

May 13, 2019

To:
USDA Forest Service, Region 2
Rocky Mountain Region
Attn: Objection Reviewing Officer
1617 Cole Boulevard, Building 17
Golden, CO 80401

MAY 15 2019

Please be advised of my objection to the Landscape Vegetation Analysis Project on the Medicine Bow National Forest as previously stated in my comment letter #113.

1. As previously stated in my comment #113 of DEIS, (refer to Air Quality if FEIS page 283), the plan does not consider climate change in any meaningful way. A major study entitled "Evidence for declining forest resilience to wildfire under climate change" published in Ecology Letters shows a decreasing regeneration of forests in five western states. It can only be assumed that a warmer and drier climate will affect forest regeneration after logging and controlled burning as well. The logging industry will no longer be interested in the beetle-killed trees, but will be going after the remaining green trees. It does not make sense to decrease the forests that are an effective tool for decreasing atmospheric carbon dioxide. (Stevens-Rumann, Kemp & Higuera, Vol. 21:243-252, 2018)
2. How will such a large-scale logging project affect the biota of the forest ecosystem? (Refer to comments #113 and soils page 278 of FEIS). A study of "Salvage logging versus natural regeneration post-fire practices in a forest: Soil chemical and microbial aspects" in the Open Journal of Ecology states that soil moisture is greatly affected by salvage logging, and drier conditions occur in the logged areas compared to unlogged areas. The article further states, "logging had a negative effect on microbial biomass, with reduced biomass in the logged compared to unlogged areas." The healthy forest begins with healthy soil. (Ginzburg & Steinberger, vol.2, No.1, 29-37, 2012)
3. The current system of roads in the Medicine Bow forest is enough for this relatively small forest. Refer to comments #113 and transportation in Appendix B of FEIS. "Studies show that road building damages wildlife by fragmenting habitat and increasing disturbances such as vehicle use and poaching. Road building can also increase the risk of erosion and landslides, which can damage water quality and threaten habitats used by salmon, trout and other important animals." (<https://oregonwild.org/forests/roadless/why-are-roadless-areas-important>)
4. Logging such a large portion of the Medicine Bow forest will be in direct conflict with the numerous recreation activities provided here. The FEIS fails to address this main concern adequately. Recreation is the main use of the Medicine Bow forest, and recreation use increases annually. Refer to comment #113. The streams, rivers, lakes and reservoirs provide habitat for wildlife and recreation for humans. An increase in suspended sediment load frequently follows timber harvest, conflicting with these valuable resources. (Impact of Forest Management on Stream Water Quality in Western Oregon by Fredriksne, USDA, 1971-72)

5. Treatment areas and temporary roads should not extend into designated Roadless Areas. This violates the Medicine Bow Forest Plan of 2003. Refer to comments #113, The result of such action diminishes the quality and quantity of these areas. "Conserving our Roadless areas will protect America's backcountry lands that provide wildlife habitat, clean water and air, incredible outdoor experiences and sustainable jobs." (<https://www.wilderness.org/articles/article/conserving-roadless-areas>)
6. Commercial logging and new roads of any kind should not be allowed in the Sheep Mountain National Game Refuge. This issue has been addressed in the FEIS.
7. Why should taxpayers pay for a logging project that hinders the progress of natural regeneration currently occurring on the Medicine Bow National Forest? Refer to comments #113 and 811.83 if FEIS, Cost Benefit Analysis of Appendix B page 168. As Dan Tinker states, "age class, structural, and vegetative diversity across the landscape is ... already occurring in the absence of any treatments. The advance regeneration...along with survival of all understory vegetation and many mature canopy trees, is creating a new forest stand that will be composed of a broad range of tree ages and sizes...." (Dan Tinker, Forest Ecologist, "Thoughts related to the Landscape Vegetation Analysis on the Medicine Bow National Forest, Wyoming)

I would hope that you would consider the harmful negative effects this LaVA project would have on the Medicine Bow National Forest and also the fact that the vast majority of the public is against this project.

Thank you,



Joy Keown

