Data Submitted (UTC 11): 5/4/2019 11:00:00 AM
First name: Eric
Last name: Dalton
Organization:
Title:
Comments: Memorandum for USFS Region 2 Objection Reviewing Officer Date: 4 May 2019Subject: MBNF LaVA FEIS and DROD - ObjectionResponsible Official: Russell Bacon, MBNFI continue to object to the LaVA project due to excessive scope, dubious financing, and the apparent lack of a scientific basis for action.I am happy that permanent roads were eliminated and that no temporary roads will be located in inventoried roadless areas (IRAs). Unfortunately, MBNF already has one of the highest road densities in the USFS system. If implemented as described, this project will be very costly to taxpayers. It seems inconceivable that eliminating existing roads wouldn't have been factored into a project this large. As we know, roads are a significant source of water contamination through sedimentation and highly disruptive to wildlife and vegetation (where is that vegetation analysis?). Closing some existing roads during the course of the project would have advanced several stated purposes.One of the rationales for the project is to reduce the threat of fire escaping the forest boundary. For that goal, selected treatments near the forest boundary would be much more effective than large scale cutting in the interior of the forest.Providing merchantable timber is another illogical purpose since the gain of commercial timber will be far outweighed by the taxpayer expense. The Rocky Mountains are the poorest region in the country for commercial timber, and this will only become more true as climate change advances.Another stated purpose is increased forest resiliency. Large scale is likely to reduce resiliency to future beetle outbreaks by creating evenly aged stands.Remaining purposes also do not hold up to casual scrutiny at this scale. It makes sense to do some cutting to mitigate future wildfire damage and provide an accelerated opportunity for forest regeneration. Older growth, healthy stands outside of IRAs and other very small protected areas do not appear to have received consideration. If the goal is resiliency, then these relatively healthy, older stands should be totally excluded. Ditto for riparian areas out to several hundred meters. The maps depict the imbalanced nature of this proposal[mdash]colors/categories should be more evenly distributed across the acreage. Areas with limited or no treatments are a mere pittance. Most of the no treatment areas are simply to comply with the Wilderness Act, and the overall wilderness acreage is already tiny.