



SELECT FEDERAL NATURAL RESOURCE MANAGEMENT COMMITTEE

September 20, 2024

Secretary Tom Vilsack
United States Secretary of Agriculture
United States Department of Agriculture
1400 Independence Avenue, NW
Washington D.C. 20250

Linda Walker
Director Ecosystem Management Coordination
201 14th St. SW Mailstop 1108
Washington D.C. 20250-1124

Re: Comments on Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Environmental Impact Statement

Dear Secretary Vilsack and Ms. Walker,

Please accept the following comments of the Wyoming Legislature's Select Committee on Federal Natural Resource Management (Committee) on the United States Forest Service's (USFS) draft Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Environmental Impact Statement (draft Plan). The Committee asserts that the draft Plan is an inappropriate and unnecessary one size fits all approach to forest management and existing forest service land management plans should be amended to address old growth through the local standard amendment process. The Committee respectfully requests the USFS withdraw its draft Plan.

I. The draft Plan is an inappropriate and unnecessary one size fits all approach to forest management.

The USFS's draft Plan would amend all 128 existing forest service land management plans including 8 plans in Wyoming's National Forests.¹ The draft Plan would amend each forest service land management plan to add new management approaches, desired conditions, objectives, standards, and guidelines regarding old growth.² This is an inappropriate and unnecessary one size

¹ Draft Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Environmental Impact Statement at 1; Appendix C Comparison of Current Management of Old Growth to Amendment at Table 1, C-2–C-4.

² Old Growth Forest Plan at 14–15.

fits all approach to forest management. This draft Plan would require a forest in Wyoming to be managed for old growth the same as any other forest across the country. This approach does not make sense considering Wyoming's National Forests are not even managed under the same Forest Service region. There are nine Forest Service regions based on geographic areas usually consisting of several states.³ Half of Wyoming's National Forests are within the Rocky Mountain Region (Region 2) and half are within the Intermountain Region (Region 4).⁴ Applying the same old growth standards and guidelines to all forests in the United States is misplaced. Each forest is unique and has different conditions, ecosystems, and old growth forest inventory. The forests should not be treated the same. A one size fits all approach overlooks the uniqueness of each forest and the effectiveness of utilizing a more localized approach to old growth forest management.

II. Existing forest service land management plans should be amended to address old growth through the local standard amendment process.

The draft Plan reviewed and categorized all existing forest service land management plans to compare the existing plans with the draft Plan's Proposed Alternative 2.⁵ All of Wyoming's forest service land management plans were placed in Category #3, which means that the plans had some plan components governing old growth but the plan either lacked standards and guidelines that constrain management activities in old growth, those standards and guidelines did not apply forest-wide or those standards and guidelines were not as restrictive as the draft Plan's Proposed Alternative 2 standards.⁶ Federal regulations allow forest service land management plans to be amended at any time and those amendments may "be broad or narrow depending on the need for change."⁷ Half of Wyoming's existing forest service land management plans have existing old growth components, contain desired conditions for old growth, and those desired conditions apply forest-wide.⁸ Therefore, these existing forest service land management plans would require limited amendments to achieve the overall goal of the draft Plan in managing old growth. As a result, the United States Department of Agriculture should allow existing forest service land management plans to be revised to address old growth through the standard amendment process. This would allow local forest service supervisors, forest service district rangers, and stakeholders to establish appropriate objectives, management approaches, desired conditions, standards, and guidelines to adequately address old growth based on the ecological conditions and characteristics of each forest. The local community knows and understand their local forests best and should be able to amend their forest service land management plans through the standard process without requiring a top-down nationwide approach from the United States Department of Agriculture.

III. Conclusion

The Committee carefully considered the draft Plan and heard extensive testimony from various stakeholders at its September 2024 meeting. As a result, the Committee believes the draft Plan is an inappropriate one size fits all approach to old growth forest management and existing forest

³ Appendix B National Forests and Grasslands and Forest Service Regions at B-1.

⁴ *Id.* at B-2–B-3.

⁵ Appendix C Comparison of Current Management of Old Growth to Amendment at C-1.

⁶ *Id.* at Table 1, C-2.

⁷ 36 C.F.R. § 219.139(a).

⁸ *Id.* at Table 4.

service management plans should be amended through the local standard amendment process to adequately address old growth. Local input is a valuable aspect of the amendment process and should be respected and not overlooked to push a national agenda. The Committee respectfully requests the USFS withdraw the draft Plan.

Sincerely,



Senator John Kolb
Co-Chairman



Representative Scott Heiner
Co-Chairman