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Comments: Attached are Montrose County's Comments on the latest revision of the Draft Forest Plan. Please reach out with any questions you may have.

[ATTACHMENT COPIED BELOW]

Montrose County is submitting comments in support of Alternative C. These comments were drafted in the interest of forest health and effective implementation of best management practices to protect and improve both the functionality and resiliency of our forest ecosystems. These comments are submitted in support of science, collaboration, and management directives that foster efficient and effective forest management.

An overly-prescriptive forest plan hinders advancements in stewardship principals and the effectiveness of future forest health initiatives. This approach would not allow adequate adaptation to changing science, future management capacities, and changing conditions in our forests.

Failure to support a plan emphasizing adaptive management imperils the future health and functionality of our forest ecosystems. To effectively protect and improve forest health requires a plan that allows for contiguous implementation of best management practices. Further, with changing conditions in our forests, it's critical to maintain the flexibility to integrate emerging science. A patchwork application of special use areas inhibits the continuity necessary for lasting success. With management criteria in place to protect any given set of desired conditions, a prescriptive plan with complex land use designations creates unnecessary layers of complexity. This complexity would tax limited management capacities and could inhibit stewardship efforts.

Changing conditions in our forests severely impact resiliency and their capacity to independently sustain ecological functionality. The scale of current and future threats to forest health demands efficiency, continuity, and proactive management approaches. Any actions hindering the efficient implementation of adaptive management imperils our forest ecosystems. An effective response to these threats is dependent on (1) Management continuity across the landscape (2) Prioritization of objectives in consideration of cost and management capacities (3) Sustaining management infrastructures. To support an effective response to forest health threats, it is important to acknowledge the role of private industry. '

While the timber industry has economic value, the true value of our regional timber producers is in their contributions to forest health and wildfire resilience. That said, the revenue crated by merchantable forest products vastly increases management capacities. In this way, the complex economic variables of a timber sale or forest plan define their value as a partner in forest health and wildfire resiliency 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 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, postfire 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 !,and use designations creates a management model that is responsive and effectively applies the principals of evolving best management practices.

Montrose County recognizes the GMUG's intent to protect forest health in consideration of the diverse interests of the public and participating agencies. We would like to commend the GMUG for their commitment to this collaborative process in a critical transitional period in our regional ecosystems.