



## SKAMANIA COUNTY BOARD OF COMMISSIONERS

Skamania County Courthouse  
240 NW Vancouver Ave | PO Box 790  
Stevenson, WA 98648

(509)427-3700

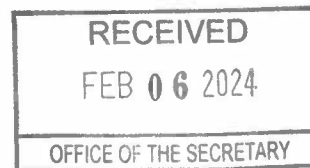
Richard Mahar  
District 1

Tom Lannen  
District 2

Asa Leckie  
District 3

January 16, 2024

Vanessa A. Countryman, Secretary  
Securities and Exchange Commission  
100 F St. NE  
Washington, D.C. 20549



**Re: File Number SR-NYSE-2023-09: Self-Regulatory Organizations; New York Stock Exchange LLC; Notice of Filing of Proposed Rule Change to Amend the NYSE Listed Company Manual to Adopt Listing Standards for Natural Asset Companies**

Dear Secretary Countryman,

Washington State is home to an abundance of natural resources and is deeply committed to the protection of its ecosystem services. The State is home to Federal Forests and State DNR Trust Lands in 29 of our 39 counties. These lands provide a wide variety of essential economic and recreational benefits to these Counties and their local communities.

Skamania County is home to over 800,000 acres of National Forests, 88,000 acres of State DNR land and 110,000 acres of private timber holding. This leaves our taxable land base at less than 2% of our total acreage, making the revenue streams and the job base from the active management of the 98% critical to our schools and county budgets, and our ability to provide the most basic services. We see this action as yet another “take” of rural counties self-determination of the management of our natural resources. We do not believe that the SEC has the authority to implement such sweeping detrimental changes without the consent of Congress.

Please add our support to the five comment letters submitted by [Club for Growth Comments](#); [Blue Ribbon Coalition Comments](#); [American Stewards of Liberty Comments](#); [Financial Fairness Alliance Comments](#), and Garfield County, CO. We particularly agree with the 8 points made on page 2 of the comments from American Stewards of Liberty.

Our Representatives at the Federal, State and Local levels and our residents must be informed of NACs and how they would align with the implementation of the Convention on Biological Diversity, an action revealed in the November 2021 memo [Explanation of Position for the Adoption of the Implementation of the Convention on Biological Diversity and its Contribution to Sustainable](#). In addition, in 2007, the governors of Arizona, California, New Mexico, Oregon and Washington formed the [Western Regional Climate Action Initiative](#) that also addresses climate and the environment.





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We appreciate your extending the date to submit comments regarding Natural Asset Companies. The SEC should disapprove the NYSE's Proposed Rule. Our Board of County Commissioners are unified when it comes to maintaining local control of its lands. Please disapprove of the NYSE's proposal.

Sincerely,

Asa Leckie  
Chair

Richard Mahar  
Commissioner

T.W. Lannen  
Commissioner

