

projects. Timber production is a definitive factor in regional forest health. Adequate support of the timber industry helps create the adaptive management infrastructure for an effective response to forest health threats. It is important to consider the input of timber producers. While timber is a prime example, it is critical to prioritize the efficient utilization of all forest health management resources and infrastructures.

With regard to economic suitability for timber, there are numerous valid and defensible factors that could preclude a timber harvest. Montrose County supports valid and objective assessments to determine timber suitability.

The USFS cannot reasonably predict the future value of a given forest product or the advancements in harvesting technologies that define economic suitability. Maintaining an accurate model would require continual analysis of forest product values and harvesting costs. This, in turn, would require continual revision of the forest plan.

Arguments to retain the current economic suitability assessment reference difficulties in changing land use designations. Regardless of intent or value in changing land use, to utilize a false economic assessment undermines the legitimacy of the proposed change.

Timber projects initiated on the GMUG are a critical component in forest health initiatives. Maintaining the current economic suitability model precludes projects with significant benefits to forest health. 1940's conservationists defined modern conservation philosophies, and placed human relationships with the landscape at the center. Few embody that connection more than our regional agricultural producers. They are one of the last remaining vestiges of a culture that defines our communities. Regional grazing permittees define, and are often reliant on, a system that exists largely outside of a broader agricultural model driven by industrialized food production conglomerates. There is significant value in supporting diverse agricultural models. The perception of public grazing as solely consumptive does not consider the full scope of the issue and ignores the vested interest of permittees in the continued health of public lands. Further, it ignores the habitat values of private lands that are tied to public grazing. In supporting the economic viability of private lands (with their own habitat values) public grazing has conservation implications beyond the forest boundary.

Montrose County would like to see a more comprehensive description of grazing as a potential management tool. With the importance of strong management infrastructures, the added value of this private sector partner deserves additional consideration. As is the case with timber producers, it is critical to strongly consider the input of grazing permittees who can provide valuable perspective, and increase management capacities.

Support for Alternative D cites a lack of "climate change analysis specifically carbon sequestration and water storage capacity of intact ecosystems." These comments define this planning process as dependent "on the appropriate adaptation to a rapidly changing climate." Montrose County fully supports a plan emphasizing adaptation to changing forest conditions. In consideration of the diversity, complexity and continual change in these ecosystems, a non-prescriptive forest plan (supported by continuity in land use designations) creates the best opportunity to protect the health and functionality of our forests. In intact ecosystems, existing capacities for water storage and carbon sequestration only persist if they remain intact.

In calling for additional analysis, it's necessary to consider existing models, the necessity for GMUG-specific data models, the capacities of Forest Service staff, and what actions are forgone with the