



NATIONAL ASSOCIATION OF STATE FORESTERS

444 North Capitol Street NW | Suite 387 | Washington, DC 20001 | www.stateforesters.org

July 11, 2025

Mr. Tom Schultz
Chief, USDA Forest Service
1400 Independence Ave SW
Washington, DC 20250

Dear Chief Schultz,

The National Association of State Foresters (NASF) is submitting comments in response to Executive Order 14225, *Immediate Expansion of American Timber Production*, Secretarial Memo 1078-006, the USDA Forest Service (Forest Service) *Implementation of Secretarial Memo 1078-006 letter*, and the Forest Service *National Active Management Strategy*. These directives are timely and essential for addressing the pressing challenges facing our nation's forests, namely reducing catastrophic wildfire risk and revitalizing rural economies.

NASF supports a bold and proactive approach to forest management and affirms our continued commitment to partnering across jurisdictions. State Foresters across the country embraced the Forest Service's Shared Stewardship Strategy during President Trump's first administration and were fundamental partners in executing shared stewardship agreements. State Foresters appreciate the Forest Service's ongoing commitment to the core principles of shared stewardship and view the *National Active Management Strategy* as a valuable step to advance the shared priorities outlined in those agreements. Through the implementation of the Good Neighbor Authority (GNA), state forestry agencies can support the Forest Service in carrying out critical active management treatments to meet domestic timber production goals, support industry partners, and reduce wildfire risk across forested landscapes.

NASF respectfully submits the following recommendations based on state forestry agencies' decade of collective experience with GNA and long-standing management responsibilities across state and private forest lands.

1. Achieve Shared Stewardship through Integrated State and Federal Planning

To maximize GNA's contribution to achieving the outlined national priorities, state and federal GNA programs must coordinate to determine GNA activities, treatments, and long-term goals. To accomplish shared goals of State Forest Action Plans and Forest Plans, we encourage Forest Service engagement during the development and updating of State Forest Action Plans. In order to maximize implementation of GNA we recommend that the Forest Service require individual units to invite state forestry agencies to be included in all stages of forest-level and regional 5-year vegetation planning. This will create opportunities for state and federal leaders to coordinate shared leaders' intent across jurisdictions, align timber projects with local markets, facilitate

industry partnerships, and provide states with the certainty required to expand capacity.

2. Dedicated and Predictable Funding to States for GNA

Given the increasing reliance on states to contribute to the Forest Service's goal of increasing timber harvest and mitigating wildfire risk, additional federal funds will be required to bolster state GNA programs and projects. We recommend that future funding to states be predictable, connected to jointly developed 5-year plans, and proportional to the additional responsibility and workload states are taking on under GNA.

To meet the demand for increased volume outputs on National Forest System (NFS) lands, the Forest Service should look across NFS federal funding sources to stabilize GNA funding for states. We estimate a minimum of \$100 million annually in federal funding across the country would create durability and stability for state GNA programs, positioning them to substantially increase treatments and timber harvest outputs to achieve the Administration's goals outlined in Executive Orders and the *National Active Management Strategy*. Volume production levels would vary by region/state, based on forest conditions, capacity, and nexus with state priorities. The Council of Western State Foresters estimates that with sustained federal investment in state GNA base programs of at least \$80 million annually, Western states are positioned to collectively treat approximately 70,000 additional acres and increase Forest Service timber volume outputs by eight percent, or more, across the West. Additional funding, streamlined federal processes, and strategic planning could substantially increase these estimates.

3. Sustained Funding for Forest Service State, Private, and Tribal Forestry Programs

State staff with GNA responsibilities are frequently supported by a broad range of federal funding, including from Forest Service State, Private, and Tribal Forestry (SPTF) programs. In addition to managing federal timber sales and restoration activities, state forestry agency staff conduct wildfire suppression and mitigation, provide training, maintain industry contacts, support private forest landowners, and implement hazardous fuels projects across jurisdictional boundaries. As the funding landscape shifts, state forestry agencies face staffing decisions that may negatively impact these positions and therefore undercut the maintenance and growth of GNA capacity. Therefore, we recommend stable funding for the work supported by the current SPTF programs so that states have the flexibility to maintain capacity to meet mutual local and national priorities. Alternatively, if SPTF programs are discontinued in their current form, then stable replacement funding would be necessary to continue the positive staffing momentum that states have made.

4. Streamlined Decision Making and Accountability in GNA Implementation

States need the discretion and operational autonomy under GNA to act effectively on needed active forest management activities. To expedite project implementation and ensure strategic alignment between state and federal priorities, states need to be treated as partners and be

empowered to act with the endorsement of the appropriate Forest Service line officer, rather than requiring layers of oversight from lower-level agency staff. This direction will streamline decision-making and increase accountability among line officers. We further recommend establishing clear and consistent timber volume production and wildfire mitigation goals for GNA projects in coordination with state forestry agencies and formally incorporating them into agency performance plans. This will help the Forest Service effectively implement the intent to increase timber production and further mitigate wildfire risk.

NASF stands ready to partner with the Forest Service to implement these recommendations and meet the goals outlined in the *National Active Management Strategy* and linked national directives. We appreciate your leadership and look forward to working together to increase active forest management across the country.

Sincerely,



Patty Cormier
President, National Association of State Foresters
Maine State Forester

cc: Chris French, Associate Chief, USDA Forest Service
John Crockett, Deputy Chief of National Forest System and State, Private, and Tribal Forestry, USDA Forest Service
Steve Lohr, Director of Natural Resources, USDA Forest Service