

allocation of those staffing resources. Montrose County does not intend to further tax GMUG staff with additional analysis. That said, a comprehensive carbon sequestration analysis would demand a consideration of forest resiliency to predict ongoing sequestration levels in imperiled forests. Further, that analysis should quantify potential benefits of management actions with regard to resiliency and, in turn, long-term carbon sequestration. In addition to analysis for fire susceptibility, similar comparisons should be made between carbon sequestration levels of harvested timber and decaying trees.

In consideration of water storage capacity and carbon sequestration, as a significant contributor to these processes, objective analysis would demand similar considerations for rangeland.

Assuming “economically beneficial protective designations” are the proposed mechanism for protecting these ecosystem services, it is important to evaluate the landscape’s capacity to independently sustain ecosystem functionality (and what adaptive management benefits the designation precludes). Focusing on the carbon footprint of management actions is far too narrow, and creating regionally-specific data that is adequately comprehensive does not justify the expenditure of agency resources. While water storage and carbon sequestration are a significant value, designations protecting short-term paybacks should not be prioritized over our forests capacity to sustain this functionality long-term. A forest plan emphasizing continuity and adaptive management best protects these values. The continued functionality of these ecosystem services is threatened by protective designations that inhibit adaptive management capacities.

This forest plan cannot reasonably prescribe adequate management practices for profoundly diverse and complex ecosystems with a future defined by continual change. A rigid, complex and overly-prescriptive forest plan will only inhibit the development of the efficient adaptive management practices necessary to effectively respond to future conditions on the landscape. An effective forest plan emphasizes versatility. That versatility is dependent on restraint and adherence to objective criteria when designating special use areas. Any proposed special use areas should weigh predicted long-term-resiliency against any resulting limitations to management capacity. Those designations should demonstrate a measurable benefit to ecological functionality.

As defined in support of Alternative D, “economically beneficial protective designations” prioritize existing conditions and short-term economic benefits over long-term forest health and the management practices that protect it. Conservation ideologies that value restrictions over stewardship actions build a management model that is defined by inaction. These models are inherently reactive and (long-term) disproportionately allocate resources to mitigating damage. Mitigation and restoration is costly and falls short of the diversity and complexity of native ecosystems. It is critical that management strategies begin to redistribute available resources to actions benefitting landscape health and resiliency.

With impacts extending beyond forest boundaries, it is critical that the Land Management Plan supports and incorporates parallel objectives; Community Wildfire Protection Plans are a prime example. The importance of watersheds to our communities and downstream riparian ecosystems defines the importance of the Land Management Plan beyond the forest boundary. In our critical watersheds, post-fire recovery and restoration are inadequate; Montrose County strongly supports a land management plan emphasizing resiliency, efficiency and proactive management of our watersheds. Continual development and advancement of treatment prioritization models further supports a non-prescriptive plan. A flexible plan and continuity in land use designations creates a management model that is responsive and effectively applies the principals of evolving best management practices.