

April 22, 2020.

TO: Rocky Mountain Region
Attn: Objection Reviewing Officer
P.O. Box 18980
Golden, CO 80402

<https://cara.ecosystem-managemt.org/Public//CommentInput?Project=51255>

SUBJECT: **MEDICINE BOW LANDSCAPE VEGETATION ANALYSIS PROJECT (LaVa PROJECT)**

SITUATION: OPPORTUNITY TO OBJECT.

NOTICE of this opportunity to object was published April 10, 2020 in the Laramie Newspaper (The Boomerang). A deadline for receipt of letters pertaining to this opportunity was also published and listed as 30 days from the date of publication. Given that 30 days from April 10 is a Saturday, May 9th, I would assume that letters would need to be received by May 8th, 2020.

OBJECTOR'S NAME AND ADDRESS:

Stephen E. Williams

Signature Required



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PROPOSED PROJECT: MEDICINE BOW LANDSCAPE VEGETATION ANALYSIS PROJECT (LAVA PROJECT)

NAME AND TITLE OF RESPONSIBLE OFFICER: Russell M. Bacon, Forest Supervisor, Medicine Bow-Routt National Forests and Thunder Basin National Grassland

REFERENCE: Previous letter on this topic dated August 20, 2018 submitted by Stephen E. Williams

In my previous letter (August 20, 2018) I addressed concerns I had about Soils in the LaVa project area as well as Best Management Practices. My intentions is to touch on these issues again as well as on several other issues as I did in my last letter¹.

¹ From the Laramie Boomerang publication on April 10, 2020: in letters submitted a connection between prior specific written comments on the particularly proposed project or activity and the content of the objection must be made unless the objection concerns an issue that arose after the period designated as an opportunity to comment. In the Newspaper announcement it states, "See paragraph C of this section," presumably for more information. There is no section, however, labeled paragraph C.

SOILS: In my previous letter I did bring up much on soils in the proposed LaVa project area. I am justified in bringing this topic up again because in the Analysis a revised specialist report, Soil Resource Report, has not been available until February, 2020. My comments on this report are as follows:

1. The author, Stacey Weems, is listed as a soil scientist but no other credentials are provided. Providing credentials and a contact address should be done. Also, the author is shown as a member of the WO, Enterprise Program. There is no explanation of this program or the meaning of WO. Is this a Forest Service program or a consulting organization?
2. Page 3 in the first paragraph. Most of the references here are not cited in the References section. They need to be added with on-line addresses if available. This is a problem throughout the report.
3. Page 4, under Issues. There is something wrong with this sentence: "Soil erosion and compaction have been brought as directed issues for the soils resource area." Verb "brought" is confusing.
4. Table 1, page 5. In the fourth column from the left, abbreviation P/N is undefined.
5. Page 6, last point. A section on reclamation of roads needs to be added. How will roads be reclaimed? Does reclamation include re-establishing plants? What level of plant re-establishment and regenerated soil properties would be reclamation targets? Reclamation within three years is highly optimistic. If decommissioning, regrading, and re-planting is completed within three years, this does not mean the area is reclaimed? Monitoring of the treated area probably for a decade would provide for opportunity to retreat problem areas and be sure that erosion is minimized. Further, what credentials and certifications will the decision maker have (called a line officer in the report) as described here?
6. Page 7. Incomplete and Unavailable Information. In this section it is stated that spatial locations of temporary roads and spatial locations for treatment areas were both not available for this analysis. It is clear to this reader that this soils report is speculative and consequently very general as to where and how roads will be constructed even in sensitive areas such as riparian areas, areas of Histosols, wet meadows, etc. Further, it is made clear in this section that this analysis will only be completed after this project is "developed and brought forward for analysis." To me this implies that analysis of road locations will be done after the project is implemented. And who will do this analysis and how will the road construction be monitored? Does Medicine Bow N. F. have the personnel for oversight of road building?
7. For both table 2 and 3: what were the model inputs? For table 3, first column, what are the units (inches, cm, etc.)? How is a restrictive layer defined? Root restriction, water? Tables 4, 5 and 6 also would be better understood if model input were better defined. For example, slope as used here needs to be defined precisely. Various disciplines define slope differently. In some a 45 degree slope is defined as 100% whereas in others a 90 degree slope is defined as 100%.
8. Table 7. In the first column. Hardwood should be defined. Often in the forestry arena, hardwoods are all deciduous trees. On the Medicine Bow then these would be mainly aspen, although there is some scrub oak in areas (e.g. Battle Mountain). However, aspen are shown as a different SAF-SRM Type. Also, there are no Pinyon or chaparral vegetation types on the Medicine Bow. I realize that chaparral has a diversity of meanings, but I have never heard it used for vegetation types in Wyoming. Pinyon, on the other hand, is a very distinct species and does not exist on the Medicine Bow Forest.

Stacey Weems
Apr 22, 2020

9. Page 11, near middle of the page. The citation of Overland, 2017 is not in the references section.
10. Table 10. It seems not possible to summarize Road Segment Analysis given the lack of information identified on page 7 (see comment 6 above). At the end of this table is reference to a decision maker described as an engineer. Is this person a contractor, a FS employee? Further, this table shows 3,374 miles of roads. How does this square with the 600 miles of new road limit for this project?
11. On page 13 in the first paragraph under Equivalent Clearcut Area, is stated that all land management activities are timber harvesting, road building and ski areas as well as fire history. It is unclear to this reader what is meant by "management activities." It seems that activities that would require some level of management would be much more diverse than those mentioned here. Examples might be winter sports other than skiing, summer recreational use, camping and location of camp trailers, etc. Also I cannot find where HUC is defined. Further, the assumption of an 80 year recovery time for all activities is much too general and is highly variable and likely conservative. Of course this depends on the definition of recovery, which is not defined here.

SOILS SUMMARY: I can make other comments on the Soil Resource Report, but I find the report incomplete in general, difficult to interpret and lacking in specific information. I realize that the intent is to do more specific analysis after implementation of this project. My concern here is that such specific analysis could be side-stepped either due to lack of resources or political edict. I realize too that it is easy for me to find fault with the Soils analysis, but as it stands now the report is vague, hard to interpret and information general and based more on modeling rather than information that has a basis in ground truth. Much of this is due to the absence of soils information for the Medicine Bow Forest. Soil surveys have not been done on the Medicine Bow. This is contrary to policy established in the Forest Service Manual 2500, Chapter 2550—Soil Management where it is stated "Conduct soil surveys at the land unit scale (1:24000 or less) according to the NCSS (National Cooperative Soil Survey) standards outlined in the USDA National Soil Survey Handbook."

OTHER ISSUES: I realize there needs to be some management of the forest, especially the beetle killed trees in the Medicine Bow. Certainly along power lines, camp and picnic grounds and popular trails hazard trees need to be removed purely from a safety perspective. There is, however, ecosystem a sustainability argument that the dead trees should be left in the forest to fall to the ground and there decay returning nutrients to the system and providing habitat for the diversity of creatures that inhabit decaying logs. If I were a decision maker for this project, this would be my choice, which is essentially Alternative 1.

I note in the Social and Economic Report (a specialist report, by Kawa Ng and Delilah Jaworski) that the cost of implementing this project at the Alternative 2 (Modified Proposed Action) would exceed Agency revenues (page 20, statement immediately following table 14). Estimated annual costs of this action are shown in this report as \$18,552,000. Whereas the estimated annual revenue is \$2,121,700. However, even the difference between annual costs of implementation and annual Agency revenue for Alternative 1 is also a net loss, it is only \$4,620,300 (\$5,010,000 annual implementation versus \$389,700 Agency revenue) compared to the estimated net annual loss of \$16,430,300 for Alternative 2. The authors of this Social and Economic Report content that the ripple impacts of Alternative 2, would have significant and positive economic impacts in terms of increased options to respond to fire as well as enhanced

ecosystem services. The authors make statements especially regarding enhanced ecosystem services without references to support their assertions. I would see the authors contention as a hypothesis, but I think especially in the world that has changed in the last two months, that the null hypothesis (Alternative 2 would not have significant and positive economic impacts) has at least equal validity.

CONCLUSION: I have worked with the USDA Forest Service professionally many times and was an employee myself early in my career. I have great respect for the organization and those that work in it. Much of my concern for this project is that I note the organization has continued to lose funding and the number of employees has eroded. I am concerned that there is are not the critical mass of employees in the Service to over-see a project of the size and complexity of the LaVa project. There is evidence to support this contention. Over the last several years there has been tree harvesting along the Snowy Range Highway through much of the alpine environment. Not only have live trees been harvested, when only dead trees were supposed to be taken, but also slash burns have happened right along the highway (see figure in my letter of August 20, 2018) leaving unsightly scars along this important scenic and recreational corridor. Further, there has been much soil disturbance along the route by the harvesting equipment used by contractors. I have not seen any attempt to stabilize or restore these disturbed areas. It would be easy to conclude that the paid stewards of our forests, the USDA Forest Service, is not doing its job as I see it. However, my strong sense too is that there are outside forces that are more at fault here than those internal to the USDA FS. Rather I would contend that these observation support my view that the ranks of the Forest Service employees are so thin that it is not possible to oversee the project in a manner that would prohibit the types of errors and poor resource management evident from the Snowy Range Highway through Medicine Bow National Forest.

The absence of soil survey information for Medicine Bow National Forest (when essentially all of the rest of the non-forest service lands, public and private, in the state have published soil surveys) is further evidence that the resources the FS can put to this kind of project are inadequate. Further still, the basic economic analysis of this project makes no sense. I realize that governments are in the habit and somewhat in the business of providing subsidies to various enterprises, but to spend an annual estimated \$18,552,000 to secure annual Agency revenue of only \$2,121,700 (for Alternative 2, the proposed alternative) makes no sense to me and especially in light of ambiguous possible ripple impacts that are riddled with uncertainty and absence of certified support.

Thank you for the opportunity to make these comments.