

*Promoting the wise use of all natural resources*

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September 12, 2024

Attn: U.S. Department of Agriculture, United States Forest Service

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

Supporting documents:

2022 Rio Blanco County Land & Natural Resources Plan and Policy (LNRUPP)

Thank you for the opportunity to provide input on the above noted Land Management Plan.

The White River and Douglas Creek Conservation Districts (the Districts) are political subdivisions of the State of Colorado, made up of locally elected officials whose special expertise is to provide leadership in the wise use of the natural resources within the Districts' boundaries. The Districts' authorities, power, and structure are contained in the Colorado Revised Statutes, Title 35, Article 70.

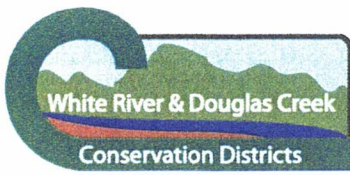
Conservation districts in Colorado are defined as "local governments" thus have the responsibility to participate in government-to-government interactions with the federal agencies. The Districts within Rio Blanco County have developed the Land & Natural Resource Use Plan and Policy (LNRUPP) to translate our statutory mandate (Colo. Rev. Stat. § 35-70-108) into land management policy and direction guided by local landowners. One of the Districts' responsibilities is: "To prepare a plan for the care, treatment, and operation of the lands within the district." Colo. Rev. Stat. § 35-70-108(1)(k). Additionally, Colorado conservation districts were created by the state legislature to provide for constructive methods of land use providing for the conservation of natural resources, including adequate underground water reserves, the control of wind and water erosion, and the reduction of damage resulting from floods. The purposes of the conservation districts are to "ensure the health, prosperity, and welfare of the state of Colorado and its people..." Colo. Rev. Stat. § 35-70-102.

The Districts strongly support improving forest and watershed health. Unfortunately, there are millions of acres of dead and dying forests here in Colorado due to long-term drought and the 'hands off' policies creating a lack of active management. Consequently, we are now experiencing mega fires that are severely impacting air quality, water quality and quantity, watershed health, and wildlife habitat.

While those proposing this Land Management Plan likely have good intentions, the Districts are very concerned with potential unintended consequences of this effort. If the intent is to improve on-the-ground forest health, the USFS should simply put money on the ground and allow the respective forests' managers to initiate a streamlined version of NEPA and start implementing large scale (thousands of acres) fuel reduction efforts within the next two years.

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**Purpose:** *To make available technical, financial, and educational resources, whatever their source, and focus or coordinate them so that they meet the needs of the local land manager with conservation of soil, water, and related natural resources.*



One of hundreds of local examples: At this time the White River National Forest, Blanco District, has very limited staff. The White River Integrated Water Initiative (16 partner entities) is asking to implement multiple projects in the near term that would significantly improve forest and watershed health, reduce fire impacts, improve wildlife habitat, protect human life and infrastructure, etc. However, it is being delayed due to lack of staff and the unwieldy NEPA process.

Rather than spending taxpayer funds on the “Land Management Plan”, wouldn’t it be more effective to implement locally supported projects that will truly improve forest management and prevent mega forest fires that are impacting mature and old growth stands? Unfortunately, the Land Management Plan will redirect the limited USFS staff to amend each of the respective 128 national forest land management plans across the country. The mature and old growth forests would be better served if the Washington Office (WO) would spend the time, money and resources at the local level and support them getting real work accomplished rather than doing another “Plan” that will invite more lawsuits and paralyze the agency even more.

If the WO insists on implementing this Plan, it must minimize and streamline the red tape to allow the local managers to manage the forests using silviculture practices that will be efficient and effective in the respective areas.

The future of our forests depends on the actions we take now. Below, the Districts highlight information from the Rio Blanco County LNRUPP that are specific to the above concerns and address issues within the “Land Management Plan” that speak to the need for more timely vegetation treatments.

#### **4.1 - County History, Custom and Culture, pg. 12:**

- **Policy #1.3** - Federal lands must be managed in a manner that recognizes the Nation’s need for a domestic source of energy, minerals, food, water, timber, and fiber.
- **Policy #1.4** - Require consultation and coordination with the District and County at the earliest possible time on all NEPA analyses. (40 C.F.R. § 1501.9(b). This includes participation in the development and disclosure of reasonable and foreseeable alternatives, economic and human impact analysis, and mitigation requirements.
- **Policy # 1.5** - It is critical for project planning and activities to be coordinated within the agency departments and with all impacted permittees to allow for opportunities to serve multiple resources with each project.

#### **2.4 - Planning Process and Legal Framework:**

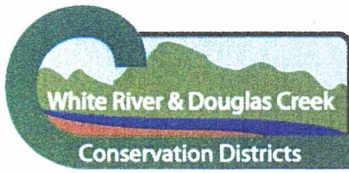
- **1.1** - Require the inclusion of quantitative data that: 1) bases decisions on the “best available science”, with a priority on “publicly available, reproducible, peer-reviewed science”; 2) to make publicly available any scientific data relied upon in a rulemaking, the analysis relied upon in a rulemaking, and the methodology used to gather and analyze data to support a proposed or final rule.
- **1.2** - Support the use of credible scientific data.

#### **4.3. Climate Change Policy Statement**

- **2.4** - The costs and benefits of any management decision or regulation adopted to address climate change must be quantified.

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#### **4.4 Forest Management, Wildfire and Community Wildfire Planning pg. 19 – 28**

- Healthy Forest Initiative (HFI) was launched in 2002 to protect natural resources from unnaturally intensive and destructive fires by reducing barriers to the timely removal of hazardous fuel.
- The Healthy Forests Restoration Act of 2003, as reported by the Senate Agriculture Committee, empowers the Secretaries of Agriculture and the Interior to expedite projects that are designed to reduce hazardous fuels buildups and restore healthy forest conditions on federal forest lands. It also promotes a variety of other efforts designed to safeguard watersheds and address threats to forest and range land health, such as wildfire and insect infestation. The 2003 bill requires the Forest Service to "fully maintain, or contribute toward the restoration of, the structure and composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type..." Sec. 102(e).
- The Districts also support the 2022 USDA Wildfire Crisis Implementation Plan that plans to increase fuels and forest health treatments across jurisdictions to achieve desired conditions on these landscapes.
  - **Policy # 3.5** - Long-term timber harvest leases, based on local market value, are important to allow private industry to take the financial risk and make an investment in the infrastructure necessary to maintain the timber industry and forest health in the County.
- The Districts highlight two LNRUPP polices/statements with Forest Health and Water Quality/Quantity and draw attention to the numerous studies worldwide that demonstrate changes in forest cover result in a change in water yield (Troendle and Nankervis 2014). Based on analysis of data plots over the course of many years, water yield (quantity) and quality increases with a decrease in timber stand density.
  - **Policy # 3.19** - Management must focus on watershed health for all public land.
  - **Policy #3. 20** - Support forest thinning and burning to improve watershed health.

Thank you for the opportunity to provide input on this proposed national old growth forest plan amendment. Please contact our office at 970.878.9839 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Collins".

Chris Collins, President  
White River Conservation District

A handwritten signature in black ink, appearing to read "Rosaly Coombs".

Rosaly Coombs, President  
Douglas Creek Conservation District

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