



FEDERAL FOREST

RESOURCE COALITION

FFRC Press Statement: To Ensure Climate Resilience, Forest Service Must Manage National Forests: *July 20, 2023:* FFRC Executive Director Bill Imbergamo issued the following statement on the Forest Service's Advanced Notice of Proposed Rulemaking on Climate Resilience:

"The Forest Service and BLM were tasked with reviewing the lands under their stewardship to determine the extent of "mature" and "old growth" forests. They found 39 million acres of mature and old growth forests on National Forest System Wilderness, Roadless, and National Monument areas alone. Forest Service and Bureau of Land Management lands have over 112 million acres of mature and old growth forest, more than 175,000 square miles. This is an area larger than all but three states, and is larger than the states of West Virginia, Maryland, Vermont, New Hampshire, Massachusetts, New Jersey, Hawaii, Connecticut, Delaware, and Rhode Island combined.

It is important to note that these impressive acreages of old growth and mature forests were found based on a review of less than 20 percent of total forest area of the United States. Notably, the review did not examine millions of acres of forests found in the National Park System, which is not open to commercial timber harvest.

We are extremely concerned the ANPR is a pretext for a broad and open-ended effort to fundamentally reorient the Forest Service – and the National Forest System in particular -- away from its core mission absent a clear mandate to do so from Congress.

Rather than engage in an unfocused, legally dubious effort to develop a myriad of new policies, planning processes, and procedures, ostensibly in the service of climate adaptation, the Forest Service should, rather, focus on implementing the considerable new authorities and funding the Congress has

provided to address the wildfire and forest health crisis that has been building on Federal lands over the last several decades.

The roots of the wildfire and forest health crisis on Federal lands are not complicated. The National Forest System has been made uniquely vulnerable to climate stresses by three decades of passive management and massive set asides from management. Even when presented with new authorities – such as the insect and disease treatment Categorical Exclusions provided in recent Farm Bills and the Fuel Break Categorical Exclusion created in the Bipartisan Infrastructure Law – the Forest Service has been unwilling to use these authorities for fear of litigation that takes advantage of dubious legal precedents, resulting in significant constraints on management.

Aggressively thinning forests on unreserved acres, creating fuel breaks around critical infrastructure, and using expedited authorities everywhere possible – should be the agency’s sole focus at this time. Eastern National Forests, which are generally less fire prone, can be managed to sequester more carbon through timber harvest on unreserved acres.”

FFRC’s official comments on the April Advanced Notice of Proposed Rulemaking on climate resilience were filed on July 25, 2023, and are attached along with this press release. The comments were joined by 20 forest industry associations.

For more information, contact Bill Imbergamo, Executive Director, at 703-629-6877 or bill@fedforest.org

About the FFRC: FFRC is a national coalition of wood products companies, local governments, conservation groups united by concern for the National Forests. FFRC supports improving the management of the federal lands to support healthy forests and vibrant rural communities.



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