



August 23, 2018

Secretary Ryan Zinke
US Department of Interior
1849 C Street, NW
Washington, DC 20240

Secretary Sonny Perdue
US Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

Dear Secretaries Zinke and Perdue:

On behalf of over 385,000 Farm Bureau members in 13 states, we write with recommendations on how to prevent, manage, and respond to forest fires. We thank you for your recent visit to the West, during which time you gave specific attention to the deadly wildfires spreading throughout our region. We commend you for advancing this important public safety crisis and for your comments and commitments announced following your visit. Farmers, ranchers, and our urban and suburban neighbors are all at risk, and we know you have closely monitored the tragic loss of life and property resulting from wildfires this year and in recent years.

The week prior to your visit to the West, the wildfire crisis was discussed at length during the annual meeting of the Western States Farm Bureau presidents and administrators. Our organizations hold a shared, strong belief that ineffective land management practices and policies in the West over the past several decades have contributed to increased risk of catastrophic wildfire. An emphasis on fire suppression, reductions in commercial timber harvest and thinning, additional regulations related to permitting, and restrictions on livestock grazing have slowed the

ability of the states' public and private forest land managers to make significant improvements in forested landscapes. Those concerned about the recurrence of catastrophic wildfires should also be concerned about current management practices and policies that hinder private and public responses to the wildfire crisis in the West.

Sustainable forest management and protecting and preserving our environment are not mutually exclusive. The U.S. Forest Service and the Bureau of Land Management must both work toward a series of significant reforms that accomplish these equally important goals. Targeted, active forest management practices will have a significant positive impact on the ability of Western states to combat catastrophic wildfire, protect lives and property, safeguard our water supplies, and prevent the destruction of farming and grazing lands.

Healthy forests are critical to rural communities in the West whose economic and social fabric rely on the revenues generated by the multiple uses of the National Forest System and BLM lands. These lands have a direct impact on agricultural activity, jobs and annual payroll in many counties throughout the West. Our timber and ranching industries depend on these lands for a merchantable supply of wood to keep our forest products economy viable, and to ensure the sustainability of our livestock producers. However, there has been a significant reduction in timber harvesting and livestock grazing in the past several decades, which has been a major contributing factor to the increased fire hazard we are now experiencing.

We know how to manage forests and rural lands for healthy forests and watersheds. Forest harvesting and livestock grazing represent two available strategies that can restore balance to these areas. That lack of balance is one reason wildfires have proven so destructive. We desperately need new policies and reforms aimed at improving the management of forest and grazing lands administered by your agencies. The Western State Farm Bureaus would like to offer the following recommendations for your consideration:

- Allow Management Plan Flexibility: Large-scale, landscape-level land management plans should be allowed to guide individual actions on forest lands without duplicative administrative processes under federal environmental laws. Landscape-level analysis and decision making should not become an unintentionally-created "new" planning level that is required to move forward with project decisions. Smaller, nimble projects with shorter analysis timelines should be allowed.
- Provide Emergency NEPA Alternatives: When salvaging timber in fire-burned areas, there should be an expeditious alternative to following standard National Environmental Policy Act (NEPA) procedures. Emergency procedures should be put in place for managing burned areas. The current system is inefficient and unworkable, and the process so slow that the value of the remaining salvageable timber plummets with each passing day spent waiting for harvest permits. In short, ways to make NEPA work more productively and effectively are desperately needed. We can provide more specific recommendations in follow up discussions on how to accomplish that objective.

- Expand Categorical Exclusion Eligibilities: In addition to the new Categorical Exclusions included in the 2018 Omnibus Bill, the use of existing CEs should be expanded for both timber harvesting and grazing purposes. For example, acreage should be expanded for fire rehabilitation, timber salvage and thinning treatments, and to treat insect and disease. CEs should also be used for grazing permits that are being renewed under the same terms and conditions as prior permits as well as range improvement projects that employ well-developed and well-understood practices.
- Strengthen Milling Infrastructure: The length of timber contracts should be lengthened to 20 years to provide an incentive for long-term investment in forestry and milling infrastructure. In addition to longer contracts, higher minimum annual permitted harvested board-foot levels should be established, to ensure mills can be sustained on an ongoing basis.
- Improve Intergovernmental Coordination: We support the emphasis on direct coordination with states in your recent announcement. Interagency coordination at the federal, state and local levels should be strengthened, to ensure consistent policies between overlapping government jurisdictions.
- Prioritize Grazing: Grazing permittees and others with long-term contractual agreements should be given stakeholder status beyond general “public” status. Agency socio-economic analysis should be given equal weight to the environmental analysis in the decision-making process. Policy changes to productively use livestock grazing as a fuels reduction tool should include policy and management changes which recognize annual grasses as authorized forage to be allocated for available grazing permit use.
- Ensure Biomass Funding: Continued financial assistance in the form of matching payments to owners and operators of agricultural and nonindustrial private forest landowners to establish, produce and deliver biomass feedstock. This assistance is essential to reducing the fuel loads as it allows producers to economically deliver eligible material to qualified Biomass Conversion Facilities.

These initial policy changes would provide the most immediate benefit. As mentioned, Farm Bureau would be happy to weigh in on other important policy changes.

In light of the recent catastrophic wildfires, it is abundantly clear that we need to implement thoughtful, sophisticated and scientifically-based strategies immediately to improve the health of our forests and to protect lives and property. Federal agencies working in conjunction with the states must work individually and collectively to allow responsible management of our natural resources. We refuse to accept the status quo as part of a so-called “new normal” that brings continued devastation to our western communities. A humane response should reassert solutions that will diminish human suffering and renew our natural resources.

Decades of poor land management have increased forest density to unhealthy and unsustainable levels. While the smoke from these horrifying wildfires lingers above us, let us commit to restoring balance to land management by focusing on cooperation and moving away from the myth that “no management” is sound policy.

Thank you for considering our views. Our organizations sincerely appreciate your time and dedication to this important matter.



American Farm Bureau Federation President



Bryce Wingley, President
Alaska Farm Bureau, Inc



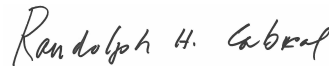
Arizona Farm Bureau Federation President



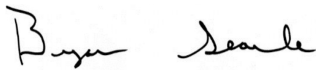
California Farm Bureau Federation President



Colorado Farm Bureau Federation President



Hawaii Farm Bureau Federation President



Idaho Farm Bureau Federation President



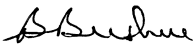
Montana Farm Bureau Federation President



Nevada Farm Bureau Federation President



New Mexico Farm & Livestock Bureau President



Oregon Farm Bureau Federation President



Utah Farm Bureau Federation President



Washington Farm Bureau Federation President



Wyoming Farm Bureau Federation President

cc: Dan Jiron, USDA Acting Deputy Undersecretary, Resources & Environment
Vicki Christiansen, Interim USFS Chief
David Bernhardt, Deputy Secretary of the Interior
Brian Steed, BLM Deputy Director, Policy & Programs