

Data Submitted (UTC 11): 8/25/2022 4:00:00 AM

First name: James

Last name: Ogsbury

Organization: Western Governors' Association

Title: Executive Director

Comments: Attached please find comments on behalf of the Western Governors' Association.

Dear Director Stone-Manning and Deputy Chief French: On April 22, 2022, President Biden signed an Executive Order (EO) on Strengthening the Nation's Forests, Communities, and Local Economies (EO 14072). The EO expands the Administration's effort to combat climate change by: protecting mature and old growth forests; increasing the pace and scale of forest restoration; coordinating wildfire risk mitigation; reducing commodity-driven deforestation; and deploying nature-based solutions to address a broad array of environmental issues. Section 2 of the EO contains the Administration's domestic forest management goals and prescribes actions to achieve them. It requires the Departments of the Interior and Agriculture, in consultation with state, local, tribal, and territorial governments and the public, to jointly pursue wildfire mitigation strategies and, by April 22, 2023, to "define, identify, and complete an inventory of old-growth and mature forests on Federal lands, accounting for regional and ecological variations, as appropriate, and shall make such inventory publicly available." According to the EO, the inventory will, eventually, be used to coordinate conservation and wildfire risk mitigation policies. In response to the Request for Information on Federal Old-growth and Mature Forests jointly published by the Departments on July 15 (87 FR 42493) regarding Section 2 of EO 14072, Western Governors appreciate the Departments' efforts to solicit feedback from a wide range of sources, including states and territories. To further inform your consideration of these matters, please find the attached Western Governors Association (WGA) Policy Resolutions: [bull] WGA Policy Resolution 2021-03, National Forest and Rangeland Management; [bull] WGA Policy Resolution 2021-02, Utilizing State Data in Federal Decision Making; [bull] WGA Policy Resolution 2021-01, Strengthening the State-Federal Relationship; and [bull] WGA Policy Resolution 2023-01, Working Lands, Working Communities. These resolutions contain Western Governors' collective, bipartisan policy on forest and rangeland management, state and territorial consultation in federal decisionmaking, use of state data, and actions to increase community engagement in land management activities. Western Governors are encouraged that the EO requires the Departments to consult with states as they work to establish a definition framework and use the framework to create an inventory of old-growth and mature forests. Early, meaningful, substantive and ongoing consultation is an integral component of any durable and effective land management strategy. This consultation will also facilitate the incorporation of state expertise, data and documentation into federal decision-making processes and land management activities. WGA Policy Resolution 2021-03 articulates Governors' support for increasing the pace and scale of restoration activities on western forests and rangelands, mitigating the potential effects of uncharacteristic wildfire, and supporting fire-adapted communities in the West. The resolution also highlights how a narrow focus on specific land management goals, such as carbon sequestration through old-growth forest conservation, can conflict with a more holistic management paradigm that seeks to satisfy a broader range of ecological and societal values. As the Departments implement Section 2 of the EO, Western Governors encourage you to comprehensively consider the various goals and values reflected in the Order. Western Governors also engage on wildfire and land management policy through WGA Policy Resolution 2023-01, Working Lands, Working Communities. The resolution emphasizes Governors' support for the integration of land management, fire management, and water protection functions within and between federal agencies, states and territories, and local communities. The resolution also underscores the need for sufficient infrastructure, access, and workforce necessary for communities to support forest and rangeland management activities. I appreciate your consideration of these resolutions and look forward to working productively with you as the Departments implement EO 14072. Sincerely, James D. Ogsbury Executive Director ATTACHMENT: Western Governors' Association - Policy Resolution 2021-03 National Forest and Rangeland Management ATTACHMENT: Policy Resolution 2021-02 Utilizing State Data in Federal Decision Making ATTACHMENT: Policy Resolution 2021-01 Strengthening the State-Federal Relationship ATTACHMENT: Policy Resolution 2023-01 Working Lands, Working Communities