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Organization: Coop - Medicine Bow Conservation District

Title: District Manager

Comments: On behalf of the Medicine Bow Conservation District, representing the eastern part of Carbon County, Wyoming, we appreciate the opportunity to submit comments on the National Old Growth Amendment.

The District is a local unit of government formed pursuant to Wyo. Stat. §§ 11-16-101 et. seq., is statutorily charged with providing conservation and protection of natural resources, including soil, water, range, and wildlife habitat, for both sustainability and economic stability, and the health and welfare of our citizens. As such, we have taken leadership roles in natural resource assessment, planning and implementation. We have statutorily recognized responsibility and special expertise (Wyo. Stat. §§ 11-16-135) of all subject matters directly or indirectly related to stabilization of the agriculture industry and protection of natural resources, including participating in federal land planning as a cooperating agency. We have extensive knowledge of local conditions and work extensively with landowners, producers, and stakeholders. It is with this long history, knowledge and relationship with the resources, that the Medicine Bow Conservation District offers the following comments on the National Old Growth Amendment.

This is a major federal action that requires U.S Forest Service to comply with NEPA per 40 CFR 1508.18 Major Federal action: "(b) (1) Adoption of official policy, such as rules, regulations, and interpretations...; formal documents establishing an agency's policies which will result in or substantially alter agency programs."

The Amendment is substantive because it imposes new obligations on both the Service and entities outside of the agency by identifying and prioritizing areas for Old Growth Forest, a change to Forest Plan components. Further, it unilaterally removes timber production, changing existing forest plans management areas.

This requires a defined forest plan amendment process per the 2012 Planning Rule that this project has bypassed including NEPA analysis and cocreation of alternatives with cooperating agencies.

We believe that the Adaptive Management Strategy, optional content approach can be influenced by political whims rather than be a product of integrated and comprehensive planning during an amendment process with the inclusion of locally-elected, cooperating partners and call for the USFS to comply with the 2012 Planning Rule.

We support these efforts because we are committed and concerned with the health and quality of our natural resources within our communities-- we depend on them for our livelihood and our quality of life and we believe successful efforts to conserve and protect natural resources happen at the local level with those that have the intricate knowledge and expertise of local conditions and the most to gain or lose.

Thank you for considering our comments.

The Medicine Bow Conservation District Board of Supervisors  
Medicine Bow, Wyoming