



February 2, 2024

Forest Service, USDA
Director, Ecosystem Management Coordination
Policy Office
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Submitted via webform

RE: Comments on December 20, 2023, Federal Register Notice FR 88, No. 243
88042–88048 (Old Growth Plan Amendment)

To Whom It May Concern,

Sublette County Conservation District (SCCD) has the mandate to assist and promote the protection and preservation of public lands, natural resources, soil, water, and wildlife, the development of water and prevention of floods, stabilization of the ranching and agricultural industries, protection of the tax base, and providing for the public safety, health, and general welfare of the citizens within Sublette County. SCCD has the following comments as it relates to our mission on the Old Growth Plan Amendment.

Sublette County is flanked by the Bridger-Teton National Forest (BTNF), which is one of the 128 national forest plan amendments in this notice. SCCD is vested in the management of our USFS lands and have a close working relationship with our USFS personnel in the Ranger Districts within our boundaries. SCCD is also the co-founder and facilitator of the Sublette County Forest Collaborative that was established in 2016. The Collaborative has worked with the BTNF and other stakeholders involving partner agencies and special interest groups to develop recommendations that have led the BTNF to develop a 10-year vegetation management plan.

SCCD is pleased that the United States Forest Service (USFS) has switched from the rule making process to address this issue to proposing forest plan amendments to address this issue. On that note SCCD reads the "Summary and Dates" in the notice to mean that the USFS is looking at a national Draft Environmental Impact Statement (DEIS) to address the Old Growth Plan. SCCD strongly opposes this approach of trying to make a one size fits all amendment to 128 forest plans. SCCD strongly encourages the USFS to work on individual forest plan amendments that involve local land managers and governments. The local approach will ensure that cooperating agencies and local interests are heard, and the plan reflects the local needs. The timelines associated with the notice are also ambitious and aggressive. SCCD recommends that

the USFS roles the old growth amendment into the current BTNF forest plan revision process that has been initiated. There is no reason to amend the 1990 forest plan or amend the new forest plan, what makes sense is to incorporate into the current process.

SCCD appreciates the opportunity to comment on the notice for the Old Growth Plan Amendment. SCCD strongly urges the USFS to withdraw the national amendment proposal and allow the individual forests to amend or incorporate into the forest plan revision process old growth plan at the local forest level. If you have any questions don't hesitate to call me at any time.

Sincerely,



Michael Henn
District Manager

Cc Sublette County Commissioners
Wyoming Association of Conservation Districts