



Federal Forestry Policy

The Issue

More than 193 million acres of the National Forest System is managed by the U.S. Forest Service (USFS), located within the U.S. Department of Agriculture. Of this total, 46 million acres (24%) are designated as allowable for timber harvest. We acknowledge that there are multiple challenges to managing a system as expansive and as diverse as this, including damage caused by pest and invasive species, devastating forest fires, satisfying the concerns of various special interest groups, and budget constraints. However we also believe that the currently designated number of acres allowable for timber harvest is less than it should be and that timber harvesting is not necessarily incompatible with other uses of the forest.

Hardwood Federation members are particularly concerned about the impact the above challenges and limited lands available for harvest have on the availability of timber and fiber from federal forests. Timber sales have declined significantly in recent years, negatively impacting countless wood products businesses, local communities and schools that rely on the jobs and tax base provided by the industry. Federation members are also concerned that the decline in active management of federal lands has also negatively impacted the general health and sustainability of the forests.

Background

Timber harvests and sales have declined for various reasons, including the rise of a diverse set of special interest groups with conflicting perspectives on how best to manage the U.S. Forest System.

Budget constraints have also had a direct impact. The increasing cost of fire suppression has directly impacted the ability of USFS to effectively manage the multitude of issues that are related to forest management. In 1991, fire suppression programs accounted for 13% of USFS appropriated funds. In 2012, this figure had grown to over 48%. In addition, since 2002, the Forest Service has transferred \$3.4 billion from non-suppression programs to fight fires, leaving other vital programs, including Timber Harvest programs, underfunded and underutilized.

Hardwood Federation Position

Hardwood Federation does not support one size fits all approach, understanding the unique characteristics of each forest, whether publically or privately owned. We recognize the different history and ecological of various federal lands, particularly the differences between the vast western forests and the eastern forest systems (also known as Weeks Act Forests.) What should be considered appropriate management strategy for old growth forests that are found west of the Mississippi, are not appropriate for eastern ranges that typically have much younger trees.

The Hardwood Federation does support efforts to help regional forest service officials achieve stated forest management objectives for forests in their region. Achievement of these goals would be a win/win for forests, the environment, and the local communities and jobs that rely on the national forest resource.

The Hardwood Federation supports the following actions to achieve this objective:

Allocation of department resources to meet current annual harvest goals set by the U.S. Forest Service.

- Less than half the allowable sale quantity in existing forest plans is being harvested. USFS should prioritize reaching stated program goals through increased active forest management and use of existing programs including the Good Neighbor Authority, the Collaborative Forest Landscape Restoration Program, and the Insect & Disease Treatment areas as designated by the 2014 Farm Bill.

We also encourage the Secretary to measure the performance of senior Forest Service personnel by how close harvest levels are to the ASQ in their forest plans.

- Timber harvesting is one of the best tools the USFS has to manage wildlife habitat. We support the position of many wildlife biologist who believe our eastern hardwood forest should have at least 5% of their stands maintained as Early Successional Forest and that these stands should be spread throughout the forest.
- The US Forest Service should put a priority on hiring experienced foresters to manage the forests in the federal system. Certainly those with expertise in specific areas of forest management are of value to the process, but the diverse needs of the forest system must be taken into account by those in leadership roles.

Appropriate funding levels for forest management programs.

- The Hardwood Federation supports the Wildfire Disaster Fund Act which would separate fire suppression dollars from pro-active forest management programs and eliminate the “borrowing” of funds from management programs to pay for underfunded fire suppression activities.
- Programs like the Collaborative Forest Landscape Restoration Program show signs of success in some project areas, but the FY 2014 program only achieved about 40% of stated goals in vegetation improvement, biomass removal, and road restoration goals. Before additional funding is appropriated to this program, improvement in the form of actual deliverables should be demonstrated.
- Maintenance and appropriate expansion of the Good Neighbor Authority Program.
- Improvements to the Stewardship Contracting Program. Federal forest reform legislation now moving through the House includes language that allows the Forest Service to use up to 25 percent of the revenue from Stewardship contracts to plan additional Stewardship contracting projects. We believe this change will result in more projects on the forest landscape.

- The U.S. Forest Service should utilize the private sector and their resources to expedite timber sales at every opportunity. This includes Good Neighbor Authority and Stewardship Contracting Programs.
- Changes to the Secure Rural School program to accomplish more work on federal forests. The House Natural Resources Committee bill includes a provision which dedicates a portion of Secure Rural School funding to projects on federal forest land that produce more timber and improve water quality.
- After a timber sale has been completed, forest roads related to the timber sale are often closed out and decommissioned which may include the removal of road culverts and stream crossings. Future timber sales in the same location often require the previously decommissioned road to be rebuilt at significant cost. The Forest Service should implement management and maintenance practices related to forest roads, including preserving culverts and other infrastructures that do not prevent forest re-growth, to contain costs and eliminate unnecessary spending.

Reasonable reform to environmental protection programs, including NEPA and ESA.

- Reform should include measures to streamline the permitting process for forest management programs, including timber harvest programs, in ways that ensure certainty and reliable time frames for decision making.
- While NEPA and ESA provide valuable safeguards to protect fragile ecosystems and species, they are too often used to needlessly delay approved programs far beyond what is reasonable. Programs with commendable policy, forest health and economic outcome goals are often hamstrung by extended NEPA and ESA litigation; it is estimated that approximately 60% of the cost of forest management projects is spent on planning and environmental assessment, further compounding budget woes. Timber sales and Collaborative projects that have been through extensive review often suffer further delays as new groups and interests file lawsuits. Mechanisms to quickly and efficiently deal with legal challenges, including time limits and arbitration, should be incorporated into the process.
- The 2014 farm bill authorized agencies to expand their use of streamlined permitting under the Healthy Forests Restoration Act (HFRA) to projects that reduce a landscape's susceptibility to insect infestations or disease. Projects up to 3,000 acres in size could be permitted under a categorical exclusion as long as they meet program guidelines set out in the Farm Bill. To our knowledge, this authority—which represents a common sense approach to NEPA compliance--has not been fully utilized by the USFS and BLM. The Forest Service should prioritize implementation of HFRA.
- The Hardwood Federation supports H.R. 2647, the Resilient Federal Forests Act of 2015, which passed the House in June 2015 and has been sent to the Senate. H.R. 2647 provides additional authority for categorical exclusions in three key areas. One for “critical response actions” which targets forested areas that have been subject to disease or insect infestation, to reduce hazardous fuel loads or to increase critical habitat for endangered species. The acreage cap is 5,000 acres but may be expanded to 15,000 acres if it is put forward by a collaborative group. A second area is for salvage activities and this is limited to 5,000 acres. Finally, a categorical

exclusion is authorized for meeting forest plan goals for early successional forests, which is also limited to 5,000 acres. We believe that expanded use of categorical exclusions is an effective method the Forest Service can use to deliver more fiber to our mills, while improving forest health.