

Alaska Rainforest Defenders \* Bark \* Cascade Forest Conservancy  
Cascadia Wildlands \* Center for Biological Diversity \* Chattooga Conservancy  
Cherokee Forest Voices \* The Clinch Coalition \* Conservation Colorado  
Conservation Northwest \* Environment America \* Forest Keeper  
Friends of the Bitterroot \* Friends of the Clearwater \* Georgia ForestWatch  
Kentucky Heartwood \* Klamath Siskiyou Wildlands Center  
The Lands Council \* MountainTrue \* Natural Resources Law  
New Mexico Wild \* Oregon Wild \* Potomac Riverkeeper Network  
San Juan Citizens Alliance \* San Luis Valley Ecosystem Council  
Sequoia ForestKeeper \* Sierra Club \* Soda Mountains Wilderness Council  
Southeast Alaska Conservation Council \* Southern Environmental Law Center  
South Umpqua Rural Community Partnership  
Virginia Wilderness Committee \* Western Environmental Law Center  
Wild Alabama \* WildEarth Guardians \* Wilderness Workshop  
Wild Heritage \* Yaak Valley Forest Council  
Yellowstone to Uintas Connection

January 28, 2021

Kevin Shea, Acting Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
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[kevin.a.shea@usda.gov](mailto:kevin.a.shea@usda.gov)

**Re: Request for USDA to Immediately Elevate Forest Service Decisions that May Conflict with New Administration Policy**

Dear Acting Secretary Shea:

We write to request that the Department of Agriculture immediately implement a targeted, 60-day elevation of Forest Service decisions for the purposes of reviewing the questions of fact, law, and policy in light of the new administration's priorities and policies relevant to the responsible stewardship of the National Forest System's lands, waters, and resources for current and future generations. Such an elevation, requiring that significant decisions be reviewed by the Secretary of Agriculture or the Under Secretary for Natural Resources and the Environment, would mirror that adopted by the Department of the Interior through Interior [Secretarial Order 3395](#). It would also complement President Biden's [Executive Order 13990](#), which directed all departments and agencies to review agencies actions taken during the Trump administration to ensure that they "protect our environment ... ensure access to clean air and water ... reduce greenhouse gas emissions ... [and] bolster resilience to the impacts of climate change."

We seek such an elevation because of the potential for Forest Service officials at the ranger district, forest, and regional forester levels to finalize decisions based in part on the prior administration's emphasis on increased timber harvest and unrestrained fossil fuel development,

on circumventing National Environmental Policy Act (NEPA) public involvement opportunities, and attempts to undermine protection of inventoried roadless areas (IRAs). All of these prior administration efforts are at odds with the new administration's agenda, including the goal of conserving 30 percent of United States lands and waters by 2030.

The undersigned 39 organizations represent millions of members and supporters who care deeply about the future of National Forest System lands, and who are actively engaged in ongoing public processes for the pending projects and plans. We specifically request that the Forest Service elevate decisions to the Secretary of Agriculture or to the Under Secretary for Natural Resources and the Environment that may be inconsistent with the new administration's priorities. We also specifically request that projects currently in the administrative objection process be reviewed again through the lens of these priorities and commitments.

A few examples of projects that appear to conflict with the new administration's policies and that could be approved or could move forward with irreversible and irretrievable commitments of agency resources within the next 60 days are outlined below:

- [Forest Plan Amendments for the Pacific Connector Gas Pipeline](#) on the Umpqua, Rogue River, and Winema National Forests (OR) unlawfully exempt a fracked liquified natural gas pipeline from 12 forest plan requirements protecting wildlife, forests, and water quality, and would require the clear-cut logging of a permanent, 90-foot right-of-way through 30 miles of imperiled species habitat. A decision could be issued at any time.
- The [Mountain Valley Pipeline and Equitrans Expansion Project](#) on the Jefferson National Forest (VA) bypassed the objection process in order to issue a record of decision on January 11, 2021. The eleventh-hour approval of this pipeline and accompanying plan amendment waives numerous plan standards, would fragment habitat and lock in the continued development of climate-damaging fossil fuels regardless of future need. This decision, which relied on the terms and conditions of Clean Water Act permits that will now be reopened, can and should be reconsidered as quickly as possible.
- The [Black Ram timber project](#) on the Kootenai National Forest (MT) would chainsaw 2,011 acres of clearcuts, cut 4,038 acres of forest for commercial logging, log nearly 600 acres of old forest, destroy habitat for the imperiled grizzly bear, and is based in part on a cookie-cutter climate analysis that denies the project's impacts on carbon sequestration and greenhouse gas pollution. A decision is expected within days.
- The [Pine Valley Wildlife Habitat Improvement Project](#) on the Dixie National Forest (UT) would remove piñon-juniper trees anywhere within a 320,000-acre area, including 250,000 acres of IRAs protected by the Roadless Rule, using an abused categorical exclusion (CE (e)(6)) that has no acreage limit. A decision could be issued at any time.
- The [Sequoia Complex/Castle Fire Roadside Hazard Tree Project](#) in the Giant Sequoia National Monument (CA) would permit commercial logging of 9,455 acres of old and large trees along 130 miles of roads, including within Giant Sequoia Groves, and would destroy essential denning habitat for the endangered Southern Sierra Nevada Pacific Fisher, of which less than 250 individual fisher still exist. The Forest Service intends to issue a categorical exclusion approving the project, which it could do at any time.

Additional examples are appended to this letter. These examples are not meant to be exhaustive, but to illustrate that numerous decisions could be made that may conflict with the new administration's direction on climate change, roadless forest, land conservation, and environmental protection and sound decisionmaking more generally.

We therefore urge the Department of Agriculture to immediately implement a 60-day elevation of decisions at the Forest Service to ensure that they comport with the new administration's priorities. We further urge the Forest Service to abandon or substantially revise damaging projects, including those in the provided examples, to ensure that forest management will protect old forests for carbon stores and sequestration, conserve roadless forest, prioritize habitat connectivity and biodiversity conservation, and be informed by robust environmental review and public involvement.

Please contact Susan Jane Brown or Ted Zukoski if you have any questions concerning this letter. We look forward to your reply.

Sincerely,

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## ADDITIONAL EXAMPLES OF IMMINENT PROJECTS THAT MAY CONFLICT WITH ADMINISTRATION PRIORITIES

- The [Prince of Wales 2021 Road Access Project](#) on the Tongass National Forest (AK) would grant road access permits to the State of Alaska to facilitate logging old growth rainforest on hundreds of acres via a categorical exclusion, and so without an analysis of alternatives or effective public involvement. A decision could be issued at any time.
- The [Berlaimont Estates Road Improvement Project](#) on the White River National Forest (CO) would approve a new paved road to benefit a luxury home developer; the road would cut through prime deer and elk winter range, bisecting an important wildlife migration corridor in an area where big game populations are in steep decline. The Forest Service finalized objection responses on January 25, 2021, and intends to approve the project imminently following minor updates to the environmental analysis.
- The [North Routt Fuels Reduction Project](#) on the Routt National Forest (CO) would log 1,826 acres, some far from structures or homes, and construct 5 miles of road within IRAs via a categorical exclusion, without analysis of potentially significant environmental effects or alternatives. A decision could be issued at any time.
- The [Whitney Creek Geotechnical Investigation project](#) on the White River National Forest (CO) would permit drilling that destroy irreplaceable wetlands and will pave the way for a reservoir that will require road construction in an IRA and will flood hundreds of acres of designated wilderness. The White River National Forest is reviewing the proposal through a categorical exclusion. A decision could be issued at any time.
- The [Foothills Landscape Project](#) on the Chattahoochee National Forest (GA) would authorize over 60,000 acres of commercial timber harvest of unspecified stands within a 157,000-acre analysis area over an indefinite, multi-decade period, with unlimited temporary road construction. A similar project on the Daniel Boone National Forest (KY), the [Blackwater Landscape Analysis project](#), would also authorize timber harvest in unspecified locations. For both projects, a draft decision could be issued at any time.
- The [North Zone Vegetation Improvement Project](#) on the Salmon-Challis National Forest (ID) would authorize approximately 20,000 acres of prescribed fire and 4,000 acres of thinning treatments annually over a 20 year period over a 1.4 million acre area, including 100,000 acres of IRAs, using an abused categorical exclusion (CE (e)(6)) that has no acreage limitation. A decision could be issued at any time.
- The [End of the World project](#) on the Nez Perce-Clearwater National Forests (ID) would log over 17,000 acres, with over 900 acres of clearcuts, and 800 acres of logging old forest; logging will degrade habitat for imperiled species including fisher, lynx, wolverine, and grizzly. After conducting merely an environmental assessment, the Forest Service issued a decision on Jan. 26, 2021; the project could be implemented within months.

- The [Frozen Moose Project](#) on the Flathead National Forest (MT) would log over 6,000 acres across a 151,200 acre project area, including over 1,000 acres of logging within IRAs, add 13 miles of unauthorized roads to the Forest Service road system, and construct 6.4 miles of new temporary roads within grizzly bear habitat, with the majority of new road miles within grizzly bear secure core habitat. A decision is expected in February.
- The [Flat Country Project](#) on the Willamette National Forest (OR) would log 4,438 acres of old forests up to 150 years old, including scattered old-growth trees, some over 600 years old; logging will occur in watersheds with streams that carry protected bull trout. The logging will occur adjacent to the popular Mount Washington Wilderness. A Record of Decision was issued on January 25, 2021.
- The [Zigzag Integrated Resource Project](#) on the Mt. Hood National Forest (OR) is an 1,863-acre project that includes logging mature native forest in some of the most popular recreation areas in the Forest, as well as logging Riparian Reserves within critical habitat for threatened coho and chinook salmon. The project's NEPA analysis used a five-year-old, cookie-cutter climate discussion lacking relevant data about the impact of logging mature forests on climate change and carbon storage. A decision could be issued at any time.
- The [White Pine Management project](#) on the Sumter National Forest (SC) would fragment interior forests and connectivity between existing old forest patches and exacerbate erosion and sedimentation in sensitive watersheds that have been heavily harvested in recent years. A draft decision could be issued at any time.