



FEDERAL FOREST
RESOURCE COALITION

March 18, 2020

Via Email

Mr. Bob Kolasky
Assistant Director, CISA National Risk Management Center
c/o Jennifer Pedersen, (jennifer.pedersen@cisa.dhs.gov)
Cybersecurity and Infrastructure Security Agency Stop 0380
Department of Homeland Security
245 Murray Lane
Washington, DC 20528-0380

Re: Tier 1 Essential Critical Infrastructure Workers: Forest Products Industry

Dear Assistant Director Kolasky:

On behalf of our members and their employees in the wood products industry, we are writing to comment on the draft “Tier 1 Essential Critical Infrastructure Workers” draft, seeking to remind the Department of Homeland Security (DHS) of the important role the wood products industry plays in providing critical infrastructure and urging the recognition of wood products manufacturing employees as “essential” workers. We do so recognizing the considerable challenges our elected officials, administrators and others are facing in making decisions aimed at protecting communities across the country.

The American Forest Resource Council (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. AFRC promotes active management to attain productive public forests, protect the value and integrity of adjoining private forests, and assure community stability. It works 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 50 forest product businesses and forest landowners throughout California, Idaho, Montana, Oregon, and Washington. These businesses provide tens of thousands of family-wage jobs in rural communities.

The Federal Forest Resource Coalition (FFRC) is a national, non-profit trade association, representing purchasers of Forest Service and Bureau of Land Management timber from 36 states, collectively representing over 650 companies and over 390,000 employees. Its members purchase, harvest, transport, and process federal timber resources into products that millions of Americans use every day, including lumber, panels, paper, and biomass energy. And its

members provide jobs in rural communities where the federal government is frequently the largest landowner. FFRC works with allied industry, conservation, and local government groups to support a growing and sustainable Federal timber program.

The forest products industry plays an important role in critical infrastructure in North America in a number of ways:

- Wood building products are the principal building material used across a myriad of infrastructure projects, including emergency medical and lodging structures, and temporary buildings, as well as timely refurbishing or repurposing of existing facilities for immediate use. As an example, there are established design guidelines for modest buildings up to 16' x 24' in size that can be constructed within 24 hours and withstand both high winds and seismic forces. These are not “temporary” buildings but rather can be erected quickly for immediate use. These designs were shared with emergency responders for use following the natural disasters in Haiti and Puerto Rico, among other places.
- Residuals from wood products manufacturers are used extensively by pulp and paper mills, which are then used in tissue, personal hygiene and packaging products – critically-needed products during this crisis.
- Wood products manufacturing facilities provide needed materials for construction supply lines.
- Many wood product manufacturers generate electricity for the public utility grid using carbon neutral biomass.
- Moreover, our mills are constructed and operate in a way that supports social distancing, and stringent safety procedures are already the norm.
- Wood products facilities are frequently located in rural communities and provide family-wage jobs that are otherwise in very short supply in those areas. Maintaining employment at wood products facilities through this crisis is essential to prevent disastrous effects on rural economies.

We ask that the wood products industry be considered a critical infrastructure industry, and as such retaining the responsibility to the public to maintain existing work schedules for essential infrastructure needs related to the COVID-19 crisis. For these reasons, we urge DHS to include Wood Products Industry employees within the Tier 1 list of Essential Critical Infrastructure workers.

Thank you for your consideration.

/s/
Travis Joseph, President
American Forest Resource Council

/s/
Bill Imbergamo, Executive Director
Federal Forest Resource Coalition