To: Objection Reviewing Officer

Payette National Forest Resilience and Fuels Reduction Prescribed Fire Project

 USFS Intermountain Regional Office

 324 25th Street

Ogden, UT 84401

Submitted VIA: US MAIL Postmarked March 30, 2024

Electronically submitted to <http://www.fs.usda.gov/project/?=63166> on March 29, 2024

Pursuant to Legal Notice of Opportunity to Object published in Idaho Statesman

February 15, 2024

Objector: The Adams County, Idaho -Board of County Commissioners

Address: c/o Christopher Boyd, PA.(Signature can be found on final page of document)

Adams County Prosecuting Attorney’s Office

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Project:

Draft Decision Notice and Finding of No Significant Impact

Resilience and Fuels Reduction Prescribed Fire Project

Located on 1.3 million acres of 2.3 million acres of the Payette National Forest (PNF) with individual burns on unknown site/locations and of unknown sizes.

Project implementation timing is over the course of 25 years (can be extended longer).

This Categorical Exclusion is allowed through a new negotiated loosened set of National Environmental Policy Act (NEPA) requirements negotiated by the United States Department of Agriculture (USDA) Forest Service and the United States Department of Interior (USDI), Bureau of Land Management Exclusion with the President’s Council on Environmental Quality (CEQ). The CEQ has oversite authority for NEPA Compliance.

This new and negotiated Categorical Exclusion attempts to avoid the Objection and Appeals process upon this and all Project Draft and Final Decision Notices.

The CEQ further amended to NEPA in the Fiscal Responsibility Act (FRA) of 2023 to remove “cooperating agency status” for county governments nation-wide. The description, “American People” has also been troublingly changed to “humans”.

These changes and negotiated terms were made through Amendments and Corrections to NEPA, as listed separately in the Federal Register (FR) and were used to change the USDA Forest Service 2012 Planning Rule, as Amended December 15, 2016, and subsequently through Federal Register (FR) corrections and clarifications that have not been referenced or included in the President’s Executive Orders (EOs); the USDA Secretary’s rulemaking Notice of Intent (NOI) to promulgate Old Growth Protections on 128 National Forests and the Bureau of Land Management Resource Management Area Plans for all units; the Forest Service National; and website; the Payette National Forest Planning website; and in the NOI Legal Notices for Comments, Objections or Appeals published in the Statesman Journal.

Computer modeling, data and maps including state and private lands is now shared worldwide to address Climate Change per the international agreements referenced in the President’s Executive Orders promulgated to support the changes to Forest Service. Bureau of Land Management planning regulations and National Environmental Policy Act (NEPA) project compliance documentation.

The Adams County Board of County Commissioners received the Payette National Forest Railroad Saddle Final Record of Decision to prescribe burn approximately 23,000 acres of an approximate 25,000-acre project area on March 8, 2024. The Record of Decision was signed on March 16, 2024, by the Payette National Forest Supervisor and Responsible Official on the Resilience and Fuels Reduction Prescribed Fire Project.

The Adams County Board of County Commissioners Appeals the Final Record of Decision and Environmental Assessment for the Railroad Saddle Forest Restoration Project Environmental Assessment and Final Record of Decision and includes the Appeal in this Objection to the Draft Record of Decision and Categorical Exclusion for the 1.3 million acres of the Resilience and Fuels Reduction Prescribed Fire Project

The Railroad Saddle Forest Restoration Project Environmental Assessment and Final Record of Decision is considered new information. It is a connected action not identified in the Finding of No Significant Impact (FONSI) for the Payette National Forest Resilience and Fuels Reduction Prescribed Fire Project.

The Railroad Saddle Forest Restoration Project Environmental Assessment describes consultation for endangered and threatened species shortly before the Final Record of Decision was signed. Compliance requirements were added to the Environmental Assessment for timber harvest to included consultation with USFS wildlife biologists before, during and after “pocket” logging a total area of less than 1,500 non-contiguous acres with a logging haul length of 208 miles. No wildlife consultation is required for prescribed burning. The timber harvest area “can be burned before or after logging” at the discretion of the prescribed burn boss.

The Responsible Official for these 1.3 million acres project states in the Draft Record of Decision:

**“The interdisciplinary team did not identify any potentially significant short-term or long-term adverse effects associated with implementing the proposed action and determined that the overall effect of implementing the project is expected to be beneficial in the long term for many proposed treatment area resources.**”

In the Railroad Saddle Forest Restoration Project Environmental Assessment, the US Fish and Wildlife Service was consulted very shortly before the release of the Final Record of Decision and information was added to the project Environmental Assessment without public notice or delay in signing the Responsible Official’s Final Record of Decision. This is the basis for our Administrative Appeal and amplifies our Objection to the Draft Record of Decision and Categorical Exclusion for the Resilience and Fuels Reduction Prescribed Fire Project.

The statements within the Environmental Assessment and subsequent Finding of No Significant Impact are unsubstantiated. A Categorical Exclusion allows State and Private Forestry Fire Crews to assess each prescribed burn site before starting a prescribed burn for burning conditions without an further NEPA for 25 plus years.

The Adams BOCC provided a letter of Comment on the Project in October of 2023. This Objection, although futile, documents for the public the reasons continue to object to this project as it is not in compliance with the U.S. Code of Federal Regulations is without errata documenting the fine and mid filter scale of on the ground conditions to assess and analyze the adverse effects on human health and safety, the environment, wildlife and endangered species, and economic impacts on the local, state and regional economies. No existing PNF Forest Plan monitoring reports exist. No timber harvest, grazing and dispersed recreation Payette National Forest per the 2012 USFS Agency wide Planning Rule as amended in 2016, and through corrections and amendments in Federal Register without transparent rulemaking.

This Objection, although futile, documented for the public the reasons the Adams County Board of Commissioners continue to object to this project as it is:

1) not in compliance with the U.S. Code of Federal Regulation, is without errata documenting the fine and mid filter scale of on the ground conditions, coarse filter scale errata and mapping are *not adequate* used except to estimate 1.3 million acres of the Payette National Forest

3) the information needed to assess and analyze the adverse effects on human health and safety, the environment, wildlife and endangered species, and economic impacts on the local, state and regional economies must be at the appropriate scale.

USFS Responsible Official: Payette National Forest Supervisor Linda Jackson

Note: \* Any Responsible Official Can Amend a Forest Plan at their “discretion” without public notice. This Project is not consistent with the Payette National Forest Plan of 2003.

All these issues arose after the designated opportunities for comment and meet the definition of new information and add to the basis of the Adams Board of County Commissioners’’ Objection.

Remedy to Resolve the Adams BOCC Objection:

This project must be withdrawn until an Environmental Impact Statement regarding a Payette National Forest Plan Revision -incorporating a fully analyzed impact of a forest wide burn plan in the Revised Forest Plan. Until then the existing Forest Plan must be implemented pursuant to U.S.C. 1600.

“Without natural resources life itself is not possible. From birth to death, natural resources, transformed for human use, feed, clothe, shelter, and transport us. Upon them we depend for every material necessity, comfort, convenience, and protection in our lives. Without abundant resources prosperity is out of reach. Therefore, the conservation of natural resources is the fundamental material problem.” Breaking New Ground by Gifford Pinchot, First Chief of the US Forest Service

The Adams County Idaho Board of County Commissioners (BOCC), as served by their County Prosecuting Attorney, has consistently reached out as well as responded to the USDA, Forest Service (FS) and the USDI, Bureau of Land Management (BLM) through opportunities to comment on numerous Payette National Forest (PNF) landscape and forest scale projects as well as Bureau of Land Management multi-state and national development plans on federal lands.

The BOCC retained an independent consultant with federal lands and interdisciplinary resource management expertise to work with the BOCC and the County Attorney in thoroughly reviewing federal land and resource projects opened for comment in 2023. To gain a thorough understanding and perspective of what had transpired in the years prior and to build a county administrative record of their involvement and substantive review and comment a series of questions were sent to the PNF Forest Supervisor.

The BOCC requests of the PNF Forest Supervisor were regarding Forest Plan land allocations for timber harvest, for grazing and for dispersed recreation monitoring and other pertinent information including the fiscal relation between the PNF and Adams County.

Instead of a reply, the PNF Forest Supervisor sent the request for information to a FS-R4 Regional Freedom of Information Act (FOIA) coordination office in Ogden, Utah. The BOCC was notified of their FOIA requirement to receive the information request through The FOIA process. This inappropriate referral to a FOIA requirement was swiftly addressed through U.S. Congressman Russ Fulcher’s Boise Office. The PNF Forest Supervisor represented to Congressman Fulcher’s Staff that the BOCC request for information was thought to be an indication of an impending lawsuit since the county attorney made the request.

The BOCC continued to request missing parts of the pertinent Forest Plan accomplishments including Allowable Sale Quantities since 2019 within the land allocation /suitable acres for timber harvest. This information had been normally and customarily reported in number of board feet produced. The BOCC also requested the number of acres burnt within the last 10 years. The last request for this information was made in December 2023 letter with a due date of January 2024. The BOCC has not received a reply to date.

To build rapport with the PNF Supervisor, District Rangers and Natural Resource and Recreation Staff, the BOCC also initiated a monthly in person meeting with the PNF in 2023. These meetings were held in the Adams County Courthouse. These open meetings were initially well attended by the PNF Supervisor, her Resource Specialist Staff and included all three BOCC members.

In late 2023, there was a clear shift in attendees to the PNF Supervisor and District Rangers only with prepared reports on project activities. Without staff resource area specialists present, no information was available to answer BOCC questions about number of timber sales and number of prescribed burn acres to date even though these District reports were for Forest Plan Accomplishments in FY2022.

The BOCC requested an in- person meeting with the PNF Supervisor and her Resource Staff before the deadline for submitting this Objection to the Payette National Forest Supervisor’s Draft Decision Notice and Finding of No Significant Impact.

In late 2021, the number and size of the PNF landscape scale planning documents increased exponentially. Landscape and watershed scale projects until mid 2020 had been addressed with on the ground information with NEPA compliance in Environmental Impact Statements with public input and in person discussion. The BOCC was routinely informed of opportunities to engage as a county and was clearly aware of their opportunity for cooperating agency status pursuant to NEPA.

In 2021, the county was no longer addressed by the FS as a county or local government and started receiving only letters as an “Interested Party”. Other categories of inclusion in providing input had changed from “public” to “stakeholder”, “partner”, “interagency” and “sponsor”. Forest Plan Monitoring Reports ended with no explanation (after a 2019 prepared in 2020) and project plans became more general with only coarse filter scaled data with no source identified.

The PNF Forest Supervisor advised the Payette Forest Coalition in the Fall of 2023 that the PNF Forest planning and resource specialists were preparing several projects Payette Forest Coalition member review, comment, and “vote” on support or nonsupport of the projects.

The BOCC has also been represented consistently on the Payette Forest Coalition (PFC) with only a disruption in meeting during the Covid 19 federal response as employees were working from home and as their offices remained closed to the public for some time. The Commissioner that attends the PFC meetings as a member has been increasingly concerned as the information provided in large planning documents seem to contain less and less about local conditions on the ground and more like templated and generalized information.

One recent project Environmental Assessment at a landscape scale was nearly 200 pages in length and had been “scoped” as if it were an EIS a year earlier with little to no public involvement. The PFC members were making comments as a group for some time as facilitated by a federal employee to reach consensus and provide a PFC letter of support or declination for the FS Projects to apparently meet the minimal public information requirements of the 2012 Forest Planning rule, as amended on December 15, 2016.

The BOCC and PNF Coalition obviously noted that their involvement with the FS and other federal agencies had changed radically after 2020 and was changing more with each review of documents and comments submitted. The proposals, plans, and project documents were at a scale far exceeding the fine and mid filter scale and detail to analyze locations and were clearly not generated by PNF staff. Without local federal agency resource specialists generating multi-disciplinary information from on the ground conditions and documented in Forest Plan Monitoring Reports, prescribed fire continues to be the single management alternative for all the projects and plans for the PNF.

Every Environmental Assessment completed was used to claim a Categorical Exclusion instead of an Environmental Impact Statement based on a general template of fire behavior, suppression history and fuel loads prepared by the Washington Office Deputy Chief area of State and Private Forestry and carried through their Regional Fire and Aviation staff.

This means that the Purpose and Need of each project conflicts with the Environmental Impact Statement (EIS) on the PNF Forest Plan. The EIS for the Payette National Forest Plan allows the Responsible Official to state: **“*to implement* the current Payette National Forest Plan”. NEPA documentation in the form of an Environmental Assessment to prescribe over half of the Payette National Forest requires an EIS from the National Forest System staff.**

**State and Private Forestry** has **no authority** to conduct NEPA on NFS lands. Interdisciplinary analysis of the potential environmental impacts of prescribed burning on National Forest System lands has not been completed by National Forest System qualified staff.

Each prepared NEPA document should provide the basis for consideration of adverse effects upon people, the environment, and the economy. The Washington Office Deputy Chief area of the National Forest System (NFS) is responsible for preparation of NEPA documentation to assure “no harm” is caused by implementation. The State and Private Forestry Deputy Chief area has produced all the NEPA and provided the basis for National Forest –in this case---the Payette National Forest Supervisor to sign Decision Notices that state “Findings No Significant Impact” and the repeated use of Categorical Exclusions from further analysis.

There is **no legal basis for NEPA to be prepared by State and Private Forestry Fire Staff to allow execution of Records of Decision for the use of prescribed burns on NFS lands**. The PNF Supervisor and PNF District Rangers have signed Records of Decision based upon State and Private Forestry prepared NEPA documents since 2021. This is why Environmental Impact Statements ae not chosen by the PNF Forest Supervisor instead of a Categorical Exclusion. Prescribed fire is the only management action considered to reduce fuel loads to presumably create fire resistant vegetation in every watershed and landscape on the National Forests nationwide.

Regardless of the BOCC concerns, questions and objections planning documents are now on a fast track to implement large scale forest and grasslands “restoration” projects and massive alternative energy projects for purposes that were not “normal and customary” to the agencies promulgating the plans. **Every one of the EAs referenced compliance with Presidential Executive Orders** and complied **with each new criteria added to Forest Planning without public involvement and Federal Code of Regulations compliance.**

An recent analysis of the 200-page “planning document” without identifying the source of coarse scale information and confusingly named - per the FS 2012 Planning Rule, as amended - an “environmental assessment” with only the general description of the Granite Goose Landscape Restoration Project (Granite Goose LRP), the project as planned was found to be inconsistent with the existing 2003 Payette National Forest Plan developed as developed and with final EIS and ROD pursuant to the 1982 FS Planning Rule. **This landscape scale project replaced vegetative management with prescribed fire.** It further departed from the existing Forest Plan by *removing logging, grazing and dispersed recreation access*. **It added prescribed burns to exceed the Forest Plan 100,000 acres of prescribed burning over a 10-year period**. Upon review of the Forest Plan Monitoring Reports, the PNF **had ceased monitoring all on the ground conditions in 2018**.

The BOCC submitted a technically substantive comment on the Granite Goose Landscape Restoration Project (LRP) following the Planning Rule and CEQ guidance as cite on the Forest Service website and the PNF Planning website. A pre-decisional Objection was submitted as described in 36 CFR 219 and 218. Since the PNF Forest Plan was promulgated through rulemaking under the 1982 Planning Rule, the Forest Plan would need to be Revised to address the removal of vegetation management except by prescribed fire, removal of timber harvest grazing and recreation. It would also require a Plan Revision to prescribe burn more that 100,000 acres of the PNF over a 10-year period.

In this Objection, the BOCC cited the Code of Federal Regulation 36 CFR 219.15 as to how to address existing Forest Plans with Records of Decision (Regional Forester RODs) that will not allow consistency of a project unless the Forest Plan is revised. Again, the Granite Goose LRP is not consistent with the 2012 Forest Planning Rule. A PNF Forest Plan Revision is required.

§ 219.15 [Project](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=95f37765cbd6672f4119b63788c70723&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) and activity consistency with the plan.

(a) Application to existing authorizations and approved projects or activities. Every decision document approving a plan, plan amendment, or plan revision must state whether authorizations of occupancy and use made before the decision document may proceed unchanged. If a plan decision document does not expressly allow such occupancy and use, the permit, contract, and other authorizing instrument for the use and occupancy must be made consistent with the plan, plan amendment, or plan revision as soon as practicable, as provided in [paragraph (d)](https://www.law.cornell.edu/cfr/text/36/219.15#d) of this section, subject to valid existing rights.

(b) Application to projects or activities authorized after plan decision. [Projects](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=95f37765cbd6672f4119b63788c70723&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) and activities authorized after approval of a plan, plan amendment, or plan revision must be consistent with the plan as provided in [paragraph (d)](https://www.law.cornell.edu/cfr/text/36/219.15#d) of this section.

(c) Resolving inconsistency. When a proposed [project](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=95f37765cbd6672f4119b63788c70723&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) or activity would not be consistent with the applicable plan components, the [responsible official](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=749c060c20afd4c4df37073f4bf928c6&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) shall take one of the following steps, subject to valid existing rights:

(1) Modify the proposed [project](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=95f37765cbd6672f4119b63788c70723&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) or activity to make it consistent with the applicable plan components;

**\*(2) Reject the proposal or terminate the** [**project**](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=95f37765cbd6672f4119b63788c70723&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) **or activity;**

(3) Amend the plan so that the [project](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=95f37765cbd6672f4119b63788c70723&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) or activity will be consistent with the plan as amended; or

(4) Amend the plan contemporaneously with the approval of the [project](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=95f37765cbd6672f4119b63788c70723&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) or activity so that the [project](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=95f37765cbd6672f4119b63788c70723&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) or activity will be consistent with the plan as amended. This amendment may be limited to apply only to the [project](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=95f37765cbd6672f4119b63788c70723&term_occur=999&term_src=Title:36:Chapter:II:Part:219:Subpart:A:219.15) or activity.

36 CFR 219.15

The BOCC Objection to the Granite Goose LRP was inappropriately blocked by the PNF Forest Supervisor as the Responsible Official. It was not published to the public record. The PNF Supervisor’s response by way of an email to the Executive Assistant to the County Attorney represented the use of her Responsible Official “Discretion” to amend the terms of an inconsistence with the current Forest Plan. This is an attempt to avoid the cancellation of the Project by not publishing the Objection and officially respond to it.

The BOCC was better informed by the Responsible Official’s informal rejection of a legitimate Objections as the December 15, 2016, Amendment to the 2012 Planning Rule of 2012 allows the Responsible Official to use their discretion without public involvement to amend a project or Forest Plan. This experience assisted in seeking confirmation other changed corrections, amendments and clarifications to the FS Planning Rule found documented in the Federal Register.

**References are made in the 2017 Forest Plan Monitoring Report by the PNF Supervisor for a Payette National Forest Plan Revision dur to the 2012 Planning Rule.** It was the last time timber harvest, grazing and dispersed recreation Forest Plan Monitoring information was collected and put in a required biennial Report. The Planning Rule had been amended in late 2016 and many within Forest Planning at the Forest level were not made aware.

As we now know, this was because there has *been an* ***intentional diminishment in timber, grazing and dispersed recreation to justify a finding that they are “unsustainable” per the Multiple Use and Sustained Yield Act*** *through further amendments and corrections to the 2012 FS Planning rule through a series of Federal Register published notes.* This is process explains how prescribed fire and burning were justified by increasing fuel loads composed of dead, decadent past- merchantable and artificially inaccessible merchantable timber on the Payette National Forest.

The USDA Forest Service is facilitating the unsubstantiated claims that climate change is causing wildfires. This claim is then justifying the need to prescribe burn millions of acres of unmanaged and unmonitored public lands and resources across jurisdictions and boundaries of state, private and tribal lands. The FS Chief’s Strategy and Implementation has not been through a National Environmental Policy Act review for this reason.

A National Association of Counties permanent policy resolution promulgated in early 2022 was ratified by the full membership in July 2022. The Resolution simply states that all counties depend on a positive environmental, health, safety, and fiscal relationship with their federal neighbors. It was resolved that the USFS and all other federal land and resource management agencies follow the U.S. Code of Federal Regulations. Specifically including performing a full NEPA analysis via an EIS with county cooperating agency status of the Chief’s Wildland Fire 10-year Implementation of the Cohesive Strategy. This Strategy is not Federal Policy. At the time of implementation in 2022, the Chief was within his 18-month authorization to use an Agency-wide Directive to address a need to adapt the management direction quickly across the agency. That time has expired.

All these actions are void of the transparency in federal policy making as mandated by Congress in the Administrative Procedure Act. Congress has been misled with changes made in the FS Planning rule; Presidential Executive Orders cited as policy in the administrative record at the implementation levels of the USFS, BLM, and other federal agencies; Council of Environmental Quality amendments to NEPA to negotiate the requirements to assess cumulative effects of prescribed and wildland fire and, through the Fiscal Responsibility Act of 2023, to change NEPA to exclude Cooperating Agency Status for Counties. Thus, the confuse ng need for a Memorandums of Understanding (MOU) currently with the USDA Secretary’s in FS and BLM Old Growth Protection rulemaking and BLM in the 22-million-acre solar development plan on federal lands.

All these *hidden* actions have served to legitimize the wildfire crisis *diminished the active management* of the National Forests, BLM, and other federal lands to only one management option: to burn them. This has been justified by the claim that climate change caused a sudden uptick in wildland fire ignitions. Drought, loss of trees that provide carbon sinks and the destruction of entire vital watersheds resulted. Smoke is not monitored and is not allowed to be addressed cumulatively as NEPA amendments allow. EPA is decreasing Clean Air Act attainment levels to address the number of states that have breached clean air standards because of the Forest Service burn policy.

Naturally ignited fires are limited to lighting strikes. All other fires on public lands to date have been caused by human ignitions…including those that have been prescribed by the USFS. Power Companies and few citizens have been relentlessly blamed by the Agency for these ignitions. The insurance companies are no longer insuring homes and/or require such high deductibles that living near federal lands is no loner affordable.

Former FS Chiefs and numerous specialists in every of every resource management

Area have attempted to reason with the Chief to understand that prescribed burning with fuel loads and cross jurisdiction risk to human life, health due to air quality, wildlife, private property, and to the environment could only be the result of burning huge areas trees and other carbon sinks across the nation. None of these extraordinary requests and serious concerns from local governments and from professional land and resource managers have been respected or heard.

The Adams BOCC is summitting this description of the steps they have taken to document their understanding in the Public Record as to why ***any*** Objection to a Forest Supervisor’s or Responsible Official’s Draft Record of Decision to prescribe burn 1.2 million acres of a 2.3 million acre national forest over the term of 25 years plus without identifying the specific locations of the burn areas within the national forest ----is impossible stop through this contrived arbitrary and capricious process.

The thorough public review of how this large size of an area of federal lands as well as the extraordinary length of 25 years (plus) for the use of prescribed fire could be considered as of “ No Significant Impact” on people, their environment, private property, and their economy will be met with great offense. Those with oversight over the federal departments and agencies will find this a complex strategy to block the American public from their right to transparency as provided in the US Code of Federal Regulations.

The Adams County Board of County Commissioners OBJECTS to this grossly flawed Payette National Forest Draft Record of Decision.

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Christopher Boyd, Adams County Prosecuting Attorney

For the Adams County Board of County Commissioners