January 24, 2017

Honorable Secretary Designee, Sonny Perdue  
US Department of Agriculture  
1400 Independence Avenue SW  
Washington, DC 20250

Dear Mr. Perdue:

Congratulations to you and to the President Trump Administration. The nation’s 59 State and Territorial Foresters that comprise the National Association of State Foresters are poised to work with you in using America’s forested green infrastructure to help make America great! Active management is the key to healthy forests and healthy communities. Collectively our state Forest Action Plans, that represent the first-ever comprehensive assessment of America’s forest resources, are the plans for our future forests and the key to focusing our active management efforts.

There are roughly 750 million acres of forested land in the US or about a third of the continental United States. **Sixty percent of those forests are state and privately owned**, while 40 percent are federally owned. **Yet 90 percent of the nation’s wood supply comes from state and privately owned forests. The forest industry sector is larger than the automobile industry and is the economic backbone of much of rural America.** These lands provide the headwaters for most of America’s drinking water and wildlife habitat.

There are 136 million acres of urban and community forests in the United States that reduce energy costs, increase property values, mitigate storm water, and support jobs. The tree-trimming industry alone has revenue of $17 billion annually. These forests are vital infrastructure that provides social, economic and environmental benefits to families and communities. All of this and more is the purview of the nation’s state foresters.

Our trees and forests face threats from conversion to development, wildfire, insects, disease, and more. We want to offer very specific ideas which we would ask you to consider implementing in the first 100 days in order to help us support America’s green infrastructure.
In the first 100 days:

- Request that the USDA Undersecretary of Natural Resources and the Environment (NRE) contact the Environmental Protection Agency (EPA) Administrator to have them change their recommendations related to **forest certification standards for federal procurement, in order to recognize all major programs operating in the United States**. Currently only the Forest Stewardship Council (FSC) certification is allowed for wood procured for the construction of federal buildings. Sustainable Forestry Initiative (SFI) and American Tree Farm System (ATFS) certifications are equally credible and need to also be acknowledged by the EPA for federal wood procurement.

- Request that the Undersecretary directs the Chiefs of the USDA Forest Service (USFS) and Natural Resources Conservation Service (NRCS) work together and provide written direction so that having a USFS Forest Stewardship Plan would qualify a landowner for EQIP funding (matching funds for forest conservation practices) from NRCS. Forest landowners having to generate duplicative plans and paperwork to meet requirements of two different federal programs for the same forested area serves no beneficial purpose and acts as a disincentive to landowners.

- Request that an Executive Order be written which highlights the pivotal leadership role of State Foresters in planning for the future of the nation’s forests through the state Forest Action Plans and in allocating contributing federal funds. Undersecretary direct the Chief of the USFS to correspond with Regional Foresters and Forest Supervisors to **ensure that state Forest Action Plans are primary source documents in forest planning** and in developing and coordinating National Forest System annual plans of work.

- Request that the Undersecretary continue to **spend USFS hazardous fuels program funding on critical private land interface areas, as coordinated with the nation’s State Foresters**, including on adjoining private lands as permitted by law. Prioritizing this ongoing investment is critical given the increasing incidence of wildfire, especially those fires that cross jurisdictional boundaries.

- **Involve the nation’s State Foresters in discussion of any changes to tax provisions** which could affect private forest land owners, such as capital gains treatment of timber revenue, deduction for timber growing costs, and deduction and amortization of reforestation costs. The greatest threat to the nation’s forests may be from conversion to seemingly more profitable land uses. As an aging forest landowner base passes their forest assets on to future generations, retaining supportive tax provisions will discourage further subdivision and loss of productive forest land and the economic and environmental benefits they provide to the American people.
• Request that the Undersecretary direct the Chief of the USFS to document progress in utilizing Good Neighbor Authority, stewardship contracts, categorical exclusions and other tools available to the Agency in order to increase active management on federal forest lands. Further, request that the Undersecretary explore with NASF’s leadership ideas for increasing active management on federal forests, including reforms to the implementation of the National Environmental Policy Act (NEPA) as contained in NASF’s policy position.

• Request that the USDA Undersecretary contact the EPA Administrator and request a revision or repeal of the Waters of the US regulation to allow for state based Best Management Practices to guide management of streams, ditches and wetlands. NASF has conducted a thorough analysis which clearly shows that the nation’s waterways are being well protected from any adverse forest management impacts by implementation of those practices.

• Request the continued support for the Wildland Fire Leadership Council by the Secretaries of USDA, the Department of the Interior and the Department of Homeland Security. This intergovernmental committee works together to provide important strategic direction for federal wildland fire management policy.

• Request that the Undersecretary direct the USDA Forest Service and APHIS to develop a joint strategic plan for management of forest pests with State Foresters being involved in developing the plan and in its implementation.

• Request the Chief of the USFS to sign a memorandum of understanding with NASF regarding cooperation on the Forest Inventory and Analysis program. Delivery of this critical research and inventory program at a regular interval across all States is a priority for tracking forest health and for forest industry investment decisions.

NASF would also like to encourage the Administration to actively support the following Legislative Priorities:

• A comprehensive wildfire suppression funding fix which addresses fire borrowing and solves the long-term erosion of agency budgets that results from the increasing cost of the 10-year rolling average,

• Reforms which will result in more active management of federal forests either as part of the wildfire suppression funding bill or separately,

• An expansion of Good Neighbor Authority which allows State Foresters to implement approved forest management projects on federal forests where efficiencies can be gained. The current law has limited applicability because of restricted use of this Authority where any approved road work is needed,

• Codification of the Landscape Scale Restoration program which allows the State Foresters to focus a portion of federal funding on the highest national priorities in their State Forest Action Plans,
• **Supporting forestry provisions in the upcoming Farm Bill.** The Undersecretary should make it an immediate priority to meet with the Forests in the Farm Bill Coalition and direct USDA legislative efforts towards developing Farm Bill provisions that strongly support the management and protection of the nation’s rural and urban forests as outlined in state Forest Action Plans.

• **Supporting key appropriations of critical importance to state foresters the nation’s forest resource and forest-based economy.** The Undersecretary should review the Forest Service budget and make it a priority to increase State & Private Forestry line items that serve most of the nation’s forestland, the private forestland that produces most of the nation’s forest products and rural jobs, and the tree care industry that protects green community infrastructure. NASF leadership is available to meet and explain the importance of federal funding for programs such as forest stewardship, forest health, state and volunteer fire assistance, forest inventory and analysis, urban and community forestry, and other critical programs.

Finally, we would ask in your selection of the Undersecretary and his staff, to please consider **candidates who have knowledge, appreciation and support for private working forests and** trees in our communities, as well as the State and Private forestry and NRCS cost-share programs that support active forest management. We ask for a willingness to work with State Foresters to actively address our mutual challenges and enhance our forested green infrastructure to keep America’s forests great!

Thanks for your consideration,

Bill Crapser  
Wyoming State Forester  
President of the National Association of State Foresters