

June 12, 2023

Dear Chair Westerman and Ranking Member Grijalva:

On behalf of our millions of members and supporters across the country, we urge you to oppose H.R. 188 that will be voted on at the House Natural Resources Committee's Markup on June 13th. This piece of legislation is poorly written, and includes anti-science approaches to forests and wildfire.

Oppose- H.R. 188 (Rep. McClintock, CA), "Proven Forest Management Act"

The legislation requires USDA and USDOJ to coordinate with "impacted parties" to carry out forest management activities that "attain multiple ecosystem benefits" (except when the costs of doing so "are excessive"). HR 188 requires the Secretaries to "establish any post-program ground condition criteria for a ground disturbance caused by a forest management activity" required by the applicable forest plan, and to monitor activities to assess whether they are meeting said post-program ground condition criteria.

Unfortunately, it also creates a 10,000-acre Categorical Exclusion (CE) for forest management activities that reduce "forest fuels."

We oppose this legislation because it is inconsistent with accepted forestry and ecological concepts, resulting in confusion about the intent of the bill. The CE would limit environmental review on a very large scale without important ecological sideboards. A CE this large, by its very nature, can have a significant effect on the human environment – especially in the absence of any interdisciplinary NEPA analysis. It is therefore inappropriate to apply a CE to projects of this magnitude.

Thank you for your consideration.

Sincerely,

Alta Peak Chapter, California Native Plant Society  
Cascade Forest Conservancy  
Center for Biological Diversity  
Defenders of Wildlife  
Earthjustice  
Endangered Species Coalition  
Environmental Protection Information Center - EPIC  
Forest Service Employees for Environmental Ethics  
Friends of the Kalmiopsis  
Idaho Conservation League  
Klamath Forest Alliance  
Klamath Siskiyou Wildlands Center  
League of Conservation Voters  
Los Padres ForestWatch

Northcoast Environmental Center  
Northeastern Minnesotans for Wilderness  
Oregon Wild  
Safe Alternatives for our Forest Environment  
Sierra Club  
Sierra Forest Legacy  
Silvix Resources  
South Umpqua Rural Community Partnership  
Standing Trees  
Umpqua Natural Leadership Science Hub  
Western Watersheds Project  
Wild Heritage  
WildEarth Guardians