



September 13, 2024

United States Forest Service
Attn: Ecosystem Management Coordination
201 14th St. SW, Mailstop 1108
Washington, D.C. 20250-1124

Submitted via electronic submission to:
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

RE: Draft Amendments to Land Management Plans to Address Old-Growth Forests
Across the National Forest System Environmental Impact Statement

Dear Ms. Jennifer McRae,

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 Draft Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Environmental Impact Statement (NOGA).

SCCD believes that the United States Forest Service (USFS) recognizes that this planning effort should be done at the local Forest level. However, the USFS appears to ignore this even though the NOGA states; "there is no single management prescription or definition that applies to all of the forest types across the National Forest System. Old-growth characteristics differ by ecosystem and species" (S-1). This national planning effort failed to have local input from resource specialists that can give critical local information on existing conditions and impacts on the local landscape. Every Forest within the USFS is unique and in a different phase with their current Forest Plan. That said allowing each Forest to address their plans and planning at the Forest scale makes the most sense.

SCCD regularly updates both a Long Range Plan and a Land Use Policy that address local issues and policies related to Sublette County and the Bridger-Teton National Forest (BTNF). SCCD participated actively throughout the cooperating agency review,

where SCCD feels the USFS never took into account nor recognized local plans and policies. Locally, SCCD works closely with the BTNF and together we have worked on several planning efforts. We have jointly experienced great success in getting those projects through the process and into implementation. SCCD believes that working relationships developed at the local level would enhance the development of any amendments to address NOGA at the Forest level, not the National level.

The BTNF lies within the boundary of Sublette County and has currently initiated the Forest Plan revision process. SCCD believes that by allowing the forest planning process to address the local needs of the BTNF including the efforts that NOGA is trying to achieve is the best approach. As with any agency, staffing and time is limited, and completing the task of addressing old growth twice- once through NOGA and again in the forest planning effort is wasteful of resources and redundant.

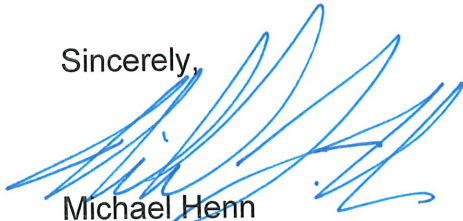
The 1990 BTNF Forest Plan has a definition of old growth on page 173 in the 2015 version of the plan with corrections and amendments. Throughout the plan old growth is noted and speaks to addressing issues when looking at projects, permits, and leases. At least for the BTNF, old growth forests are addressed in the forest plan. SCCD believes that each forest should be able to address old growth where appropriate, instead of mandated actions that go against your planning handbooks and being completed at a national level.

NOGA mandates that Forests “develop and adhere to an Adaptive Strategy for Old-Growth Forest Conservation to accomplish...” (page 21, NOGA). Adaptive Strategies as presented in NOGA are not required content for a forest plan under the 2012 planning rule and should not be mandated in a plan revision at the national level. The planning handbook (FSH1909.12) states that optional content must not include or appear to include to do lists of tasks or actions. The USFS directly ignores their planning handbook guidance and in the Final Environmental Impact Statement (FEIS) needs to remove these adaptive strategy requirements and align with their planning handbook.

SCCD endorses and incorporates by reference comments submitted by the Wyoming Association of Conservation Districts, Wyoming County Commissioners Association, Coalition of Local Governments, and the State of Wyoming.

SCCD appreciates the opportunity to comment on the NOGA and encourages the USFS to select the No Action Alternative for the FEIS and the Record of Decision. Then each Forest can move forward with a Forest Plan revision if warranted under the 2012 Planning Rule utilizing local knowledge and expertise to make a successful revision that can address the NOGA effort.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Henn', is written over the word 'Sincerely,'.

Michael Henn
District Manager

Cc Sublette County Commissioners
Wyoming Association of Conservation Districts
Wyoming County Commissioners Association