



April 23, 2014

The Honorable Steve Bullock, Governor
Office of the Governor
PO Box 200801
Helena MT 59620-0801

Dear Governor Bullock,

Please accept this letter, on behalf of WildEarth Guardians, regarding the recent designation of 5.1 million acres of national forest land in Montana for insect and disease treatments. WildEarth Guardians is a westwide conservation organization dedicated to protecting and restoring the wildlife, wild places and wild rivers of the American West. We have more than 43,000 members and supporters across the country, and 10 offices, including one in Missoula, Montana.

While WildEarth Guardians recognizes that the Farm Bill included this new provision and gave each state governor just 60 days to identify lands in need of treatment as a result of insect and disease infestation, we are extremely surprised with both the acreage designated and the process used to determine that acreage. In re-reading the language of the bill, it seems there are additional opportunities after the first 60 days, to engage with USDA regarding insect and disease concerns. It seems not just hurried but incredibly aggressive to designate 5.1 million acres of land as qualifying for treatments under this provision after a limited series of phone meetings with a small number of outside interests.

Because the Farm Bill allows for categorical exclusions from National Environmental Policy Act review of projects up to 3,000 acres in size under this provision, the public will have extremely limited opportunities to engage in any due process regarding whether or not such treatments are truly warranted within the lands designated by your office. While we recognize that it was Congress who created the provisions to fast track logging for insect and disease management, they left enough discretion to enable governors to take a measured approach to designating these lands, and to engaging the public and scientists to ensure that any lands that will be fast tracked have been appropriately studied by forest researchers.

Such study is critical in light of the significantly controversy surrounding the best actions to take to address insect and disease "infestations" on forest lands. A new meta-analysis by University of Montana Entomologist Diana Six, for example, finds that logging may actually exacerbate insect impacts, rather than reducing or resolving them (Six, D., E. Biber, E. Long. 2014. Management for Mountain Pine Beetle Outbreak Suppression: Does Relevant Science Support Current Policy? *Forests* 2014, 5, 103-133). In light of this and other research, we cannot understand how your office could designate such a huge acreage of Montana's national forests as subject to treatment under this new

provision. This only perpetuates the myth that insect and disease outbreaks are unnatural and abnormal events, when natural disturbances have always been part of healthy ecosystems.

We respectfully request that you withdraw this designation and restart the process. Specifically, we request that you make the full process open and accessible to the public, and that you engage forest management experts, not just a small number of “stakeholders” from a handful of organizations throughout the state.

Please don't hesitate to contact me if you have any questions about our concerns.

Sincerely,

Bethanie Walder

Public Lands Director
WildEarth Guardians
PO Box 7516
Missoula, MT 59807
406-543-9551
bwalder@wildearthguardians.org

cc: Northern Regional Forester Faye Krueger
Senator Jon Tester
Senator John Walsh