

Exhibit A

New Mexico Wild Letter re USFS Planning and 30x30



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On behalf of the board of directors, staff, and thousands of members and supporters of New Mexico Wilderness Alliance (New Mexico Wild), we write to respectfully request that United States Department of Agriculture and the United States Forest Service immediately postpone the finalization, and suspension of process, of all Forest Plans in New Mexico, consisting of the Carson, Cibola, Gila, Lincoln, and Santa Fe National Forests. New Mexico Wild is an independent, statewide, grassroots, membership non-governmental organization dedicated to the protection, restoration, and continued enjoyment of New Mexico's public lands, waters, and wildlife.

These plans have not taken into consideration President Biden's America the Beautiful plan¹ and "30x30" executive order, committing to protect thirty percent of the lands, waters, and oceans of the United States by 2030.² The executive order directed the Secretaries of the Interior, Agriculture, and Commerce to "identif[y] strategies that will encourage broad participation in the goal of conserving 30 percent of our lands and waters by 2030." At present, there have been no strategies identified, codified, or authorized to guide federal land management agencies towards these 30x30 goals. It is our understanding that guidance has not yet been provided to Forests in New Mexico regarding how to use the Forest Plan process to help realize the ambitious and critical goals of President Biden's executive order.

The USFS manages over 8 million acres in New Mexico, many with incredibly high, untapped conservation potential. Forest Service plans will determine how these public lands are managed for the next twenty-five or more years. Management decisions will affect land and water designations, watershed and forest health, extractive industry use, grazing, and other resource consumptive practices and could greatly contribute to—or detract from—30x30 goals.

¹ *Conserving and Restoring America the Beautiful*, 2021, available at <https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf>.

² Exec. Order No. 14008, 86 Fed. Reg. 7,619 (Jan. 27, 2021).

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All five New Mexico national forests are over 20 years behind on their National Forest Management Act required revision dates³ and we appreciate the desire to conclude the current planning processes. We also recognize the tremendous amount of work and consideration that have been devoted to these planning processes, by both the USFS and community stakeholders (including New Mexico Wild).

However, given the scale and urgency of the dual crisis of climate change and mass species extinction, we do not believe it will be possible to realize the goals of 30x30 without considered, robust Forest management decisions designed to address them, including: maximizing wilderness recommendations to preserve the untrammeled qualities of these areas now and the future; maximizing wild and scenic eligibility by utilizing reasonable regions of comparison; and limiting consumptive use to a more sustainable and practicable rate.

The rapid pace of change effecting species and the climate will not support waiting for the next round of forest plan revisions, twenty or more years from now, to consider and integrate the goals and commitments to 30x30. Indeed, once completed, the plans will be in force during the year of 2030. We consider America the Beautiful and the 30x30 executive order to be new information and a changed circumstance that must be addressed within the current planning processes. Not doing so would be a missed opportunity of historic import.

There is nothing in the 2012 planning rule requiring immediate action on these five forests, and in fact, the 2012 planning rule supports a momentary suspension to allow for final agency policy and scientific information.⁴ This is the efficient and reasonable choice and will ultimately save the Forest Service valuable resources by ensuring these plans are as up to date as possible and reflect current agency policy and strategy.

We appreciate that the Administration has committed to address the existential threat that climate change poses, as elucidated by Executive Order 14008: “It is the policy of my Administration to lead the Nation’s effort to combat the climate crisis by example—specifically, by aligning the

³ LMP Revisions Currently Underway, current as of Feb. 26, 2021, retrieved from https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd897803.pdf on Oct. 1, 2021.

⁴ *See, e.g.*, 36 C.F.R. § 219.1 (purpose of the 2012 planning rule “is to guide the collaborative and science-based development, amendment, and revision of land management plans that promote the ecological integrity of national forests and grasslands...”), 219.3 (requirement for the responsible official to use the best available scientific information), 219.7(c)(2)(ii) (when developing a new plan, “the responsible official shall:...consider the goals and objectives of the Forest Service strategic plan.”), and 219.8 (requiring “social, economic, and ecological sustainability” be provided by the Forest Service).



management of Federal...public lands and waters...to support *robust* climate action.”⁵ The USFS will play a critical role in realizing this commitment, and the Forest Planning Process represents an essential tool in this process.

As we near the end of the objection period for the Carson, Cibola, and Santa Fe National Forests, await the proposed final plan from the Gila National Forest, and near the end of the comment period for the Lincoln National Forest’s draft plan, it is essential at this moment in our country’s history that we ensure that these plans are premised upon and guided by the President’s 30x30 executive order.

Therefore, we assert that these plans must be put on hold, and eventually substantially changed, to address the administration’s goals and commitments to 30x30. We request suspending any further action on forest planning until the individual Supervisor’s offices and Ranger Districts have guidance from the Washington Office on how best to implement the Administration’s 30x30 goals.

We welcome the opportunity to discuss this request with you and your staff—nationally, regionally, and locally. Thank you in advance for your careful consideration of this urgent matter. We look forward to your response.

Sincerely,

Mark Allison
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Cc: Secretary Tom Vilsack, Department of Agriculture
Chair Brenda Mallory, Council on Environmental Quality
Meryl Harrel, Under Secretary for Natural Resources and Environment
Christine Dawe, Acting Chief of Staff for Natural Resources and Environment
Stephenne S. Harding, Council on Environmental Quality Senior Director for Lands
Libby R. Washburn, Special Assistant to the President for Native Affairs
Chris French, Deputy Chief for National Forest System
Barnie Gyant, Associate Deputy Chief for National Forest System

⁵ Exec. Order No. 14008, 86 Fed. Reg. 7,623 (Jan. 27, 2021) emphasis added.



Michiko Martin, Southwest Regional Forester
James Duran, Carson Forest Supervisor
Steve Hattenbach, Cibola Forest Supervisor
Rob Lever, Acting Gila Forest Supervisor
Travis Mosely, Lincoln Forest Supervisor
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