



June 13, 2023

Senator John Barrasso
307 Dirksen Senate Office Building
Washington, D.C. 20510

Rep. John Curtis
2323 Rayburn House Office Building
Washington, DC 20515

Dear Senator Barrasso and Representative Curtis:

We are writing in support of S. 1435/H.R. 3397, legislation that would require the Director of the Bureau of Land Management to withdraw a proposed rule entitled “Conservation and Landscape Health” (88 Fed. Reg. 19,583).

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 70 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to BLM managed land that this new rule will impact, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. Rural communities, such as those affected by this rule, are particularly sensitive to the forest products sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

We and our members share the goal of sustaining healthy, working lands through science-based management under the Federal Lands Policy and Management Act (FLPMA). However, the proposed rule would substantially rewrite the goals and implementation of FLPMA without Congressional authorization, limit public input and transparency in land management decisions, restrict multi-use management and public access of federal lands, and create new confusing, arbitrary standards and regulations that impede efficient and effective implementation of land management plans.

Conservation and landscape health are laudable goals that are consistent with modern, science-based forest management and other resource management objectives. These goals are also embodied and codified in existing multi-use federal statutes such as FLPMA. We have serious concerns about the lack of public involvement and engagement in determining the proposed rule's purpose and need; legal and congressional authorization; local and state government coordination; and environmental, economic, and social impacts.

We support S. 1435/H.R. 3397 and believe the proposed rule should be withdrawn. At a minimum, and absent legislation, the BLM should engage in a more inclusive and transparent process that would start with an advanced notice of proposed rulemaking that clearly outlines what "problem" the BLM is seeking to solve, what outcome the BLM is hoping to achieve, and what information the government is lacking and seeking to obtain from the public, issue experts, and interested stakeholder groups.

Thank you for your leadership and attention to this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style.

Travis Joseph
President