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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

KELSEY CASCADIA ROSE JULIANA;
XIUHTEZCATL TONATIUH M., through
his Guardian Tamara Roske-Martinez; et al.

Plaintiffs,

v.

The UNITED STATES OF AMERICA;
DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

Case No.: 6:15-cv-01517-TC

PLAINTIFFS' FIRST SET OF REQUESTS
FOR ADMISSIONS TO DEFENDANT THE
UNITED STATES DEPARTMENT OF
AGRICULTURE

PROPOUNDING PARTIES: PLAINTIFFS

**RESPONDING PARTY: DEFENDANT THE UNITED STATES
DEPARTMENT OF AGRICULTURE**

SET NO: ONE

Pursuant to Federal Rule of Civil Procedure 36, Plaintiffs hereby request that Defendant the United States Department of Agriculture (“Defendant”) respond fully, in writing and under oath, to the following Requests for Admissions, and serve such responses on counsel for Plaintiffs within thirty (30) days after service of these Requests for Admissions.

I. DEFINITIONS

A. As used herein, the term “AUM” is an abbreviation of Animal Unit Month, the amount of forage necessary for the sustenance of one cow or its equivalent for a period of 1 month.¹

B. As used herein, the term “CARBON SEQUESTRATION” or “SEQUESTER” shall mean the capture of carbon dioxide through terrestrial, geological, biological, or other means, which prevents the release of carbon dioxide into the atmosphere.²

C. As used herein, the term “CLIMATE CHANGE” shall mean any change in the state of the climate lasting for an extended period of time. In other words, the term “CLIMATE CHANGE” includes changes in surface and ocean temperature, precipitation, or wind patterns, among other effects, that occur over several decades or longer, attributed directly or indirectly to human activity. The term “CLIMATE CHANGE” also shall include OCEAN ACIDIFICATION, sea level rise, and other impacts resulting from the increased concentration of greenhouse gases in the atmosphere and oceans. “CLIMATE CHANGE” also has been called

¹ 43 C.F.R. § 4100.0-5 (2017).

² 22 U.S.C. § 7901(1) (2012).

inadvertent weather modification, the greenhouse effect, CO₂ problem, carbon dioxide problem, climate changes, GLOBAL WARMING, global change, global heating, atmospheric pollution by carbon dioxide or other greenhouse gases, and dilution of carbon 14 by fossil carbon.

D. As used herein, the term “DEPARTMENT OF AGRICULTURE” or “USDA” shall mean Defendant United States Department of Agriculture, including all offices, bureaus, agencies, departments, and programs within the United States Department of Agriculture, including but not limited to the United States Forest Service (“USFS”).

E. As used herein, the term “DISTURBANCE EVENT” includes fire, disease, insect outbreaks, drought, and harvesting.

F. As used herein, the term “FARM” shall include prime farmland, unique farmland, and farmland as defined in the Farm Protection Policy Act.³

G. As used herein, the term “FEDERAL LANDS” shall mean any lands or interests in lands, such as mineral and timber interests, that are owned by the United States, without regard to how the United States acquired ownership.⁴

H. As used herein, the term “FOREST” shall refer to land that has at least 10 percent crown cover by live tally trees of any size or has had at least 10 percent canopy cover of live tally species in the past, based on the presence of stumps, snags, or other evidence. To qualify, the area must be at least 1.0 acre in size and 120.0 feet wide. FOREST includes transition zones, such as areas between forest and non-FOREST lands that meet the minimal tree stocking/cover and forest areas adjacent to urban and built-up lands. Roadside, streamside, and shelterbelt strips of trees must have a width of at least 120 feet and continuous length of at least 363 feet to qualify

³ 7 U.S.C. § 4201(c)(1) (2012).

⁴ 36 C.F.R. § 254.2 (2017).

as FOREST. Unimproved roads and trails, streams, and clearings in forest areas are classified as FOREST if they are less than 120 feet wide or less than an acre in size. Tree-covered areas in agricultural production settings, such as fruit orchards, or tree-covered areas in urban settings, such as city parks, are not considered FOREST.⁵

I. As used herein, the term “FOREST OFFICER” shall mean an employee of the USFS.⁶

J. As used herein, the term “GLOBAL WARMING” shall mean the rise in global average temperatures near Earth’s surface. GLOBAL WARMING causes CLIMATE CHANGE but GLOBAL WARMING is only one aspect of CLIMATE CHANGE.

K. As used herein, the term “GRASSLAND” shall refer to land on which the vegetation is dominated by grasses and other herbaceous plants. This term may include dedicated pastureland—i.e., land devoted to the production of indigenous or introduced forage for harvest primarily by grazing—and rangeland—i.e., land on which the indigenous vegetation (climax or natural potential) is predominantly grasses, grass-like plants, forbs, or shrubs, and is managed as a natural ecosystem (and if plants are introduced, they are managed as indigenous species).⁷

L. As used herein, the term “MBF” is an abbreviation of one-thousand (1,000) board

⁵ See *Forest Inventory and Analysis Glossary*, U.S. Dep’t of Agric., Forest Serv., <https://www.nrs.fs.fed.us/fia/data-tools/state-reports/glossary/default.asp> (last visited Mar. 9, 2018).

⁶ 36 C.F.R. § 261.2 (2017).

⁷ *Grazing Terminology*, Or. State Univ., <http://forages.oregonstate.edu/fi/topics/pasturesandgrazing/grazingsystemdesign/grazingterminology> (last visited Mar. 9, 2018) (using input from U.S.D.A. scientists and agencies, as well as international scientific committees); see also *Rangelands and Grasslands Programs*, U.S. Dep’t of Agric., Nat’l Inst. for Food and Agric., <https://nifa.usda.gov/program/rangelands-and-grasslands-programs> (last visited Mar. 9, 2018).

feet, a unit of measure for volume of timber.⁸

M. As used herein, the term “NATIONAL FOREST” shall refer to those lands in the NATIONAL FOREST SYSTEM that have been designated as such.⁹

N. As used herein, the term “NATIONAL FOREST SYSTEM” or “NATIONAL FOREST LANDS” shall mean “units of federally owned forest, range, and related lands throughout the United States and its territories, united into a nationally significant system dedicated to the long-term benefit for present and future generations.” Furthermore, the term shall include all national forest lands reserved or withdrawn from the public domain of the United States, all national forest lands acquired through purchase, exchange, donation, or other means, the national grasslands and land utilization projects administered under title III of the Bankhead-Jones Farm Tenant Act, and other lands, waters, or interests therein which are administered by the USFS or are designated for administration through the USFS as a part of the system.¹⁰

O. As used herein, the term “NATIONAL GRASSLAND” shall refer to those lands in the NATIONAL FOREST SYSTEM that have been designated as such.

P. As used herein, the term “OCEAN ACIDIFICATION” shall mean the decrease in pH of the Earth’s oceans and changes in ocean chemistry caused by chemical inputs from the atmosphere, including carbon dioxide.

⁸ *Glossary of Forest Engineering Terms*, U.S. Forest Serv., S. Research Ctr., <https://www.srs.fs.usda.gov/forestops/glossary/> (last visited Mar. 9, 2018).

⁹ See 16 U.S.C. §§ 471–539r (2012).

¹⁰ Compare Forest and Rangeland Renewable Resources Planning Act of 1974, 16 U.S.C. § 1609(a) (2012) with 36 C.F.R. § 222.1(b)(11) (2017) (defining National Forest System lands more succinctly as “the National Forests, National Grass lands, Land Utilization Projects, and other Federal lands for which the Forest Service has administrative jurisdiction.”).

Q. As used herein, the phrase “PERMITTED TO GRAZE” or “PERMITTED”¹¹ shall refer to when livestock are permitted to graze by a grazing permit,¹² grazing agreement, livestock use permit¹³ or other permitting document. In the case of on-off permits,¹⁴ the “on” portion is included.

R. As used herein, the term “PERSON” shall mean all individuals, entities, firms, organizations, groups, committees, regulatory agencies, governmental entities, business entities, corporations, partnerships, trusts, and estates.

S. As used herein, the term “RESERVED FOREST” refers to land permanently reserved from wood products utilization through statute or administrative designation. Examples include National Forest wilderness areas and National Parks and Monuments.¹⁵

T. As used herein, the term “TIMBER LAND” shall refer to FOREST that is capable of producing crops of industrial wood and not withdrawn from timber utilization by statute or administrative regulation.¹⁶

¹¹ See *Grazing Statistical Summary Reports*, U.S. Dep’t of Agric., Forest Serv., <https://www.fs.fed.us/rangeland-management/reports/index.shtml> (containing reports for FY1966 to FY2015, variably using the term “permitted to graze” or just “permitted.”).

¹² A grazing permit is “any document authorizing livestock to use National Forest System or other lands under Forest Service control for the purpose of livestock production including: (i) Temporary grazing permits for grazing livestock temporarily and without priority for reissuance. (ii) Term permits for up to 10 years with priority for renewal at the end of the term.” 36 C.F.R. § 222.1(b)(5) (2017).

¹³ Livestock use permit means “a permit issued for not to exceed one year where the primary use is for other than grazing livestock.” 36 C.F.R. § 222.1(b)(9) (2017).

¹⁴ On-and-off grazing permits are “permits with specific provisions on range only part of which is National Forest System lands or other lands under Forest Service control.” 36 C.F.R. § 222.1(b)(12) (2017).

¹⁵ *Forest Inventory and Analysis Glossary*, U.S. Dep’t of Agric., Forest Serv., <https://www.nrs.fs.fed.us/fia/data-tools/state-reports/glossary/default.asp> (last visited Mar. 9, 2018).

¹⁶ U.S. Dep’t of Agric., Forest Serv., FS-696-M, *U.S. Forest Facts and Historical Trends 19*, (2001), <https://www.fia.fs.fed.us/library/ForestFactsMetric.pdf>.

II. INSTRUCTIONS

A. Each Request for Admission shall be answered separately and fully in writing under oath by Defendant, unless it is objected to, in which event Defendant shall state its reasons for objecting and shall answer to the extent the Request for Admission is not objectionable.

B. The answers are to be signed by the person making them, and the objections signed by the attorney making them.

C. All grounds for an objection to a Request for Admission shall be stated with specificity. Any ground not stated in a timely objection is waived unless Defendant's failure to object is excused by the court for good cause shown.

D. The subject matter of these Requests for Admissions shall be deemed admitted unless, within thirty (30) days after service of these Requests for Admission, Defendant serves upon Plaintiffs a written answer or objection addressed to the matter, signed by Defendant or by Defendant's attorney.

E. If the answer to a Request for Admission is a denial, it shall specifically deny the matter set forth in detail, and the reasons why Defendant cannot admit the matter requested.

F. A denial shall fairly meet the substance of the Request for Admission and, when good faith requires that Defendant qualify an answer or deny only a part of the matter of which an admission is requested, Defendant shall specify the portion that is true and qualify or deny the remainder of the Request for Admission.

G. If Defendant considers that a matter upon which an admission has been requested presents a genuine issue for trial, Defendant may not, on that ground alone, object to the Request for Admission.

III. REQUESTS FOR ADMISSIONS

Plaintiffs request that Defendant admits that each of the following statements is true within thirty (30) days after service of these Requests for Admissions:

REQUEST FOR ADMISSION NO. 1:

The DEPARTMENT OF AGRICULTURE provides assistance in managing the nation's 1.3 billion acres of FARM, ranch, and private FOREST lands through public and private partnerships.¹⁷

ANSWER:

REQUEST FOR ADMISSION NO. 2:

In 2014, the agricultural sector accounted for 10% of total U.S. greenhouse gas emissions based on greenhouse gas emission accounting then-employed by the federal government.¹⁸

ANSWER:

¹⁷ Jane A. Leggett, Cong. Research Serv., R43915, *Climate Change Adaptation by Federal Agencies: An Analysis of Plans and Issues for Congress* 34 (2015), <http://nationalaglawcenter.org/wp-content/uploads/assets/crs/R43915.pdf>.

¹⁸ U.S. Dep't of Agric., Econ. Research Serv., *Agriculture and Climate Change*, <https://www.ers.usda.gov/topics/natural-resources-environment/climate-change/agriculture-and-climate-change/> (last visited Mar. 19, 2018).

REQUEST FOR ADMISSION NO. 3:

The DEPARTMENT OF AGRICULTURE manages 193 million acres of NATIONAL FORESTS and NATIONAL GRASSLANDS, comprising the NATIONAL FOREST SYSTEM.¹⁹

ANSWER:

REQUEST FOR ADMISSION NO. 4:

The DEPARTMENT OF AGRICULTURE shares responsibility, working in concert with State and local agents, for the stewardship of approximately 500 million acres of non-Federal rural and urban forests.²⁰

ANSWER:

¹⁹ U.S. Dep't of Agric., Forest Serv., FS-383, *Land Areas of the National Forest System* 1 (2012), https://www.fs.fed.us/land/staff/lar/LAR2011/LAR2011_Book_A5.pdf; U.S. Dep't of Agric., Forest Serv., *The U.S. Forest Service – An Overview* 9 (2008), https://www.fs.fed.us/sites/default/files/media/types/publication/field_pdf/USFS-overview-0106MJS.pdf; Carol Hardy Vincent et al., Cong. Research Serv., R42346, *Federal Land Ownership: Overview and Data* 4–5 (2017), <https://fas.org/sgp/crs/misc/R42346.pdf>.

²⁰ U.S. Dep't of Agric., Forest Serv., FS-383, *Land Areas of the National Forest System* 1 (2012), https://www.fs.fed.us/land/staff/lar/LAR2011/LAR2011_Book_A5.pdf; U.S. Dep't of Agric., Forest Serv., *The U.S. Forest Service – An Overview* 9 (2008), https://www.fs.fed.us/sites/default/files/media/types/publication/field_pdf/USFS-overview-0106MJS.pdf.

REQUEST FOR ADMISSION NO. 5:

The DEPARTMENT OF AGRICULTURE, through the USFS, exercises “some type of stewardship responsibility over 80 percent of America’s forests.”²¹

ANSWER:

REQUEST FOR ADMISSION NO. 6:

In 2012, the NATIONAL FOREST SYSTEM contained 145 million acres, of which 98 million acres were classified as TIMBER LAND, 27 million acres were classified as RESERVED FOREST, and 20 million acres were classified as “other.”²²

ANSWER:

REQUEST FOR ADMISSION NO. 7:

The DEPARTMENT OF AGRICULTURE authorized the harvest of 525,484,148 MBF, or approximately 1.24 trillion cubic meters, of timber from FY1905–2016.²³

ANSWER:

²¹ U.S. Dep’t of Agric., Forest Serv., *The U.S. Forest Service – An Overview* 10 (2008), https://www.fs.fed.us/sites/default/files/media/types/publication/field_pdf/USFS-overview-0106MJS.pdf.

²² Brett Butler, *Forest Ownership*, in U.S. Forest Resource Facts and Historical Trends 13, 14 (Sonja N. Oswalt & W. Brad Smith eds., 2014), https://www.fia.fs.fed.us/library/brochures/docs/2012/ForestFacts_1952-2012_English.pdf.

²³ See *Forest Products Cut and Sold from the National Forests and Grasslands*, U.S. Dep’t of Agric., Forest Serv., <https://www.fs.fed.us/forestmanagement/products/cut-sold/index.shtml> (last visited Mar. 10, 2018).

REQUEST FOR ADMISSION NO. 8:

From FY 1984–2017 the DEPARTMENT OF AGRICULTURE, through the USFS, authorized the CLEAR CUT of 3,011,086 acres of NATIONAL FOREST SYSTEM lands.²⁴

ANSWER:

REQUEST FOR ADMISSION NO. 9:

From FY 1984–2017 the DEPARTMENT OF AGRICULTURE, through the USFS, authorized the REMOVAL CUT of 1,357,396 acres of NATIONAL FOREST SYSTEM lands.²⁵

ANSWER:

REQUEST FOR ADMISSION NO. 10:

From FY 1984–2017 the DEPARTMENT OF AGRICULTURE, through the USFS, authorized the selection cut of 1,031,491 acres of NATIONAL FOREST SYSTEM lands.²⁶

ANSWER:

²⁴ U.S. Dep’t of Agric., Forest Serv., *Historic Harvest Trends: 1984 to Present* (2017), <https://www.fs.fed.us/forestmanagement/documents/harvest-trends/NFS-HarvestHistory1984-2017.pdf>.

²⁵ U.S. Dep’t of Agric., Forest Serv., *Historic Harvest Trends: 1984 to Present* (2017), <https://www.fs.fed.us/forestmanagement/documents/harvest-trends/NFS-HarvestHistory1984-2017.pdf>.

²⁶ U.S. Dep’t of Agric., Forest Serv., *Historic Harvest Trends: 1984 to Present* (2017), <https://www.fs.fed.us/forestmanagement/documents/harvest-trends/NFS-HarvestHistory1984-2017.pdf>.

REQUEST FOR ADMISSION NO. 11:

From FY 1984–2017 the DEPARTMENT OF AGRICULTURE, through the USFS, authorized the commercial thinning of 4,373,715 acres of NATIONAL FOREST SYSTEM lands.²⁷

ANSWER:

REQUEST FOR ADMISSION NO. 12:

From FY 1984–2017 the DEPARTMENT OF AGRICULTURE, through the USFS, authorized the prep cut of 296,213 acres of NATIONAL FOREST SYSTEM lands.²⁸

ANSWER:

REQUEST FOR ADMISSION NO. 13:

From FY 1984–2017 the DEPARTMENT OF AGRICULTURE, through the USFS, authorized the seed cut of 1,181,295 acres of NATIONAL FOREST SYSTEM lands.²⁹

ANSWER:

²⁷ U.S. Dep’t of Agric., Forest Serv., *Historic Harvest Trends: 1984 to Present* (2017), <https://www.fs.fed.us/forestmanagement/documents/harvest-trends/NFS-HarvestHistory1984-2017.pdf>.

²⁸ U.S. Dep’t of Agric., Forest Serv., *Historic Harvest Trends: 1984 to Present* (2017), <https://www.fs.fed.us/forestmanagement/documents/harvest-trends/NFS-HarvestHistory1984-2017.pdf>.

²⁹ U.S. Dep’t of Agric., Forest Serv., *Historic Harvest Trends: 1984 to Present* (2017), <https://www.fs.fed.us/forestmanagement/documents/harvest-trends/NFS-HarvestHistory1984-2017.pdf>.

REQUEST FOR ADMISSION NO. 14:

From FY 1984–2017 the DEPARTMENT OF AGRICULTURE, through the USFS, authorized the sanitization of 3,001,454 acres of NATIONAL FOREST SYSTEM lands.³⁰

ANSWER:

REQUEST FOR ADMISSION NO. 15:

From FY 1984–2017 the DEPARTMENT OF AGRICULTURE, through the USFS, authorized the special cut 150,441 acres of NATIONAL FOREST SYSTEM lands.³¹

ANSWER:

REQUEST FOR ADMISSION NO. 16:

The DEPARTMENT OF AGRICULTURE, through the USFS, has made 2,767,897 green tons of small, low-value trees from NATIONAL FOREST SYSTEM lands or other FEDERAL LAND available for energy production in 2008.³²

ANSWER:

³⁰ U.S. Dep’t of Agric., Forest Serv., *Historic Harvest Trends: 1984 to Present* (2017), <https://www.fs.fed.us/forestmanagement/documents/harvest-trends/NFS-HarvestHistory1984-2017.pdf>.

³¹ U.S. Dep’t of Agric., Forest Serv., *Historic Harvest Trends: 1984 to Present* (2017), <https://www.fs.fed.us/forestmanagement/documents/harvest-trends/NFS-HarvestHistory1984-2017.pdf>.

³² U.S. Dep’t of Agric., Forest Serv., *The U.S. Forest Service – An Overview* 9 (2008), https://www.fs.fed.us/sites/default/files/media/types/publication/field_pdf/USFS-overview-0106MJS.pdf.

REQUEST FOR ADMISSION NO. 17:

A PERSON or private entity may not cut or otherwise damage any timber, tree, or other forest product on FEDERAL LANDS, except as authorized by the DEPARTMENT OF AGRICULTURE.³³

ANSWER:

REQUEST FOR ADMISSION NO. 18:

A PERSON or private entity may not cut any standing tree, under permit or timber sale contract on FEDERAL LANDS, before a FOREST OFFICER has marked it or has otherwise designated it for cutting.³⁴

ANSWER:

REQUEST FOR ADMISSION NO. 19:

A PERSON or private entity may not remove any timber, tree or other forest product from FEDERAL LANDS, except as authorized by the DEPARTMENT OF AGRICULTURE.³⁵

ANSWER:

³³ 36 C.F.R. § 261.6(a)–(b), (h) (2017).

³⁴ 36 C.F.R. § 261.6(a)–(b), (h) (2017).

³⁵ 36 C.F.R. § 261.6(a)–(b), (h) (2017).

REQUEST FOR ADMISSION NO. 20:

The DEPARTMENT OF AGRICULTURE, through the USFS, manages more than 35 million acres of designated wilderness areas.³⁶

ANSWER:

REQUEST FOR ADMISSION NO. 21:

More than 2.5 million Americans have forest-related jobs, including in forest management, outdoor recreation, and the forest products industry.³⁷

ANSWER:

REQUEST FOR ADMISSION NO. 22:

Nearly one-fifth of the Nation's water originates on the NATIONAL FOREST SYSTEM.³⁸

ANSWER:

³⁶ U.S. Dep't of Agric., Forest Serv., FS-957b, *National Roadmap for Responding to Climate Change* 6 (2011), <https://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf>.

³⁷ U.S. Dep't of Agric., Forest Serv., FS-979, *National Report on Sustainable Forests—2010*, at II-90 (2011), <https://www.fs.fed.us/research/sustain/docs/national-reports/2010/2010-sustainability-report.pdf>.

³⁸ U.S. Dep't of Agric., Forest Serv., FS-957b, *National Roadmap for Responding to Climate Change* 6 (2011), <https://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf>.

REQUEST FOR ADMISSION NO. 23:

Americans spend up to 7.5 billion activity days per year recreating in NATIONAL FORESTS and GRASSLANDS.³⁹

ANSWER:

REQUEST FOR ADMISSION NO. 24:

Since the 1980s, the U.S. FOREST SERVICE has studied the actual and potential impacts of climate change and ecosystem response.⁴⁰

ANSWER:

REQUEST FOR ADMISSION NO. 25:

Youth⁴¹ will be most affected by climate change.⁴²

ANSWER:

³⁹ U.S. Dep't of Agric., Forest Serv., FS-957b, *National Roadmap for Responding to Climate Change* 6 (2011), <https://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf>.

⁴⁰ U.S. Dep't of Agric., Forest Serv., FS-957b, *National Roadmap for Responding to Climate Change* 7 (2011), <https://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf>.

⁴¹ For purposes of this RFA, the term "Youth" shall be given the same meaning as used in the referenced document from which this statement was sourced.

⁴² U.S. Dep't of Agric., Forest Serv., FS-957b, *National Roadmap for Responding to Climate Change* 15 (2011), <https://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf>.

REQUEST FOR ADMISSION NO. 26:

The United States' FORESTS and GRASSLANDS are at risk due to the effects of climate change.⁴³

ANSWER:

REQUEST FOR ADMISSION NO. 27:

The many benefits Americans receive from U.S. FORESTS and GRASSLANDS are threatened by climate change, including provisioning services such as water, wood, and wild foods; regulating services such as erosion, flood, and climate control; and cultural services such as outdoor recreation, spiritual renewal, and aesthetic enjoyment.⁴⁴

ANSWER:

REQUEST FOR ADMISSION NO. 28:

Most of the urgent FOREST and GRASSLAND management challenges of the past 20 years, such as wildfires, changing water regimes, and expanding forest insect infestations, have been driven, in part, by a changing climate.⁴⁵

ANSWER:

⁴³ U.S. Dep't of Agric., Forest Serv., FS-957a, *A Roadmap for Responding to Climate Change: A Summary* (2010), https://www.fs.fed.us/climatechange/pdf/Brochure_FINAL.pdf.

⁴⁴ *National Roadmap for Responding to Climate Change*, U.S. Dep't of Agric., Forest, Serv., <https://www.fs.fed.us/climatechange/advisor/roadmap.html> (last visited Mar. 10, 2018).

⁴⁵ U.S. Dep't of Agric., Forest Serv., FS-957b, *National Roadmap for Responding to Climate Change 2* (2011), <https://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf>.

REQUEST FOR ADMISSION NO. 29:

Since the 1990s, the U.S. FOREST SERVICE's Forest Inventory and Analysis program has provided official estimates of forest carbon stocks and flows for the United States.⁴⁶

ANSWER:

REQUEST FOR ADMISSION NO. 30:

As of 2008, FOREST covered about one-third of the United States, or about 751 million acres in the United States.⁴⁷

ANSWER:

REQUEST FOR ADMISSION NO. 31:

Carbon accumulates in woody biomass and soils for decades or centuries, until a DISTURBANCE EVENT triggers accelerated release of stored carbon back to the atmosphere.⁴⁸

ANSWER:

⁴⁶ U.S. Forest Serv., *Climate Change Advisor's Office Briefing Paper: Baseline Estimates of Carbon Stocks in Forests and Harvested Wood Products for National Forest System Units* (2015), <https://www.fs.fed.us/climatechange/documents/CarbonAssessmentsBriefingPaper.pdf>.

⁴⁷ U.S. Dep't of Agric., Forest Serv., *The U.S. Forest Service – An Overview* 11 (2008), https://www.fs.fed.us/sites/default/files/media/types/publication/field_pdf/USFS-overview-0106MJS.pdf.

⁴⁸ S.N. Goward et al., *Forest Disturbance and North American Carbon Flux*, 89 *Eos* 105, 105 (2008).

REQUEST FOR ADMISSION NO. 32:

1.5 billion trees are harvested per year in the United States.⁴⁹

ANSWER:

REQUEST FOR ADMISSION NO. 33:

Total NATIONAL FOREST SYSTEM carbon in 2013 was 10,770 Tg, which is 24% of total carbon stocks in the United States.⁵⁰

ANSWER:

REQUEST FOR ADMISSION NO. 34:

The CARBON SEQUESTRATION capacity of FORESTS in the United States are affected by DISTURBANCE EVENTS such as wildfires, insect activity, timber harvesting and forest management, and weather events.⁵¹

ANSWER:

⁴⁹ U.S. Dep't of Agric., Forest Serv., *The U.S. Forest Service – An Overview* 9 (2008), https://www.fs.fed.us/sites/default/files/media/types/publication/field_pdf/USFS-overview-0106MJS.pdf.

⁵⁰ U.S. Forest Serv., *Climate Change Advisor's Office Briefing Paper: Baseline Estimates of Carbon Stocks in Forests and Harvested Wood Products for National Forest System Units* (2015), <https://www.fs.fed.us/climatechange/documents/CarbonAssessmentsBriefingPaper.pdf>.

⁵¹ U.S. Forest Serv., *Climate Change Advisor's Office Briefing Paper: Baseline Estimates of Carbon Stocks in Forests and Harvested Wood Products for National Forest System Units* (2015), <https://www.fs.fed.us/climatechange/documents/CarbonAssessmentsBriefingPaper.pdf>.

REQUEST FOR ADMISSION NO. 35:

At the present time, FORESTS in the United States SEQUESTER more carbon than they emit each year.⁵²

ANSWER:

REQUEST FOR ADMISSION NO. 36:

In 2014, NATIONAL FORESTS stored 9,499 million metric tons of carbon.⁵³

ANSWER:

⁵² Mike Ryan et al., *Forests and Carbon Storage*, U.S. Dep't of Agric., Forest Serv. (2012), <https://www.fs.usda.gov/ccrc/print/topics/forests-carbon>.

⁵³ For purposes of this RFA, total carbon includes the following pools: Aboveground (live trees, saplings, and understory vegetation); Belowground (roots of live trees, saplings, and understory vegetation); Deadwood (standing dead trees and down woody material); Forest Floor (litter); and Soil Organic Carbon. See U.S. Forest Serv., Forest Inventory and Analysis Program, *Total Carbon Storage in U.S. Forests by State and Ownership Group* (2014), <https://www.fia.fs.fed.us/Forest%20Carbon/methods/docs/2014/Total%20forest%20carbon20140721.xlsx>; see also James E. Smith et al., U.S. Dep't of Agric., Forest Serv., *U.S. Forest Carbon Calculation Tool: Forest-Land Carbon Stocks and Net Annual Stock Change 9* (2010), https://www.nrs.fs.fed.us/pubs/gtr/gtr_nrs13R.pdf (excluding Interior Alaska because the FIA program does not collect plot data there).

REQUEST FOR ADMISSION NO. 37:

In 2014, public forest other than NATIONAL FORESTS stored 6,403 million metric tons of carbon.⁵⁴

ANSWER:

REQUEST FOR ADMISSION NO. 38:

In 2014, privately owned forests stored 23,525 million metric tons of carbon.⁵⁵

ANSWER:

⁵⁴ For purposes of this RFA, total carbon includes the following pools: Aboveground (live trees, saplings, and understory vegetation); Belowground (roots of live trees, saplings, and understory vegetation); Deadwood (standing dead trees and down woody material); Forest Floor (litter); and Soil Organic Carbon. See U.S. Forest Serv., Forest Inventory and Analysis Program, *Total Carbon Storage in U.S. Forests by State and Ownership Group* (2014), <https://www.fia.fs.fed.us/Forest%20Carbon/methods/docs/2014/Total%20forest%20carbon20140721.xlsx>; see also James E. Smith et al., U.S. Dep't of Agric., Forest Serv., *U.S. Forest Carbon Calculation Tool: Forest-Land Carbon Stocks and Net Annual Stock Change* 9 (2010), https://www.nrs.fs.fed.us/pubs/gtr/gtr_nrs13R.pdf (excluding Interior Alaska because the FIA program does not collect plot data there).

⁵⁵ For purposes of this RFA, total carbon includes the following pools: Aboveground (live trees, saplings, and understory vegetation); Belowground (roots of live trees, saplings, and understory vegetation); Deadwood (standing dead trees and down woody material); Forest Floor (litter); and Soil Organic Carbon. See U.S. Forest Serv., Forest Inventory and Analysis Program, *Total Carbon Storage in U.S. Forests by State and Ownership Group* (2014), <https://www.fia.fs.fed.us/Forest%20Carbon/methods/docs/2014/Total%20forest%20carbon20140721.xlsx>; see also James E. Smith et al., U.S. Dep't of Agric., Forest Serv., *U.S. Forest Carbon Calculation Tool: Forest-Land Carbon Stocks and Net Annual Stock Change* 9 (2010), https://www.nrs.fs.fed.us/pubs/gtr/gtr_nrs13R.pdf (excluding Interior Alaska because the FIA program does not collect plot data there).

REQUEST FOR ADMISSION NO. 39:

The current rate of CARBON SEQUESTRATION for U.S. FORESTS is a “legacy of harvesting and forest conversion that took place in the past,” which means that today’s FORESTS are SEQUESTERING only “some” of the carbon dioxide released into the atmosphere by DISTURBANCE EVENTS “decades ago.”⁵⁶

ANSWER:

REQUEST FOR ADMISSION NO. 40:

From January 1, 2006 through December 31, 2010, DISTURBANCE EVENTS in the U.S. reduced the CARBON SEQUESTRATION potential of U.S. forests by 42% of its potential, of which 13% is attributable to natural disturbances and 87% is attributable to harvest.⁵⁷

ANSWER:

REQUEST FOR ADMISSION NO. 41:

The DEPARTMENT OF AGRICULTURE, through the USFS, has recognized that “[c]limate change has led to fire seasons that are now on average 78 days longer than in 1970.”⁵⁸

ANSWER:

⁵⁶ Mike Ryan et al., *Forests and Carbon Storage*, U.S. Dep’t of Agric., Forest Serv. (2012), <https://www.fs.usda.gov/ccrc/print/topics/forests-carbon>.

⁵⁷ N. L. Harris et al., *Attribution of Net Carbon Change by Disturbance Type Across Forest Lands of the Conterminous United States*, 11 Carbon Balance & Mgmt. 1, 2 (2016).

⁵⁸ U.S. Dep’t of Agric, Forest Serv., *The Rising Cost of Wildfire Operations: Effects on the Forest Service’s Non-Fire Work 2* (2015), <https://www.fs.fed.us/sites/default/files/2015-Fire-Budget-Report.pdf>.

REQUEST FOR ADMISSION NO. 42:

The DEPARTMENT OF AGRICULTURE has acknowledged that about “12 percent of coterminous U.S. FOREST is currently at a high or very high risk for wildfire.”⁵⁹

ANSWER:

REQUEST FOR ADMISSION NO. 43:

In 2012, wildfire combustion released 270 teragrams of CO₂-equivalent back into the atmosphere, which had been previously SEQUESTERed in forest ecosystems.⁶⁰

ANSWER:

REQUEST FOR ADMISSION NO. 44:

In Fiscal Year 2007, wildfires burned 2,996,000 acres of NATIONAL FOREST SYSTEM land.⁶¹

ANSWER:

⁵⁹ National Interagency Fire Center, *Wildland Fire*, in U.S. Forest Resource Facts and Historical Trends 35 (Sonja N. Oswalt & W. Brad Smith eds., 2014),

https://www.fia.fs.fed.us/library/brochures/docs/2012/ForestFacts_1952-2012_English.pdf.

⁶⁰ Grant Domke & Chris Woodall, *Forest Ownership*, in U.S. Forest Resource Facts and Historical Trends 27 (Sonja N. Oswalt & W. Brad Smith eds., 2014),

https://www.fia.fs.fed.us/library/brochures/docs/2012/ForestFacts_1952-2012_English.pdf.

⁶¹ U.S. Dep’t of Agric., Forest Serv., *The U.S. Forest Service – An Overview* 9 (2008), https://www.fs.fed.us/sites/default/files/media/types/publication/field_pdf/USFS-overview-0106MJS.pdf.

REQUEST FOR ADMISSION NO. 45:

In Fiscal Year 2007, USFS treated 3,027,032 acres of NATIONAL FOREST SYSTEM lands to reduce hazardous fuels.⁶²

ANSWER:

REQUEST FOR ADMISSION NO. 46:

In 2014, the USFS spent \$320 million in wildfire suppression costs to suppress the ten largest fires on NATIONAL FOREST SYSTEM LANDS.⁶³

ANSWER:

REQUEST FOR ADMISSION NO. 47:

In 1985, 82,591 fires burned 2,896,147 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$161,505,000 and the DEPARTMENT OF THE INTERIOR \$78,438,000 in nominal dollars.⁶⁴

ANSWER:

⁶² U.S. Dep't of Agric., Forest Serv., *The U.S. Forest Service – An Overview* 9 (2008), https://www.fs.fed.us/sites/default/files/media/types/publication/field_pdf/USFS-overview-0106MJS.pdf.

⁶³ U.S. Dep't of Agric, Forest Serv., *The Rising Cost of Wildfire Operations: Effects on the Forest Service's Non-Fire Work* 2 (2015), <https://www.fs.fed.us/sites/default/files/2015-Fire-Budget-Report.pdf>.

⁶⁴ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 48:

In 1986, 85,907 fires burned 2,719,162 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$111,625,000 and the DEPARTMENT OF THE INTERIOR \$91,153,000 in nominal dollars.⁶⁵

ANSWER:

REQUEST FOR ADMISSION NO. 49:

In 1987, 71,300 fires burned 2,447,296 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$253,657,000 and the DEPARTMENT OF THE INTERIOR \$81,452,000 in nominal dollars.⁶⁶

ANSWER:

REQUEST FOR ADMISSION NO. 50:

In 1988, 72,750 fires burned 5,009,290 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$429,609,000 and the DEPARTMENT OF THE INTERIOR \$149,317,000 in nominal dollars.⁶⁷

ANSWER:

⁶⁵ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁶⁶ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁶⁷ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 51:

In 1989, 48,949 fires burned 1,827,310 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$331,672,000 and the DEPARTMENT OF THE INTERIOR \$168,115,000 in nominal dollars.⁶⁸

ANSWER:

REQUEST FOR ADMISSION NO. 52:

In 1990, 66,481 fires burned 4,621,621 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$253,700,000 and the DEPARTMENT OF THE INTERIOR \$144,252,000 in nominal dollars.⁶⁹

ANSWER:

REQUEST FOR ADMISSION NO. 53:

In 1991, 75,754 fires burned 2,953,578 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$132,300,000 and the DEPARTMENT OF THE INTERIOR \$73,820,000 in nominal dollars.⁷⁰

ANSWER:

⁶⁸ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁶⁹ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁷⁰ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 54:

In 1992, 87,394 fires burned 2,069,929 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$290,300,000 and the DEPARTMENT OF THE INTERIOR \$87,166,000 in nominal dollars.⁷¹

ANSWER:

REQUEST FOR ADMISSION NO. 55:

In 1993, 58,810 fires burned 1,797,574 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$184,000,000 and the DEPARTMENT OF THE INTERIOR \$56,436,000 in nominal dollars.⁷²

ANSWER:

REQUEST FOR ADMISSION NO. 56:

In 1994, 79,107 fires burned 4,073,579 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$757,200,000 and the DEPARTMENT OF THE INTERIOR \$161,135,000 in nominal dollars.⁷³

ANSWER:

⁷¹ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁷² Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁷³ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 57:

In 1995, 82,234 fires burned 1,840,546 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$367,000,000 and the DEPARTMENT OF THE INTERIOR \$110,126,000 in nominal dollars.⁷⁴

ANSWER:

REQUEST FOR ADMISSION NO. 58:

In 1996, 96,363 fires burned 6,065,998 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$547,500,000 and the DEPARTMENT OF THE INTERIOR \$153,683,000 in nominal dollars.⁷⁵

ANSWER:

REQUEST FOR ADMISSION NO. 59:

In 1997, 66,196 fires burned 2,856,959 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$179,100,000 and the DEPARTMENT OF THE INTERIOR \$105,048,000 in nominal dollars.⁷⁶

ANSWER:

⁷⁴ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁷⁵ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁷⁶ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 60:

In 1998, 81,043 fires burned 1,329,704 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$306,800,000 and the DEPARTMENT OF THE INTERIOR \$109,904,000 in nominal dollars.⁷⁷

ANSWER:

REQUEST FOR ADMISSION NO. 61:

In 1999, 92,487 fires burned 5,626,093 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$361,100,000 and the DEPARTMENT OF THE INTERIOR \$154,416,000 in nominal dollars.⁷⁸

ANSWER:

REQUEST FOR ADMISSION NO. 62:

In 2000, 92,250 fires burned 7,383,493 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,076,000,000 and the DEPARTMENT OF THE INTERIOR \$334,802,000 in nominal dollars.⁷⁹

ANSWER:

⁷⁷ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁷⁸ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁷⁹ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 63:

In 2001, 84,079 fires burned 3,570,911 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$683,122,000 and the DEPARTMENT OF THE INTERIOR \$269,574,000 in nominal dollars.⁸⁰

ANSWER:

REQUEST FOR ADMISSION NO. 64:

In 2002, 73,457 fires burned 7,184,712 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,279,000,000 and the DEPARTMENT OF THE INTERIOR \$395,040,000 in nominal dollars.⁸¹

ANSWER:

REQUEST FOR ADMISSION NO. 65:

In 2003, 63,629 fires burned 3,960,842 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,023,500,000 and the DEPARTMENT OF THE INTERIOR \$303,638,000 in nominal dollars.⁸²

ANSWER:

⁸⁰ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁸¹ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁸² Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 66:

In 2004, 65,461 fires burned 8,097,880 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$726,000,000 and the DEPARTMENT OF THE INTERIOR \$281,244,000 in nominal dollars.⁸³

ANSWER:

REQUEST FOR ADMISSION NO. 67:

In 2005, 66,753 fires burned 8,689,389 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$524,900,000 and the DEPARTMENT OF THE INTERIOR \$294,054,000 in nominal dollars.⁸⁴

ANSWER:

REQUEST FOR ADMISSION NO. 68:

In 2006, 96,385 fires burned 9,873,745 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,280,419,000 and the DEPARTMENT OF THE INTERIOR \$424,058,000 in nominal dollars.⁸⁵

ANSWER:

⁸³ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁸⁴ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁸⁵ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 69:

In 2007, 85,705 fires burned 9,328,045 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,149,654,000 and the DEPARTMENT OF THE INTERIOR \$470,491,000 in nominal dollars.⁸⁶

ANSWER:

REQUEST FOR ADMISSION NO. 70:

In 2008, 78,979 fires burned 5,292,468 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,193,073,000 and the DEPARTMENT OF THE INTERIOR \$392,783,000 in nominal dollars.⁸⁷

ANSWER:

REQUEST FOR ADMISSION NO. 71:

In 2009, 78,792 fires burned 5,921,786 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$702,111,000 and the DEPARTMENT OF THE INTERIOR \$218,418,000 in nominal dollars.⁸⁸

ANSWER:

⁸⁶ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁸⁷ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁸⁸ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 72:

In 2010, 71,971 fires burned 3,422,724 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$578,285,000 and the DEPARTMENT OF THE INTERIOR \$231,214,000 in nominal dollars.⁸⁹

ANSWER:

REQUEST FOR ADMISSION NO. 73:

In 2011, 74,126 fires burned 8,711,367 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,055,736,000 and the DEPARTMENT OF THE INTERIOR \$318,789,000 in nominal dollars.⁹⁰

ANSWER:

REQUEST FOR ADMISSION NO. 74:

In 2012, 67,774 fires burned 9,326,238 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,436,614,000 and the DEPARTMENT OF THE INTERIOR \$465,832,000 in nominal dollars.⁹¹

ANSWER:

⁸⁹ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁹⁰ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁹¹ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 75:

In 2013, 47,579 fires burned 4,319,546 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,341,735,000 and the DEPARTMENT OF THE INTERIOR \$399,199,000 in nominal dollars.⁹²

ANSWER:

REQUEST FOR ADMISSION NO. 76:

In 2014, 63,212 fires burned 3,595,613 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,195,955,000 and the DEPARTMENT OF THE INTERIOR \$326,194,000 in nominal dollars.⁹³

ANSWER:

REQUEST FOR ADMISSION NO. 77:

In 2015, 10,125,149 fires burned 2,896,147 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,713,000,000 and the DEPARTMENT OF THE INTERIOR \$417,543,000 in nominal dollars.⁹⁴

ANSWER:

⁹² Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁹³ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁹⁴ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

REQUEST FOR ADMISSION NO. 78:

In 2016, 67,595 fires burned 5,503,538 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$1,603,806,000 and the DEPARTMENT OF THE INTERIOR \$371,739,000 in nominal dollars.⁹⁵

REQUEST FOR ADMISSION NO. 79:

In 2017, 71,499 fires burned 10,026,086 acres on private, state, and federal lands, costing the DEPARTMENT OF AGRICULTURE \$2,410,165,000 and the DEPARTMENT OF THE INTERIOR \$508,000,000 in nominal dollars.⁹⁶

ANSWER:

REQUEST FOR ADMISSION NO. 80:

USFS's firefighting suppression costs incurred in 2017 had already exceeded \$2 billion by September 14, 2017, making 2017 the year on record in which the USFS has spent the most amount of money on fire suppression costs.⁹⁷

ANSWER:

⁹⁵ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁹⁶ Nat'l Interagency Fire Ctr., *Federal Firefighting Costs (Suppression Only)* (2018), https://www.nifc.gov/fireInfo/fireInfo_documents/SuppCosts.pdf.

⁹⁷ *Forest Service Wildland Fire Suppression Costs Exceed \$2 Billion*, U.S. Dep't of Agric. (Sept. 14, 2017), <https://www.usda.gov/media/press-releases/2017/09/14/forest-service-wildland-fire-suppression-costs-exceed-2-billion>.

REQUEST FOR ADMISSION NO. 81:

From 1984 to 2008, wildfire and bark beetles killed trees across 20% of Arizona and New Mexico forests.⁹⁸

ANSWER:

REQUEST FOR ADMISSION NO. 82:

The USFS has created advanced computer models producing the national-scale simulations of how ecosystems and fire regimes could change in the 21st century under CLIMATE CHANGE scenarios.⁹⁹

ANSWER:

REQUEST FOR ADMISSION NO. 83:

The DEPARTMENT OF AGRICULTURE has projected that, because of CLIMATE CHANGE: wildfire will increase throughout the United States, causing at least a doubling of area burned by the mid-21st century.¹⁰⁰

ANSWER:

⁹⁸ U.S. Glob. Change Research Program, *Climate Change Impacts in the United States: The Third National Climate Assessment* 468 (2014), http://s3.amazonaws.com/nca2014/low/NCA3_Climate_Change_Impacts_in_the_United%20States_LowRes.pdf?download=1.

⁹⁹ Valerie Rapp, *Science Update: Western Forests, Fire Risk, and Climate Change*, Pac. Nw. Research Station, Jan. 2004, at 1, <https://www.fs.fed.us/pnw/pubs/science-update-6.pdf>.

¹⁰⁰ U.S. Dep't of Agric., Forest Serv., PNW-GTR-870, *Effects of Climatic Variability and Change on Forest Ecosystems: A Comprehensive Science Synthesis for the U.S. Forest Sector* v (2012), https://www.usda.gov/oce/climate_change/effects_2012/FS_Climate1114%20opt.pdf.

REQUEST FOR ADMISSION NO. 84:

The DEPARTMENT OF AGRICULTURE has projected that, because of CLIMATE CHANGE: insect infestations, such as the current advance of bark beetles in forests throughout the Western United States and Canada, will expand, often affecting more land area per year than wildfire.¹⁰¹

ANSWER:

REQUEST FOR ADMISSION NO. 85:

The DEPARTMENT OF AGRICULTURE has projected that, because of CLIMATE CHANGE: invasive species will likely become more widespread, especially in areas subject to increased disturbance and in dry forest ecosystems.¹⁰²

ANSWER:

¹⁰¹ U.S. Dep't of Agric., Forest Serv., PNW-GTR-870, *Effects of Climatic Variability and Change on Forest Ecosystems: A Comprehensive Science Synthesis for the U.S. Forest Sector v* (2012), https://www.usda.gov/oce/climate_change/effects_2012/FS_Climate1114%20opt.pdf.

¹⁰² U.S. Dep't of Agric., Forest Serv., PNW-GTR-870, *Effects of Climatic Variability and Change on Forest Ecosystems: A Comprehensive Science Synthesis for the U.S. Forest Sector v* (2012), https://www.usda.gov/oce/climate_change/effects_2012/FS_Climate1114%20opt.pdf.

REQUEST FOR ADMISSION NO. 86:

The DEPARTMENT OF AGRICULTURE has projected that, because of CLIMATE CHANGE: increased flooding, erosion, and movement of sediment into streams will be caused by higher precipitation intensity in some regions (e.g., Southern United States), higher rain-snow ratios in mountainous regions (western mountains), and higher area burned □(western dry forests).¹⁰³

ANSWER:

REQUEST FOR ADMISSION NO. 87:

The DEPARTMENT OF AGRICULTURE has projected that, because of CLIMATE CHANGE: increased drought will exacerbate stress complexes that include insects, fire, and invasive species, leading to higher tree mortality, slow regeneration in some species, and altered species assemblages.¹⁰⁴

ANSWER:

¹⁰³ U.S. Dep't of Agric., Forest Serv., PNW-GTR-870, *Effects of Climatic Variability and Change on Forest Ecosystems: A Comprehensive Science Synthesis for the U.S. Forest Sector v* (2012), https://www.usda.gov/oce/climate_change/effects_2012/FS_Climate1114%20opt.pdf.

¹⁰⁴ U.S. Dep't of Agric., Forest Serv., PNW-GTR-870, *Effects of Climatic Variability and Change on Forest Ecosystems: A Comprehensive Science Synthesis for the U.S. Forest Sector v* (2012), https://www.usda.gov/oce/climate_change/effects_2012/FS_Climate1114%20opt.pdf.

REQUEST FOR ADMISSION NO. 88:

As of 2007, over 2 million FARMS exist in the United States, covering about 900 million acres.¹⁰⁵

ANSWER:

REQUEST FOR ADMISSION NO. 89:

CLIMATE CHANGE presents threats to U.S. agricultural production, forest resources, and rural economies, including more severe storms, rising average temperatures, extremes in precipitation, and more forest fires.¹⁰⁶

ANSWER:

REQUEST FOR ADMISSION NO. 90:

20 million metric tons of carbon are currently SEQUESTERed each year in U.S. FARM and grazing land soils, with the potential to SEQUESTER an additional 180 million metric tons annually.¹⁰⁷

ANSWER:

¹⁰⁵ C.L. Walthall et al., U.S. Dep't of Agric., USDA Tech. Bulletin 1935, *Climate Change and Agriculture in the United States: Effects and Adaptation* 11 (2012), [https://www.usda.gov/oce/climate_change/effects_2012/CC%20and%20Agriculture%20Report%20\(02-04-2013\)b.pdf](https://www.usda.gov/oce/climate_change/effects_2012/CC%20and%20Agriculture%20Report%20(02-04-2013)b.pdf).

¹⁰⁶ *Climate Solutions*, U.S. Dep't of Agric., <https://www.usda.gov/topics/climate-solutions> (last visited Mar. 13, 2018).

¹⁰⁷ Nat. Res. Conservation Serv., *Carbon Sequestration* (n.d.), https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs144p2_066823.pdf.

REQUEST FOR ADMISSION NO. 91:

Agricultural soil management is the single greatest contributor to greenhouse gas emissions from the U.S. agricultural production sector.¹⁰⁸

ANSWER:

REQUEST FOR ADMISSION NO. 92:

Land management practices such as long-term vegetation cover can improve carbon storage by approximately 1.3 million tons per year.¹⁰⁹

ANSWER:

REQUEST FOR ADMISSION NO. 93:

The U.S. agricultural sector is the leading source of nitrous oxide (N₂O) emissions in the U.S., largely as a result of soil management, commercial fertilizer and manure application, and production of nitrogen-fixing crops.¹¹⁰

ANSWER:

¹⁰⁸ Jeff Schahczenski & Holly Hill, Nat'l Sustainable Agric. Info. Serv., *Agriculture, Climate Change and Carbon Sequestration* 5 (2009), <https://attra.ncat.org/attra-pub/download.php?id=297>.

¹⁰⁹ Kelly Connelly Garry, Nat'l Agric. L. Ctr., *Managing Carbon in a World Economy: The Role of American Agriculture* 10 (2005), http://nationalaglawcenter.org/wp-content/uploads/assets/articles/garry_carbon.pdf (citing 2002 Farm Bill--Conservation Reserve Program--Long-Term Policy, 68 Fed .Reg. 24830-01, 24835 (May 8, 2003) (to be codified at C.F.R. pt. 1410)).

¹¹⁰ Renée Johnson, Cong. Research Serv., RL33898, *Climate Change: The Role of the U.S. Agriculture Sector* 4 (2009), <http://nationalaglawcenter.org/wp-content/uploads/assets/crs/RL33898.pdf>.

REQUEST FOR ADMISSION NO. 94:

In 2004, livestock grazing occurred on 92,924,000 acres of NATIONAL FOREST SYSTEM land.¹¹¹

ANSWER:

REQUEST FOR ADMISSION NO. 95:

The DEPARTMENT OF AGRICULTURE, through the USFS, authorized 71,280 permittees over the course of twelve (12) grazing seasons from 2002 through 2013 for a total of 76,026,504 AUMs.¹¹²

ANSWER:

REQUEST FOR ADMISSION NO. 96:

In 2014, the DEPARTMENT OF AGRICULTURE authorized about 1.1 million cattle to graze on NATIONAL FOREST SYSTEM land.¹¹³

ANSWER:

¹¹¹ Christine Glaser et al., Ctr. for Biological Diversity, *Costs and Consequences: The Real Price of Livestock Grazing on America's Public Lands* 11 (2015), https://www.biologicaldiversity.org/programs/public_lands/grazing/pdfs/CostsAndConsequences_01-2015.pdf.

¹¹² Christine Glaser et al., Ctr. for Biological Diversity, *Costs and Consequences: The Real Price of Livestock Grazing on America's Public Lands* 14 (2015), https://www.biologicaldiversity.org/programs/public_lands/grazing/pdfs/CostsAndConsequences_01-2015.pdf (citing USDA Grazing Statistical Summaries FY 2002 to 2013).

¹¹³ See dailypitchfork.org, *BLM and USFS Livestock Grazing Stats: Examining Key Data in the Debate Over Wild Horses on Western Public Lands* 10 (2015), http://dailypitchfork.org/wp-content/uploads/2015/11/BLM_USFS-grazing-analysis_2014_Daily-Pitchfork.pdf.

REQUEST FOR ADMISSION NO. 97:

Unless otherwise specified by the Chief of USFS, all grazing and livestock use on NATIONAL FOREST SYSTEM lands and on other lands under USFS control must be authorized by a grazing or livestock use permit.¹¹⁴

ANSWER:

REQUEST FOR ADMISSION NO. 98:

Livestock grazing is permitted on over 95 million acres of NATIONAL FOREST SYSTEM lands spread across 29 states.¹¹⁵

ANSWER:

¹¹⁴ 36 C.F.R. § 222.3(a) (2017).

¹¹⁵ U.S. Dep't of Agric., Forest Serv., *Grazing Statistical Summary: FY2015*, at iii (2016), <https://www.fs.fed.us/rangeland-management/documents/grazing-stats/2010s/GrazingStatisticalSummaryFY2015.pdf>.

REQUEST FOR ADMISSION NO. 99:

The DEPARTMENT OF AGRICULTURE, through the USFS, in FY2015, PERMITTED 1,031,350 cattle TO GRAZE on NATIONAL FORESTS within the NATIONAL FOREST SYSTEM for a total of 4,988,359 AUMs, and PERMITTED 199,253 cattle TO GRAZE on NATIONAL GRASSLANDS within the NATIONAL FOREST SYSTEM for a total of 1,392,513 AUMs.¹¹⁶

ANSWER:

REQUEST FOR ADMISSION NO. 100:

In FY2014, PERMITTED 991,553 cattle TO GRAZE on NATIONAL FORESTS within the NATIONAL FOREST SYSTEM for a total of 4,788,413 AUMs, and PERMITTED 195,977 cattle TO GRAZE on NATIONAL GRASSLANDS within the NATIONAL FOREST SYSTEM for a total of 1,281,816 AUMs.¹¹⁷

ANSWER:

¹¹⁶ U.S. Dep't of Agric., Forest Serv., *Grazing Statistical Summary: FY2015*, at 4–6 (2016), <https://www.fs.fed.us/rangeland-management/documents/grazing-stats/2010s/GrazingStatisticalSummaryFY2015.pdf>.

¹¹⁷ U.S. Dep't of Agric., Forest Serv., *Grazing Statistical Summary: FY2014*, at 4–6 (2015), <https://www.fs.fed.us/rangeland-management/documents/grazing-stats/2010s/GrazingStatisticalSummaryFY2014.pdf>.

REQUEST FOR ADMISSION NO. 101:

In FY2013, PERMITTED 997,232 cattle TO GRAZE on NATIONAL FORESTS within the NATIONAL FOREST SYSTEM for a total of 4,773,566 AUMs, and PERMITTED 162,587 cattle TO GRAZE on NATIONAL GRASSLANDS within the NATIONAL FOREST SYSTEM for a total of 1,127,061 AUMs.¹¹⁸

ANSWER:

REQUEST FOR ADMISSION NO. 102:

In FY2012, PERMITTED 1,013,287 cattle TO GRAZE on NATIONAL FORESTS within the NATIONAL FOREST SYSTEM for a total of 4,961,829 AUMs, and PERMITTED 200,438 cattle TO GRAZE on NATIONAL GRASSLANDS within the NATIONAL FOREST SYSTEM for a total of 1,430,223 AUMs.¹¹⁹

ANSWER:

¹¹⁸ U.S. Dep't of Agric., Forest Serv., *Grazing Statistical Summary: FY2013*, at 4–6 (2014), <https://www.fs.fed.us/rangeland-management/documents/grazing-stats/2010s/GrazingStatisticalSummaryFY2013.pdf>.

¹¹⁹ U.S. Dep't of Agric., Forest Serv., *Grazing Statistical Summary: FY2012*, at 4–6 (2013), <https://www.fs.fed.us/rangeland-management/documents/grazing-stats/2010s/GrazingStatisticalSummaryFY2012.pdf>.

REQUEST FOR ADMISSION NO. 103:

In FY2011, PERMITTED 1,026,811 cattle TO GRAZE on NATIONAL FORESTS within the NATIONAL FOREST SYSTEM for a total of 4,946,013 AUMs, and PERMITTED 203,862 cattle TO GRAZE on NATIONAL GRASSLANDS within the NATIONAL FOREST SYSTEM for a total of 1,344,687 AUMs.¹²⁰

ANSWER:

REQUEST FOR ADMISSION NO. 104:

In FY2010, PERMITTED 1,037,974 cattle TO GRAZE on NATIONAL FORESTS within the NATIONAL FOREST SYSTEM for a total of 5,165,413 AUMs, and PERMITTED 186,494 cattle TO GRAZE on NATIONAL GRASSLANDS within the NATIONAL FOREST SYSTEM for a total of 1,354,832 AUMs.¹²¹

ANSWER:

¹²⁰ U.S. Dep't of Agric., Forest Serv., *Grazing Statistical Summary: FY2011*, at 4–6 (2013), <https://www.fs.fed.us/rangeland-management/documents/grazing-stats/2010s/GrazingStatisticalSummaryFY2011.pdf>.

¹²¹ U.S. Dep't of Agric., Forest Serv., *Grazing Statistical Summary: FY2010*, at 4–6 (2013), <https://www.fs.fed.us/rangeland-management/documents/grazing-stats/2010s/GrazingStatisticalSummaryFY2010.pdf>.

REQUEST FOR ADMISSION NO. 105:

In FY2009, PERMITTED 1,031,790 cattle TO GRAZE on NATIONAL FORESTS within the NATIONAL FOREST SYSTEM for a total of 4,989,837 AUMs, and PERMITTED 233,145 cattle TO GRAZE on NATIONAL GRASSLANDS within the NATIONAL FOREST SYSTEM for a total of 1,187,894 AUMs.¹²²

ANSWER:

REQUEST FOR ADMISSION NO. 106:

In FY2008, PERMITTED 990,169 cattle TO GRAZE on NATIONAL FORESTS within the NATIONAL FOREST SYSTEM for a total of 4,834,280 AUMs, and PERMITTED 190,167 cattle TO GRAZE on NATIONAL GRASSLANDS within the NATIONAL FOREST SYSTEM for a total of 1,266,825 AUMs.¹²³

ANSWER:

¹²² U.S. Dep't of Agric., Forest Serv., *Grazing Statistical Summary: FY2009*, at 4–6 (2014), <https://www.fs.fed.us/rangeland-management/documents/grazing-stats/2000s/GrazingStatisticalSummaryFY2009.pdf>.

¹²³ U.S. Dep't of Agric., Forest Serv., *Grazing Statistical Summary: FY2008*, at 4–6 (2009), <https://www.fs.fed.us/rangeland-management/documents/grazing-stats/2000s/GrazingStatisticalSummaryFY2008.pdf>.

REQUEST FOR ADMISSION NO. 107:

In 2008, the amount of greenhouse gas emissions attributable to beef cattle in the U.S. was a net addition of 138.2 Tg CO₂ equivalent, when including sources from enteric fermentation, managed livestock waste, and grazed land.¹²⁴

ANSWER:

REQUEST FOR ADMISSION NO. 108:

Enteric fermentation and manure management accounted for, respectively, 22.5% and 8.4% of U.S. methane emissions in 2014.¹²⁵

ANSWER:

REQUEST FOR ADMISSION NO. 109:

More than 5 million acres of NATIONAL FOREST SYSTEM lands are leased for oil, gas, coal, and phosphate development.¹²⁶

ANSWER:

¹²⁴ U.S. Dep't of Agric., Tech. Bulletin No. 1930, *USDA Agriculture and Forestry Greenhouse Gas Inventory: 1990–2008*, at 11 (2011), https://www.usda.gov/oce/climate_change/AFGG_Inventory/USDA_GHG_Inv_1990-2008_June2011.pdf.

¹²⁵ Richard K. Lattanzio et. al, Cong. Research Serv., R43860, *Methane: An Introduction to Emission Sources and Reduction Strategies* 11 (2016), <http://nationalaglawcenter.org/wp-content/uploads/assets/crs/R43860.pdf>.

¹²⁶ *Welcome to Minerals & Geology Management (MGM)*, U.S. Dep't of Agric., Forest Serv., <https://www.fs.fed.us/geology/index.html> (last visited Mar. 10, 2018).

REQUEST FOR ADMISSION NO. 110:

In 2010, 16.7 million barrels of oil and 194 million cubic feet of natural gas were produced from almost 3,200 wells on FEDERAL LANDS managed by the DEPARTMENT OF AGRICULTURE.¹²⁷

ANSWER:

REQUEST FOR ADMISSION NO. 111:

In 2010, there were almost 12,800 wells located on NATIONAL FOREST LANDS where the subsurface was privately owned, the majority of which were located in Allegheny National Forest in Pennsylvania.¹²⁸

ANSWER:

¹²⁷ *Challenges Facing Domestic Oil and Gas Development: Review Of Bureau Of Land Management/U.S. Forest Service Ban On Horizontal Drilling On Federal Lands: Hearing Before the H. Subcomm on Energy & Mineral Resources & the H. Subcomm. on Conservation, Energy, & Forestry*, 112th Cong. 18 (2011) (statement of Joel Holtrop, Deputy Chief, U.S. Forest Service), <https://www.gpo.gov/fdsys/pkg/CHRG-112hhr72151/pdf/CHRG-112hhr72151.pdf>.

¹²⁸ *Challenges Facing Domestic Oil and Gas Development: Review Of Bureau Of Land Management/U.S. Forest Service Ban On Horizontal Drilling On Federal Lands: Hearing Before the H. Subcomm on Energy & Mineral Resources & the H. Subcomm. on Conservation, Energy, & Forestry*, 112th Cong. 18 (2011) (statement of Joel Holtrop, Deputy Chief, U.S. Forest Serv.), <https://www.gpo.gov/fdsys/pkg/CHRG-112hhr72151/pdf/CHRG-112hhr72151.pdf>.

REQUEST FOR ADMISSION NO. 112:

As of 2010, NATIONAL FOREST LANDS provided 25% of the United States' coal production.¹²⁹

ANSWER:

REQUEST FOR ADMISSION NO. 113:

As of 2012, the FOREST SERVICE has authorized almost 20,000 active oil and gas wells on NATIONAL FOREST LANDS in 19 states.¹³⁰

ANSWER:

¹²⁹ *Coal*, U.S. Forest Serv., Minerals & Geology Mgmt., <https://www.fs.fed.us/geology/energyCoal.html> (last visited Mar. 10, 2018).

¹³⁰ *The American Energy Initiative, Part 27: A Focus On Growing Differences For Energy Development On Federal Versus Non-Federal Lands: Hearing Before the Subcomm. on Energy & Power*, 112th Cong. 23 (2012), <https://www.gpo.gov/fdsys/pkg/CHRG-112hhrg82689/pdf/CHRG-112hhrg82689.pdf> (statement of Mary Wagner, Associate Chief, U.S. Forest Service).

REQUEST FOR ADMISSION NO. 114:

On the Dakota Prairie National Grasslands, the FOREST SERVICE authorized oil and gas production by approving 14 surface use plans of operation in 2008, 13 plans in 2009, 29 plans in 2010, and 36 plans in 2011.¹³¹

ANSWER:

REQUEST FOR ADMISSION NO. 115:

As of 2012, the FOREST SERVICE authorized 7,000 oil and gas leases covering approximately 5.5 million acres on NATIONAL FORESTS and GRASSLANDS.¹³²

ANSWER:

¹³¹ *The American Energy Initiative, Part 27: A Focus On Growing Differences For Energy Development On Federal Versus Non-Federal Lands: Hearing Before the Subcomm. on Energy & Power, 112th Cong. 24 (2012)*, <https://www.gpo.gov/fdsys/pkg/CHRG-112hhr82689/pdf/CHRG-112hhr82689.pdf> (statement of Mary Wagner, Associate Chief, U.S. Forest Service).

¹³² *The American Energy Initiative, Part 27: A Focus On Growing Differences For Energy Development On Federal Versus Non-Federal Lands: Hearing Before the Subcomm. on Energy & Power, 112th Cong. 25 (2012)*, <https://www.gpo.gov/fdsys/pkg/CHRG-112hhr82689/pdf/CHRG-112hhr82689.pdf> (statement of Mary Wagner, Associate Chief, U.S. Forest Service).

REQUEST FOR ADMISSION NO. 116:

A PERSON or private entity may not mine, develop, produce, or extract coal, oil, or gas on FEDERAL LANDS managed by USDA, except as authorized by the DEPARTMENT OF AGRICULTURE.

ANSWER:

REQUEST FOR ADMISSION NO. 117:

The DEPARTMENT OF AGRICULTURE uses economic discounting analyses to inform the DEPARTMENT OF AGRICULTURE's decisions on whether or not to authorize, lease, permit, or otherwise allow for coal, oil, and gas development, mining, and production.

ANSWER:

REQUEST FOR ADMISSION NO. 118:

80.5% (435,273 MWh) of the DEPARTMENT OF AGRICULTURE's electricity usage was from non-renewable electricity in 2012.¹³³

ANSWER:

¹³³ U.S. Dep't of Agric., *2012 Strategic Sustainability Performance Plan 17* (2012).

REQUEST FOR ADMISSION NO. 119:

“Because vegetation and soil contain about three times as much carbon as the atmosphere, terrestrial ecosystems offer an opportunity to absorb and store ([SEQUESTER]) a significant additional amount of CO₂ from the atmosphere.”¹³⁴

ANSWER:

REQUEST FOR ADMISSION NO. 120:

“One possible approach for slowing the increase in greenhouse gas[] concentrations in the atmosphere is to manage terrestrial ecosystems to conserve or [SEQUESTER] additional carbon.”¹³⁵

ANSWER:

REQUEST FOR ADMISSION NO. 121:

“Agricultural systems, which cover vast acreages, can be managed on a yearly basis to augment the large store of carbon in their soils.”¹³⁶

ANSWER:

¹³⁴ EPA & USFS, EPA 230-R-95-002, *Climate Change Mitigation Strategies in the Forest and Agriculture Sectors* ES-1 (1995).

¹³⁵ EPA & USFS, EPA 230-R-95-002, *Climate Change Mitigation Strategies in the Forest and Agriculture Sectors* ES-1 (1995).

¹³⁶ EPA & USFS, EPA 230-R-95-002, *Climate Change Mitigation Strategies in the Forest and Agriculture Sectors* ES-1 (1995).

REQUEST FOR ADMISSION NO. 122:

Prior to 1995, the USFS and the U.S. Environmental Protection Agency conducted “an assessment of land use management policies that can contribute to stabilizing U.S. greenhouse gas emissions” that analyzed “potential greenhouse gas, economic, and other impacts of land use management policies.”¹³⁷

ANSWER:

REQUEST FOR ADMISSION NO. 123:

In the EPA and USFS assessment of land use management policies described in *Climate Change Mitigation Strategies in the Forest and Agriculture Sectors*, EPA 230-R-95-002 (June 1995), the agencies identified the following policies “that could potentially increase the capacity of terrestrial carbon storage,” including “increasing the rate of tree growth on existing forest land by improving timber management practices or using improved seedling stock;” “using biomass-based fuels, which reduce carbon emissions from fossil fuels, and do not themselves have a net impact on long-term atmospheric carbon;” “increasing utilization rates for recycled paper, thereby reducing demand for pulpwood and maintaining and increasing timber inventories;” “concerning or setting primary and old-growth forests as stocks of biomass by restricting harvesting or setting aside land;” “reducing soil disturbances by modifying tillage practices and

¹³⁷ EPA & USFS, EPA 230-R-95-002, *Climate Change Mitigation Strategies in the Forest and Agriculture Sectors* ES-1 (1995).

thereby increasing soil organic carbon;” and “planting winter cover crops to increase biomass on agricultural lands.”¹³⁸

ANSWER:

Dated: May 4, 2018

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¹³⁸ EPA & USFS, EPA 230-R-95-002, *Climate Change Mitigation Strategies in the Forest and Agriculture Sectors* ES-1 (1995).

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of May, 2018, I have served the foregoing Plaintiffs' Requests for Admissions to Defendant the United States Department of Agriculture, to Defendant Department of Agriculture by email on the following counsel for all parties.

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