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Bill Imbergamo  
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600 New Hampshire Ave., NW Suite 500  
Washington, DC 20037

July 3, 2018

The Honorable John Barrasso, MD  
Chairman, Senate Committee on Environment and Public Works  
United States Senate  
Washington, D.C. 20510

Re: Endangered Species Act Amendments of 2018

Dear Chairman Barrasso:

The Federal Forest Resource Coalition (FFRC) is pleased to offer its support for the Endangered Species Act Amendments of 2018. FFRC is a national trade association focused on improving the management of Federal forests to support local business while improving watershed health and protect important forest values. With members in 32 States, FFRC works with those who rely on Federal timberlands for all or a portion of their fiber supply, as well as broad coalition of sportsmen's groups, local governments, and others who share our goals.

FFRC and our members are keenly aware of the impact of species listings under the Endangered Species Act (ESA). Listing of numerous species was used as a pretext to reduce timber harvest across many regions of the Forest Service, forcing closure of numerous sawmills, reducing management of national forests, and leading to greatly increased fire dangers across the National Forest System. Increasing the involvement of States and focusing on recovery of species – as the discussion draft bill does – would go a long way towards addressing concerns about endangered species management.

The Endangered Species Act Amendments of 2018 take appreciable steps to improve implementation of the ESA. Title I will improve coordination and input from States which have some of the best local knowledge and information about wildlife proposed for listing or species already listed under the Act. There are significant improvements in recovery planning, including the requirement to set objective recovery thresholds at the time a species is listed and the option of a State-led recovery team. Improving the recovery planning and implementation process is important, as clear guidelines and State involvement are more likely to provide a return on conservation investments made by State, private, and other stakeholders.

Title II would incentivize and improve the use of Candidate Conservation Agreements with Assurances (CCAAs), which have emerged as an important tool in building commitments among private, State, and federal landowners to conserve species across all lands to avoid the necessity of an ESA listing. The provisions regarding litigation transparency will shed important light on the role of litigation in driving management decisions that should be science-based.

As the Committee considers this important legislation, we urge you to examine the role that interagency consultation under ESA section 7 plays in Federal land management decisions. Timely completion of the consultation process is critical to implement urgently needed forest management projects – particularly those intended to reduce fire danger or to recover value from already damaged timber stands. Congress took a step forward with the Consolidated Appropriations Act in March, which addressed much of the Ninth Circuit’s disastrous *Cottonwood* decision. A complete fix would eliminate duplicative paperwork without removing any significant conservation benefits.

The Committee should also consider firm timelines for completion of section 7 consultation, as well as enabling the Forest Service’s own expert biologists to make determinations that an action is “not likely to adversely affect” listed species. This would streamline the process and make better use of the agency’s expertise in land management.

Thank you for your leadership on the Endangered Species Act Amendments of 2018 and we look forward to working with you and the Committee as the legislation moves forward.

Sincerely,



Bill Imbergamo  
Executive Director