



# CWSF

COUNCIL OF WESTERN  
STATE FORESTERS

March 23, 2026

The Honorable Doug Burgum  
Secretary, U.S. Department of the Interior  
1849 C Street, N.W.  
Washington D.C., 20240

Secretary Burgum,

The Council of Western State Foresters (CWSF) is submitting comments regarding the underuse of the Good Neighbor Authority (GNA) (16 U.S.C. 2113a and 16 U.S.C. 8571), a critical tool available to the U.S. Department of the Interior's (DOI) Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (USFWS), and the National Park Service (NPS) to meet active forest management and wildfire risk reduction needs across western landscapes. GNA is identified within Executive Order 14225, *Immediate Expansion of American Timber Production*, as an important mechanism to facilitate increased timber harvest and sound forest management. CWSF urges DOI to act on the recommended GNA improvements in this letter to increase opportunities for state forestry agencies to partner with DOI to meet the Administration's timber and wildland fire priorities. The recommendations are specific to the BLM; however, they apply across all DOI bureaus.

CWSF members comprise the 23 State Foresters from 17 western states and six U.S.-Affiliated Pacific Islands. State Foresters have supported GNA since its inception as a pilot and have accumulated over two decades of experience to maximize this authority's potential, primarily with the USDA Forest Service (Forest Service). As of 2025, 14 western state forestry agencies had 18 active GNA agreements with BLM, covering activities and projects on roughly 22 of 43 BLM districts. This is contrasted with 186 active GNA agreements covering 84 of 87 national forests with the Forest Service.<sup>1</sup>

GNA authorizes DOI to enter into cooperative agreements or contracts with state forestry agencies, enabling states to carry out authorized restoration services across jurisdictional boundaries. GNA leverages state forestry agencies' capacity, expertise, and use of their own contracting processes and procedures to improve project efficiency and achieve cost savings. Congress intended GNA to be a collaborative mechanism in which states function as strategic partners in defining mutual landscape-scale priorities, project development, and implementation goals across mixed-ownership projects.

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<sup>1</sup> Western State Forestry Agencies Good Neighbor Authority Activities and Accomplishments, October 2025. [https://www.westernforesters.org/sites/default/files/2025GNASynthesis\\_Final.pdf](https://www.westernforesters.org/sites/default/files/2025GNASynthesis_Final.pdf)

CWSF respectfully submits the following recommendations on behalf of western state forestry agencies to improve GNA and welcomes the chance to put these changes into action alongside our DOI partners.

### **1. Incorporate state forestry agencies throughout GNA policy development**

State forestry agencies are essential partners in the successful execution of GNA. For state forestry agencies to act on behalf of the federal government to complete critically needed treatments that support timber production, hazardous fuels thinnings, habitat improvements, and more, the governing policy has to work for state partners and address their shared priorities. This is clearly reflected in Congress's intent for GNA to serve as a mechanism for collaborative partnerships that advance mutual objectives in landscape restoration and active management. When developing governing GNA policy, federal agencies should conduct early and ongoing coordination with states.

Recently, a subset of the CWSF GNA Committee, comprising state forestry agency GNA staff leaders, received an early look at the draft BLM GNA policy. While those staff appreciate the opportunity to review the draft guidance, it largely frames the relationship between BLM and cooperating entities in transactional terms (e.g., contractor, recipient, or applicant). This framing does not fully reflect Congress's intent or the operational realities of GNA implementation, and is insufficient for state forestry agencies. CWSF urges BLM to partner with state forestry agencies and other cooperating entities to develop a policy that meets the needs of GNA partners before finalizing it.

Additionally, CWSF encourages DOI and the bureaus to collaborate with the Forest Service and utilize existing Forest Service GNA workflows and processes. Greater alignment across federal agencies will reduce confusion, improve administrative efficiency, and better support state partners that have already achieved success treating hundreds of thousands of acres with the Forest Service.

### **2. Establish a new bilateral GNA agreement process that requires signatures from both parties (state and BLM)**

CWSF recommends that BLM transition from a unilateral grant-based system to a bilateral agreement framework. This model has been successfully used by the Forest Service for more than a decade and would replace the BLM's current requirement that states "apply" via grants.gov, which frames state forestry agencies as passive recipients of federal aid rather than active, collaborative partners. This transition aligns with the legislative intent of GNA and with the Administration's priorities to empower local decision-making and support responsible resource stewardship.

### **3. Develop simple and flexible GNA agreements**

CWSF recommends that BLM develop distinct GNA agreements that allow local BLM and state forestry resource managers to bring forward, adapt, or modify GNA projects to meet mutually identified priorities while ensuring the necessary accountability. The current BLM GNA process requires significant detail, including individual personnel costs and line-item operating budgets for every GNA project. This approach forces state agency resource managers into a rigid administrative box, preventing flexibility in shifting resources to where they can serve the greatest good across the

federal landscape. For example, the unnecessary requirement in GNA grants that there shall be “substantial BLM involvement in contractor and purchaser selection,” that contractor selection decisions by the state must be approved by BLM, and that a BLM “Risk Assessment” be completed prior to the state’s award of a state contract. This process has at times led to missed opportunities for BLM to secure state funding and additional priority treatments due to the inflexibility of agreements. CWSF urges BLM to partner with state forestry agencies and the Forest Service to develop distinct GNA agreements.

#### **4. Empower line officers with greater authority and responsibility for GNA coordination, priority setting, and implementation**

CWSF recommends that BLM assign greater authority and responsibility to State Directors, District Managers, and Field Office Managers for GNA planning, funding distribution, and implementation. Because these line officers are responsible for achieving land management outcomes on the ground, they should have a clear role in identifying joint priorities, advancing projects, and ensuring GNA is used strategically to meet shared objectives. GNA is most effective when it is integrated into broader programmatic and landscape-level planning, rather than treated solely as an administrative agreement mechanism.

In addition, GNA policy should assign line officers responsibility for coordinating with State Foresters on shared priorities for project development, treatment implementation, and long-term planning. State forestry agencies are not simply grantees or contractors under GNA; they are governmental partners with statutory responsibilities, operational capacity, and non-federal perspectives that increase cross-boundary forest health outcomes. Formalizing this coordination expectation in policy would help ensure that GNA projects are driven by mutual objectives and informed by both federal land management needs and state-level restoration strategies.

In practice, DOI Grants Management Officers (GMOs) often hold substantial authority over project development and execution. While GMOs play an important role in ensuring compliance with applicable laws and regulations, they should support GNA delivery rather than function as the primary drivers of program decisions. Administrative roles should be standardized and supported with consistent training that reflects GNA’s purpose as a cooperative authority rather than a traditional financial assistance program. GNA policy should ensure that administrative functions facilitate implementation, while line officers retain primary responsibility for direction, coordination, and accountability for results.

#### **5. Institute 10-year BLM GNA agreements**

At this time, GNA projects with the BLM are limited to three to five years. Within that time frame, the identified GNA activities must be completed, and any revenue received from completed timber sales must be spent on additional restoration services. Further, any remaining revenue in a GNA grant cannot be transferred to another GNA project. Typical restoration projects require multi-year planning, implementation, and monitoring, and the existing time limitations curtail GNA’s successful application. A shift from three- to five-year to 10-year agreements would be consistent with the longer-term agreement structure that states enter into with the Forest Service.

In the early look at the draft BLM GNA policy, CWSF GNA Committee members were encouraged to see the BLM's extension of GNA grants up to 10 years. However, the additional process, documentation, approval requirements, and the unilateral option-year structure outlined in the guidance would create a cumbersome framework that would limit successful implementation. Ten-year agreements should be the default for GNA, without the additional justification documentation, and should be determined at the discretion of the local state forestry agency and BLM partners engaged in co-planning and developing the GNA agreement.

## **6. Develop consistent GNA policy and process across DOI**

CWSF recommends that DOI develop policy that guides GNA implementation consistently across all relevant bureaus. In the fiscal year 2024 Consolidated Appropriations Act, GNA was expanded to include the USFWS and the NPS. With the recent establishment of the U.S. Wildland Fire Service, questions have been raised about implications for GNA fuels projects. CWSF urges DOI bureaus with the authority to coordinate in developing a collective GNA policy that supports consistent implementation.

Thank you for considering CWSF's recommendations to improve GNA planning and implementation with BLM and other DOI bureaus. The recommendations reflect the strong interest and support of State Foresters to partner with DOI to achieve the Administration's forestry and wildfire risk reduction priorities. As state and federal agencies collectively look to advance landscape-level forest management to stem the tide of catastrophic wildfire and sustain the forest products industry, the goals of each party have never been more aligned.

Sincerely,

Kelly Norris  
Chair, Council of Western State Foresters  
Wyoming State Forester

cc: Kate MacGregor, Deputy Secretary of the U.S. Department of the Interior  
Lanny Erdos, Acting Assistant Secretary for Land and Minerals Management  
Bill Groffy, Acting Director of the Bureau of Land Management