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Organization: Board of County Commissioners of Rio Blanco County, Colorado

Title: Chairman

Comments: September 9, 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)

Overview of Rio Blanco County and Its Public Lands Management

Founded in 1889 following its separation from Garfield County, Rio Blanco County spans approximately 3,223 square miles. Within this vast area, about 76% is public land, while the remaining 24% is privately owned. The public lands are managed by several agencies: approximately 2.7% by Colorado Parks and Wildlife (CPW), 55.7% by the Bureau of Land Management (BLM), and 17.6% by the U.S. Forest Service.

Importance of Coordinated Land Management

The socioeconomic well-being, health, safety, welfare, and cultural integrity of Rio Blanco County are closely connected to the use and management of these federal lands. It is essential that the management of public lands be coordinated with Rio Blanco County to ensure that federal land policies are consistent with, and complementary to, the county's policies. Given that 76% of the county's land is publicly owned, the principles of multiple-use land management are critical to maintaining the socioeconomic structure of the community and supporting the livelihoods of its residents.

Alignment with Federal Land Management Statutes

Land use within Rio Blanco County is guided by the county's Land and Natural Resources Plan and Policies (LNRUP), developed and approved in accordance with state statutes. The county's approach to federal land use aligns with the Federal Land Policy and Management Act of 1976 (FLPMA) and the National Forest Management Act of 1976 (NFMA). These Acts require federal agencies to coordinate their land use inventory, planning, and management activities with the land use planning and management programs of local governments.

This alignment demonstrates Rio Blanco County's commitment to ensuring that federal land management practices are designed to support local economic, environmental, and cultural objectives while also meeting broader national mandates.

Concerns Regarding the Proposed Land Management Plan

Forest and Watershed Health

Rio Blanco County is a staunch advocate for improving forest and watershed health. The county has observed

the devastating impact of millions of acres of dead and dying forests across Colorado, a situation exacerbated by prolonged drought and a lack of active management due to restrictive policies. These conditions have culminated in catastrophic mega fires, which have severely degraded air quality, water quality, watershed health, and wildlife habitats.

Potential Unintended Consequences

While the proposed national old growth forest plan amendment is well-intentioned, Rio Blanco County is concerned about the potential for unintended consequences. If the objective is to enhance on-the-ground forest health, the U.S. Forest Service (USFS) should prioritize the allocation of funds to local forest managers, enabling them to implement streamlined NEPA processes and execute large-scale (thousands of acres) fuel reduction initiatives within the next two years.

Local Example: White River National Forest, Blanco District

The White River National Forest's Blanco District, which encompasses parts of Rio Blanco County, is currently operating with severely limited staff. The White River Integrated Water Initiative, consisting of 16 partner entities, aims to implement several critical projects in the near term that would significantly improve forest and watershed health, mitigate fire impacts, enhance wildlife habitat, and protect human life and infrastructure. Unfortunately, these vital projects are being delayed due to staffing shortages and the cumbersome NEPA process.

Call to Action

Rio Blanco County believes that instead of directing taxpayer funds towards the development of an additional "Land Management Plan," it would be more effective to support locally backed projects that will directly enhance forest management and prevent the catastrophic forest fires that threaten mature and old-growth stands. The proposed plan risks diverting the already limited USFS staff away from essential on-the-ground actions to amend each of the 128 national forest land management plans across the country. The mature and old-growth forests would be better served if the Washington Office (WO) focused its time, resources, and funding at the local level to support effective, actionable forest management efforts, rather than creating another plan that could invite further litigation and paralyze the agency.

Should the WO proceed with implementing this Plan, it is crucial that the process be streamlined to reduce bureaucratic obstacles, thereby empowering local managers to utilize efficient and effective silvicultural practices tailored to the unique needs of Rio Blanco County. The future of our forests hinges on the actions we take today. The Rio Blanco County LNRUPP offers specific guidelines and recommendations to address these concerns and underscores the critical need for timely vegetation management to safeguard our local forests and communities.

Land and Natural Resources Plan and Policy Statements

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. [sect] 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.

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 rangeland 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).

ATTACHMENT: Old Growth Forest Public Comments 240910.pdf - BOARD OF COUNTY COMMISSIONERS OF RIO BLANCO COUNTY, COLORADO letter: this is the same content that is coded in the text box