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Bill Imbergamo,
Executive Director
Federal Forest Resource Coalition



Federal Legislative Review

Federal Land Policy in 2025



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RESOURCE COALITION

Bill Imbergamo, Executive Director

Level Setting: The Sun
will run out of
hydrogen fuel in
approximately 5
Billion Years.



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FEDERAL FOREST RESOURCE COALITION



U.S. Forest Service

June 2024

Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System

Draft Environmental Impact Statement



But First:

FFRC and our allies successfully demonstrated that the proposed National Old Growth Amendment was a solution in search of a problem

Inventory showed older forests are widespread on the National Forest System



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Almost 92 Million Acres/143K Sq. Miles of NFS Lands in “mature” or “old growth” (MOG) – almost 64 percent of NFS forested acres (bigger than MONTANA!)

39 Million Acres of National Forest Old Growth already in Wilderness, Roadless, Wild & Scenic River designations (more than 42 percent of the MOG total and more than 1/4th of NFS Forested Acres).

“Protected” MOG = 61,000 sq. mi. (bigger than HI, MA, VT, NH, NJ, CT, DE, and RI COMBINED)

BLM adds another 20 Million Acres MOG for total of almost **113 million acres of MOG**

JUST ON NFS AND BLM LANDS



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OG Threat Assessment showed nearly all losses were from fire, insects, disease, NOT harvest:

- ***Since 2000, Old Growth losses (NFS and BLM) were from:***
 - Wildfires - 689,000 acres
 - Insects/disease - 134,000 acres
 - Tree cutting (NFS and BLM) – 9,000 acres



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FFRC Comments on NOGA showed that --

- ***The proposed amendment violated key requirements of the National Forest Management Act and the 2012 Planning Rule***
- ***The DEIS fell FAR SHORT of the NEPA's "Hard Look" Requirement***
- ***The diverse nature of older forests across the National Forest System precluded any sort of "consistent" approach to management***



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USDA Forest Service
U.S. DEPARTMENT OF AGRICULTURE

U.S. Forest Service

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Forest Service, White House CEQ, and USDA OGC Concluded

- ***Finalizing the NOGA would be unworkable***
- ***Finalizing the NOGA would subject the proposed plan amendment to Congressional Review Act***
- ***Finalizing the NOGA presented a substantial litigation risk which it was unlikely to survive***



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The Daily Journal of the United States Government



N Notice

Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System; Withdrawal

A Notice by the Forest Service on 01/10/2025



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Chief Moore January 10 Memo

- support and expectation that the FS will “continue to conserve these forests based on the best available scientific information”
- The agency can now identify where “old growth conditions may be ... vulnerable to reasonably foreseeable threats, versus where conditions are high-functioning”
- ***Essentially directed individual units to consider old growth values and management strategies during plan revisions.***



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The Daily Journal of the United States Government



Notice

**Land Management Plan Direction for Old-Growth Forest
Conditions Across the National Forest System; Withdrawal**

A Notice by the Forest Service on 01/10/2025



Addressing OG Through Forest Plans

- ***Exactly what the 2012 Planning Rule said to do.***
- ***Exactly what FFRC recommended all along.***
- ***But damn, I had fun writing over 102 pages of comments on the Inventory, Threat Assessment, Advanced Notice of Proposed Rulemaking, Silviculture Guide, and Draft EIS***



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 Notice

**Land Management Plan Direction for Old-Growth Forest
Conditions Across the National Forest System; Withdrawal**

A Notice by the Forest Service on 01/10/2025



Level Setting:
According to NASA,
the probability of
an asteroid capable
of destroying a city
striking Earth is
0.1% every year.



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But First,

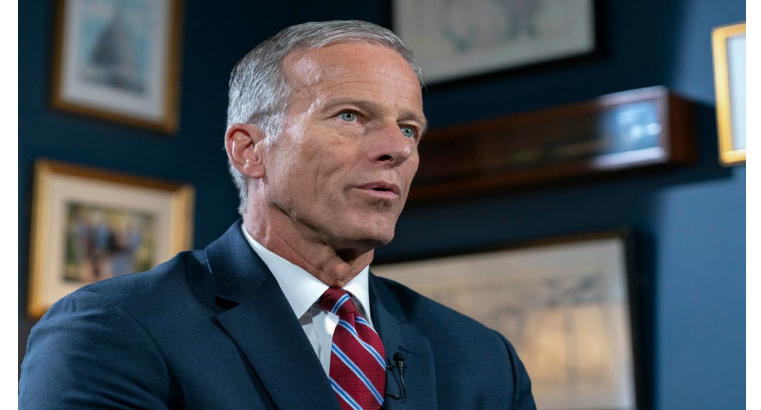
GOP Trifecta Promises Significant Change



Trump White House



219 to 215 House GOP "Majority"



53 to 47 Senate GOP Majority



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Solid Cabinet Appointments



Brooke Rollins, Agriculture Nominee



Doug Burgum, Interior Secretary

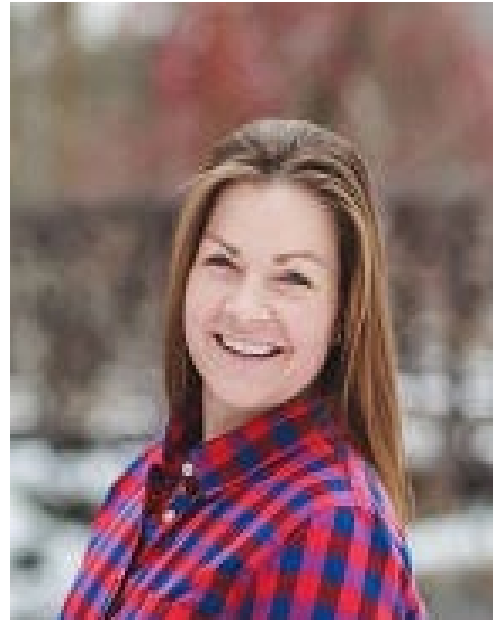


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Natural Resources Team at USDA



Michael Boren, Nominee
Under Secretary Natural
Resources and Environment



Kristin Sleeper
Deputy Under Secretary



Tom Schultz
Chief of Staff



Trump Administration is Serious About Streamlining/Reorganization

Established the Department of Government Efficiency (DOGE) within the White House with an 18-Month timeline.

Requires Every Department to establish a 4-member DOGE Team (Team Lead, engineer, human resources specialist, and an attorney) which reports back to the DOGE dude.

Directs all agencies to adopt "SES Performance Plans" and reconstitute hiring and performance review boards.

Directed all agency heads "to deliver emergency price relief... to the American people and increase the prosperity of the American worker," including "actions to.. lower the cost of housing and expand housing supply; ... create employment opportunities for American workers," requires White House staff to report to the President every 30-day.



Trump Administration is Serious About Streamlining/Reorganization

January Funding Freeze – Applied to all “Grants and Loans” but ambiguity led to suspension of normal timber sales. The freeze remains tangled in litigation as of February 4th.

Review of Infrastructure Act and Inflation Reduction Act spending ongoing – FS Partners like National Forest Foundation and National Wild Turkey Federation are still on hold with some major timber projects.

Employee “Buy Outs” Offered Tuesday, January 28th, with Thursday, February 6th deadline for. Allows employees to collect salary (assuming no shutdowns) until end of Fiscal Year 2025 (Sep. 30). On February 3rd, Administration “sweetened” the offer by adding Voluntary Early Retirement to the mix.

All of these actions are being challenged by Federal employee unions, others, and their impact won’t be clear for at least a few weeks.

Trump Administration is Serious About Streamlining/Reorganization

Buyout E-Mail Established “Four Pillars” of Public Service Employment:

- ***Return to office*** – Most employees to be back in office five days a week
- ***Performance culture*** – Admin will “insist on excellence at every level”
- ***More streamlined and flexible workforce*** – “Federal agencies ...to be downsized through restructurings, realignments, and reductions in force;” and
- ***Enhanced standards of conduct*** – employees are to be “reliable, loyal, trustworthy, and ... strive for excellence in their daily work,” those who fall short “will be investigated, disciplined, or terminated.”

Trump Administration is Serious About Streamlining/Reorganization

Serious Structural Changes Under Consideration:

Reducing Number of FS Regions – From current 9 down to 3

Moving staff from Regions and Washington Office to Field Units
(individual NFS units)

Rethinking Research Branch – Outsourcing to Universities

Slimmed down State, Private, Tribal Branch – Focus on cross-boundary issues rather than landowner assistance

Trump Administration is Serious About Streamlining/Reorganization

Shrinking the Federal Workforce:

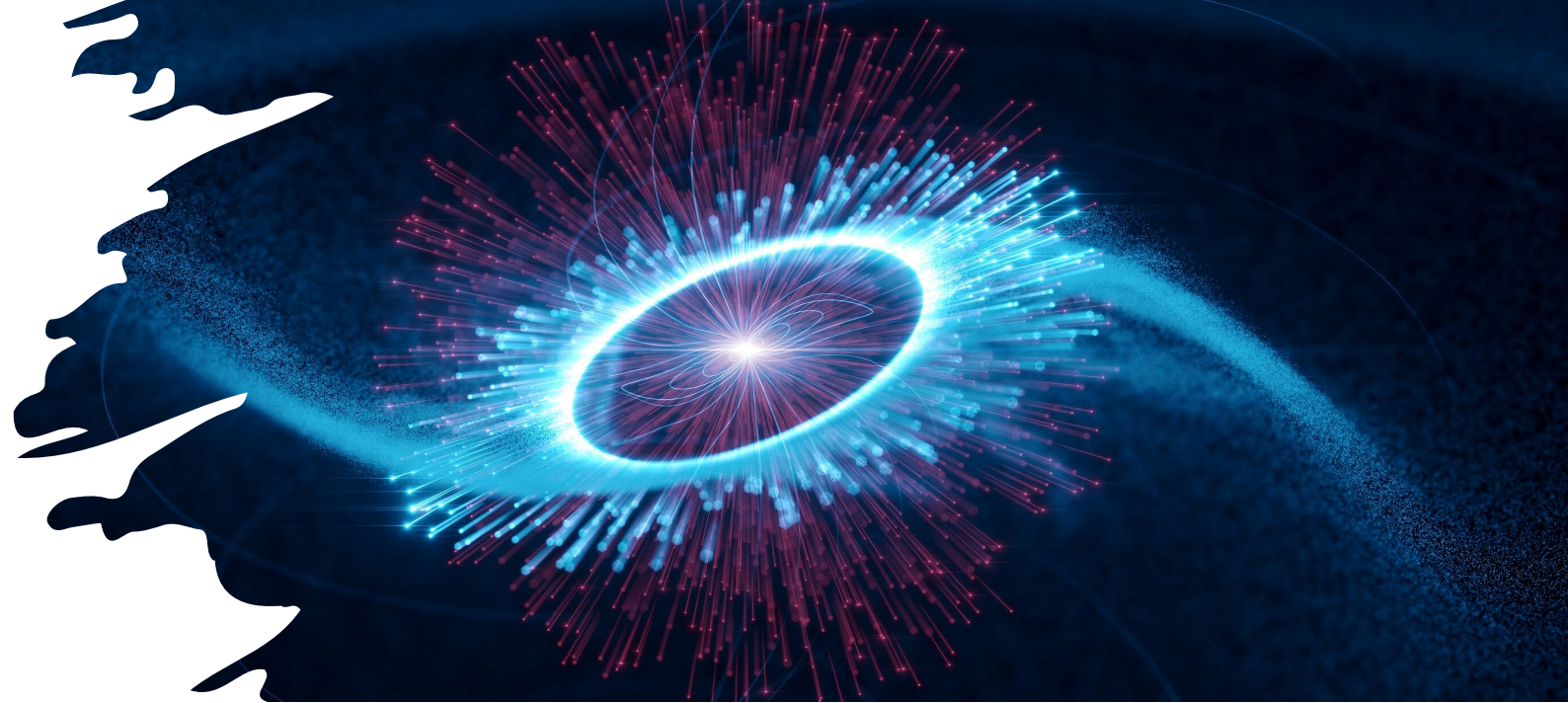
“Buyout” and Voluntary Early Retirement

Also Under Consideration:

- Dismissal of “provisional” employees, including hires onboard less than 1, 2, or 3 years, depending on grade & SES Status
- Cancellation of ACES (retiree hire back) contracts
- Still not clear how FS will be able to add needed seasonals

Cost savings are great, but need to avoid achieving them by letting headcount reductions serve as only metric (don't want to lose field level “do-ers” just because they are easy to let go)

Level Setting: A direct hit from a gamma ray burst within 200 light years of earth could eliminate all life on earth within minutes.



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But First,

Pro-Timber Congress, but Challenges Remain

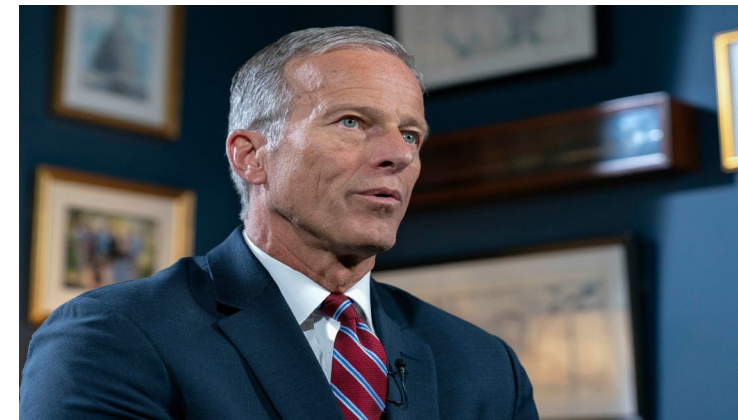


219 to 215 House GOP “Majority”

House Speaker Johnson (R-LA) has a two-seat “majority” and faces challenges from the 31-member House Freedom Caucus.

Complicates government funding (current temporary funding bill expires Mid-March), debt ceiling.

Senate Majority Leader John Thune (R-SD) has already said he will not be doing away with the filibuster – meaning anything outside of reconciliation legislation will have to be bipartisan.



53 to 47 Senate GOP Majority



Pending Congressional Business



~~2023~~
~~2024~~
2025

We mean it this time!

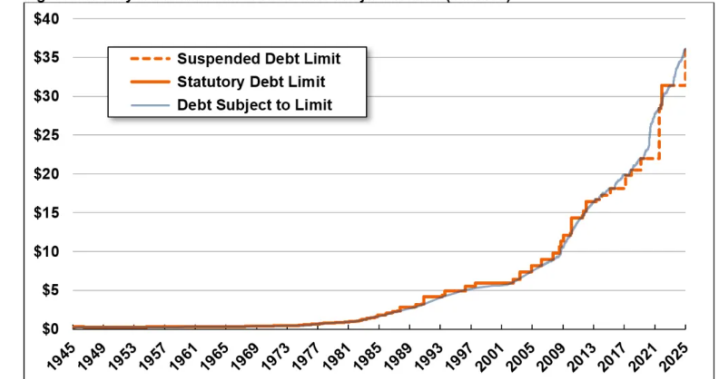


Current CR Expire March
15th.

“DOGE” seeking \$2T in cuts
(out of \$6.7T Annually)

Don't bet against lengthy
shutdowns

Fig. 1: Statutory Debt Limit and Federal Debt Subject to Limit (Trillions)



Debt Ceiling:
Currently under
“extraordinary measures”
to avoid breach.

Trump suggested doing
away with it (mostly to
make it easier to renew
2017 Tax Cuts)

House & Senate Leadership Changes



G.T. Thompson (R-PA)
Chairman



Angie Craig (D-MN)
Ranking Member (New)

House Agriculture Committee (Farm Bill, USDA Oversight, NFS East of the Mississippi)

House & Senate Leadership Changes



Bruce Westerman (R-AR)
Chairman



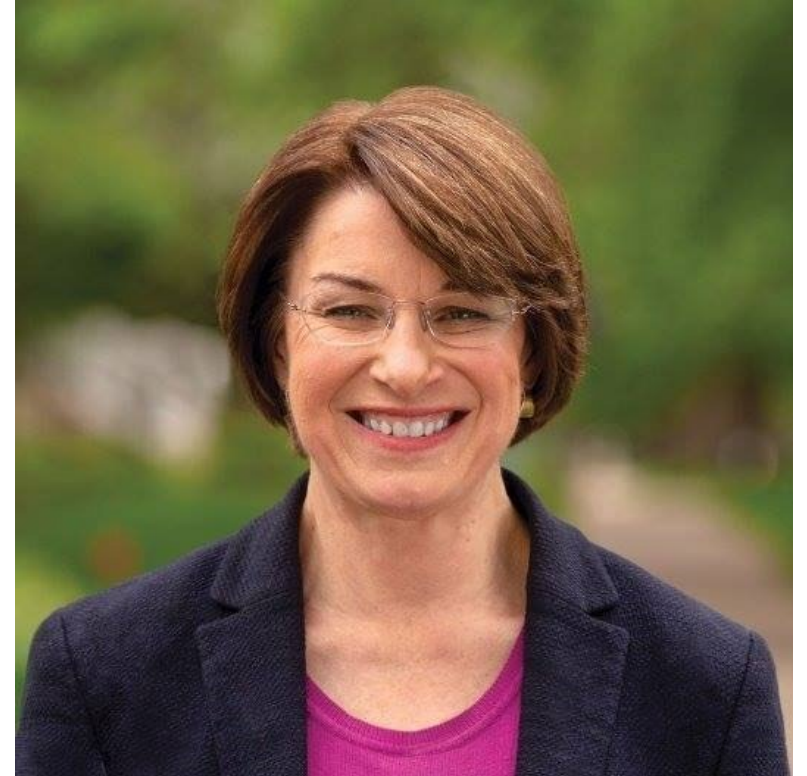
Jared Huffman (D-CA)
Ranking Member (New)

House Natural Resources Committee (Western Public Lands, ESA)

House & Senate Leadership Changes



John Boozman (R-AR)
Chairman (New)



Amy Klobuchar (D-MN)
Ranking Member (New)

Senate Agriculture Committee (Farm Bill, USDA Oversight, NFS East of the Mississippi)

House & Senate Leadership Changes



Mike Lee (R-UT)
Chairman (New)



Martin Heinrich (D-NM)
Ranking Member (New)

Senate Natural Resources Committee (Western Public Lands, ESA)



Farm Bill: FFRC Priorities

Good Neighbor Authority (GNA): Allow States, Counties, and Tribes to utilize revenues generated on non-Federal lands, incorporate fire liability limitations.

Stewardship Contracting: Collect K-V deposits for Stewardship Contracts that include merchantable timber; Make retention/expansion of ***existing forest products infrastructure a co-equal objective of the program***; Allow some retained receipts to be used ***to pay for NEPA analysis***.

Farm Bill Categorical Exclusions: Increase the size of the Insect & Disease and Fuel Treatment ***Categorical Exclusions from 3,000 to 15,000 acres***.

Cottonwood Fix: ***Make a permanent fix to clarify that Forest Plans are not ongoing actions*** and make clear that consultation under the Endangered Species Act Section 7 is not required at the plan level.

LA Fires Kickstart Action on FOFA



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LA Fires Kickstart Action on FOFA



House reacted by passing Fix Our Forests Act (FOFA), which included numerous FFRC priorities:

- Cottonwood Fix
- Expanded most legislated Cat Ex's from 3,000 to 10,000 Acres
- Ends Administrative Objections for projects in priority firesheds
- Makes Retention of Industry Infrastructure a co-equal objective of Stewardship Contracting
- Expands Direct Sale Authority and requires solicitation of bids for work in priority firesheds
- GNA Revenue Fixes

Farm Bill or FOFA

Considerable Overlap between FOFA and House Committee Approved (2024) Farm Bill

- FOFA referred to Senate Agriculture Committee
- Farm economy is struggling, so there is urgency to do a Farm Bill
- Remains to be seen whether FOFA stands alone or fold into Farm Bill – race to the President’s Desk



Other Congressional Challenges

Fiscal Challenges are the top line and will be difficult to resolve

- Debt Ceiling/Reconciliation (may encourage timber harvest increases, expansion of biomass definition for RFS)
- Continuing Resolution – Gov't Shutdowns?
- Making the Chief a confirmed political appointee
- Moving the Forest Service?
 - To the West?
 - To the Interior Department?



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Life is short, practice good forestry.

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