

Date: May 19, 2019

From: Jim Field

To: Whom it may concern, submitted via USFS email message addressed to  
r02\_admin\_review@fs.fed.us

Subject: Medicine Bow National Forest LaVA Project (ID [51255](#))

I am strongly opposed to the newly proposed LaVA project on the US Forest Service (FS) Medicine Bow National Forest (MBNF) for the very same reasons I mentioned in my August 20<sup>th</sup> memo to you.

My name is Jim Field and my address is below.

The proposed project is mentioned above. I assume the responsible individual is the Medicine Bow-Routt National Forest and Thunder Basin National Grassland Forest and Grassland Supervisor, Russell M. Bacon.

I do not feel you addressed my concerns in your Final DEIS. I am hereby resubmitting my concerns with a few highlighted additions:

1. Being a landowner that recently experienced a 300+ acre clear cut bordering my property, I have witnessed critical Elk habitat be disrupted with excessive water runoff (I recently had to completely replace my cabin's foundation located at 51 Wilderness Drive). Other local cabin owners have also seen foundations and decks shift, with some having to do major repairs or replacements.
  - **Twice recently on the front page of the local newspaper, ie, the Laramie Boomerang, spring runoff and flooding concerns were mentioned for both the cities of Laramie and Saratoga. LaVA is removing historic amounts of live timber. Forest Fires are imminent as we've seen in the recent past. Once all this live timber is removed by LaVA and killed by fire, along with projected climate change and common weather cycles, we will likely see seasons of even larger than normal snowpack adding to the risk of extensive erosion and flooding of the entire area in the forest and surrounding communities.**
2. In 2011 the FS first started timber harvesting bordering my cabin. Today, there are still multiple decks of logs stacked in these clear cuts. It took the FS until 2017 to finally burn the slash piles nearby. And even though the FS said they would keep most trees 5" and smaller in diameter, there are basically very few trees left with very few trees reaching even the 4-5" diameter size.
  - **These decks are still next to my cabin. Therefore I reiterate my concern that you simply don't have the budget or priority to perform proper regeneration and cleanup of the forest (as in this above example which was done in 2011). The term mastication or mastification, should have a definition for it as it is not clear from the FEIS, what it is. I am not in favor of piling and burning as it leaves spots of ground that are sterilized by the burning. Also, it is better to lop and scatter by roller chopping to get regeneration.**
3. All this cutting was initially done at the North and East side of the Foxborough and Valhalla private land areas. I feel this was also a mistake since most of the recent fires the MBNF have gone from a Southwest to Northeast direction, including the 2003 Gramm Fire and 2012 Squirrel Creek Fire.

- **I have not seen any change in your priorities with this. To me, your first and foremost priority should be to protect Wildland Urban areas by removing the unwanted fuels starting on the Southwest side of these areas.**
- 4. Being a former FS employee, I have seen internal directives indicating the use of larger clear cutting of the National Forest is not always the preferred treatment method of mitigating large Forest Fires.
  - **Again, you are grossly exceeding your normal 40 acre clear cut limit dictated in your Forest Plan.**
- 5. Whenever the FS harvests large quantities of contiguous timber, it simply creates still another 'same age' Timber Stand that will be just as susceptible to major beetle kill as they mature decades from now!
  - **I saw no change in your approach to this, nor was this concern mentioned in long-term vision of the Forest.**
- 6. From the time I bought my cabin in 2002 until 2011, I would see deer, elk, and moose on my property all the time. This has stopped since there is no hiding cover or travel corridors for the wildlife to safely roam in the National Forest (NF) around my property.
  - **This overlaps my concern with the first point I made. I feel the habitat of big game and fisheries has not been fully considered this project.**
- 7. Because leftover scraps of wood are left on the ground, game, hiking, and 4-wheel drive trails have been abolished making it much more difficult for wildlife and humans to get around. And in our dry climate, it will takes decades for this timber to decompose. This can be a safety hazard in the event for humans to escape a fire or inclement weather.
  - **Fighting fires will also be affected if you don't provide adequate access to the Forest.**

While I agree dead fuels in the National Forest need to be greatly reduced, I do suggest the MBNF consider revising the LaVA project in these areas:

1. Ensure roads built for timber harvesting are strategically located for fire prevention access and kept intact so that firefighters have better access to the National Forest. Roads that need to be closed should be done with gates, instead of obliterating them, making them impassable so much that even humans cannot walk on them. Also ensure as many roads as possible remain open to the Public for us to enjoy our NF's.
2. Make it the number one priority to harvest timber near communities and major structures first, starting on the Southwest areas since this is where fires typically come from due to our prevailing winds. Consider having timber sales provide fuel "breaks" to that fires cannot easily travel massive areas in the NF. This might even include large fuel break corridors (either crisscrossing or oriented in a SE to NW direction) to intercept common fire path directions.
3. Because the Forest Service has found the wind blows down the smaller trees, retain larger diameter trees to increase the survival rate of both smaller and larger trees.
4. Only exceed the 40 acre Forest Plan guide when used to protect structures and communities in the National Forest or when the mortality rate of dead, beetle killed trees exceeds 90%.
5. Perform timber harvesting and reclamation activities only as current budgets allow for. In other words, do not remove timber without adequate treatment for trees to grow back in a timely manner. I am still seeing large areas of timber removed around my cabin in 2011 that are simply not growing back.



6. Fish habitats must be fully considered in your approach.
7. Better protect natural riparian areas. I was surprised how much timber was harvested next to the meadows that are the head waters of the Illinois Creek. I am very concerned about erosion and spring run-off problems.
8. Ensure wildlife are protected with plenty of hiding cover, forage, and travel corridors for wildlife to migrate in and out and around the National Forest. Wyoming Game and Fish has already closed several deer hunting areas closed due to the lack of wildlife.
9. Allow the Public to periodically comment on the progress of this project to ensure the FS is meeting our needs by making necessary adjustments throughout the entire process.

The LaVA project does not appear to sufficiently involve extensive, coordinated, and holistic plans from all your own internal resources including landscape architects for the visual aspects; fire scientists to best protect massive wildfires like the 2018 Badger Creek fire; wildlife and fish biologists to protect these species; hydrologists and soil scientists to minimize erosion and habitat damage; and recreation planners to ensure the Forest meets the needs of hikers, bikers, horseback riders, photographers, skiers, snowmobilers, hunters, people who fish, etc.

I am also concerned why the FS has "side" timber sales such as Lake Owen and Foxpark while at the same time doing the LaVA project. It appears these projects are not being coordinated, plus they are not involving the Public as much. Please actively use your mailing lists and news media to keep us informed of the project.

Finally, I feel the proposed LaVA project basically gives the MBNF a "blank check" to harvest timber, therefore allowing them to exceed their own Forest Plan targets by changing their own Forest Plan standards and guidelines for sustainability.

Thank you for allowing the Public the opportunity to comment on this very important project.



Jim Field

