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First name: Jim

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Organization: Wyoming Stock Growers Association

Title: Executive Vice President

Comments: Re: Federal Register Notice FR 88, No. 243 88042 - 88048 Dear Director: The Wyoming Stock Growers Association (WSGA) has represented ranchers who graze livestock on the national forests in Wyoming since long prior to the creation of the U.S. Forest Service. We have done this with an emphasis on the proven reality that those closest to the resource are best equipped to appropriately manage that resource. Since the establishment of the USFS that management, whether of the forage resource or the timber resource, has been accomplished through local resource users and local FS employees working together to determine the resource management needs. That information was then passed up to District Rangers and Forest Supervisors[mdash]the designated managers of our national forests. Regional Foresters played an appropriate role in allocating resources and mitigating any direct conflicts between forests. The proposed Old Growth Timber Amendment is in direct conflict with traditional forest management. It assumes that the wisdom lies somewhere within the federal bureaucracy, likely above the professional Forest Service leadership, to mandate a plan amendment that fits 126 individual forests representing a very diverse array of ecological characteristics. This approach fundamentally ignores the proven processes outlined above. It provides no opportunity for meaningful input by local citizens whose lives are impacted both culturally and economically by this mandated plan amendment. This approach to planning will have a lasting negative impact on the relationship of the Forest Service with local citizens and local governments. Wyoming has five national forests that are headquartered in our state as well as two forests that extend into the state. Each of these forests are geographically and ecologically unique and require different approaches based on local conditions. The management of old growth areas in these forests has widely differed over time and it is critical that future management reflect the current status and needs of each area. The planning status of these forests also differs widely. One is several years along in plan completion, while another is just initiating the assessment phase of planning. Others are currently scheduled to begin the planning process within the next few years. The proposed Amendment will impact each of these planning processes in a different manner. The proposed Old Growth Timber Amendment is in direct conflict with the goals of the 2012 Planning Rule which sought to strengthen the opportunities for public engagement in Forest Planning. The rule envisions strong public engagement in the assessment phase in the identification of alternatives and in providing comments related to the selection of the final plan. Each of these steps become meaningless under this proposed amendment where the plan outcome is predefined. As an individual who had the privilege to serve in the FACA Committee established by the Forest Service to provide direction on the implementation of the 2012 Planning Rule, I have, to this date, felt proud of the recommendations that our Committee was able to make toward ensuring that the Rule would meet its objectives. Should the Forest Service proceed in the manner proposed in this Amendment, my pride will turn into embarrassment over the many days that I committed to the work of the FACA Committee. The proposed Old Growth Amendment, from my perspective, defeats the intent of the 2012 Rule. Furthermore, I believe that it is in direct conflict with critical rule provisions addressing public engagement as well as the defined consultation with state and local governments. In compliance with the 2012 Planning Rule and out of consideration for the public engagement process and the unique characteristics and needs of diverse forests, the Wyoming Stock Growers Association is urging you to withdraw this proposed Old Growth Timber Plan Amendment. ATTACHMENT: Old Growth Comments - Comments copy/pasted to text box; coded/completed.