

Strand, Jay -FS

Subject: Invitation for Public Comment - Robinson Integrated Resource Project Environmental Assessment

From: David Lacy [mailto:dmlacy51@gmail.com]

Sent: Sunday, June 10, 2018 1:45 PM

To: Strand, Jay -FS <jstrand@fs.fed.us>; Mattrick, Christopher J -FS <cmattrick@fs.fed.us>

Cc: Triplett, Andrew -FS <atriplett@fs.fed.us>

Subject: Re: Invitation for Public Comment - Robinson Integrated Resource Project Environmental Assessment

Dear Jay and Chris: Thanks for sharing the comprehensive Robinson EA and the invitation to comment.

I have two comments/concerns, one general and one specific:

First, I would like to reiterate my general concern that the Forest is burning the candle at both ends by rolling out Integrated Resource Projects at such close intervals. Programs with few personnel and proponent-dependent funding are getting squeezed as they try to juggle inventory, assessment, planning, NEPA/NHPA, implementation, and monitoring all at the same time in 3, 4 or 5 general locations across the Forest. I would be interested in knowing how the Forest Leadership Team is addressing this since it affects both quality of work and the well-being of employees.

Second, and more specifically, given:

- the existence of some gaps in coverage/knowledge about the distribution of Heritage sites within the Robinson IRP;
- the likelihood that there will need to be some on-the-ground involvement of an archaeologist during implementation;
- the implications of having multiple IRP processes going on simultaneously (i.e., potentially affecting quality of work); and
- the fact that the analysis done at the IRP scale is not sufficiently linked to the ground-truthed project design details -

I would like to see a specific statement in the document (preferably in the Heritage section) that commits to having a project-specific NHPA-Section 106 report completed to the standards established in the (Draft or Final) Programmatic Agreement with the State Historic Preservation Office before any project implementation is begun. This would provide some assurance that if the Forest's status quo (in terms of Program of Work projections and relevant staffing) continues into the future, Heritage resources will not become casualties of any lesser standards promoted in the name of production and efficiency.

Thanks for considering my input.

Sincerely,

/s/ David M Lacy

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