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Comments: The mission of the Wyoming Wilderness Association (WWA) is to protect Wilderness, Recommended Wilderness Areas, Wilderness Study Areas, Lands with Wilderness Characteristics, and Inventoried Roadless Areas (IRAs) on Wyoming public lands. We appreciate that no temporary roads will be placed in Wilderness and IRAs in the LaVA project area, that all proposed activities in IRAs will require approval from the Regional Office, and that the public will have opportunities annually to provide recommendations and feedback about roadless area management, as part of the adaptive management and monitoring plan (Appendix A). We also applaud the decision to prohibit commercial activities in the Sheep Mountain IRA and Sheep Mountain Federal Game Refuge, and the limit of 75 miles of open, new, temporary roads at any given time. Still, the magnitude of LaVA appears to be essentially the same as last year, with the possibility of up to 600 miles of temporary roads in the project area, up to 148 square miles of even-aged management (clearcuts), up to 123,000 acres of mechanical treatments in 230,000 acres in IRAs (over half), and up to 259 square miles of uneven-aged treatments during the next 15 years.

Moreover, we are concerned with treatment areas identified in the 2003 Forest Management Plan Record of Decision (ROD) as Forest Plan Management Area (MA) 1.2 - Recommended for Wilderness (RWA) - being open to treatment activities under the LaVA program. Up to 12,320 of the 27,974 RWA acres - greater than 44% - would be subject to forest treatments under the new plan. The treatments in the LaVA process would jeopardize the wilderness characteristics of the RWAs that the Forest Service is mandated to preserve. We therefore maintain that the total 27,974 RWA acres identified in the 2003 ROD should be excluded from the treatment activities outlined within the LaVA process. We do appreciate the value of sometimes using prescribed fire and hand tools to clear trails in RWAs and other roadless areas.

Furthermore, the rationale for potentially using feller-bunchers, skidders, and masticators in over half of the land area in IRAs is not convincing. Much of the harvesting in IRAs would be done to hopefully mitigate hazardous fires in a) county communities at risk, b) along the USFS boundary and in the wildland-urban interface, c) Cheyenne Board of Public Utilities lands, and d) non-Forest Service inholdings. We understand the necessity for attempts at reducing the severity of fires in the wildland-urban interface (WUI), which to us implies places with established homes, water diversion structures, and the like. No structures, however, are shown on the maps so far provided. Ditches and fences are shown; why not homes and the other structures that would define a true WUI? Thus, the need for WUI treatments is not convincing. The maps which we think are insufficient are found at https://www.fs.usda.gov/nfs/11558/www/nepa/106251_FSPLT3_4637742.pdf.

Related to this concern is that much of the harvesting in IRAs would be done to protect "non-Forest Service inholdings" that appear to be parcels of state or private land. There is no indication that the inholdings have structures that would imply a WUI. As the large state parcel within IRA number 3, Battle Creek Roadless Area, illustrates, not all of these areas calling for WUI treatment in the current plan actually require it, as no structures exist within this parcel. The public at large should not be expected to sacrifice IRAs on public lands for a plan that seeks to protect undeveloped state or private lands on the border of an IRA. The WUI needs to be defined and mapped more clearly.

We thank you for the opportunity to share our concerns regarding the LaVA project. Please contact us if you have questions.

Thank you again