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**Testimony on S.1784 Oregon and California Land Grant Act of 2013**

*Senate Committee on Energy and Natural Resources*

Thursday, February 6, 2014

by Sean Stevens, Executive Director, Oregon Wild

Thank you to Chairman Wyden and the members of the committee for the opportunity to testify today on the O&C Land Grant Act of 2013.

My name is Sean Stevens, and I am the executive director of Oregon Wild, a conservation organization representing over 13,000 members and supporters. In 2014 we celebrate 40 years of protecting and restoring Oregon's wildlands, wildlife, and waters.

Over the last two decades we have worked closely with Chairman Wyden and his staff on important environmental policy for Oregon. We worked together to protect more of Mount Hood and the Columbia Gorge as Wilderness, and joined with the Chairman's staff and the logging industry to negotiate the Oregon Eastside Forest Restoration, Old-Growth Protection and Jobs Act of 2009. Oregon Wild has sought to balance the protection of Oregon's special places with science-based management that benefits the environment and sustains rural communities.

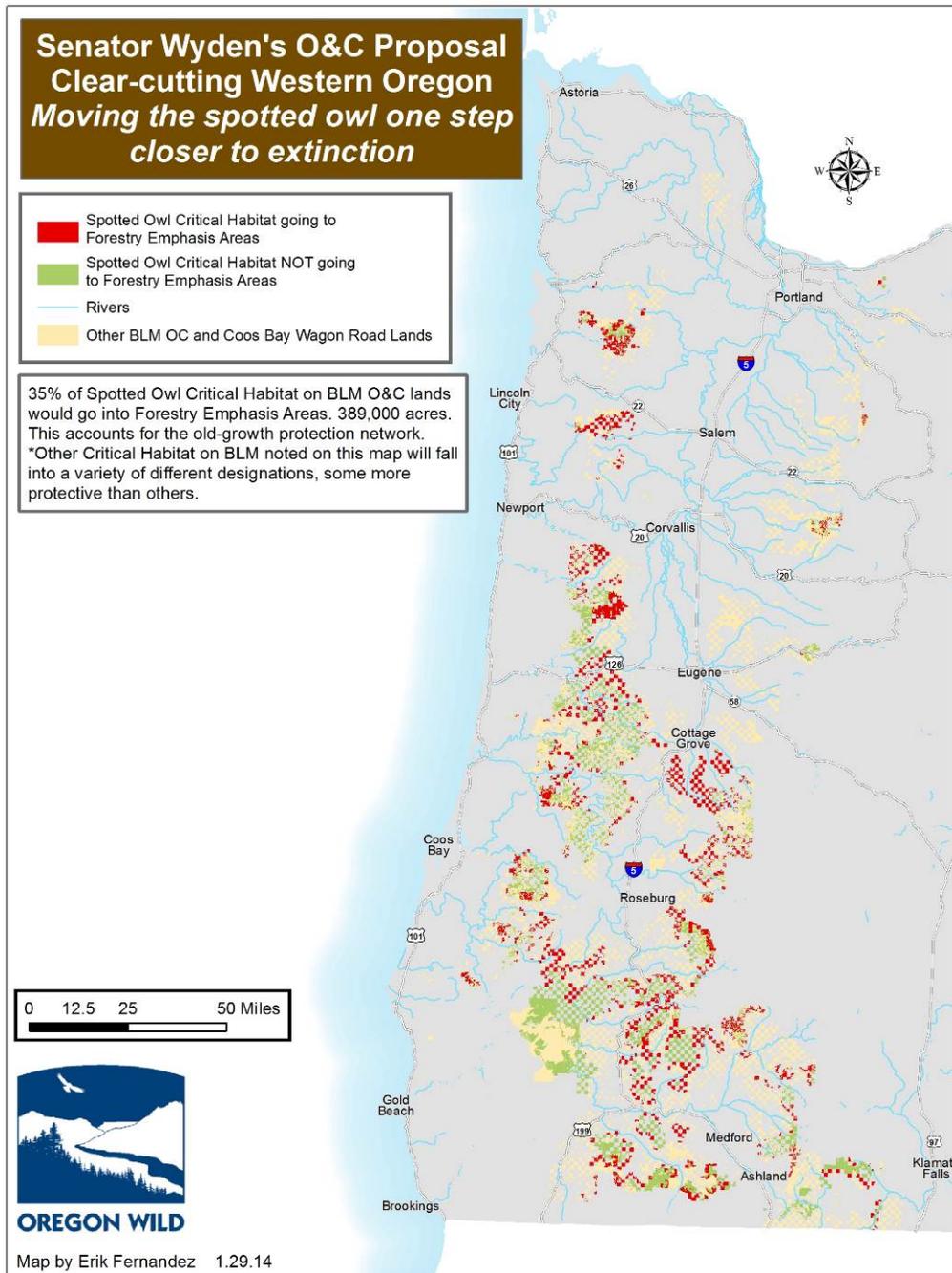
It is from this perspective of appreciation for our past work together that we must oppose S.1784. Dozens of other conservation groups with membership numbering in the millions are similarly opposed and have sent letters to you, and to other members of Congress, to this effect. (See Appendices A and B).

This bill seeks to re-link funding for 18 Oregon counties to aggressive logging of publicly-owned Bureau of Land Management lands in western Oregon. S.1784 would dramatically weaken President Clinton's historic 1994 Northwest Forest Plan (NWFP) and significantly undermine federal environmental laws like the Clean Water Act (CWA), Endangered Species Act (ESA), and National Environmental Policy Act (NEPA).

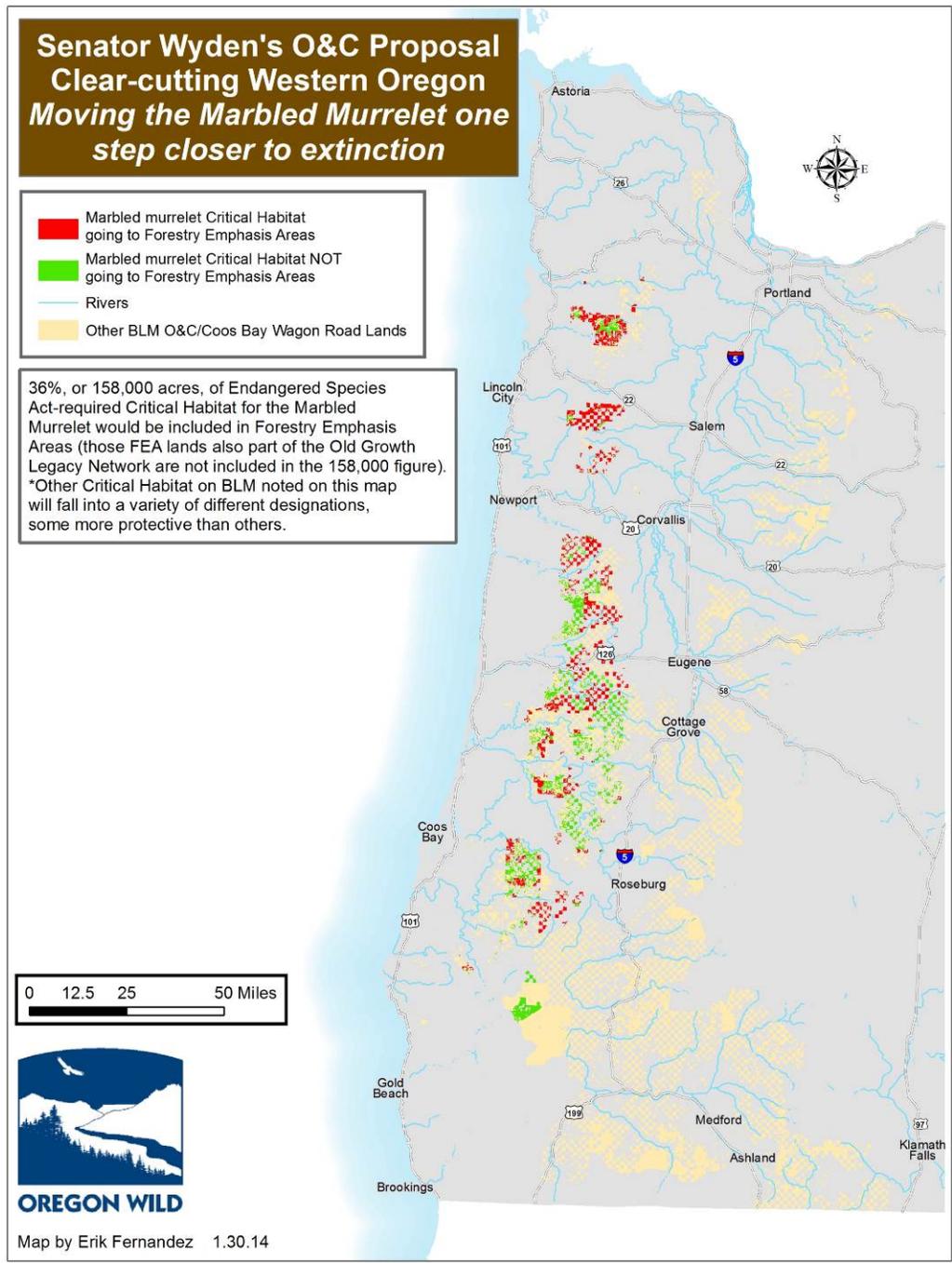
The legislation, as introduced, represents a significant departure from the principles laid out in Chairman Wyden's document titled "Principles for an O&C Solution: A Roadmap for Federal Legislation to Navigate both the House and Senate," released in 2012. Those principles represented a good starting point for discussion to craft a workable, balanced, and realistic legislative proposal that did not sacrifice conservation values that Oregonians, and all Americans, hold dear.

## Endangered Species

S.1784 proposes to override critical and long-standing requirements of the ESA in some sections, and weakens them in others. Harmful logging in critical habitat for listed species is allowed (see Figs 1 and 2 below). The bill appears to create weaker ESA consultation requirements than exists under current law. The BLM can, but does not have to, ask federal wildlife agencies for a determination of whether activities will impact threatened species, and whether a project can move forward or if it requires consultation.



**Fig 1 – Northern spotted owl Critical Habitat to be logged in S.1784**



**Fig 2 – Marbled murrelet Critical Habitat to be logged in S.1784**

Furthermore, S.1784 eliminates the survey and manage program of the NWFP on Forestry Emphasis Areas. This “look-before-you-log” program is specifically designed to avoid logging impacts that could result in future ESA listings. The survey and manage program was deemed a “foundational” element of the NWFP by the courts when the Bush administration tried to remove it.<sup>1</sup>

<sup>1</sup> Northwest Ecosystem Alliance v. Rey, 380 F. Supp. 2d 1175, 1192 (W.D. Wash. 2005).

## **Public Process**

In regards to NEPA, the bill would severely undermine the law by eliminating environmental analysis and public review of individual timber sales, and mandating a single large-scale analysis covering 10 years of logging spread over one million acres of western Oregon.

Currently, individual timber sales go through rigorous environmental review and public vetting to ensure they are consistent with applicable law and do not irreparably harm the environment. However, S. 1784's mandate to analyze 10 years of logging in a single Environmental Impact Statement (EIS) disregards the critical need for site-specific reviews of a project's impacts. By eliminating project-level review under NEPA, the public will be largely unable to ensure that BLM makes informed decisions and carefully considers the best available science, public input, local conditions, and changed circumstances.

While members of the public may still challenge the large-scale EISs, severe timing and content restrictions are placed on those seeking to hold federal agencies accountable to federal laws. Chairman Wyden, we are disappointed to see you endorse significant and precedent-setting restrictions on the ability of citizens to participate in a federal process, particularly given your commitment to other government transparency and accountability issues.

## **Northwest Forest Plan**

Along with eliminating the survey and manage program, S.1784 further undermines the landmark Clinton NWFP by dismantling the current system of old-growth and wildlife reserves for protecting and restoring older forest habitat. Allowing some young forests to grow into old-growth forests is a major underpinning of the NWFP.

By changing the reserve system, the bill eliminates the integrated landscape conservation approach to conserving fish and wildlife habitat across both Forest Service and BLM lands.

## **Disposing of Public Lands**

Provisions in S.1784 allow for land sales and exchanges. Historic consolidation and privatization proposals involving the transfer of public lands to private logging interests have resulted in losses to the environment and American taxpayers.

Rather than giving careful consideration to consolidation or land sales/exchanges, S.1784 allows the fast-tracking of privatization of public lands by reducing public oversight. These provisions do not ensure that such land trades are in the public interest, and shortchange the American public and the long-term conservation of public resources.

## **Climate Change**

For the last century logging in western Oregon has contributed to climate change by emitting millions of tons of CO<sub>2</sub> into the atmosphere. After harvest levels were reduced by the NWFP, the USFS and BLM have shifted emphasis toward conservation and a program of extensive thinning in young stands. Consequently, the flow of carbon has reversed, and at least on federal lands, there is now more carbon being absorbed and stored by growing trees, and less carbon being emitted by logging.

However, there is still a long way to go before our public forests recapture all the carbon transferred to the atmosphere during decades of old growth liquidation. S.1784 would increase logging on BLM lands in western Oregon, including reducing the area of reserves and clearcutting of carbon-rich mature forests. This represents a shift from land uses that store more carbon to land uses that store less carbon. This will increase emissions of CO<sup>2</sup> and curtail progress on climate change mitigation in direct conflict with current administration climate policy which is to “preserve[e] the role of forests in mitigating climate change.”<sup>2</sup>

This is particularly troubling because the highly productive forests on BLM lands in western Oregon are very well suited for carbon storage, and conservation of carbon is highly compatible with many other important public values, such as clean water, fish and wildlife habitat, recreation, and quality of life.

### **Historical Context**

In one sense, this legislation was drafted with the best of intentions – attempting to keep county governments in Oregon from going bankrupt. No one wants to see public services in rural Oregon disappear. However, while we face these budget challenges in real time, we must not forget how we got here.

For decades, the BLM and the Forest Service operated as if their only mission were to clearcut public lands. It took a tremendous outpouring of public demand to reform the BLM and Forest Service to ensure wildlife, wild salmon, clean water, and clean air received equal priority to logging.

Had we not clearcut nearly 90% of our ancient forests, pushed numerous wild salmon runs to the brink of extinction, and muddied our clean drinking water through excessive logging – we may have faced a much different world today. The O&C Land Grant Act of 2013, had it been written and passed in 1974, could have been a sane alternative to the destruction.

But this isn't 1974, and we cannot ignore the huge mistakes of the past. We must chart a path forward that repairs the damage from past mismanagement of our forests, not a path that makes it worse.

Chairman Wyden, you were right when you worked to pass the Secure Rural Schools Act and de-linked logging on public lands from funding for county services.

At the time, you said in The Oregonian newspaper: “The new relationship between the counties and the federal government means that the 21st century relationship is not just going to be about cutting trees.”<sup>3</sup>

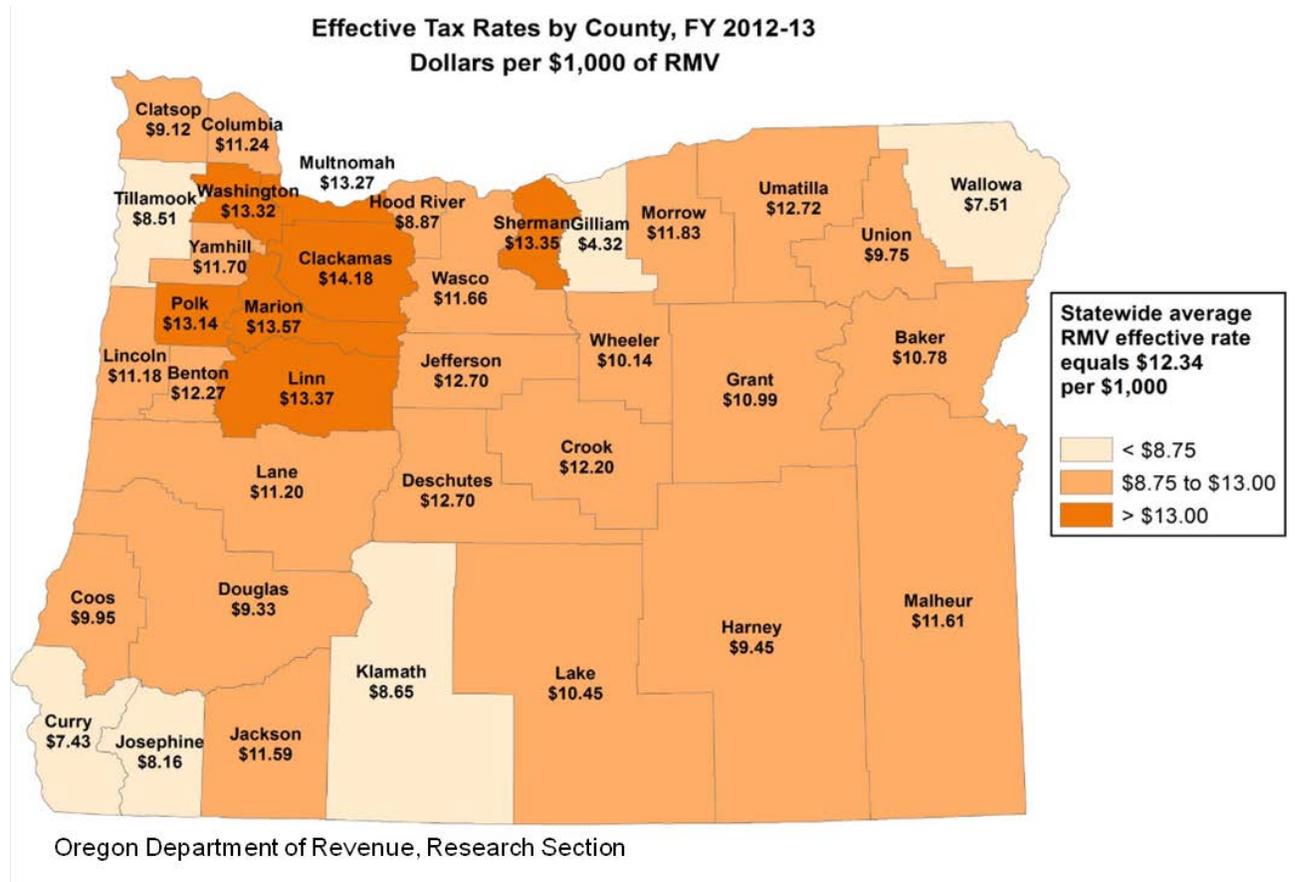
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<sup>2</sup> President's Climate Action Plan.

<http://www.whitehouse.gov/sites/default/files/image/president27sclimateactionplan.pdf>

<sup>3</sup> Barnett, Jim and Hogan, Dave. "Senators Offer Plan To Rescue Forest Counties." The Oregonian 8 September 2000: A20. Print.

That statement is as wise today as it was 14 years ago. It makes no sense to fund local county governments – counties that have some of the lowest local tax rates in the nation (see Fig 3) – by logging public lands that belong to all Americans.



**Fig 3 – Timber payments kept property tax rate historically low in O&C counties**

### Restoration Based Logging

When we see our forests as natural resources to steward rather than simply as piggy banks, amazing things happen.

Oregon Wild has seen it on the ground. While we are often accused of being so, we are not anti-logging. For nearly two decades we have worked alongside the Forest Service, timber companies, watershed councils, and other local stakeholders to push collaborative forest restoration in places like the Siuslaw National Forest. Because of our work restoring forests, putting people to work in the woods, and sending trees to the mills we’ve twice been recognized with the Two Chiefs Award from the Forest Service and NRCS.

In the 1980s, the Siuslaw National Forest was ground zero in the timber wars. Under the visionary leadership of former Forest Supervisor Jim Furnish and his successors, the Siuslaw decided to abandon controversial clearcutting and move away from logging forests older than 80 years old. Instead, they focused on working collaboratively with the local community to develop

sustainable thinning projects in younger stands. Over the last twenty years, these projects have allowed the Siuslaw to consistently meet or exceed timber production goals while improving environmental health.

The Siuslaw model was made possible by President Clinton's historic 1994 Northwest Forest Plan. Under the plan, some areas were set aside as old-growth and wildlife reserves, while others were managed for multiple values. Logging was to be a secondary goal, taking a back seat to protecting clean drinking water, recovering old-growth forests, and restoring abundant populations of endangered salmon and wildlife.

The clear playing field and ground rules the plan created was the starting point for government agencies, responsible logging companies, and conservationists to work together to develop a new model of forestry – one that did not rely on clearcutting forests and sacrificing rivers and wildlife. No place epitomizes that progress better than the Siuslaw National Forest.

On federal public lands the Siuslaw model has great potential and should become the norm all across western Oregon. However, private forest lands also hold a key to solving our county funding mess. The past five years have seen a dramatic jump in log exports from Oregon and Washington.<sup>4</sup> Exports off of private lands in Oregon send jobs to China while doing nothing to pay for county services. Addressing this growing trend could not only alleviate pressure to log federal public lands but help to keep milling jobs in Oregon.

While exports have increased, state revenue from severance taxes on logging has gone down. In the early 1990s, the state collected about \$50 million per year related to harvest in western Oregon. The tax was phased out by the late 1990s and now logging companies pay almost nothing to support the county infrastructure (roads, etc) that they use to extract logs.<sup>5</sup>

Reforms to local and state tax structures combined with federal subsidies that are de-linked from logging levels form a three part, shared responsibility solution that maintains forest values while putting counties on the path to financial stability.

### **The Economy of the Future**

Still, we should be clear-eyed – in 2014, logging is no longer the driver of Oregon's economy. And that's okay. Recent reports show Oregon ranking third in the nation in job growth last year, thanks to a thriving high tech industry, and to our tourism and outdoor recreation economy. Oregon's quality of life – our forests, rivers, and mountains – are a big part of that success, bringing new people and new investment to our state.

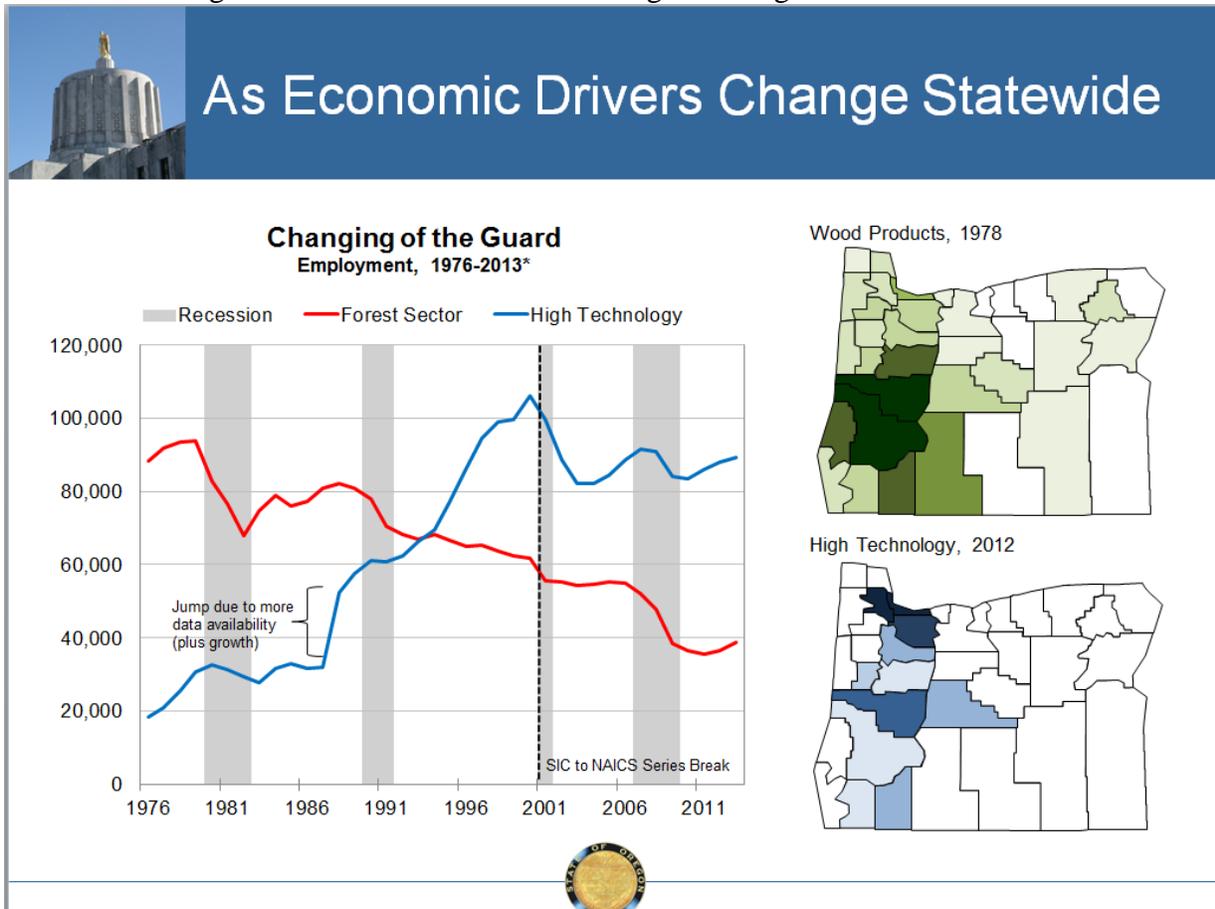
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<sup>4</sup> Templeton, Amelia (Producer). (2013, November 13). "China's Building Boom Revives Northwest Log Export Debate." Portland: OPB News. <http://earthfix.opb.org/land/article/chinas-construction-revives-northwest-log-export-d/>

<sup>5</sup> Niemi, Ernie. "Timber changes reflect inequality." Eugene Register Guard 2 February 2014: Online. <http://www.registerguard.com/rg/opinion/31069622-78/workers-industry-timber-inequality-percent.html.csp>

The Outdoor Industry Association recently reported that Oregon’s annual outdoor recreation economy accounts for \$12.8 billion in annual consumer spending and is responsible for 141,000 direct jobs.<sup>6</sup> Furthermore, a recent analysis by Georgetown University found that in Oregon, employment in recreation and related industries is expected to grow by 31 percent by 2020 – far surpassing the 3 percent expected job growth in logging and related industries.<sup>7</sup>

Oregon State economists have observed a so-called “changing of the guards” (Fig 4) from the old economy dominated by logging to a new economy based more on attracting talented workers from across the globe who desire to live in a setting like Oregon.



**Fig 4 – The “changing of the guard” from the old logging economy to the economy of the future**

**Conclusion**

Chairman Wyden, while the goal of your legislation is laudable, it puts Oregon’s economic and environmental future at risk in an attempt to resurrect the economy of the 1970s. As you wisely pointed out more than a decade ago, funding county budgets by aggressive logging on public lands is a failed model.

<sup>6</sup> [https://www.outdoorindustry.org/images/ore\\_reports/OR-oregon-outdoorrecreationeconomy-oia.pdf](https://www.outdoorindustry.org/images/ore_reports/OR-oregon-outdoorrecreationeconomy-oia.pdf)

<sup>7</sup> <http://cew.georgetown.edu/recovery2020>

We can and should find a balance between active management and preservation – and we are appreciative of your efforts to write into this legislation protection for some of our oldest forests and Wilderness gems.

However, during the last century, the scales have been tipped so far towards harmful logging that the future must create balance by restoring lands we have mismanaged and protecting other natural resource values that will drive Oregon's future.

Will this cautious, sensible approach result in a massive bailout check for county politicians? No.

Will it preserve Oregon's environmental values and pass on a natural legacy to future generations? Yes it will – and that is the balance that we need.

Thank you for the opportunity to testify before you here today.

Sincerely,

A handwritten signature in black ink, consisting of stylized initials 'SS' followed by a flourish.

Sean Stevens

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## Appendix A

American Bird Conservancy \* Audubon Society of Corvallis \* Audubon Society of Portland \*  
Bark \* Benton Forest Coalition \* Cascadia Wildlands \* Center for Biological Diversity \*  
Conservation Northwest \* Coast Range Association \* Dakubetebe Environmental Education  
Programs \* Earthjustice \* Environment America \* Environment Oregon \*  
Forest Web of Cottage Grove \* Gifford Pinchot Task Force  
\* Klamath-Siskiyou Wildlands Center \* Lane County Audubon Society  
\* Oregon Wild \* Sierra Club \* Soda Mountain Wilderness Council \*  
Threatened and Endangered Little Applegate Valley \* Umpqua Valley Audubon Society \*  
Umpqua Watersheds \* Western Environmental Law Center \* Willamette Riverkeeper

January 23, 2014

The Honorable Ron Wyden  
United States Senate  
Washington, DC 20510

Dear Senator Wyden,

On behalf of our tens of thousands of members and supporters in Oregon, and millions of supporters nationally, we write to express our disappointment with the recently introduced “O&C Land Grant Act of 2013.”

The legislation, as introduced, represents a significant departure from the principles laid out in your document titled “Principles for an O&C Solution: A Roadmap for Federal Legislation to Navigate both the House and Senate,” released in 2012. Those principles represented a good starting point for discussion to craft a workable, balanced, and realistic legislative proposal that did not sacrifice conservation values that Oregonians, and all Americans, hold dear.

Unfortunately, S. 1784, the “O&C Land Grant Act of 2013” (O&C Act of 2013) falls far short. Some of our major concerns are listed below.

### **Weakens environmental laws and policies.**

Despite assurances that you intended to maintain all environmental laws in any O&C legislation, provisions of your proposed O&C Act of 2013 would both undermine and override federal environmental laws, including the Endangered Species Act (ESA), Clean Water Act, National Environmental Policy Act (NEPA), and Administrative Procedure Act.

In regards to the ESA, for example, the legislation attempts to override critical and long-standing requirements of the ESA in some sections, and weakens them in others. The ESA provides a safety-net for our most imperiled species, and the ESA’s consultation process gives the federal fish and wildlife agencies the chance to review and balance proposed projects against harmful impacts to species and their habitat. These vital protections must not be undermined as proposed in the O&C Act of 2013.

In regards to NEPA, the bill would severely undermine the law by eliminating environmental analysis and public review of individual timber sales, and mandating a single large-scale analysis covering 10 years of logging spread over a million acres of western Oregon. Currently, individual timber sales go through rigorous environmental review and public vetting to ensure they are consistent with applicable law and do not irreparably harm the environment. However, S. 1784's mandate to analyze 10 years of logging in a single Environmental Impact Statement (EIS) disregards the critical need for site-specific reviews of a project's impacts. By eliminating project-level review under NEPA, the public will be largely unable to ensure that BLM makes informed decisions and carefully considers the best available science, public input, local conditions, and changed circumstances.

While members of the public may still challenge the large-scale EISs, severe timing and content restrictions are placed on those seeking to hold federal agencies accountable to federal laws. We are disappointed to see you endorse significant and precedent-setting restrictions on the ability of citizens to participate in a federal process, particularly given your commitment to other government transparency and accountability issues.

### **Dismantles the Northwest Forest Plan.**

The system of conservation reserves set up under the Northwest Forest Plan (NWFP) to both protect and restore fish and wildlife habitat will be effectively dismantled under the O&C Act of 2013. Streamside buffers and the strong provisions of the Aquatic Conservation Strategy are severely reduced. The "Survey & Manage" program—deemed a "foundational" element of the NWFP by the courts when the Bush administration tried to remove it—is eliminated in Forestry Emphasis Areas. And, by changing the reserve system, the bill eliminates the integrated landscape approach to conserving clean water supplies and fish and wildlife habitat across public lands managed by both the U.S. Forest Service and Bureau of Land Management (BLM).

### **Does not solve county budget problems.**

One of your original stated aims for legislation was to provide stable funding for the 18 O&C counties facing budget shortfalls due in part to the expiration of Secure Rural Schools funding. In 2012, we were heartened that your principles for legislation pointed out that it is not reasonable for local and state elected officials to rely solely on federal funding to make up for county budget shortfalls. A lasting solution to this problem will require local, state, and federal components.

Your proposed legislation aims to double logging to generate revenue for counties, but at the same time recognizes that this revenue alone will fall far short what counties say they need to balance their budgets. And because the legislation shifts the BLM logging program from relatively less controversial thinning of young stands towards more controversial clearcutting of older forests, any logging revenue is far from certain.

We thank you for your reauthorization of the Secure Rural Schools program for FY2013 and urge you to reauthorize this vital program while we work with you on finding alternate

proposals that decouple payments from resource extraction and do not jeopardize our conservation values.

**Mandates aggressive logging and harms water quality.**

Your goal of “sustainability” of timber harvest in last year’s principles has translated into the designation of zones where logging is the only prioritized resource value and other public values, such as clean water, are ignored. Management of the Forestry Areas in the O&C Land Act is overly prescriptive and blatantly disregards the need for using the best available science information and site conditions to dictate appropriate management.

Last year’s principles mentioned using “ecological forestry principles” as one way of meeting timber production goals. In contrast, your legislation mandates its use. Moving this experimental concept forward with such broadscale application on nearly one million acres of public lands is dangerous. Experimental logging methods such as those from Johnson and Franklin have only been applied on a limited number of pilot projects in western Oregon. They have not been tested over long periods or large scale, and this raises questions of consistency with water quality, wildlife, carbon storage, or social acceptance.

Furthermore, your legislation undermines two critical requirements of the method proposed by Johnson and Franklin, making its application all the more concerning. According to their key publication on the subject in the *National Journal of Forestry* in December 2012, their new approach is heavily dependent upon monitoring and adaptive management. But your legislation explicitly eliminates monitoring and survey requirements in forest management areas and prevents adaptive management by limiting review to one generalized look every decade for the two forest types and by mandating the use of certain ecological forestry logging principles without providing any opportunity to deviate from this approach.

The O&C Act of 2013 also drastically shrinks riparian buffers – putting at risk threatened salmon populations, clean water, and sensitive soils – and reducing the forests’ resilience to withstand climate change impacts such as increased heavy rain events. Buffers for streams and other bodies of water are significantly reduced in many areas, and monitoring of impacts is inadequate or nonexistent.

**Falls short on old growth protection.**

The bill also falls short on one of your legislative principles of which we were most supportive: safeguarding old growth forests. While we support setting aside the “Legacy Old Growth Protection Network” within moist-forest Forestry Emphasis Areas and the general prohibition of cutting and removing old growth trees in both moist and dry forest types, other provisions in the bill leave hundreds of thousands of acres of mature forests and old trees available or specifically designated for logging. This is unacceptable. Under the Northwest Forest Plan, forest stands over 80 years old are recognized as being essential habitat for old-growth dependent species. This habitat is also recognized as important to the growth of future old growth forests.

In addition, exceptions and loopholes that allow cutting and removal of old-growth are found throughout the bill.

### **Disposes of and fragments public lands.**

By abandoning the Northwest Forest Plan reserves and promoting aggressive logging techniques, this legislation will result in extreme fragmentation of the O&C lands – making an even less sensible pattern out of the O&C checkerboard.

Furthermore, provisions in your O&C Act of 2013 concerning land sales and exchanges are of great concern to us. Historic consolidation and privatization proposals involving the transfer of public lands to private logging interests have resulted in losses to the environment and American taxpayers. We point to the failed Lower Umpqua Land Exchange Project as an example that would have resulted in a significant loss of older forests on public lands, in exchange for logged-over industry lands.

Rather than giving careful consideration to consolidation or land sales/exchanges, your bill allows the fast-tracking of privatization of public lands by reducing public oversight. These provisions do not ensure that such land trades are in the public interest, and shortchange the American public and the long-term conservation of public resources.

### **Offsets major environmental harms with small conservation gains.**

Our organizations were heartened by your indications leading up to the introduction of this bill that you were committed to proportional conservation designations, including Wilderness. As you know, with just 4% of its land safeguarded as Wilderness, Oregon lags far behind California (15%), Washington (11%), and Idaho (8%).

Unfortunately, the conservation measures proposed to balance increased logging and reduced stream buffers fall far short of Wilderness protection standards. While the O&C Act of 2013 would designate areas nearing 900,000 acres for conservation, recreation, backcountry, drinking water, and Wild & Scenic Rivers, much of the land in these new conservation designations is already currently protected under other laws and regulations (including the Northwest Forest Plan), and could still be subject to logging under the guise of “fire threat reduction” and other logging loopholes found in your bill.

### **Sets a dangerous precedent for public lands across the nation.**

We are deeply concerned that the advancement of this bill will encourage far-reaching federal forestland legislation that further endangers public resources and values. The allowance in the O&C Act of 2013 for private citizens and local governments to remove vegetation from public land with minimal oversight is but one small example of a precedent that could open the door to losing the environmental laws and policies that have helped protect our public lands for 40 years.

We sincerely hope you will consider making changes to your proposed legislation based on our concerns, and that we can continue to work with your office on forest management and county revenue programs that do not impair the clean water, wildlife, and public lands that Americans hold dear.

## Appendix B

**American Bird Conservancy \* American Rivers \* Defenders of Wildlife  
Earthjustice \* Environment America \* Friends of the Earth  
League of Conservation Voters \* National Audubon Society  
Natural Resources Defense Council \* Sierra Club**

January 24, 2014

Dear Senator:

On behalf of our millions of members and activists we write to urge you to oppose the 2013 Oregon and California Land Grant Act (S. 1784) (“O&C Act”) as introduced and any other national forest legislation containing similar damaging provisions that may be advanced. The O&C Act undermines federal environmental law and sets out detailed management prescriptions for newly designated “forestry emphasis areas” across 2.1 million acres of western Oregon forest land.

The O&C Act strikes at the heart of the Endangered Species Act (ESA) on its 40<sup>th</sup> anniversary. For example, it eliminates the requirement that the managing federal agency (the Bureau of Land Management) consult with expert federal biological agencies on whether individual logging projects on these public forestlands harm endangered species and their habitat. Federal agency consultation is a fundamental component of the ESA.

The O&C Act also reduces the application of the National Environmental Policy Act (NEPA) to a shell of its current self. It goes much further than “streamlining” NEPA. The bill would severely limit analysis and public disclosure of the direct environmental impacts of individual projects, as well as any cumulative effects analysis of other actions affecting these forestlands and resources. Instead, it requires only a once-a-decade cursory review with a largely predetermined outcome. In addition, it severely limits judicial review, closing the doors of the courthouse to citizens who are unable to analyze the entire NEPA decision and file a complaint during the 30 days immediately following release of NEPA documents.

In addition, the legislation has Clean Water Act (CWA) implications. For example, the bill only allows water quality impacts under the CWA to be measured a full two years after a harvest which could mask all near term negative impacts of a timber project. The bill could also be interpreted to establish a potentially degraded water quality baseline that could affect all future determinations of impact. We support post-treatment monitoring to measure the effects on water quality, but not in the context of defining the water quality under the CWA.”

Accordingly, we oppose S. 1784, along with any national forest legislation that may be modeled after the O&C Act or other proposals that curtail application of bedrock environmental statutes. Our federal environmental laws are a safety net for our forests, protecting a broad array of benefits including clean drinking water for millions of Americans, wildlife and their habitat, hunting, fishing, and hiking opportunities cherished by generations of Americans, and a multi-billion dollar outdoor industry important to rural communities and regional economies.

We are also concerned by any legislative effort to dictate timber harvest prescriptions that cannot be modified to reflect the best available science without a subsequent act of Congress. Forest managers must be able to use the best available information in making decisions about where, when, and how to proceed with logging projects. They need to be able to incorporate new information about the health of wildlife populations, potential air or water pollution, or changes in the forest from climate change. Ensuring healthy forests and healthy wildlife in a time of climate change will require greater reliance on evolving science, not less.

Just this past September, the Administration echoed these sentiments when it issued a strong veto threat against national forest legislation in the House H.R. 1526. As the Senate considers the O&C Act or national forest legislation it is worth noting that the administration made clear that it strongly opposed the House bill because it “includes numerous harmful provisions that impair Federal management of federally owned lands and undermines many important existing public land and environmental laws, rules and processes.” The September 18, 2013, Statement of Administration Policy made clear that such legislation could “significantly harm sound long-term management of these Federal lands for continued productivity and economic benefit as well as for the long-term health of the wildlife and ecological values sustained by these holdings.” The statement also provided that the “Administration does not support specifying timber harvest levels in statute, which does not take into account public input, environmental analyses, multiple use management or ecosystem changes.”

Our nation’s public forestlands, including those covered by the O&C Act, are national treasures that provide a wealth of benefits to all Americans. The O&C Act flouts environmental laws that have provided longstanding and vital safeguards to help ensure the health and resilience of these great assets. Without these protections and adequate reliance on science in management, our national forests would be threatened with declining wildlife populations, increased erosion, polluted rivers and streams, and substantial ecological and economic decline. We cannot let this happen.

We urge you to oppose S. 1784 and any other forest legislation that undermines sound forest management or undercuts our bedrock environmental laws.

Sincerely,  
George H. Fenwick  
President  
American Bird Conservancy

Robert Irvin  
President and CEO  
American Rivers

Jamie Rappaport Clark  
President & CEO  
Defenders of Wildlife

Trip Van Noppen  
President  
Earthjustice

Margie Alt  
Executive Director  
Environment America

Erich Pica  
President  
Friends of the Earth

Gene Karpinski  
President  
League of Conservation Voters

David Yarnold  
President & CEO  
National Audubon Society

Frances Beinecke  
President  
Natural Resources Defense Council

Michael Brune  
Executive Director  
Sierra Club