

**From:** [REDACTED]  
**To:** [FS-r02admin-review](#)  
**Subject:** objection to FEIS, LaVA Project  
**Date:** Monday, May 20, 2019 8:58:17 AM

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508 S. 11<sup>th</sup> Street  
Laramie, WY 82070  
20 May 2019  
USDA Forest Service, Region 2  
Rocky Mountain Region  
Attn: Objection Reviewing Officer  
1617 Cole Boulevard, Building 17  
Golden, CO 80401  
Sent by email: [r02admin\\_review@fs.fed.us](mailto:r02admin_review@fs.fed.us)  
Objector's name and address:  
Sarah Gorin  
[REDACTED]

Proposed project:

Medicine Bow Landscape Vegetation Analysis Project (LaVA Project)  
Final Environmental Impact Statement and Record of Decision  
Responsible Official: Russell M. Bacon, Forest Supervisor  
Medicine Bow-Routt National Forests  
Laramie Ranger District

To Whom It May Concern:

My comments on the DEIS (in italics below) focused in part on the following:

*Another overall omission – perhaps the most important one – is any comprehensive cost/benefit evaluation of the proposed “analysis” or “treatments.” The DEIS discusses the need to produce more forest products (although, oddly, this seems to mean growing more lodgepole pine, the target of the bark beetle – page 15) and to improve forage for livestock.*

*Nowhere in the DEIS did I find any data on how much it will cost us as taxpayers to benefit private interests seeking merchantable timber or livestock forage.*

*... a more in-depth economic analysis of merchantable timber and forage production obviously is necessary to meet the requirements of the National Environmental Policy Act, because the decisions to go forward with these goals (1) divert resources from other environmental priorities, and (2) cause environmental impacts that otherwise might be avoided.*

The following excerpts (in bold) from the “Regional Economic Contributions” and the “Financial Efficiency” sections of the *Social and Economic Report* included as part of the FEIS did nothing to allay the concerns expressed by my earlier comments.

**It is therefore helpful to consider employment figures shown in Table 2 and Table 3 as the ‘accumulative’ employment effects or requirement, across sectors in the local economy, associated with the proposed activities (in this case those direct, indirect and induced labor necessary to support the harvest of 40 – 50 thousand CCF on an annual average basis). In other words, ‘one job’ as reported in IMPLAN may be a collection of different jobs (e.g. ‘one job’ may be the summation of 1 full-time equipment operator working 3 months + 1 full-time driver working 3 months + 2 half time office support staffs working 6 months each.**

In other words - overlooking, for the moment, the fact that these jobs will exist only if subsidized by the U.S. taxpayer - they will be seasonal and most likely lack associated benefits such as health insurance or retirement. This entire section of the *Social and Economic Report* is very carefully phrased with numerous caveats, reflecting the ill-defined nature of the LaVA Project itself.

**On the Laramie District, typical stumpage prices are approximately \$4/ccf. On the Brush Creek Hayden District, typical stumpage prices are approximately \$13/ccf. The Modified Proposed Action would be expected to increase timber volume harvested during the project period by about 5,000 ccf per year. Stumpage receipts associated with this increased volume would range from \$20,000 to \$65,000 per year during project implementation. Over the 15-year project period, road**

**maintenance, reconstruction, temporary road construction and decommissioning are expected to cost approximately \$13.7 million, or \$912,000 per year on average. Current road maintenance and reconstruction costs are approximately \$576,000 per year, so the Modified Proposed Action represents an increase in costs of approximately \$336,000 per year. Therefore, the costs of project implementation would exceed Agency revenues from the project.**

Substantially would exceed Agency revenues, I might add.

Like the United States Forest Service as a whole, the Medicine Bow-Routt National Forests are underfunded. This is particularly apparent in enforcement, judging by the widespread, continuous and egregious destruction of forest resources by vehicles traveling off-road. There is no such thing as a "temporary" road in the difficult-to-reclaim and unsupervised environments of the Medicine Bow National Forest. When more so-called temporary roads are created, there will be more off-road destruction and, ironically, more risk of fire as people make their way into more of the forest. Nowhere are these potential costs addressed.

The *Social and Economic Report* goes on to claim that there will be non-monetary benefits associated with the project, but again, these claims do not constitute a comprehensive cost/benefit analysis. Mention is made of benefit to municipal water supplies, but neither Cheyenne nor Laramie "rely" on the forest for water. Mention is made of benefit to current and future residents in the "wildland-urban interface" without any explanation of why issues in that interface are the responsibility of United States taxpayers rather than the relatively affluent individuals affected (as mentioned in the "Environmental Justice" section.) In short, it's really difficult to ascertain how the costs of the LaVA Project justify the benefits and, like the DEIS, the FEIS failed to address this fundamental issue in sufficient detail.

Sincerely,  
Sarah Gorin