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Testimony for the Hearing Record U.S. House of Representatives Committee on Oversight and Reform Subcommittee on Environment

Oversight Hearing
"Fighting Fire with Fire: Evaluating the Role of Forest Management in
Reducing Catastrophic Wildfires"

March 16, 2022

Dear Chairman Khanna, Ranking Member Norman and Members of the Subcommittee:

Thank you for this opportunity to share our observations on the role of forest management in reducing catastrophic wildfires. The Family Farm Alliance (Alliance) is a grassroots organization of family farmers, ranchers, irrigation districts, and allied industries in 16 Western states. We are committed to the fundamental proposition that Western irrigated agriculture must be preserved and protected for a host of economic, sociological, environmental and national security reasons – many of which are often overlooked in the context of other national policy decisions. The American food consumer nationwide has access to quality fruits, vegetables, nuts, grains and beef throughout the year largely because of Western irrigated agriculture and the projects that provide water to these farmers and ranchers.

Reaction to Witness Testimony at the March 16, 2022, Hearing

Robust media coverage on the wildfires raging in Northern California last year featured misleading commentary implicating climate change as the sole driving factor behind the fires that have forced tens of thousands of Westerners to flee their homes. We were very disappointed to see that the Committee's March 16, 2022, hearing featured several witnesses that perpetuated this troubling narrative that ignores the bodies of science indicating unnatural forest conditions are a leading cause of the increased wildfire activity. Once again, scant attention was paid to rural Westerners who look on as a century of fire suppression and decades of poor forest management – or rather, the lack of management by federal agencies, driven in part by litigious environmental groups –has degraded the condition of our Western forests and turned them into unhealthy tinderboxes.

We urge the Committee to set aside the rhetoric of extreme groups and listen to the "objective center" in our rural communities, mainstream conservation groups, and Western universities, including some that were on your panel, that understand through study and experience the importance of active forest management. For example, Dr. Wally Covington, a renowned professor of forest ecology, testified in the past at multiple Congressional hearings about how "[a]

restoration-based approach including thinning and prescribed burning is imperative to safely reduce fuels and restore forest health—it's too late for fire alone to restore most of the landscape."

It is essential that Congress and the federal agencies pursue meaningful, long-term forest health solutions that can restore their communities and the forested highlands that form the headwaters of many important Western river systems. Continuing to focus exclusively on climate change's role in diminished forest health or waiting to act until the global community has taken action to address climate change will result in disaster for our Western forests and headwaters. Further, perpetuating the myth that doing nothing will solve our forest health crisis is not only dangerous, but when delivered to elected officials and spread by media coverage, it contributes to a public misunderstanding of the true nature of the problem, further delaying development and implementation of real solutions.

Rep. Carolyn Maloney's (D-NY) *Northern Rockies Ecosystem Protection Act* (H.R. 1755) would designate about 23 million acres in Idaho, Montana, Oregon, Washington and Wyoming as wilderness lands, marking it as the largest public lands protection bill in the Lower 48 in history (*E&E Daily*, March 12, 2021). H.R. 1755 would also designate 1,800 miles of rivers and streams as wild and scenic rivers. The draconian "non-management" measures envisioned by H.R. 1755 would be instituted in the heart of our membership area and would have devastating impacts to some of the most critical headwater areas of the West. We urge the Committee to resist this flawed land management strategy and focus on active management of our Western forests.

To provide further background on how Western forests are impacting those who live and rely on them for water resources, along with approaches to address the issues, I have included below excerpts from earlier written testimony of Alliance President Patrick O'Toole, who testified on forest health issues before the House Natural Resources Committee last October.

The State of Western Forests

As the "endless summer" of 2021 came to an end, wildland firefighters wrapped up containment work on 63 large fires and complexes that burned more than 3.1 million acres in the Western United States, according to the National Interagency Fire Center (NIFC). From August through October, the most extreme conditions caused thousands of evacuations, homes and structures lost, and tragic fatalities of 11 people in Oregon and 34 people in California. Over 46,000 fires in the West charred more than 5.8 million acres in 2021, slightly lower than the 10-year average.

Mr. O'Toole has served on the Family Farm Alliance's Board of Directors since 1998 and was named as the organization's President in 2005. He is also a former member of Wyoming's House of Representatives. He presently serves on the board of directors of Solutions from the Land and work closely with both the Intermountain Waterfowl Joint Venture and Partners for Conservation. His family and Ladder Ranch were the recipients of the distinguished 2014 Wyoming Leopold Environmental Stewardship Award. Ladder Ranch straddles the Wyoming-Colorado border at the headwaters of the Colorado River, which has long afforded him the opportunity to view some

unique water issues first-hand. Mr. O'Toole has testified before Congressional committees several times, and Alliance representatives have testified before Congress nearly 90 times since 2005.

In his October 2021 testimony, Mr. O'Toole observed that he's seen the ups and downs and the volatility of weather and the changing climate. "Now it's clear that the cycle of life has been disturbed," he told the committee. His written testimony provided background and specific recommendations regarding the importance of restoring Western forestlands.

Increasingly fierce Western wildfire disasters are becoming an annual occurrence and underscore the importance of improving on-the-ground vegetation management actions that can lead to improved forest health. Improving the condition of our nation's forested lands is of primary importance to water providers. National Forest lands are overwhelmingly the largest, single source of water in the U.S. and, in most regions of the West, contributing nearly all the water that supplies our farms and cities. In addition, our already fragile water infrastructure can be severely damaged or rendered useless by fire and post-fire flooding and debris flows. Burned areas hold no water at all, leading to floods, erosion, and mudslides. It also increases turbidity in the streams flowing through our watersheds. The unhealthy state of our national forests, which were initially reserved specifically to protect water resources, has led to catastrophic wildfires that threaten the reliability, volume, and quality of water for tens of millions of Americans, along with the wildlife, recreational, and multi-purpose values of these lands.

Our great Western forests are damaged and diseased. This came about through a perfect storm of neglect, misguided litigation, inadequate use of science, strained management budgets, and, of course, climate change. We can have no doubt that the West is warming, and some places are warming more rapidly than past modeling has predicted. Insect outbreaks have weakened and killed trees. Violent winds have brought these trees down providing an abundant source of fuel. Drought and forests cluttered with dead fall timber serve as a tinderbox for increasingly intense and devastating fires. Our National Forests in the Rocky Mountain Region are suffering from climate-driven lack of function. The inability to develop a logical management strategy has led to these consequences: catastrophic fires, lack of wildlife habitat and critical interruption of our water supply.

Challenges

Today's wildfires are often larger and more catastrophic than in the past. Some of the blame can be attributed to climatic conditions, like reduced snowpack in alpine forests, prolonged droughts and longer fire seasons. Western population growth has also played a role since we now have more homes within or adjacent to forests and grasslands. However, decades of fire suppression and inability to manage our forests through controlled burns, thinning, and pest/insect control probably play an even bigger role. Where California now has about 100 trees per acre, it once had about 40 trees / acre.

Much of last year's media coverage on the fires raging in Northern California featured commentary from politicians, environmental activists and academics who point to climate change as the driving

factor behind the fires that have forced tens of thousands of Westerners to flee their homes. Climate change concerns may certainly be shared by some rural Westerners who live in once-thriving timber dependent communities. However, there is also a growing frustration that forest management – or rather, the perceived lack of management by federal agencies, driven in part by environmental litigation – fails to get the attention it deserves in many media accounts of the current Western wildfire infernos.

Some of us who live in rural Western communities who have watched the condition of federal forests deteriorate in recent decades have a different perspective. We have witnessed how federal forest management actions have been hampered in recent decades, in part due to environmental lawsuits initiated by certain activist groups.

National Environmental Policy Act (NEPA) Processes Associated with Forest Health

The U.S. Forest Service (Forest Service) is not fully meeting agency expectations, nor the expectations of the public, partners, and stakeholders, to improve the health and resilience of forests and grasslands, create jobs, and provide economic and recreational benefits. The Forest Service spends considerable financial and personnel resources on NEPA analyses and documentation, as well as environmental litigation.

In recent years – catalyzed by the ominous increase in Western wildfire activity – we have worked with other organizations, seeking ways to discourage litigation against the Forest Service relating to land management projects. We have supported efforts to develop a categorical exclusion (CE) under NEPA for covered vegetative management activities carried out to establish or improve habitat for economically and ecologically important Western species like elk, mule deer, and black bear. Thus, we have advocated for expediting and prioritizing forest management activities that achieve ecosystem restoration objectives.

Reforming the Forest Service's NEPA procedures is needed at this time for a variety of reasons. An increasing percentage of the Forest Service's resources have been spent each year to provide for wildfire suppression, resulting in fewer resources available for other management activities, such as restoration. In 1995, wildland fire management funding made up 16 percent of the Forest Service's annual spending, compared to 57 percent in 2018. Along with a shift in funding, there has also been a corresponding shift in staff from non-fire to fire programs, with a 39 percent reduction in all non-fire personnel since 1995.

Additionally, the Forest Service in 2019 had a backlog of more than 5,000 applications for new special use permits and renewals of existing special use permits that are awaiting environmental analysis and decision. On average, the Forest Service annually receives 3,000 applications for new special use permits. Over 80 million acres of National Forest System land need restoration to reduce the risk of wildfire, insect epidemics, and forest diseases¹.

¹ Federal Register Doc. <u>2019-12195</u> Filed 6-12-19

Forest Management Impacts on Upper Watershed Water Supplies

It is hard to overstate the importance of snowmelt as a source of fresh water in parts of the Rocky Mountain West, and great attention is paid to ecosystem water cycles in this region. Some of the snow that falls in the mountains goes directly from crystalline snow to water vapor, bypassing the liquid water phase. This phenomenon – sublimation – accounts for the loss of a large portion of the snowfall during the winter months in the Rocky Mountains. Snow intercepted by tree branches sublimates the fastest, often disappearing within a few days of a snowfall. Recently published work by the Rocky Mountain Research Station² (RMRS) teases apart how the loss of spruce canopy affects the sublimation rates for snow both in the canopy and on the ground in these ecosystems. These findings have some important implications to snow interception and retention.

Across the West, federal laws, regulations and environmental litigators have greatly restricted our ability to thin forests and take other actions to aggressively combat invasive insects like the pine beetle. As a result, large swaths of national forest lands essentially remain "un-managed". In some places, all you can see for miles is a sea of dead trees, victims of the pine and spruce beetles.

Overgrown Western forests also means forests are using more water than they did historically. Because the moisture content of the trees and brush is so low, it makes them more vulnerable to fire and parasites, such as the bark beetle, which has ravaged millions of acres throughout the West. The Western wildfire disasters have underscored the importance of improving on-the-ground management that can lead to improved forest health. Thinning out trees can reduce water stress in forests and ease water shortages during droughts. By reducing the water used by plants, more rainfall flows into rivers and accumulates in groundwater. If we could calculate potential water yield impacts with even more confidence, we could determine how much water could be freed up by thinning forests and controlling pests and invasive insects like the pine and spruce beetle. Fortunately, we are seeing more recent, positive developments towards this end.

Mr. O'Toole's written testimony included examples that provide additional models for ways of quantifying the amount of water removed from Wyoming's water supply by dying forests and invasive species like the bark beetle. It also summarized research, published in 2018 in the journal *Ecohydrology*, showing that forest thinning has increased in recent decades to stave off disastrous wildfires fueled by dense forests. This study shows that restoring forests through mechanical thinning or prescribed burning can also save California billions of gallons of water each year. These and other examples highlight the need for individual management plans for forest and woodland, especially considering the projected drier conditions in the Western U.S.

Solutions

Regardless of the causes behind the sad state of our forests, it is our job now to look for solutions. These solutions will be applied through specific and thoughtful management. The problem

² Beetle Outbreaks in Subalpine Forests and What They Mean for Snowmelt, May 2021. Rocky Mountain Research Station, U.S. Forest Service.

involves a natural landscape, so some of the solutions will be time-tested natural processes. Others will be driven by landowners and forest managers through proactive, aggressive actions. The neglect and deterioration of our forests cannot continue. We must act now to heal them, or we will ultimately lose them all. We offer below the recipe for success.

1. Actively Manage and Restore our Federal Forests

Drought brings less snowfall in many areas. The snow that falls melts off up to 45 days earlier and runs off downstream on frozen ground. Therefore, the snowpack no longer functions as a reservoir delaying the release of water in a timely manner. However, the forest floor can be restored through thoughtful management. A responsible level of continuous fuels reduction includes a combination of robust mechanical thinning and prescribed fire. This can be employed to significantly reduce evapotranspiration, tree stress, disease, and pest infestation, preserve health forest conditions, and protect species and habitats.

This is not only good stewardship – it is good economics.

Failure to employ this approach will continue the downward, accelerating spiral of fuel accumulation, drought, disease, and invasive insects. This will lead, inevitably, to additional high-intensity and costly fire events in the future.

We believe active forest management can increase water yield, improve water quality, provide for jobs, and reduce the cost of firefighting, while increasing forest resiliency. This can be done, in part, by increasing the productivity of national forests and grasslands; employing grazing as an effective, affordable forest and grassland management tool; increasing access to national forest system lands; expediting environmental reviews to support active management; and designing West-wide studies to quantify water yield.

a. Use Controlled Fire and Grazing as Management Tools to Restore Forests

Wildlife habitat has suffered profoundly from the "pick-up-sticks" of dead trees on the forest floor, from disruption in water function, and most dramatically, from widespread hot fires. These large catastrophic fires not only eliminate habitat, but kill millions of animals, birds and insects. Controlled fire is one of the tools that can be used to improve forest grounds. However, it is not the only tool. A 2021 article in the Sacramento Bee ("Self-serving garbage.' Wildfire experts escalate fight over saving California forests") does a nice job explaining this. We are seeing a major shift happening; the people who love the forest are coming together.

The Organic Administration Act of 1897 (Organic Act) addresses the role of the forests as part of a larger community—a larger and complex landscape. They do not exist in a vacuum. Forest grounds were intended to produce timber for Americans. We have seen the terrible effects of the near halting of the timber industry. Foresters know how to log in a responsible and sustainable manner. When done properly, it is one of the most effective tools to restore forest health. The

alternatives are unregulated logging in other parts of the world and sky-high lumber prices. Sustainable timber management is a practice that must be encouraged and facilitated.

Likewise, the forests are part of our food production system. The grasslands existing in forest lands sustain not only grazing wildlife like deer, elk, big horn sheep, and antelope, but also forage for domestic livestock like cattle and sheep. Proper grazing improves soil through hoof actions and fertilization from manure. Grazing returns carbon to the soils and is a tool, indeed almost the only tool, for improving and restoring soils. Again, it must be properly managed, but many grazers are experts in just those practices. Narrow policy proposals that disconnect the role of responsible grazing, or even seek to eliminate this practice, from grassland function will result in cascading impacts to habitat connectivity, soil health, wildlife habitat, and carbon sequestration. These actions will also create added strain on rural communities.

b. Secure Long-Term Conditions of Water Flows

"Securing long-term conditions of water flows" is named as a top priority in the Organic Act, yet it is perhaps the most severely impacted by the deteriorated forests. Healthy forests act as a sponge. Winter snowfall settles among the trees, and snowmelt and rainfall alike traditionally soak into the humus and healthy soils on the forest floor. Climate change and human mismanagement have disrupted this crucial cycle.

In the Intermountain West, flood-irrigated wet meadows provided by ranchers as part of their agricultural operations comprise the bulk of the wetland habitat in snowpack-driven systems. These hay meadows and irrigated pastures provide important habitat for sandhill cranes, white-faced ibis, northern pintails, and other priority waterbirds, as well as an array of ecosystem benefits. Flood irrigation naturally maintains underlying groundwater that is less vulnerable to a warming climate and key to supporting seasonally flooded wetlands on the surface. Filling these "sponges" through flood irrigation is critical to slowing the movement of water through the system and thus increasing resiliency in the face of drought. Likewise, upland watershed and forest management activities can help increase water quality and quantity, as well as mitigating the risk of catastrophic wildfire.

Restoration is very doable. It will require planning, resources, commitment and will. All of these things exist.

c. Improve Watershed Yield Through Better Forest Management

As previously discussed, there is a significant gain in water supply to streams because the consumptive use of water is reduced when the number of trees growing as forests are managed to avoid the conditions that result in catastrophic insect infestation or wildfires. Generating new water through landscape management practices should become a new priority in the Colorado River watershed and other parts of the American West.

d. Improve Invasive Species Management

Addressing the harmful impacts of invasive species should also be a priority. Water users confront challenges associated with invasive species across the West, where salt cedar (Tamarix), quagga mussels, and cheatgrass – just to name a few- all proliferate. For example, Tamarix species along riparian corridors or around desert springs can seriously reduce underground water tables and surface water availability, drying up wetlands, and reducing flows. Tamarix species can increase flooding in riparian areas by narrowing channel width. In addition, the plants are flammable and can introduce fire into wetland and riparian communities that are not adapted to periodic burning. While millions of dollars have already been spent on efforts to reduce the impacts of these and other non-native pests, it hasn't been enough. And more invasive species will continue to arrive.

2. Engage the U.S. Forest Service

Since the Forest Service is responsible for much of the forestland in the West, it's engagement will be critical. Bold action is required. Decision-makers must be empowered to act, rather than get bogged down in bureaucratic morass. Unfortunately, current bureaucratic practices are not equipped to fulfill the need. Upper-level policy makers and managers will need to create a plan and set an agenda that will lead to success. We must "empower the competent" to achieve scale. The areas in need of restoration encompass millions of acres; 100-acre solutions will not suffice. Legislation may be required.

Experts from the Forest Service and various affected interests must be part of the planning process. These interests would necessarily include area and state foresters, private sector forest managers, watershed experts, wildlife scientists, grazers, and local community representatives. This group should be broad enough to cover areas of concern, but nimble enough to plan quickly and set the wheels in motion. The multi-level strategy includes solutions to sustainably manage our water, which largely originates on forest landscapes and watersheds. It must consider the habitat provided, or formerly provided, by the affected forest lands, and the needs of those species whose lives depend upon those lands. Likewise, traditional forest uses that have sustained local communities must be considered both as a tool to bring about needed change, and as a part of the holistic system which includes trees, wildlife, water and people. These tools include targeted logging, particularly of dead standing trees, and grazing to restore soils and reduce fire danger.

Healthy forests provide multiple recreation, agricultural, ecological and economic benefits, and indeed the legislation that created the Forest Service, mandates this. A successful plan must direct the effective transition from the forests' present non-functioning state to a functioning state. This will take time, but a commitment to action is required to ensure long-term success.

3. Improve federal funding programs and delivery

To increase stakeholder confidence and ensure effective funding delivery, federal agencies should invite outside guidance and clearly state to the maximum extent practical, the intended impact of funds, method of distribution, and other discretionary factors. We understand that these agencies

have limited influence over specific legislative prescriptions and that further direction may be provided as the legislative process unfolds. We also believe that a certain amount of discretion based on agency expertise is necessary to ensure proper allocation of funds. However, we submit that our collective on-the-ground experience can serve as a guide to ensure that such funds broadly dedicated to conservation and restoration are best utilized to the benefit of ecosystem function, local community vitality, and working lands health.

4. Remove regulatory barriers to conservation

From our decades of collective expertise, we are aware of numerous barriers that prevent interested landowners and other entities from participating in programs administered by federal agencies, and ultimately, prevent funding from reaching the ground in a meaningful way. Statutory limitations such as program payment caps can create misalignment between program eligibility and conservation objectives. Regulatory hurdles, for example presented through interpretation of NEPA, can prolong agency action.

a. NEPA Concerns

The current implementation of the NEPA is reactive, cumbersome, time consuming and does not enable the Forest Service to implement forest management strategies in a timely manner. We have advocated for some key general recommendations to improve the Forest Service application of environmental laws: 1) Allow landscape-level land management plans to guide individual actions on the ground without duplicative administrative process under federal environmental laws; 2) Direct the creation and use of CEs already allowed under NEPA in preventing catastrophic wildfires and restoring forest habitat and ecosystems more effectively and on a timely basis; and 3) Use the NEPA process to consider how a robust vegetative management program could improve forest health, improve water quality and lead to increased available water supply by reducing demand from overly dense tree and vegetative cover.

We do not seek changes that waive or ignore existing federal environmental laws. Instead, we call for improvements to make those laws work for the benefit of the nation as intended. By eliminating duplicative or unnecessary processes and using streamlining tools already allowed under the law-and promoting action instead of litigation - the status quo could be changed. The proposed changes could help government agencies to use their limited resources to expeditiously implement land management actions designed to prevent wildfires and improve habitat for priority, endangered and/or threatened species. Surely that would be a dramatic improvement over spending precious time and resources on bureaucratic process and litigation. These types of critically needed procedural changes to NEPA implementation will improve our Western landscapes and protect our valuable water supplies from the devastating effects of wildfires. They will also allow agencies to improve habitat, restore ecosystems for the benefit of federally important species and allow continued agricultural use of our public lands.

The Forest Service three years ago proposed revisions to its NEPA procedures with the goal of increasing efficiency of environmental analysis while meeting NEPA's requirements. We

supported these proposed changes to NEPA, many of which were based on adding or expanding existing CEs. At the time, it was estimated that on average, an environmental assessment took 687 days to complete. Average time to complete a CE was just 206 days. By using the new CEs in the proposed rule, the Forest Service could potentially complete NEPA analyses between 30 and 480 days earlier on applicable projects.

Increasing the efficiency of environmental analysis would enable the Forest Service to do more to increase the health and productivity of our national forests and grasslands and be more responsive to requests for goods and services. The Forest Service's goal should be to complete project decision making in a timelier manner, improve or eliminate inefficient processes and steps, and, where appropriate, increase the scale of analysis and the number of activities in a single analysis and decision. Improving the efficiency of environmental analysis and decision making will ensure that lands and watersheds are sustainable, healthy, and productive; mitigate wildfire risk; and contribute to the economic health of rural communities through use and access opportunities.

b. Candidate Conservation Agreements with Assurances and Safe Harbor Agreement

Federal agency staff capacity and siloed communication structures also present very tangible hindrances to effective program implementation on the ground and further complicate already complex processes. For example, Candidate Conservation Agreements with Assurances and Safe Harbor Agreements can serve as useful tools to ensure that landowners' efforts to conserve and recover at-risk and listed species do not put them in jeopardy of further regulatory restrictions because of their conservation actions. However, these agreements are time consuming and sometimes costly to landowners to develop. Beyond agreement development though, the cost of ongoing implementation, monitoring and reporting is largely unaccounted for and often falls on landowners, the state or other agreement holders. There are certain funds that can provide cost-share assistance in developing these agreements, but ongoing support for implementation, monitoring, management and stewardship remains a gap and presents a hurdle to the long-term success of conservation objectives.

5. Action in Congress

We are pleased that there appears to be growing recognition in Congress of the importance of active forest management. There are several bills that have been introduced in the past year, intended to facilitate responsible forest management.

One of those is the *Outdoor Restoration Partnership Act*, sponsored by Senator Michael Bennet (D-CO), and supported by the Family Farm Alliance. Another bipartisan bill would provide carbon credits to companies and other non-federal partners in exchange for thinning trees on fire-prone forests. *America's Revegetation and Carbon Sequestration Act*, co-sponsored by Senators John Barrasso (R-WY) and Joe Manchin (D-WV) would encourage more intensive forest management — and reforestation — through a variety of initiatives. The carbon credit idea would allow non-federal entities to be awarded carbon credits through voluntary markets in exchange for money they provide the Forest Service for projects that increase carbon sequestration. One more

important piece of legislation is the *Resilient Federal Forests Act*, introduced by Rep. Bruce Westerman (R-AR). This bill – supported by 85 organizations, including the Family Farm Alliance- would help address the environmental and economic threats of catastrophic wildfires.

Each of these bills is important. We hope that efforts like these will build momentum towards larger forest management reforms in subsequent bipartisan legislation.

Conclusion

The revival of Western watershed forests is crucial to combating the effects of climate change. By bringing together changemakers and working collaboratively, we can change the paradigm of forest management. Success will mean healthier forests, healthier wildlife populations, more prosperous and dynamic local communities, more recreation opportunities, greater economic benefits and much-needed security in our water supplies.

Balance in production and conservation is the answer to forest health.

The epic drought we have been experiencing across the western United States, especially in the last three years, and other weather abnormalities are different than in the past. We find that solutions are local and come from the land. Farmers, ranchers, foresters and fishers across the West work in the extremes of elements and volatile weather, and we share a love of the land. We see the pressure on the land we manage and our water supplies. Sadly, strategies appear to be evolving to take water from Western farmers, from food production, and redirect it to other uses.

The key to success has been local leadership and uncommon collaboration with diverse partners to address our unique challenges and capitalize on opportunities. Farmers must be at the center of all discussions and decision-making in Western watersheds. Significant input will be needed from a wide range of farmer and other producer organizations outside of typical policymaking structures. We all must become more adaptable and open to change.

We must learn from those who have experience.

Thank you for this opportunity to submit this testimony for the hearing record.