

WRITTEN TESTIMONY
OF
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BEFORE THE WATER, WILDLIFE, AND FISHERIES SUBCOMMITTEE OF THE U.S. HOUSE
OF REPRESENTATIVES COMMITTEE ON NATURAL RESOURCES
MARCH 6, 2024

Chairman Bentz, Ranking Member Huffman, and distinguished Members of the Water, Wildlife, and Fisheries Subcommittee, on behalf of the National Alliance of Forest Owners (NAFO), thank you for the opportunity to testify on private working forests and the important role they play conserving at-risk, threatened, and endangered species.

NAFO is a national advocacy organization advancing Federal policies that ensure private working forests provide clean air, clean water, wildlife habitat, and jobs through sustainable practices and strong markets. NAFO member companies own and manage 44 million acres of private working forests across the U.S. NAFO's membership also includes State associations and national associations representing tens of millions of additional acres. Our members embrace a culture of stewardship for their forests and the wildlife that depend on them.

Since the passage of the Endangered Species Act (ESA) 50 years ago, species conservation has frequently mired stakeholders in inefficient and ineffective conflict, especially on Federal lands. However, decades of experience have proven that, on privately owned lands, conservation efforts are most effective when landowners, Federal and State agencies, and stakeholders identify shared conservation objectives and proactively and voluntarily work together to accomplish them. Such collaboration has built the trust necessary to innovate on better and more enduring approaches to species conservation and has increased our understanding of conservation at both the local and landscape level.

As we consider our course for the next 50 years of species conservation under the ESA, we would be wise to draw from what our experience has taught us – culture is more powerful than law or policy, and a culture of voluntary, collaborative conservation will always be more effective than reactive regulation and conflict. That is the focus of my testimony today.

Private Working Forest Owners as Conservation Partners

Across the country, NAFO members join other private working forest owners in meeting some of the highest sustainable forest management standards in the world. Wildlife habitat, clean water, clean air, carbon mitigation benefits, long-term forest health, and rural prosperity are all well-established outcomes of sustainable forest management. That is why private forest management in the U.S. leads the world in quality and productivity across a variety of performance measures.

Private working forests – or those managed to provide a sustainable supply of wood and fiber for homes, building construction, and over 5,000 consumer products that we use every day – are critical to successful species conservation because of the scale of private ownership in the United States. Forty-seven percent of forests in the U.S. are privately owned. In some areas of the country, 80% or more of our forests are privately owned. NAFO members invest substantially in maintaining habitat for terrestrial and aquatic species as a fundamental management objective. Forest owners also invest in collaborative research to understand how sustainable forest management can further benefit the conservation of both game and non-game wildlife species, particularly at-risk wildlife species.

Multiple approaches to wildlife conservation can work together to provide conservation benefits. At a baseline, sustainable forest management promotes forest health and resilience, which supports all forest-dependent species; and forest certification provides additional assurances of sustainable forest management implementation. Beyond that baseline, NAFO members also participate in conservation projects and programs to conserve a wide variety of species. Nearly 11 million acres of NAFO member land are participating in conservation programs or projects. Together, these complementary layers of conservation have become standard operating procedure for NAFO members, proactively conserving species before they require emergency conservation measures or regulatory intervention.

The Importance of Sustainable Forest Management for Creating Diverse Forest Types

Private working forests provide habitat for thousands of common, at-risk, and listed species. Sixty percent of at-risk species depend on private working forests for survival. Through sustainable forest management, private forest owners create a mosaic of interconnected forest conditions. This variability across the landscape provides a diversity of high-quality species habitat.

For example, sustainable forest management creates healthy young forests, characterized by open fields and low, thick brush. Young forests are home to species of conservation concern such as Kirtland's warbler, the New England cottontail rabbit, and the American woodcock. Other wildlife species that depend on young forest for at least part of their habitat requirements include wild turkey, grouse, elk, white-tailed deer, eastern cottontail rabbit, black bear, and native pollinators like honeybees and butterflies.

Sustainable forest management also provides open-canopy forests, characterized by widely spaced trees that allow sunlight to reach the forest floor. Several leafy plant species that provide food and habitat for many at-risk species require a lot of sunlight to grow and thrive in these conditions. Examples of at-risk species that depend on these conditions are the [gopher tortoise](#), Louisiana pine snake, southern hog-nosed snake, and gopher frog. Numerous at-risk plant species that need additional sunlight are also found in open-canopy forests.

Sustainable forest management protects rivers and streams by leaving a buffer along watercourses called Streamside Management Zones (SMZs). Forest landowners implement State-based [Best Management Practices \(BMPs\)](#) in SMZs during harvests to protect water quality. SMZs also facilitate wildlife travel and include riparian species, providing further habitat diversity on the landscape. Additionally, these riparian forest buffers filter sediment from runoff after rain and snow, keeping the water in streams and rivers clean for aquatic species, like at-risk mollusks and fish.

The Wildlife Conservation Initiative (WCI)

Eight years ago, NAFO member companies established the Wildlife Conservation Initiative (WCI) as a voluntary, collaborative partnership to conserve common, at-risk, and listed fish and wildlife species on private working forests. This groundbreaking initiative is building a culture of trust and collaboration between regulators and landowners.

Last year, NAFO, the National Council on Air and Stream Improvement (NCASI), and the U.S. Fish & Wildlife Service (USFWS) signed a programmatic Memorandum of Understanding (MOU) to implement the WCI nationwide. A weeks ago, NAFO and the Association of Fish & Wildlife Agencies (AFWA) signed a companion MOU to connect NAFO member companies, the USFWS, and State agencies in a common WCI effort.

What began as regional collaboration between NAFO member companies and USFWS field offices has now grown into a national, agency-wide initiative and a model for engaging forest owners, Federal and State agencies, and other stakeholders in effective voluntary species conservation. The WCI is demonstrating the value of active forest management as a wildlife conservation tool.

The WCI operates simply. NAFO member companies partner with NCASI, the USFWS, State agencies, and other collaborators to identify priority species and collect and share field data on the species and how sustainable forest management affects them. In some cases, data helps to identify better management approaches to maintain and improve conservation benefits.

The reduction of regulatory risk to landowners, the growing culture of trust between landowners and regulators, and the formal recognition of the conservation value of sustainable forest management serve as powerful incentives for private forest owners to engage in collaborative conservation projects through the WCI. NAFO members have partnered with researchers and regulators through the WCI to conduct much-needed research on mussels in Louisiana,

pollinators in California, wood turtles in Michigan, habitat needs across landscapes in Alabama and Florida, Humboldt martens in Oregon, and migratory birds across the entire Eastern Seaboard.

Collaborative Success Outcomes

Collaborative conservation through the WCI delivers positive outcomes for wildlife while reducing the regulatory burden on private landowners.

The USFWS has cited the benefits of sustainable forest management, private land access for researchers through the WCI, and forest certification as significant contributions to species conservation, often negating the need for further Federal action. One example of WCI success is the gopher tortoise.

The gopher tortoise is a keystone species, benefiting more than 350 other species—including snakes, insects, frogs, and owls—that all depend on tortoise burrows and surrounding habitat to survive. In 2022, the USFWS found that the eastern population of the gopher tortoise did not warrant listing. Data and habitat information provided by NAFO members showed that the open-canopy forest conditions on sustainably managed private working forests across the range of the gopher tortoise had provided high-quality habitat that conserved more gopher tortoises than scientists originally anticipated. The survey work leading to the USFWS decision was conducted through the WCI.

A second example of WCI success is the red tree vole—a small, furry mammal that nests in forest canopies and feeds almost exclusively on Douglas-fir needles. Just a few weeks ago, the [USFWS decided](#) not to list the red tree vole under the ESA and credited the WCI as a factor in its decision. The WCI identified the red tree vole as a species of common interest, and the WCI supported the resultant inventory work with funding. Ultimately, the USFWS' Species Status Assessment cited valuable information from NCASI and WCI researchers as the USFWS made its “not warranted” decision.

Through our ground-breaking WCI work, we are developing new and unprecedented tools and approaches that were not possible eight years ago. For example, a NAFO member company will soon conduct a zero-baseline or “no-risk” reintroduction of a listed species, the flatwood salamander, on its land in the Florida panhandle. Additionally, we are working with the USFWS on a pioneering cooperative agreement to provide data and research on several bat species, including the northern long-eared bat. The agreement will allow the USFWS to conduct surveys and research on private forests owned by NAFO members who volunteer to participate and will safeguard covered forest management activities.

These conservation achievements, and many others, are only possible because of a fundamental, profound culture shift within the forest-owner community and the State and Federal agencies. Trust and collaboration are replacing cynicism and conflict. Through the WCI,

we are demonstrating that culture is more powerful than law or policy and that proactive collaboration is far more effective than reactive regulation.

Collaborative Conservation Leads to Enduring Success

In the interest of advancing enduring conservation solutions, like the WCI, we support every legislative effort to make voluntary, collaborative conservation more accessible to, and effective for, all private landowners, including the America's Wildlife Habitat Conservation Act and the Recovering America's Wildlife Act.

A number of provisions in the America's Wildlife Habitat Conservation Act, which the Committee is considering today, help advance voluntary, collaborative conservation on private working lands. These include:

- **Providing funding to State fish and wildlife agencies and tribes.** States and Tribes can use such funding for voluntary, collaborative conservation work with willing landowners.
- **Waiving public disclosure requirements when landowners voluntarily share species data with USFWS.** Protecting proprietary data and information will encourage landowners to provide sensitive, yet vital data on threatened and endangered species more freely with their Federal partners. Such data is crucial to Species Status Assessments and listing decisions. Protection from disclosure will also enable more targeted and robust collaborative conservation efforts to occur on private land.
- **Precluding critical habitat designations from occurring on private lands with tailored land management plans.** Extending Sikes Act authority applied to Department of Defense land to private landowners willing to follow the same process and abide by the same criteria will enable private landowners to work with the USFWS to develop land management plans to protect listed species in ways that are significantly more efficient and impactful than simply designating critical habitat.
- **Codifying and Expanding the Candidate Conservation Agreements with Assurances (CCAA) Program.** CCAAs encourage landowners to voluntarily work with the USFWS to develop and implement conservation plans for declining species prior to listing decisions. NAFO members have used CCAAs for years and are now developing new and innovative cooperative agreements with the USFWS that we believe will be even more effective than CCAAs. We welcome the opportunity to work with the Subcommittee staff to provide technical suggestions to strengthen this section.
- **Extending Good Neighbor Authority to the USFWS.** Allowing the USFWS to enjoy the same successes enjoyed by the Bureau of Land Management and the Forest Service will benefit wildlife. Authorizing the USFWS to collaborate with their State, local, and Tribal partners to help improve land management by leveraging more resources for habitat and species recovery projects will have a significant, positive impact.

Conclusion

NAFO supports every effort that will enable private landowners to conserve species, prosper as land stewards, and provide other public benefits to communities and the Nation. We encourage Committee members to seek common ground and to work with their House and Senate colleagues to advance policy approaches that encourage and reward voluntary, collaborative conservation and that foster positive cultural change among Federal and State agencies, landowners, stakeholders, and affected communities across the Country.

Thank you again for the opportunity to participate in this hearing. We appreciate the Subcommittee's commitment to species conservation, and we stand ready as a resource to you and your staffs as we work together on enduring solutions for America's wildlife.