

Congress of the United States
Washington, DC 20515

February 1, 2021

Mr. Kevin Norton
Acting Chief, Natural Resources Conservation Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Re: Guidance for Identification of Nonindustrial Private Forest Land (NIPF); Docket No. NRCS-2020-0009

Dear Acting Chief Norton:

We write to express our concerns with proposed guidance regarding the Natural Resources Conservation Service (NRCS) definition of nonindustrial private forest land (NIPF) as submitted in the Federal Register on December 17, 2020. While we appreciate NRCS's goal of providing greater clarity regarding the NIPF definition, we believe that this guidance could inadvertently hinder important forest conservation efforts in the state and adversely impact the logging, forest products, and outdoor recreation industries that sustain Maine's economy and rural communities.

According to the most recent data from the Department of Commerce's Bureau of Economic Analysis, Maine's outdoor recreation industry makes up a larger percentage of the state's economy than in almost any other state – ranking in the top five among Hawaii, Montana, Florida, Vermont, and Wyoming. Outdoor recreation continues to support more than forty thousand jobs in Maine, accounting for 4.7 percent of employment. Moreover, data compiled by the Professional Logging Contractors of Maine and the University of Maine revealed that the estimated overall annual economic contribution of Maine's logging and trucking industries, including multiplier effects, was an estimated \$619 million in output, nine thousand jobs, and \$342 million in labor income.

Given the importance of Maine's outdoor recreation and logging industries to our state's economy and the role NRCS plays in sustaining our forests, it is troubling that your agency has chosen to pursue a threshold of 45,000 acres when determining what qualifies as NIPF. While the proposed guidance would allow State Conservationists and Technical Committees to set additional state-based criteria, we remain concerned that entities that have previously used NRCS funds could become ineligible to participate in NRCS programs. For example, the Appalachian Mountain Club (AMC) owns and manages 75,000 acres in Piscataquis County and has used NRCS funds to hire loggers and logging equipment to install stream restoration material and restore habitat for Brook trout and Atlantic salmon. These activities also have a secondary impact of improving the ability of loggers to conduct timber stand management and move wood from the forest to market. The \$523,000 in grants that AMC has received to date from NRCS have been matched by \$870,000 in private funds for a total of nearly \$1.4 million invested in the local economy of one of Maine's poorest counties. The loss of these funds would be a severe blow to Maine's economy that is already reeling from the effects of the COVID-19 pandemic.

In Maine, NRCS programs have played a vital role in protecting thousands of acres of pristine working forests that have been managed and utilized for a variety of purposes, including forestry, recreation, habitat restoration, and outdoor education. It is our hope that you will reconsider the proposed definition change to NIPF, as it does not accurately reflect the reality that land holdings greater than 45,000 acres are not exclusively associated with large corporate forest owners.

We appreciate your attention to this important matter.

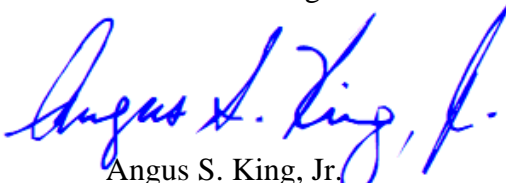
Sincerely,



Jared Golden
Member of Congress



Chellie Pingree
Member of Congress



Angus S. King, Jr.
United States Senator



Susan M. Collins
United States Senator