



Brooke L. Rollins  
Secretary of Agriculture  
United Department of Agriculture  
1400 Independence Ave  
Washington, DC  
20250-0506

### **Green Climate Comments on USDA Reorganization Plan**

Secretary Rollins,

Green Climate is extremely concerned about the USDA Reorganization plan and its dangerous impact on wildfires and the firefighting and other critical measures to control them. The only way to prevent, control and fight the more frequent and much more dangerous wildfires in our country is for these efforts to be coordinated as closely to the fires as possible. The leadership, staffing and resources to prevent and battle these wildfires must be as close as possible to the National Forest Land that is most at risk for wildfires. The elimination of these current nine regional offices ignores the wildfire emergency that this country is experiencing. Millions of acres of wildfires that could be prevented and controlled will occur directly from this action. People **will** die because of this action. With respect to wildfires, the plan only provides that:

**“The Forest Service will phase out the nine Regional Offices over the next year and implementation activities will take into consideration the ongoing fire season.”**

On April 3, 2025, you, Secretary Rollins issued Memorandum 1078-006, entitled “Increasing Timber Production And Designating An Emergency Situation On National Forest System Lands. (published April 4, 2025) (Memorandum) (attached). The Memorandum designated 60% of all National Forest Land to be in an “Emergency Situation.” This Emergency Situation Determination (ESD) covers 112,646,000 acres. Now, some four months later, you are closing the offices that can actually address this emergency. It is not even clear how this emergency will be addressed after the reorganization. The plan only states that ongoing wildfires will be taken into consideration over the next year. Taking only ongoing wildfires into “consideration” is far from the commitment required to solve the emergency. As the Memorandum notes, ESD’s require extraordinary efforts:

**“After making an emergency situation determination with respect to National Forest System land, the Secretary may carry out authorized emergency actions on that National Forest System land in order to achieve relief from hazards threatening**



human health and safety or mitigation of threats to natural resources on National Forest System land or adjacent land, including through-

- (A) the salvage of dead or dying trees;
- (B) the harvest of trees damaged by wind or ice;
- (C) the commercial and noncommercial sanitation harvest of trees to control insects or disease, including trees already infested with insects or disease;
- (D) the reforestation or replanting of fire-impacted areas through planting, control of competing vegetation, or other activities that enhance natural regeneration and restore forest species;
- (E) the removal of hazardous trees in close proximity to roads and trails;
- (F) the removal of hazardous fuels;
- (G) the restoration of water sources or infrastructure;
- (H) the reconstruction of existing utility lines; and
- (I) the replacement of underground cables.”

Section 6592c(b)(2).

How will any of these Emergency Actions occur without regional offices? One of the only two National Forest Service offices that will remain is the Forest Products Lab which is dedicated to increasing timber harvesting of National Forests **not** performing the Emergency Actions that must be done to prevent and address wildfires. There is no question that the USDA under your leadership is focused only on dramatically increasing timber harvesting and sales above the current three billion board feet average annual sales over 43 million acres not subject to the ESD. In fact, on April 3, 2025 (the same date that the Memorandum was signed), Christopher B. French, Acting Associate Chief, United States Forest Service issued a letter entitled “Forest Service Letter (1300), Implementation of Secretarial Memo 1078-006” to all NFS Regional Foresters and Deputy Chiefs. The Letter directs that Regional Foresters and Deputy Chiefs act within 90 days (of April 3, 2025) to develop and adopt a strategy and program of work to increase timber volume on NFS land by 25%. (Attached). This 25% of the 112,646,000 acres amounts to 28,500,000 acres of additional timber harvest and sale not Emergency Actions.



The only reference in the Letter to possible Emergency Actions is the following language:

“Finally, it is imperative that we plan and execute salvage and reforestation projects as these disturbances happen to accelerate post-wildfire recovery and reestablish healthy and resilient forests. We have many critical successes to anchor to, including expanded hazard tree removal efforts along roadways, post fire shaded fuel break construction, and Memorandum of Understandings (MOUs) with key industry partners that have helped us model success at local levels. But we need to do more, and as such, I am directing line officers to prioritize and address salvage opportunities, including leveraging opportunities to work with states, tribes, counties, private industry, and partners to increase the pace and scale of recovery and share in achieving cross-boundary results. I’m also directing the use of existing frameworks and tools, such as Potential Operational Delineations (PODS) and the National Alliance of Forest Owners (NAFO) MOU to capitalize on the opportunity to move quickly, capitalize on value, and restore the areas to more fire resilient conditions. **Regions, in consultation with the Washington Office and Forests, will integrate their regional 10-year reforestation implementation strategies with the national active forest management strategy.** To the maximum extent practicable, use existing and new categorical exclusions for timber stand improvement, salvage, and other site preparation activities for reforestation, consistent with applicable law. I expect that active management, reforestation and stand improvement activities will reduce wildfire risk, ensure sustainable timber supply, promote forest health, and protect our communities and their water supply.”

While most of the actions listed above are not Emergency Actions, how can the regions implement the reforestation strategies if the regions no longer exist?

Green Climate incorporates the comments of the Virginia Wilderness Committee by reference.

#### A. Green Climate

Green Climate is a 501(c)(3) non-stock corporation organized under the laws of the Commonwealth of Virginia. Green Climate has nine members who are committed to the protection and conservation of our National Forests. Green Climate’s members recreate in National Forests and National Parks. This recreation includes hiking, camping and fishing. Our members also actively work to protect federal forest land and focus on combating climate change through the protection and conservation of National Forests.



Jay Holloway  
President  
Green Climate  
1507 Grove Ave  
Richmond, VA 23220  
[Jay@greenclimate.eco](mailto:Jay@greenclimate.eco)