



MONTROSE COUNTY
BOARD OF COUNTY COMMISSIONERS
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September 19, 2024

Mr. Thomas J. Vilsack
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

Submitted via Federal eRulemaking Portal

Portal: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

RE: United States Department of Agriculture Forest Service Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement (Federal Register Vol.89 No. 120/Friday, June 21, 2024/Notices/Page 52039)

Dear Secretary Vilsack:

The Montrose County, Colorado, Board of County Commissioners (“County”) appreciates the opportunity to provide comments on the U.S. Forest Service (USFS) National Old-Growth Amendment (NOGA) Draft Environmental Impact Statement (DEIS). The County is puzzled that this national regulatory policy has been drafted and published with so little local notice and discussion, especially in light of the recent completion (July, 2024) of the Forest Management Plan for the Grand Mesa, Uncompahgre and Gunnison National Forests (“GMUG”). The GMUG Plan took years of careful considerations of environmental, recreational and community impacts and represents multi-use and careful wildfire planning, including forest management through timber sales, to lessen the dangers of wide spread wildfires in the future. It is an example of other plan revisions occurring across the country. To have this NOGA imposed upon GMUG at this time seems to be a misplaced top-down directive that ignores the time and resources devoted to the GMUG Plan. We would ask that the NOGA be revised to except the GMUG from its provisions.

Montrose County is a rural county in Western Colorado. The County includes a significant amount of federally managed lands. The County’s economic base depends on the multiple uses of these federally managed lands, including USFS lands, for grazing, timber production, hunting, recreation, tourism, wildlife habitat and energy development. The NOGA will have significant impacts on the County, its residents, businesses and visitors.

Our timber producers are critical partners in maintaining and improving forest health and resilience. Any negative impacts to these local producers threaten their ability to continue operations and their continued contribution to resilience and restoration efforts. NOGA would severely limit the economic viability of timber harvesting,

resulting in more limited ability of our partners to continue the successful partnerships we have had, including two CFLRP and SBEADMR that have been nationally recognized.

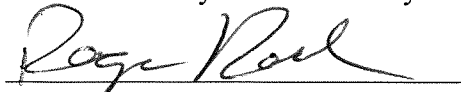
Montrose County has historically been actively engaged with our federal lands agencies and has participated as a coordinating agency in other regulatory reviews and the NEPA process. In that role, the County has consistently advocated for wildfire mitigation and improved forest management to that end, as well as for continued use of the public lands for grazing hunting, recreation, wildlife habitat and energy production. The County is concerned that NOGA will result in a return to the neglect of forest health that has occurred for many decades. NOGA will curtail logging that contributes to forest health and wildfire resilience actions benefitting both old growth and successional forest regimes. We are also concerned that there may be unintended consequences of NOGA, or at least implications that deserve further consideration before such a wide swath of national overlay to all forest lands.

Given the lengthy process that NEPA usually entails, the County is concerned that this process has been too rushed and has not allowed for the careful consideration of all options that NEPA contemplates. The process has been devoid of the usual outreach to local coordinating and cooperating agencies such as the County. No meaningful consideration of local impacts to the GMUG has been given. No local environmental impacts have been considered in this process. Given the time frame in which this rule has been rushed, and the recent completion of the lengthy process for revising the GMUG Plan, the USFS could have proposed additional site-specific revisions to the GMUG that might have been appropriate on a site-specific basis. Instead, this “top-down” national approach makes the careful and considerate process of the GMUG Plan seem like a wasted effort.

The County is an advocate for careful stewardship of national forest lands, and asserts that this rushed process to adopt a national, “one-size-fits-all” regulatory policy has not been conducted in a manner that assures good stewardship of our local GMUG. Moreover, the County is skeptical that this rushed process fully meets the spirit and intent of NEPA, and suggests that it does not meet the legal requirements of NEPA. Ironically, the narrative of the DEIS advocates for regionally specific approaches, with reasoning consistent to that which Montrose County advocates, before concluding with a nationwide prescription. Therefore, Montrose County urges the Secretary and the USFS to delay any action on this proposal until more local cooperation and coordination with adequate opportunity for full public review and comment can be completed. In the meantime, Montrose County can only support the No-Action Alternative which will ensure that local conditions and community input are considered in determining whether any revisions are appropriate to the GMUG management Plan adopted in July of this year.

Sincerely,

Montrose County Board of County Commissioners



Roger Rash, Chair

CC: The Honorable United States Senator John Hickenlooper
The Honorable United States Senator Michael Bennet
The Honorable United States Congresswoman Lauren Boebert