



Sustainable Forest Action Coalition

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Organization Representatives

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Congressman Doc Hastings
Chairman
Natural Resources Committee
United States House, Washington DC

Congressman Peter DeFazio
Ranking Member
Natural Resources Committee
United States House, Washington DC

Dear Chairman Hastings and Ranking Member DeFazio:

The Sustainable Forest Action Coalition (SFAC) of Northern California would like to take this opportunity to discuss the current House version of the Farm Bill as well as H.R. 1526. Both of these pieces of proposed legislation have language that is critical to our rural California counties as well as to the state and nation as a whole. Our counties, as well as state and nation, continue to experience an increase in impacts due to the non-management of our public lands. The SFAC feels strongly that these impacts are a result of years of living with and under current legislation and Presidential mandates that have allowed various individuals and groups to halt management of these public lands and tie the hands of the Federal agencies who directly manage them. We are experiencing fires that are destroying the very ecosystem that most of this legislation and Presidential mandates had thought would be protected and preserved. Instead, we are seeing species, watersheds, forests and recreational opportunities either destroyed or greatly impacted. The end result is also adversely impacting our counties and leading to a continuing downfall in our social and economic well-being.

When SFAC reviews the current condition of our public lands within our counties, we only see the negative impacts that current legislation and Presidential mandates are resulting in. When we review and listen to forecast in relation to climate change predictions, our situation becomes even more dire and demands an urgent need for addressing specific legislative language.

This prediction was just highlighted at the Tahoe summit by Mr. Gore who stated, "all the good that has been done and will continue to be done could be overturned unless we find a way to...deal with this problem of global warming." At this same meeting (August 19th), many others spoke of the need to continue bi-partisan cooperation as the only effective way to protect the lake. This work has been accomplished with the spending of almost \$1.7 billion dollars in an area that was almost totally logged during the silver boom era and now composed of second growth forests. Mr. Gore went on the state, "I don't think anyone has missed the irony of the smoke in our air as we meet here today." That smoke is burning from the American fire that has burned approximately 15,000 acres of timber land just to the west and the Lake Tahoe Basin. The majority of this fire is burning on public forestland on the Tahoe National Forest. Unlike the second growth stands in the Tahoe basin, the American fire is burning in old growth stands and standing dead snags that are a result of the Westville Fire from 2008 when little salvage occurred.

Currently certain Senators are working on another proposed bill to authorize an additional \$415 million towards the Tahoe Basin, the SFAC hopes there will also be an understanding of the importance of the rest of the Sierra Nevada, Cascade and the North Coast range in California as well as all of our public lands when it comes to these same ecological needs. These regions and many National Forests in all regions could support most of their own public land restoration needs with many of

Participating Counties:

Amador • Butte • Calaveras • Colusa • Del Norte • El Dorado • Glenn • Inyo • Lassen • Modoc
Nevada • Placer • Plumas • Shasta • Sierra • Siskiyou • Tehama • Trinity • Tuolumne • Yuba

the changes proposed in the House version of the Farm Bill and H.R. 1526. Our National Forests could accomplish the needed ecological restoration if there is bi-partisan cooperation when this topic comes to the floor before both houses. With these proposed changes, our public lands can economically support the needed restoration, while reducing the threat spoken about by Mr. Gore.

However, to accomplish the needed restoration, there must be a change in philosophy and leadership from the Secretary and Chief's office for the U.S. Forest Service. At a recent meeting in Ketchikan, Chief Tidwell made a statement that society has moved on and the agency wants to gain good will from the environmental groups and that necessitates transitioning out of old-growth logging soon. These statements highlight how out of contact Chief Tidwell is with our real public lands issues where old-growth logging is not occurring on the majority of our public lands. These same environmental groups that he wishes to gain good will with are the very groups who appeal and litigate restoration projects. These projects only benefit our ecological needs while reducing the threats to global warming by reducing the amount of smoke that is released from fires that are increasing in size.

The SFAC wishes to highlight some specifics relative to our counties and their public lands and then discuss specific points that are in the House version of the Farm Bill and H.R. 1526.

The SFAC asks that you consider the following information and realize that the proposed language in the House version of the Farm Bill and H.R. 1526 discussed below would have a significant impact on job creation, increasing the pace and scale of ecological restoration, reducing appropriations in relation to Secure Rural Schools funding, fire funding and in direct appropriations to various federal over-sight agencies (U.S. Fish and Wildlife Service). We ask you to support the areas discussed below that are specific to these issues so that our counties, state and nation can get back to the necessary management of our public lands in relation to watershed and forest health.

What we are losing or impacting due to current legislation and non-management of our public lands:

1. The major impact due to years of non-management of our public lands relates to the overstocked conditions of our national forests and the resulting loss of water that is critical to our state. When this is coupled with the climate change, the necessity to manage our overstocked stands of trees on public lands is at a crisis stage. There are many papers that address the water loss and climate change issues, but critical to California and the Sierra's and Cascade regions is a paper prepared for PG&E by Gary J. Freeman. Mr. Freeman in 2010 wrote "Tracking the Impacts of Climate Change on Central and Northern California's Spring Snowmelt Subbasin Runoff and in 2008 "Runoff Impacts of Climate Change on Northern California's Watersheds as Influenced by Geology and Elevation – A Mountain Hydroelectric System Perspective. These two papers highlight the issue of climate change impacts on the State Water Projects main reservoir, Lake Oroville, which serves 25 million urban water users from the north to the southern end of the state, as well as supplies water to 750,000 acres of agricultural land in the state. A later report published in November of 2011, "Forests and Water in the Sierra Nevada: Sierra Nevada Watershed Ecosystem Enhancement Project", Bales, Battles, Chen, Conklin, Holst, O'Hara, Saksa and Stewart, provides information on the influence of forest vegetation and the need to treat and manage our forests if we want to address the ever decreasing water supply and timing of deliver to this critical water project. Just a few highlights from these reports are:
 - a) In 2009, the Feather River Basin is producing 400,000 AF less average annual runoff into Lake Oroville than the Basin produced in 1960. The 270,000 AF decline in inflows from the NFFR includes the 90,000 AF in reduced outflows from Lake Almanor and the 180,000 AF streamflow reduction from the EBNFFR. The remaining 130,000 AF decline in inflows to Oroville is attributed mainly to reduced streamflows in the Middle Fork of the Feather River.
 - b) Stream inflows to Lake Almanor (primary upstream reservoir) have diminished by 15% or by 90,000 AF/yr since 1960. The combination of low elevation and open topography of the watershed creates a "rain shadow" effect that magnifies impact of the warming pacific storms on local runoff.
 - c) Increase in winter minimum temperatures has reduced the snow pack around Lake Almanor. The Mt. Stover Ski area (just west of Chester) April 1 snow pack declined by 59% since 1949.
 - d) Early estimates from the SN study cited above state, "First-order estimates based on average climate suggest that reducing forest cover by 40% of maximum levels across a watershed could increase water yields by about 9%." And, "Sustained, extensive treatments in dense Sierra Nevada forests could increase water yield by up to 16%." Given that approximately 60% of the states water comes from the Sierra Nevada's, this is a substantial increase in the states most critical resource.
2. The facts and statistics in #1 above are very meaningful when it comes to our public lands that are mainly located in our rural counties. The following table illustrates how little management of our overstocked forests is occurring and as a result, most of the rainfall and snow fall is transpiring back into the atmosphere versus being delivered into our states critical water system. As shown in the table, there are 8,353,224 acres of suitable productive forestland in the

California Forest Service region. The annual net growth on these acres is 3.73 billion board feet and of that, 846 million board feet dies each year from overcrowding, that is 23% of our growth per year dies and goes to waste and adds fuel in the event of wildfires. Prior to many of the current legislative and Presidential mandates (Northwest Forest Plan and California Spotted Owl specifically) that occurred in the mid 1990's, our public lands were producing an average annual product amount of 1.46 billion board feet. Since 1995 and the change in policy on our public lands, the California region now only produces 338 million or 23% of the previous average from 1978 through 1995 and only 9% of the annual net growth of our public forest lands. It no wonder that we have seen such a drastic loss of water yield into our watersheds and state water systems.

Table 1

California, Region 5, National Forests suitable forest lands, net growth, mortality, and average volume sold 1978-1994 and 1995-2010.

Forest	Suitable Productive Forestland (Ac.)	Annual Net Growth (mmbf)	Avg. Annual Mortality (mmbf)	Mortality as % of Net Growth	Avg. Annual Sold 1978-1994 (mmbf)	Avg. Annual Sold 1995-2010 & as % of 1978-1994 Vol. Sold	Avg. Vol. Sold 1995-2010 as % of Net Growth
Lassen	860,680	266.2	105.5	36%	137.15	56.95 42%	21%
Modoc	570,754	84.4	40	42%	55.25	26.43 48%	31%
Plumas	988,969	1,134	66.5	6%	177.97	36.04 20%	3%
Tahoe	669,910	535.1	41.7	8%	112.25	38.80 35%	7%
Mendocino	367,296	94.1	19.7	21%	65.76	6.62 10%	7%
Six Rivers	367,296	219	71.7	33%	106.17	7.78 7%	4%
Klamath	620,520	125.7	90.1	72%	174.12	27.70 16%	22%
Shasta-Trinity	1,054,923	459.7	99.4	22%	172.85	41.59 24%	9%
Eldorado	393,498	197.3	53.4	27%	133.28	38.85 29%	20%
Lake Tahoe Basin	108,815	33.2	14.1	42%	6.25	2.58 41%	8%
Stanislaus	385,691	181.9	41.9	23%	116.30	23.95 21%	13%
Sierra	511,468	229.3	56.9	25%	111.74	13.59 12%	6%
Sequoia	440,086	126.9	94.5	74%	69.22	8.84 13%	7%
Inyo	149,623	26.6	4.8	18%	10.89	3.25 28%	12%
Angeles	67,025	5.1	15.7	308%	0.79	0.24 30%	5%
San Bernardino	130,129	9.2	23.8	259%	8.38	4.37 52%	48%
Cleveland	22718	1.0	1.1	100%	0.79	0.15 19%	15%
Los Padres	48,170	1.2	5.3	442%	1.04	0.23 22%	19%
R5 Totals	8,353,224	3,730	846	23%	1,460	338 23%	9%

3. Loss of species and habitat: Coupled with the information stated in 1 and 2 above is the fact that we are seeing an ever increasing loss of our ecosystems and related benefits due to larger wildfires and more intense burning within those fires. A quick look at the effects of overcrowding and the impact of larger fires can be illustrated with just two recent fires. The Moonlight fire (Plumas NF) of 2007, 65,000 acres burned, destroyed 22 California Spotted Owl (CSO) Protected Activity Centers (PAC). The Chips fire (Plumas NF) of 2012, 75,000 acres, destroyed 8 CSO PAC's and 3 Goshawk centers. The lack of forest management as a result of various pieces of legislation and Presidential mandates are a leading factor in not being able to properly protect the very species that they intended to protect.
4. Restrictions on salvaging after fires is leading to additional watershed impacts:
 - a) Because of various legislative requirements to thoroughly analyze all projects, too much time is taken to prepare and try to bullet proof the NEPA documents from appeal and litigation. By the time the agency prepares the required documents and most are then appealed or litigated, most if not all of the potential revenue generating salvage is deteriorated. The result is few acres being salvaged and most burned acres remain with snags that become a hazard and future fuel issue. An example of the magnitude and future watershed impacts can be highlight from the Chips fire of 1012.
 - b) The BAER report from the recent Chips fire on the Plumas and Lassen NF verify this increased impact in areas that are re-burns in areas not salvage logged or treatment of heavy fuels occur. The following information comes from the BAER report;

“ However, many of the areas indicated by the BAER imagery to be burned at high severity were reduced to moderate soil burn severity after on-the-ground visits by BAER soil scientists. The revised areas were in the “new burn”, i.e. ground that had not been burned by the 2000 Storrie Fire. While high severity areas indicated by the BARC in the new burn exhibited complete consumption of ground cover and duff and complete consumption of canopy, on-the-ground surveys in some areas of the new burn indicated a “fast” burn that heated the soils only to very shallow depths (1/2-inch to 1-inch) and little hydrophobicity in the soils. These areas were downgraded to moderate soil burn severity. However, watershed response in these areas is expected to be significant, with increased runoff and debris flows expected over the next one to three runoff seasons due to reduced ground cover, duff storage, and infiltration capacity and high occurrence of post-burn debris within and near stream channels (see photo below). **Within the Storrie Fire “re-burn”, and in several areas of the new burn, areas indicated by BARC imagery to have burned at high severity were found, on the ground, to exhibit high soil burn severity, with high hydrophobicity and deeper soil burn depths.”**

The highlighted statement is critical when you consider to treat or not treat burned areas. These non-treated and re-burned areas are causing increased impacts and losses to watersheds and soils that increase the erosion and sediment values as well as potential for downstream impacts. They also reduce the potential to re vegetate these areas in a timely manner to reduce these impacts. Presently, Colorado is experiencing this very situation and after the Haymen fire in Colorado, the City of Denver's water reservoir was filled with sediment and took millions of dollars to dredge.

Most acres on public lands are now left to recover on their own. This recovery occurs over many more decades before these burned areas have returned into a natural forested state. This situation is detrimental to water production. The paper *Mediterranean Climate Effects. I. Conifer Water Use Across A Sierra Nevada Ecoton*, by E. B. Royce and M. G. Barbour has shown that shrubs use far more soil moisture than do conifers and hardwoods. If all of our state's burnt acres on public lands are left to their own means of recovery, we will see, and are seeing, an extended period when these lands are dominated by shrubs. We are losing thousands of acre feet of water per year by not managing our burnt landscapes in a more economic and watershed friendly manner.

So how does all of this information fit into the upcoming debate on the House version of the Farm Bill as well as H.R. 1526. The SFAC feels strongly that these two pieces of legislation contain important elements for our rural counties and the plight of the public forest lands that dominate most of these same counties. Specifically we would like to highlight the following points in these two pieces of legislation:

1. Requires that the Forest Service actively manage its commercial timber lands to produce revenues on a sustained yield basis by producing at least half of the sustainable yield of timber each year on lands designated for active management and, as required by law since 1908, share 25 percent of receipts with the counties.
 - a) This is important for many reasons and we would like to provide some insights on why it is important to all or our counties as well as the ability for our public lands to be restored economically by maintaining and enhancing our remaining infrastructure.
 - b) The following table provides the Region 5 timber target and accomplishments for fiscal years 2008-2011.

Fiscal Year Targets and Accomplishments Region 5

Fiscal Year	Target (mmbf)	Accomplishment (mmbf)
2008	426	203
2009	400	321
2010	410	355
2011	355	323

- c. The targets for this time period are less than one quarter of what they were on average from 1978 through 1990 and only slightly higher than the average for 2000-2010. Even with these greatly reduced targets, the agency cannot meet the targets on an annual basis. As a result of the reduced target accomplished, additional impacts are occurring. Our rural counties cannot stand additional losses of volume that will translate into prolonged mill closures. The impact of the loss of the direct jobs causes the further loss of indirect and induced jobs (1.6 – 2.25 according to IMPLAN documentation in the Framework EIS). As mills either shut down or reduce their workforce, there is a slow loss of indirect and induced jobs that impact rural economics well after the actual closure or reduction in production.
- d. Mill and biomass power infrastructure closures heighten the concern and need to address the issues surrounding the economic and social impacts when these closures occur. The following information is in relation to the social and economic impacts that have occurred and continue to occur with these counties. To define these losses, I offer the following;
 - e. From 1978 through 1990, the average Forest Service timber sale production was 1,730 million board feet. From 2000-2010 the average production had fallen to 292 million board feet. Using UC Berkeley Professor McKillop's statistics, there are 6.4 jobs created per 1 million board feet of production. There is a difference of 1,439 million board feet from 1978-1990 to the current average production from 2000-2010, which equates to (1,439 times 6.4) 9,210 jobs lost. Currently these jobs average about \$42,000 in annual salary or \$386,820,000.
 - f. Using multipliers derived using the Forest Service IMPLAN model used for the 2001 Sierra Nevada Framework, the multiplier is 2.1 for indirect and induced jobs, or 13.44 per 1 million board feet which results in 19,340 (13.44 times 1,439 jobs) indirect and induced jobs.
 - g. The resulting total jobs related to the production difference is 28,550 jobs and approximately 75% of these jobs relate to counties in Northern and Central California, or 21,412 jobs for an average of 1,127 jobs per county. Given the changes in forest management due to various environmental restrictions, the SFAC realizes that we will never obtain the previous employment levels or product production levels from the 1978-1990 period. However, we also feel strongly that given the change in technology associated with the current forest practices, environmental concerns have been greatly reduced. Change in treatment prescriptions have also changed dramatically to thinning of smaller trees leading to a combination of small sawlogs and biomass.
 - h. When discussing losing the existing forest products infrastructure, it is important to consider what these jobs mean to our rural economic and social well-being. Forest workers and the related jobs that this infrastructure provide are all family wage jobs that provide health and insurance benefits. With the emphasis on job creation, nationally, the following information should be used to highlight the importance of this effort to revitalize and maintain this economic opportunity.
 - i. What have our rural forested counties lost as far as forest products infrastructure over the last 10-20 years? The following table will outline this loss over the last 20 years by county.

**Mill Closure from 1989-2009
And Mills Open by County in 2010**

COUNTY	MILLS CLOSED 1989-1999	MILLS CLOSED 2000-2009	MILLS REMAINING
Amador	2	0	1
Butte	1	0	1
Calaveras	1	0	0
El Dorado	2	2	0
Lassen	2	2	0
Modoc	4	0	0
Nevada	1	0	0
Placer	2	0	2
Plumas	2	0	2
Shasta	10	3	6
Sierra	0	1	0
Siskiyou	4	1	3
Tehama	5	0	0
Tuolumne	1	1	1
Yuba	3	1	0
TOTAL	40	11	16

j) After reviewing this, it becomes very apparent that our rural forested counties cannot continue to lose this valuable forest products infrastructure if the U.S. Forest Service in California is to accomplish the restoration that is so critically needed. Many of these counties continue to suffer with extremely high unemployment rates and have not seen other businesses come in to replace their lost forest products infrastructure.

k) **Loss of infrastructure:** California today has 36 mills remaining open. From 1980 to 2010, we have seen 112 mills close or a loss of 76 percent of our infrastructure needed to economically manage our forest. In 1980, these mills employed 14,842 and today only 3,832 for a loss of 74 percent of our employees or jobs. In addition, California in the late 1980's had 62 operating biomass power plants and today we have 23 (with the current closure of POPI in Oroville) or a 63 percent loss of that infrastructure.

2. Provides an extension on Secure Rural Schools funding. This will be critical as any increase in program as stated above in #1 will take some time to implement. This is critical to our counties as displayed in the table below that shows 6 of the counties loses with the current decrease in SRS funding since 2009.

SRS Appropriations

Fiscal Year	Modoc Co	Lassen County	Shasta County	Plumas Co.	Siskiyou Co	Trinity Co
08	\$3,109,487	\$3,604,665	\$3,732,085	\$6,750,169	\$8,620,981	\$7,188,207
09	2,798,538	3,244,198	3,358,877	6,075,152	7,758,883	6,469,386
10	2,522,139	2,923,784	3,027,136	5,475,137	6,992,573	5,830,434
11	2,002,276	2,321,134	2,403,183	4,346,602	5,551,265	4,628,666
12	1,877,632	2,176,641	2,253,582	4,076,021	5,205,992	4,340,526
Total Reduction	\$3,237,269	\$3,752,903	\$3,885,562	\$7,028,664	8,975,211	7,483,816

These six counties have lost a combined \$34,363,425 in 25% receipts through SRS reductions since 2009. If we displayed all of our counties, you would see an even bigger impact.

3. Section 4, (e), Compliance with Endangered Species Act;
 - a) This subsection covering the conduct of ESA consultation and the timing of this process is way overdue. For too many years reasonable and sound forest health projects have been significantly delayed because of ESA consultation and many of the projects have then succumbed to the impacts and losses due to wildfire. In almost every case, the very species that were to be protected have perished in the wildfire and/or their habitat was destroyed.
 - b) A point for consideration is the fact that the U.S. Forest Service has their own expert wildlife and fisheries professionals and to require oversight by another federal agency gets at the root of why our federal budgets are out of line and authorize spending that is not necessary. It would be very valuable for both the House and Senate to review duplication of agencies' roles. When projects are under the responsibility and oversight of one expert agency who has capable scientists, in this case the Forest Service, the duplication of review by other federal agencies, the Fish and Wildlife Service or National Marine Fisheries Service, imposes excessive and unnecessary delay and expense. Just this one change to allow the Forest Service professional biologists to conduct the ESA review could eliminate millions of dollars each year from federal appropriations. The Ninth Circuit in the en banc Mission Brush decision and other courts have emphasized that the federal land managing agencies' resource specialists are experts whose decisions are entitled to deference, particularly in scientific areas. So duplicative oversight is not necessary and ESA consultation is an area where substantial time and cost savings can be attained.

4. Section 4, (f), (B) – Bond Required and C. Recovery.
 - c) This specific language in the original H.R. 1526 does not impact any rights associated with the Equal Access To Justice Act, but finally will bring some protection to the general tax-paying public against the plethora of lawsuits that have become an every-day occurrence against sound public land management. The language as proposed only requires a plaintiff who is challenging these specific projects to post a bond to cover the reasonable estimated costs, expenses and attorneys fees of the Secretary as defendant. (C). Recovery allows the Secretary to submit to the Court a motion for payment of all litigation expenses when they prevail. The tax payer should be provided the same protection and recovery of expenses when projects meet all necessary standards and are routinely litigated by individuals or groups who now use the projects as an opportunity to profit from suing the Forest Service and other Federal Agencies.

5. Section 4; (5) CATEGORICAL EXCLUSION (CE)- Proposed language of H.R. 1526 designated a 10,000 acre limit on CE's for areas identified at risks for catastrophic events.
 - a) Forest Service Handbook 1909.15, Chapter 30 provides specific direction on CE's. The Council of Environmental Quality (CEQ) regulations provide for categorical exclusions (CEs) to implement the National Environmental Policy Act (NEPA) for the purpose of reducing delay and paperwork. CEQ regulations allow Federal agencies to exclude from documentation in an environmental assessment (EA) or environmental impact statement (EIS) categories of actions that DO NOT INDIVIDUALLY OR CUMULATIVELY HAVE A SIGNIFICANT EFFECT on the human environment. Based on the agency's experience and knowledge, the responsible official can conclude that if the action fits within an identified category and analysis shows there are no extraordinary circumstances, then the action would not have significant effects.
 - b) The proposal of the 10,000 acre limit on the use of CE's for areas identified at risk of catastrophic events fits well with the NEPA premise that areas and projects that propose repetitive management do not require repeated study and analysis. The current management proposals are almost exclusively designed for the reduction of risk to individual species, improving watershed health and the reduction of the risk and destruction associated with wildfire. There have been numerous studies as well as science that concludes that proper thinning and design of landscape scale projects are reducing the loss and impacts to species, ecosystems and our states valuable watersheds without adverse impacts to our environment. These projects are creating jobs while improving our ecosystem health. One such study on effectiveness is the USDA R5-TP-031, December 2010, A Summary of Fuel Treatment Effectiveness in the Herger-Feinstein Quincy Library Group Pilot Project Area.
 - c) To endorse the 10,000 acre limit would add no additional risk to the environment while reducing the need for unnecessary taxpayer expense associated with the writing of an Environmental Assessment or Environmental Impact Study.

6. SEC. 7204. Stewardship End Results Contracting Project Authority. This change would extend the Stewardship Authority to 2018. During this extended time period, it would be the SFAC and our counties desire to see a language change proposal that would address a system that allows 25% of any product value being designated for payment to counties. In addition, the section, (7) Fire Liability Provisions, is critical to support so that prospective contractors will have the same protection as stipulated in current timber sale contracts. Given that the current Integrated Resource Service Contract sets no limit on liability, most prospective contractors will not submit a proposal knowing that they can lose their business due to not liability limit.

SFAC, and all the other forested counties in the Sierras and Northern California, can play a key role in the supply of water and the benefits that it brings to this debate. In addition, the recognition and acceptance of the role that our forests play in the overall agricultural discussion in relation to jobs and benefits is vital to our economic well being and survival as rural counties. This can only occur through proper management of the forests and an increase in the supply of logs and biomass from the National Forests.

The SFAC and all of our Counties implore you to consider these impacts and losses as you move forward. In addition, it is over due to rethink the National Environmental Policy Act, as stated by Senator Wyden at recent hearings, and realize that Pace and Scale can only increase by recognizing that most forest and watershed health projects are necessary and not causing undue harm to our environment. On the contrary, they are showing that thinning is critical to reducing the threat of insect and fire losses that destroy all species habitat while impacting our watersheds.

The SFAC asks that your Committee consider the following language in the House version of the Farm Bill and H.R. 1526:

1. The proposed NEPA considerations in relation to time spent to prepare documents as well as the use of Categorical Exclusions to address repetitive type projects in relation to catastrophic wildfire and insect and disease issues.
2. Address the Endangered Species Act in relation to the duplication of appropriations and effort when the Forest Service already has their own wildlife and fisheries professionals and the courts have determined that they do not need additional over-sight.
3. In relation to the Equal Access to Justice Act, support the proposed bond requirement as well as recovery of federal court costs when they prevail.
4. Provides an extension on Secure Rural Schools funding.
5. Extension of the Stewardship Contracting authority with the proposed changes in fire liability for service contracts.

It is the SFAC hope and desire that we can continue to work with you to bring awareness as well as recommendations on the changes discussed above.

Sincerely,



Bill Wickman and Laurel Brent-Bumb
Representatives for the Sustainable Forest Action Coalition

Cc:

Senator Boxer
Senator Heller
Congressman McClintock
Congressman Geramendi
Congressman Bera
Congressman Denham
Congressman LaMalfa
Congressman Nunes
Congressman Huffman
Congressman McCarthy
Sustainable Forest Action Coalition