



SAN JUAN COUNTY COMMISSION

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September 17, 2024

Linda Walker, Director
Ecosystem Management Coordination
U.S. Department of Agriculture
Forest Service
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Dear Director Walker:

San Juan County has reviewed the Draft Environmental Impact Statement (DEIS) for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System. Rather than make county-specific comments, San Juan County concurs with and incorporates by reference into our comments the comments made in Utah's Public Lands Policy Coordinating Office's (PLPCO) letter of September 20, 2024, commenting on the subject DEIS. We respect the review of the DEIS made by PLPCO staff and recognize that their comments are made not only on behalf of the State of Utah but on behalf of Utah's counties as well.

San Juan County is the largest of Utah's 29 counties located in southeast Utah. Within the county are two districts of the Manti-LaSal National Forest which would be affected by management developed for old-growth forests in the current DEIS. These forest lands are important parts of the culture, lifestyle and economics of the county. Management developed for old-growth forests would undoubtedly have some effect on these aspects of the county.

As noted in the PLPCO letter, the Forest Service has certain responsibilities required by law to coordinate its planning with that of State and local governments. San Juan County has a Master Plan as well as a Resource Management Plan (specific to public lands), the latter of which is incorporated into the State's Resource Management Plan. These plans lay out land use planning direction for the County and are the plans to be reviewed as part of the Forest Service's coordination responsibilities. We respectfully

request that the development of old-growth Forest policy be consistent with County plans to the extent allowed by law and reason.

In addition to the comments made in PLPCO's letter, we would request that the Forest Service keep in mind that the greatest threats to old-growth forests are wildfires, insect infestations and disease. We would hope that management developed for old-growth forests would not override the need for active forest management to prevent and control wildfires, insect infestations and disease. Active forest management is critical to achieve and maintain healthy forests.

We appreciate this opportunity to comment and look forward to future opportunities to participate in planning efforts.

Sincerely,

Jamie Harvey
Commission Chairman

cc: Utah PLPCO