

August 7, 2020

The Honorable Mike Pompeo  
Secretary of State  
2201 C St. NW  
Washington, DC 20520

The Honorable Eugene Scalia  
Secretary of Labor  
200 Constitution Avenue  
Washington, DC 20210

The Honorable Chad F. Wolf  
Acting Secretary of Homeland Security  
Washington, DC 20528  
Dear Secretaries Pompeo, Scalia and Wolf,

The undersigned sporting-conservation organizations request that the suspension of H-2B guest workers for conservation and forest-related jobs be exempted. Presidential Proclamation 10014 and its subsequent amendment bans non-immigrant H-2B guest workers from entering the United States through December 31, 2020. At the onset of the COVID-19 pandemic, the Department of Homeland Security designated the forest sector as “Critical Infrastructure”. If the Administration fails to exempt H-2B conservation and forest-related workers from the proclamation, it will negatively impact sustainable forest management, hunters and anglers, as well as small businesses and rural, forest-dependent communities across America.

America needs millions of new trees each year to ensure a continuous and healthy growing cycle for both public and private forests. Additionally, annual tree planting is a vital component of ensuring healthy habitats, clean water, and a robust hunting and fishing recreational activity, which has proven invaluable during the COVID-19 pandemic. Work performed by H-2B workers is critical to long-term forest sustainability, collecting seeds for tree nurseries, invasive species control, forest thinning, fuel reduction treatments to prevent catastrophic wildfire, and forest restoration.

American workers do not typically apply for these jobs; labor for these jobs is extremely scarce or non-existent without the H-2B option. Before receiving H-2B guest workers, businesses are required by law to advertise the available jobs to U.S. workers. In FY2020, the number of U.S. workers who applied for these conservation and forest-related jobs (6,350 positions) was only 1.9% of the number of available positions. In FY2019, American workers applied for only 3.6 percent of the positions that were ultimately filled by H-2B workers.

Earlier this year President Trump announced that the United States will join the Trillion Trees Initiative and that the United States “will continue to show strong leadership in restoring, growing, and better managing our forests.” H-2B conservation and forest-related workers are a key component to this Initiative. They plant 1.55 billion tree seedlings on 2.2 million acres of forestland in the United States each year. If this sector is not granted an exemption allowing H-2B workers to begin this critical work in the next 60 days, an estimated 1.6 million acres of forestland will go unplanted and 1.12 billion seedlings will die at a direct cost of \$336 million. Most of these seedlings are grown by small tree nurseries whose jobs depend on H-2B guest

workers; for the most part, American citizens own and operate these nurseries while guest workers collect seeds and plant the tree seedlings they produce. Without workers to plant trees, many conservation and forest-based small businesses will be forced to lay off local, operational and administrative employees whose jobs depend on reforestation happening. American landowners, conservation agencies and organizations, and companies will suffer from the lost cost of seedlings and cancelled contracts.

Forests, especially reforestation, play a significant role in a partial solution to climate change, as forests could store 30% or more of needed carbon reductions. Forests are particularly important because their carbon sequestration potential far exceeds other habitat types. Forests are a significant carbon sink, currently offsetting 11% of total U.S. carbon emissions.

Many of America's sporting-conservation organizations rely on H-2B visa workers to perform critical conservation practices, including reforestation. Many government agencies also rely on these workers to accomplish their objectives. Some of these include the Natural Resources Conservation Service, Farm Service Agency, U.S. Army Corps of Engineers, U.S. Forest Service, Bureau of Land Management, and the U.S. Fish and Wildlife Service.

Regulatory programs protect many habitats and ecosystems, but the core of private land conservation policy in the U.S. drives voluntary, incentive-based programs to improve habitat while also promoting sustainable forest management. These programs incentivize habitat conservation on private lands by offering incentives, cost-share payments, and other financial assistance to landowners that improve both their bottom line and the quality of wildlife habitat on their land. Almost all of the programs are implemented by the aforementioned agencies and require H-2B workers to put these forest management and habitat improvement projects on the ground.

The H-2B conservation and forest-related guest worker ban is an economic and environmental crisis that will leave critical conservation and forest management services undone, causing cascading damage to our nation's forests, family forest landowners, the forestry sector supply chain, hunters and anglers, drinking water supplies, and the rural economies that depend on forests. It will negatively impact millions of acres of public and privately owned, working and non-working forests, thousands of family forest landowners, billions of dollars in growing timber, and will jeopardize the work of thousands of American conservation and forest workers.

The undersigned organizations ask the Administration to provide an exemption from the H-2B visas suspension for H-2B guest workers that perform conservation and forest-related work.

Thank you for your consideration of this important request from America's sporting-conservation organizations.

Sincerely,

American Woodcock Society  
Archery Trade Association  
Association of Fish and Wildlife Agencies  
Bear Trust International  
Boone and Crockett Club  
California Waterfowl Association  
Campfire Club of America

Catch-A-Dream Foundation  
Congressional Sportsmen's Foundation  
Conservation Force  
Dallas Safari Club  
Delta Waterfowl  
Houston Safari Club  
Masters of Foxhounds Association  
Mule Deer Foundation  
National Association of Forest Service Retirees  
National Wild Turkey Federation  
National Wildlife Federation  
North American Falconers Association  
Orion – the Hunter's Institute  
Quality Deer Management Association  
Rocky Mountain Elk Foundation  
Ruffed Grouse Society  
The Conservation Fund  
Whitetails Unlimited  
Wild Sheep Foundation  
Wildlife Forever  
Wildlife Management Institute  
Wildlife Mississippi