



February 6, 2024

The Honorable Joseph R. Biden, Jr.
President
The White House
1600 Pennsylvania Ave NW
Washington, DC 20500

The Honorable Thomas J. Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Avenue S.W.
Washington, D.C. 20250

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

Dear Mr. President and Secretary Vilsack:

Thank you for the opportunity to submit comments to the United States Department of Agriculture (USDA) and United States Forest Service (USFS) regarding the notice of intent (NOI) to prepare an environmental impact statement amending all land management plans for units of the National Forest System to include old-growth forest conditions. We write today to express our concerns with this effort, especially in light of the wildfire and forest health crisis our states are facing.

We have watched this effort unfold over the course of nearly two years. During this time, USDA and USFS leadership have failed to engage with us as leaders of our states to address any of the challenges and flaws we have identified with this old-growth forest policy. While the NOI seems to suggest that there were areas of consensus, we clearly do not agree with that assessment. Our concerns remain ignored. The April 20, 2023, inventory highlights the USFS' lack of collaboration with our states and its disregard for our concerns. For example, the initial released map displays large swaths of state forests, private property, farmland, and municipalities as having old growth conditions. This is simply poor execution and showcases the failure of collaboration with this proposal. We cannot have confidence that this policy is sound and supported by science if the USFS

cannot even accurately identify the land it manages. The USFS should abandon this effort or at the very least, begin this process again.

Fundamentally, existing old-growth forest definitions are sound and sufficient for informing decisionmakers, and there is no need for a definition for mature forests. Old-growth is a complex ecological concept or characteristic, and the very idea that a universal definition could apply across the entire nation is problematic and flawed. Land managers across ownerships face significant challenges, ranging from the lack of landscape-scale forest management to administrative delays to uncertainties associated with forest management on federal lands. Amending forest management plans to “conserve” or “recruit” old-growth, or mature stands, will simply not aid these land managers in meeting the ambitious goals set forward by each of us to address our forest health and wildfire crisis, nor the USFS’ “Wildfire Crisis Strategy: Confronting the Wildfire Crisis.”¹ In fact, this effort runs counter to our State Forest Action Plans, which represent significant investments in time and resources to meaningfully guide our work among federal, state, tribal, and other stakeholders. Our state forest action plans have addressed old-growth and mature forests through established planning rules and processes. These are sound plans developed with a high level of analysis and collaboration, which is in direct contrast to this effort USDA and USFS have undertaken.

We are witnessing a concerning theme across federal land management agencies where decision-making is being elevated to the Washington Office and the expertise of the field is being ignored. This very effort in question is reflective of this reality. USDA and USFS should be focusing on where the need truly is – removing administrative bottlenecks and working with partners to increase the pace and scale of forest management projects in order to meaningfully address our forest and wildfire health crisis.

Sincerely,



Governor Greg Gianforte
State of Montana



Governor Kristi Noem
State of South Dakota



Governor Mark Gordon
State of Wyoming



Governor Brad Little
State of Idaho



Governor Spencer Cox
State of Utah



Governor Joe Lombardo
State of Nevada

¹ <https://www.fs.usda.gov/sites/default/files/Confronting-Wildfire-Crisis.pdf>