



June 24, 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

The Forest Resources Association (FRA), and undersigned associations are requesting a national interest exemption for forestry related work in President Trump’s Proclamation that suspends the entry of H-2B visa guest workers until December 31, 2020. The forest products industry relies on seasonal forestry workers who legally enter the U.S. to perform important forestry work that renews our public and private forestlands through the planting of trees, improves forest health, and prevents and suppresses wildfire.

Overall, the H-2B program differs from other visa categories included in the President’s Proclamation. These differences include a legislatively mandated cap that limits the number of H-2B workers that can enter the U.S. and the requirement that prior to hiring H-2B workers, employers must first advertise these jobs to Americans. Domestic workers have historically shown little interest in this critical work even during times of high unemployment, as the work requires travel to multiple states, often encountering rough terrain in inclement weather.

H-2B forestry workers play a major role in planting more than 1.6 billion trees on 2.6 million acres of public and private forestlands annually, including Federal forestlands. If this work is not completed, it could prevent forestland owners from meeting states’ regulatory requirements or compliance with forest certification programs for years to come. Guest workers who plant trees are also critical in meeting the President’s commitment and support of the World Economic Forum Trillion Trees Initiative.

H-2B workers are important to the forestry economies of rural communities across America. This is supported by a recent General Accountability Office report which concluded, “counties with H-2B employers generally had lower unemployment rates and higher average weekly wages than counties that do not have any H-2B employers.”¹ Further, the H-2B program protects the jobs of the full-time, year-round American workers, who rely on the H-2B workers to sustain their jobs. Every H-2B worker supports 4.6 American jobs.²

¹ United States, Congress, “H-2B VISAS: Additional Steps Needed to Meet Employers' Hiring Needs and Protect U.S. Workers.” *H-2B VISAS: Additional Steps Needed to Meet Employers' Hiring Needs and Protect U.S. Workers*, GAO-20-230, U.S. Government Accountability Office, 2020, pp. 13–14.

² Zavodny, Madeline. *Immigration and American Jobs*. American Enterprise Institute, 15 Dec. 2011, www.aei.org/research-products/working-paper/immigration-and-american-jobs/.

Forest Resources Association

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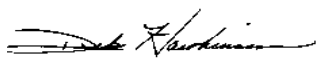
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The work performed by H-2B forestry workers is critical to maintaining a viable forest products industry in America. H-2B forestry workers play a vital role in the wood supply chain and are essential to the long-term economic recovery of the forest products industry in the U.S.

As the Secretaries of State, Labor and Homeland Security work to establish standards to define categories of aliens covered by section 3(b)(iv) of the proclamation, we urge you to recognize the importance of H-2B forestry workers to the immediate and continued economic recovery of the forest products industry.

Further, it is our hope that the President and the Administration promptly review the proclamation and lessen the impacts on the forest products industry and the essential and critical services H-2B forestry workers perform to improve the health and productivity of public and private forest lands. H-2B forestry workers play a vital role in the wood supply chain and are essential to the long-term economic recovery of the forest products industry in the U.S.

Sincerely,



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Alabama Forestry Association
American Forest Resource Council
Arkansas Forestry Association
Arkansas Timber Producers Association
Associated Logging Contractors – Idaho
Black Hills Forest Resource Association
Empire State Forest Products Association
Federal Forest Resource Coalition
Florida Forestry Association
Forest Landowners Association
Forestry Association of South Carolina
Georgia Forestry Association
Great Lakes Timber Professionals Association
Hawai'i Forest Industry Association
Intermountain Forest Association
Kentucky Forest Industries Association
Louisiana Forestry Association
Maine Forest Products Council
Maple Flooring Manufacturers Association

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Michigan Association of Timbermen
Michigan Forest Products Council
Minnesota Forest Industries
Minnesota Timber Producers Association
Mississippi Forestry Association
National Alliance of Forest Owners
National Association of State Foresters
National Woodland Owners Association
North Carolina Forestry Association
Northeastern Loggers Association
Ohio Forestry Association, Inc.
Oregon Forest & Industries Council
Pennsylvania Forest Products Association
Pennsylvania Forestry Association
Railway Tie Association
South Carolina Timber Producers Association
Southeastern Lumber Manufacturers Association, Inc.
Southern Loggers Cooperative
Tennessee Forestry Association
Texas Forestry Association
Virginia Forestry Association
Washington Forest Protection Association
Western Wood Preservers Institute
West Virginia Forestry Association

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