

September 26, 2017

To: The Honorable John Barrasso
Chairman
Committee on Environment and Public Works
United States Senate
410 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Thomas R. Carper
Ranking Member
United States Senate
456 Dirksen Senate Office Building
Washington, D.C. 20510

Re: S. 1731, "The Forest Management Improvement Act of 2017"

Dear Chairman Barrasso and Ranking Member Carper:

We the undersigned urge you to oppose "The Forest Management Improvement Act of 2017" (S. 1731).

S. 1731 does not offer solutions for protecting communities from fire or ensuring that our public forests are ecologically healthy. Instead what S. 1731 proposes is a gutting of this Nation's environmental charter – the National Environmental Policy Act (NEPA), limiting public participation in agency decisions about logging on public lands and removing the judicial branch from its constitutionally established role as a check and balance on the legislative and executive branches of our government. All to get more logs to the mill.

S. 1731's main provisions would eliminate environmental analysis required by NEPA on major federal logging projects by mandating that expansive categories of these projects could be excluded from environmental analysis. Under NEPA, categorical exclusions were originally developed to cover projects, typically administrative in nature, such as putting up a sign, or refurbishing a picnic ground, which have no potential to significantly impact the environment. If this legislation were approved, the Senate would be authorizing extensive logging projects, covering areas as large as 10,000 acres each (i.e. entire watersheds)—including 10,000-acre clearcuts under the guise of early seral habitat creation—to proceed on our National Forests and other federal public lands as if they would not result in any adverse impacts to the environment. Such a legal construct has no basis in reality and would unnecessarily and irretrievably damage our public forests.

Forest ecosystems are dynamic and complex. The highest levels of native plant and animal diversity in forests are found in areas which have a mix of naturally created habitat types, including large mature and old growth forests, forests that have burned at low, moderate and high intensity in a wildland fire, areas which have large numbers of snags (standing dead trees) as a result of natural processes such as drought, competition and native beetle activity, and areas

that persist as shrubs and meadows for decades at a time. S. 1731 would endanger all of these habitat types and homogenize these ecosystems by removing much of the habitat or habitat components (downed logs, dead trees, and shrubs—as well as old-growth trees) which create our vibrant forest ecosystems.

The subtext of S. 1731 is that the elimination of environmental analysis requirements, and the resulting extensive increase in logging on our public lands, will somehow save our forests from natural processes such as fire or cycles of native bark beetles. However, commercial logging (which includes forest “thinning”) does not control native bark beetle populations, nor does it represent ecologically-sound fire management. In fact, the slash debris left behind after such logging operations can increase native beetle populations, and the killing and removal of trees from the forest reduces the forest canopy, creating hotter and drier conditions on the ground and increasing wind speeds through the forest, since fewer trees are available as a buffer. Both of these factors can often increase rather than decrease fire behavior. In addition, studies show that “thinning” logging operations typically end up killing more trees overall than beetles or fire alone, and it leaves behind stumps, instead of snags, which are so important for wildlife. Logging, whether clearcutting or thinning, also removes important genetic variation, including the very trees that are adapted to best survive natural processes such as drought and fire and will perpetuate our forests for generations to come.

S. 1731 does not create a path toward better forest management, it is simply a logging bill which will result in the loss and degradation of millions of acres of public forests, all without the benefit of examining the environmental impacts of these actions on our forest ecosystems and wildlife species through meaningful environmental analysis (including reviewing and comparing alternatives to the proposed logging project and engaging in a back and forth dialogue with non-agency experts, the public and other agencies). NEPA guarantees a process, with the end goal of this process being well-informed decisions, not just paperwork. Elimination of this process, coupled with the curtailment of the public’s ability to seek redress in the Courts, would ensure that our National Forests would be aggressively logged and damaged in 10,000-acre chunks without any scrutiny or constraint of these extractive activities. This might be a boon for timber interests and those they support but it would be a travesty for our nation’s public lands and the plants and animals these forests support, including numerous sensitive, threatened and endangered species, as well as for the increasingly large number of Americans who frequently recreate in these areas. Please protect our public lands and oppose S. 1731.

Sincerely,

John Muir Project of Earth Island Institute
P.O. Box 897 718 7th Street NW
Big Bear City, CA 92314 Washington, DC 20001

Alliance for the Wild Rockies
P.O. Box 505
Helena, MT 59601

Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, OR 97803

Buckeye Forest Council
PO Box 824
Athens, Ohio 45701

California Chaparral Institute
PO Box 545
Escondido, CA 92033

Conservation Congress
2132 Nord Avenue #3
Chico, CA 95926

Friends of Blackwater
501 Elizabeth Street
Charleston, WV 25311

Friends of the Bitterroot
PO Box 442
Hamilton, MT 59840

Friends of the Clearwater
PO Box 9241
Moscow, ID 83843

Friends of the Wild Swan
PO Box 103
Bigfork, MT 59911

Forests Forever
1936 University Ave. #160
Berkeley, CA 94704

Heartwood
Micheal Luuestema, Chair
PO Box 543
Tell City, IN 47586

Kootenai Environmental Alliance
PO Box 1598
Coeur d'Alene, ID 83833

Los Padres ForestWatch
PO Box 831
Santa Barbara, CA 93102

Montanans for Gallatin Wilderness
PO Box 6151
Bozeman, MT

Project Coyote
PO Box 5007
Larkspur, CA 94977

Restore the North Woods
9 Union Street PO Box 1099
Hallowell, ME 04347 Concord, MA 01742

Sequoia Forest Keeper
PO Box 2134
Kernville, CA 93238

Save Our Sky Blue Waters
PO Box 3661
Duluth, Minnesota 55803

Swan View Coalition
3165 Foothill Road
Kalispell, MT 59901

WildLands Defense
Jeff Jeul, Public Lands Director
618 Rollins Street
Missoula, MT 5980

WildNature Institute
15 North Main Street, Suite 208
Concord, NH 03302

Wild Virginia
P.O.Box1065
Charlottesville, VA 2290

Wilderness Watch
PO Box 9175
Missoula, MT 59807

Wild Virginia
P.O.Box1065
Charlottesville, VA 2290

WildWest Institute
PO Box 7998
Missoula, MT 59807

Yellowstone to Uintas Connection
PO Box 62
Paris, Idaho 83261