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Title: Chair

Comments: Thank you for the opportunity to submit comments on the White River Aspen Management Plan #59419. I am Chair of ESWA, the Eagle Summit Wilderness Alliance, a nonprofit group that works with the USFS to protect Wilderness Areas in Eagle and Summit Counties. Our understanding is that no Wilderness Area lands will be treated under the Plan. We appreciate this exclusion and emphasize its importance.

However, we have the following concerns and comments on the remainder of the proposal:

1. In addition to excluding any lands within existing Wilderness Areas, the project parameters should exclude any areas being considered as future Wilderness either under the CORE Act or the package of public lands bills recently passed by the US House of Representatives known as Protecting America's Wilderness Act Plus.
2. A project of this scale (authorizing the removal of 20,000 acres of aspen forest per decade and up 375,000 acres of aspen forest over a span of decades) should not move forward until the USFS has laid out plans for how to analyze cumulative climate impacts and ensure management projects are promoting climate resiliency.
3. We are concerned that the Plan may not comply with NEPA, which requires site-specific analysis and opportunities for public comment on specific locations and timelines for forest-management activities. We note that you have provided generally that "[a]fter site-specific areas are identified, public notification would be conducted," that some sort of public input would be accepted, and "the treatment area could be modified based on line officer discretion." This process must be much more detailed and robust if the Forest Service proceeds with its current sweeping approval proposal. For instance, the current proposal should (a) require detailed site-specific plans to be sent to each person who provided comments on the current proposal as well as notices to the general public, (b) allow at least a thirty day comment period, (c) not preclude concerns from being raised or considered on the ground that they could or should have been raised in comments on the pending proposal, (d) provide adequate justification for the particular management practices chosen for a site specific area, and (e) otherwise allow meaningful input and review of the annual plans. We note that we only recently learned of the current proposal, so we are concerned that there will not be adequate notice given, and opportunity afforded, to comment on the site-specific work plans.
4. We are concerned about the proposed construction of new roads (again with no site-specific information or public review), the potentially significant impacts to the many caves and karst resources within the project area, and effects on roadless areas and wildlife such as lynx. These details are absent from the current proposal, so the annual plans and review process must allow for a robust review of such details.
5. Given the large scope of the current proposal, an Environmental Impact Statement should be prepared, supplemented by Environmental Assessments for each site-specific work plan as it is developed. Such Environmental Assessments are required to satisfy NEPA's requirements of a site-specific analysis and opportunity for public comment on the particular forest management practices chosen for each area.

Sincerely,

Michael F. Browning Chair, Eagle Summit Wilderness Alliance