

**Date:** May 11, 2020

**From:** Jim Field (email: mdnum1@msn.com)

**To:** Whom it may concern, submitted via USFS web [link](#)/email message

**Project Name:** Landscape and Vegetation Analysis (LaVA) Project (ID [51255](#))

**Responsible Official:** Russell Bacon, Medicine Bow National Forest Supervisor

**Forest to be Implemented:** Medicine Bow National Forest

**Subject:** Response Letter to the LaVA Project

Greetings. This is my third response letter to you regarding LaVA. I remain strongly opposed to this project. I do not feel my and other Public concerns have been fully addressed in your Modified FEIS and ROD. Rather than repeating myself, I will instead only summarize my most current and critical concerns (with recommendations), of which I have brought up before.

First and foremost...after today the Public will no longer be involved in formal engagement opportunities. This is mentioned on page 8 of Appendix A. While we appreciate informational meetings with the Public, many of us feel the NEPA process, requiring action based on Public input, will no longer exist, basically giving the FS blanket approval to carry out it's mission. I can only suggest to stop this project and go back to your previous NEPA processes to accomplish your most important goals on smaller scales, such as individual accounting units.

Secondly, I am very skeptical that long-term funding can be sufficiently identified and committed to, especially as our federal deficit grows at record rates. Therefore, this project could be aborted at any time, (for budget or political reasons), leaving the forest in a mess as far as monitoring, regeneration/reforestation, and cleanup are concerned. By breaking this project up, the budgets will become more realistic and predictable.

Because of budget uncertainty, I am concerned you won't have the needed FTE's to properly administer this project through it's full completion...again especially in regards to monitoring, regeneration, and cleanup years after the cutting is completed. Surely, additional personnel is needed in the form of timber contracting specialists, sale administrators, cultural resource specialists, engineers, etc. Since you have already started to hire some of these positions, it appears the decision has already been made. By having smaller projects, additional FTE's will be more manageable.

I am concerned you may not have the market for the timber removed. It would be helpful and less risky if periodic market analysis is performed before advertising new projects.

I am not seeing where the priorities will be in protecting WUI areas FIRST. This should be accomplished by reducing fuels from the SouthWest areas of WUI's prior removing any other fuels. This is because our prevailing winds come from the SW driving our last 2 major forest fires (Badger Creek and Squirrel Creek) to the NorthEast.


All clear cut treatments should be mostly done in high mortality rated areas (>50%) and most should not exceed the normal 40 acre limit per the Forest Plan. Large clear cuts create the same age stand which will likely repeat the same problems we are seeing now (with beetle kill and large fires).

Obliterated roads should be rehabilitated, but many should remain usable for the Public to access for foot travel only (ie, non-motorized trails). Some roads should be left intact for fire fighting access only. They can still be closed to the Public by installing locked gates at road entrances.

I also question how other current and future projects will be affected, e.g., what will be done in the 23,000 acre Badger Creek burn area to regenerate it?

Finally, please respect private landowner desires and concerns when treating areas near their private inholdings. Visual and erosion concerns need to be fully addressed and agreed upon.

Thank you for this opportunity to respond. I look forward to future public meetings and correspondence.



James Field

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