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Director

Ecosystem Management Coordination (EMC)

USDA Forest Service

201 14th Street SW, Mailstop 1108

Washington, DC 20250-1124

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Dear EMC Director:

In support of New Mexico's forests, the New Mexico Energy, Minerals and Natural Resources Department Forestry Division (Division) is submitting a formal comment to the United States Department of Agriculture, Forest Service's proposal to amend all Forest Plans to include old-growth forest management direction while recognizing traditional and cultural values.

The Division's mission is to promote healthy, sustainable forests and watersheds while balancing the need for wildfire prevention and suppression. New Mexico is one of the most ecologically diverse states in the nation, encompassing five of the eleven United States Department of Agriculture Climate Zones. New Mexicans value our forests and the benefits they provide to current and future citizens. New Mexico's forests supply 50% to 75% of all water for municipalities and agriculture. They also provide important wildlife habitat, recreational opportunities, timber, and cultural values to communities across the state.

The proposed Forest Service management plan is closely aligned with New Mexico's 2020 New Mexico Forest Action Plan which promotes ecological integrity of ecosystems and watersheds. The Division actively engages in management to help prevent wildfires, which are currently the leading threat to mature and old-growth forest conditions. In addition to the Division's wildfire suppression activities, the Division recognizes the benefit of old growth trees and values land management decisions developed in partnership with traditional New Mexico

communities.

There are twenty-three sovereign tribal nations in New Mexico and twenty-seven traditional land grant communities recognized as political subdivisions of the state. New Mexico's indigenous and traditional communities are inextricably tied to the land. Traditional land management practices shape the land we see today, and traditional knowledge still guides land management in New Mexico.

The Division and the Forest Service practice various forms of co-stewardship across New Mexico and utilize a Shared Stewardship Agreement which incorporates New Mexico's 2020 Forest Action Plan as the vehicle to support that coordination. Both agencies actively engage in important work within priority landscapes, including New Mexico's watersheds ranked by their significance for water source protection and biodiversity support. The Forest Service's goal to foster ecologically appropriate management while recognizing traditional and cultural values complements the already productive work between New Mexico Communities, the Division, and the Forest Service.

While the Division is generally supportive of the Forest Service old growth management plan direction, there are two critical issues we wish to flag:

* First, active management of old growth stands is essential to mitigate the wildfire threat. New Mexico has already lost priceless old growth trees that burned in catastrophic wildfires or were killed by native insects. The old growth management direction must not impede the ability of Forest Service managers to proactively manage for threats and stressors that accelerate tree mortality and enhance wildfire risk.

* Second, the Division is concerned about the near-term impact of amending all national forest plans on the workload of national forest units. We hope that the work can be structured such that the plan revision amendments do not stall or stop projects with just finished or nearly finished NEPA or Forest Plan revisions. New Mexico contractors are counting on these plans and projects for work and wood supply. With climate change bearing down on the Southwestern Region, even a few years of delay could result in destruction of old growth trees and increased fire risk across the region.

We appreciate consideration of our concerns and look forward to continuing collaboration in support of responsibly managing New Mexico's forests.

Sincerely,

Laura McCarthy

State Forester

Attachment: NM_Old-Growth_Letter_USFS.pdf is letter text above.