United States who are united in seeking your support for the efforts in the House and Senate to improve the health and management of our National Forests. Many of our forests are being inadequately cared for due to flat funding, litigation, and over-complicated regulations. Some of these problems are also blocking access to federal lands for both jobs and recreation. As long-time partners of the agencies in federal forest and rangeland management, we have a great stake in working with you and the Congress on solutions. Our millions of members use federal public lands for hunting, shooting sports, and angling, generating enormous economic activity and job growth in rural America.

**Move Forward.** We are encouraged by efforts underway in both chambers of Congress to provide additional authorities to the Forest Service and the BLM to expedite forest management projects that would return federal public lands to a more diverse set of habitat types, which compose more productive landscapes. With constrained budgets, the agencies are finding it challenging to reverse negative trends in forest health and wildlife habitat. While Congress needs to invest more in our land management agencies, Congress must also authorize new policies and approaches that can increase the pace and scale of management.

**The Problems.** Your February 2012 report on increasing the Pace and Scale of Management on the National Forests, among many other Forest Service reports, establish—without any doubt—that a significant portion of federal forests are in poor health, with overstocked forests susceptible to severe wildfires, loss of diverse habitat especially early seral or young, open-canopy forest types, and millions of forest acres experiencing insect and disease epidemics and non-native vegetation.

You have testified about these issues:

- Chief Tidwell before the Senate Appropriations subcommittee on the Interior and the Environment: "It’s not near enough of what we need to be doing to change the conditions..."
on the landscape, to restore the resiliency of those forests and reduce the wildland fire threat to our communities…I’ve tried to be really clear about the challenge we have in front of us, and the need for us to increase the pace and scale of restoration of our nation's forests."

The Goal. Several expert reports conclude that the agencies should treat double the forest habitat annually to sustain a positive trend in forest health. Broadly speaking, that means finding ways to complete projects in half the time and half the cost.

That outcome is attainable with your input to and support of the congressional process.

Solutions. Is there a reasonable path forward? Yes, the lesson from the recent Farm Bill is that common ground exists to create efficient, environmentally responsible authorities for forest health projects. The NEPA-compliant insect and disease project authority is showing immense promise. Your description of the work underway in that regard is informative:

- Chief Tidwell testified at a House Agriculture Subcommittee on Conservation and Forestry: “the 2014 Farm Bill added authority to the Healthy Forest Restoration Act to authorize designation of insect and disease treatment areas and provide a categorical exclusion (CE) for insect and disease projects on areas as large as 3,000 acres. The new CE holds significant potential to improve efficiency, resulting in on-the-ground restoration work that is accomplished more quickly and across a larger landscape.”

Our organizations are encouraging Congress to continue what it started in the Farm Bill by considering additional NEPA-compliant efficiencies, such as for early seral forest (and open canopy) restoration, forest stand diversity, pinyon juniper woodlands treatment, and forested watersheds at risk or with impaired functionality (condition class 2 and 3), for example. Our experts agree with your experts that these projects need to get done on significant portions of federal lands, and thus they should move forward quickly and at less cost. We also support application of the efficiencies of the Healthy Forest Restoration Act to a broader scope of the federal forest landscape. State wildlife managers should be given a more formal role in efforts to restore habitat that achieves wildlife population goals, and projects with such outcomes should be undertaken using NEPA-compliant expediencies.

The agencies similarly are concerned about the challenges of litigation on forest health projects.

- Chief Tidwell stated before the Senate Energy and Natural Resources Committee that “[L]itigation definitely does impact [projects] and it’s not just the litigation. When we get a temporary restraining order, we have to stop and wait. Every time we get a lawsuit, the same staff that would be preparing for the next project, they have to prepare to go to court.”

Chief Tidwell expressed a willingness to consider an arbitration pilot program as a way to resolve disputes around forest management projects. We agree. Our organizations support collaborative work specifically designed to hasten project planning and execution. The threat of litigation delays the development of all projects and the lawsuits actually filed stymie years of
solid work on a disproportionate number of federal forest management activities. This routine problem also deters future efforts. For a subset of projects, Congress should authorize and the agencies should support the use of alternative dispute resolution, such as binding arbitration, in lieu of litigation.

Finally, on funding, it is time to put in place incentives to generate more projects. National Forests should be able to retain a share of receipts where they use new authorities, to fund additional projects.

**Working Together.** Now is the time to work together to provide new authorities for the BLM and USFS to significantly expedite the pace of restoring forest and rangeland acres to healthy, resilient conditions.

With the Administration, the Senate and the House of Representatives all working on a solution to fixing the problem of fire borrowing, we are truly encouraged that the federal government can fix the other side of the problem. As President Theodore Roosevelt once said, “Besides each one of us working individually, all of us have got to work together. We cannot possibly do our best work as a nation unless all of us know how to act in combination as well as how to act each individually for himself.”

Sincerely,

Boone and Crockett Club
Camp Fire Club of America
Catch-A-Dream Foundation
Congressional Sportsmen’s Foundation
Houston Safari Club
Masters of Foxhounds Association
Mule Deer Foundation
National Association of Forest Service Retirees
National Rifle Association
National Shooting Sports Foundation
National Wild Turkey Federation
North American Bear Foundation
Orion: The Hunter’s Institute
Rocky Mountain Elk Foundation
Ruffed Grouse Society
Safari Club International
Theodore Roosevelt Conservation Partnership
Tread Lightly!
Quality Deer Management Association
Wildlife Forever
Wildlife Mississippi
Wild Sheep Foundation