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May 16, 2019

USDA Forest Service, Region 2
Rocky Mountain Region
Attn: Objection Reviewing Officer
1617 Cole Blvd, Building 17
Golden, CO 80401

Submitted via email to r02admin_review@fs.fed.us

RE: OBJECTION - Draft Record of Decision (ROD) for the Landscape Vegetation Analysis (LaVA) Project on the Medicine Bow-Routt National Forest

Our contact officer is:

Shaleas Harrison

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The mission of the Wyoming Wilderness Association (WWA) is to protect Wilderness, Wilderness Study Areas, 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 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. Still, the magnitude of LaVA is staggering, 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 IRAs, and up to 259 square miles of uneven-aged treatments during the next 15 years.

WWA submitted comments on the DEIS in a timely manner. We have read the responses to public comments, and we have studied the Draft Record of Decision (DROD). The FEIS is a much better document than the DEIS, because it has more of the specific information we

requested. The DROD also addresses some of our concerns. However, we are compelled to file the following two objections:

1. The rationale for potentially using the full suite of mechanical tools—including 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, which to us implies places with established homes, businesses, water diversion structures, and the like. But no structures are shown on the maps. Ditches and fences are shown; why not buildings? Thus, the need for WUI treatments is not convincing. The maps to which we refer are at https://www.fs.usda.gov/nfs/11558/www/nepa/106251_FSPLT3_4637742.pdf.

Related to this concern is that much of the harvesting would be done to protect “non-Forest Service inholdings” that sometimes appear to be parcels of state land. Again, there is no indication that the inholdings have buildings, whether private or state. The public at large should not be expected to sacrifice IRA wildlands on public lands for a plan that seeks to protect undeveloped state lands on the border of an IRA. The benefits of maintaining rare IRAs should be a collaborative effort. The WUI needs to be mapped more clearly. Without these details, it is difficult for the Forest Service to demonstrate whether the DROD complies with the roadless rule.

2. There are frequent assertions that the public will have regular opportunities to comment and make recommendations as the project develops. However, it is not clear that this applies to the treatments shown on the IRA maps at the website above. WWA would like to participate in a helpful way, and we want to trust the sincerity expressed in the DROD and Appendix A about public participation, but the magnitude of temporary road building and potential timber harvesting makes us wary. Are the tools, intensity, and location of treatments in IRAs still negotiable? Are the “Requesting Agencies” identified on the legend willing to work collaboratively during implementation as well as planning for the IRAs?

WWA does not support mechanical treatments in IRAs to the level that is proposed in the DROD. We also would like the Forest Service to map the WUI with more detail. We will appreciate your consideration of our objections and look forward to receiving your response.

Khale Century Reno
Executive Director

Shaleas Harrison
Public Lands Coordinator