Wyoming DEPARTMENT OF Agriculture

Mark Gordon, *Governor*
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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

January 26, 2024

Director
Ecosystem Management Coordination
201 14th Street SW
Mailstop 1108
Washington, DC 20250-1124
https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356

Dear Director,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the United States Department of Agriculture (USDA) Notice of Intent (NOI) to prepare an Environmental Impact Statement for Land Management Plan Direction for Old-Growth Forest Conditions across the National Forest System (Amendment).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The proposed plan amendment will impact 128 U.S Forest Service (FS) plans, each with unique ecological conditions. Out of the 128 plans, seven forests located within Wyoming's border, may be impacted by the upcoming Amendment. WDA is extremely concerned with the FS taking a blanket approach to manage Old-growth Forests at the national level. As with many national level planning efforts currently underway, this appears to be a thinly veiled attempt to bypass the local input by impacted stakeholders, limit the agency's multiple-use mandate, and restrict district rangers and supervisors from making decisions at the individual forest level.

The National Forest Management Act, 36 CFR § 219.2 includes the following regulatory language regarding levels of planning and responsible officials: *"The supervisor of the national forest, grassland, prairie, or other comparable administrative unit is the responsible official for development and approval of a plan, plan amendment, or plan revision for lands under the responsibility of the supervisor..."* WDA does not support the National FS office superseding the local forest supervisor's authority or restricting their ability to make appropriate management decisions based on ecological conditions, economies, and multiple uses.

Existing forest supervisor's signed forest plans, presumably already identify, map and manage Old-growth Forests. A prime example from the Medicine Bow National Forest in Wyoming where local forest management already includes planning and protection of Old-growth Forests, under the Medicine Bow Landscape Vegetation Analysis (LaVA) Project.

The LaVA project was a collaborative effort led by the forest supervisor, utilizing cooperating agencies and local stakeholders' expertise, to develop a plan allowing for flexibility and timeliness to manage forest vegetation while still retaining Old-growth Forests. LaVA has a specific objective to *"maintain and enhance old-growth across the landscape."* This forest specific decision, exemplifies the value of local input and for the ability of each forest to independently

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decide how to manage for Old-growth Forests without National FS office dictating the need to amend all 128 plans. The proposed Amendment is a glaring abuse of top-down management, a waste of time, effort and funding, expended to amend 128 plans, when many of these plans may have recently been amended, revised, or will be in the near future.

WDA urges the National FS to support district rangers, forest supervisors, and local stakeholders to analyze current Old-growth Forest management and determine if additional management is actually needed. If the local plan would benefit from additional Old-growth Forest management each forest can issue their own NOI to amend their current plan. Local plan amendments must remain consistent with the Multiple-use and Sustained Yield Act of 1960 as directed in 36 CFR § 219.2.

If an amendment is deemed necessary, the local FS must map existing ecological conditions, while considering management of all forest resources. The National FS should not amend plans to manage specifically for Old-growth Forest. In order to manage for healthy and resilient forests on a landscape level, forests must contain a diversified age class of forest stands and diverse species of wildlife, while still supporting multiple-use within the National Forest System.

In conclusion, the WDA opposes the National FS from moving forward with the NOI to amend all 128 forests across the nation. This approach is flawed and reduces the voices of concerned citizens at the local level, who rely on the forest for their local economies. As a Cooperating Agency on all Wyoming forest decisions, we rely on our strong working relationships with district rangers, forest supervisors, and resource staff to identify appropriate management and decisions, but do not support top-down decisions as proposed in this NOI.

If you have questions or concerns, please contact Linda Cope, Senior Policy Analyst at 307-777-7024.

Sincerely,

Doug Miyamoto
Director

DM/lc

CC: Governor's Policy Office
        Wyoming Board of Agriculture
        Wyoming Stock Growers Association
        Wyoming Wool Growers Association
        Wyoming Farm Bureau Federation
        Wyoming State Grazing Board
        Wyoming Association of Conservation Districts
        Wyoming Game and Fish Department
        Wyoming County Commissioners Association
        Public Lands Council