

From: [Bern Hinckley](#)
To: [FS-r02admin-review](#)
Subject: Medicine Bow - Routt Landscape Vegetation Analysis Project
Date: Monday, May 20, 2019 12:00:21 PM

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August 19, 2018
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USDA Forest Service, Region 2
Rocky Mountain Region
Attn.: Objection Reviewing Officer
1617 Cole Boulevard, Building 17
Golden, CO 80401
[r02admin_review@fs.fed.us]

RE: Medicine Bow Landscape Vegetation Analysis Project - Final EIS - Medicine Bow - Routt National Forests

Dear USFS:

Following up on comments provided by letter dated August 19, 2018, I have made an attempt to digest relevant portions of the FINAL EIS for this project.

The fundamental objection voiced previously was simply that "the project" upon which public comment was nominally being sought was too unspecific and ill-defined (8/9/18 comment #1). The FINAL EIS makes some effort to put sideboards on portions of the discussion, but we, the public, are still left with activities like "not more than 600 miles" of new road to be constructed somewhere on the 78% of the "treatment opportunity area" that has not been excluded. This is a marginal response to the concern, and is followed by basically telling the public readers of this 420-page document to go figure it out for themselves: "By knowing both the existing road density by accounting unit and where temporary road construction is prohibited by the forest plan, assumptions can be made about where temporary roads may or may not be needed during LaVA Project implementation."

The primary USFS response to the widespread complaint about a lack of specificity appears to be the inclusion of Appendix A, which seems to promise vigorous public engagement once the actual details of specific "treatments" are developed. Yet the nature of that engagement remains unclear. At Appendix B response to "806.02: Oppose Modified Proposed Action", we read, "This process requires ... public engagement for each proposed treatment." (emphasis added). But at Appendix A - "Public Engagement", "Public feedback periods associated with individual treatment proposals" are described as "informal" and it is noted "that there are no regulations requiring comment or objection periods associated with LaVa project implementation." Is the Forest Service obligated to provide meaningful opportunity for public comment once an articulated "treatment" is proposed for a specific location, or not?

Another common complaint with the DRAFT EIS was the lack of economic analysis (e.g. 8/9/18 comment #2). The Appendix B response (805.0305: Economics – No-Action Alternative) states that, "The economic analysis describes the effects to ecosystem services, such as clean air and water, of each alternative" and the matrix on p. iii of the FINAL EIS states the Chapter 3, Socioeconomic "section has been augmented to include an economic efficiency analysis of the proposed alternatives". But the "Socioeconomics" section in the FINAL EIS is a scant 8 pages; the only economic impact for which any quantitative analysis is offered is for logging; and the conclusion in that case is that "From a financial efficiency perspective, the agency would spend more to implement the project than it would receive in revenue". There is little, if any, other attempt to balance the dollar costs of plan implementation against the dollar benefits of anything, even in the most general terms.

Finally, I repeat my initial complaint with the terminological legerdemain of your project title and the "treatment" activities described throughout (8/9/18 comment #3). The very first sentence of the LaVA website - "Project Overview" states the project is to "Holistically review the Snowy Range and Sierra Madre mountain ranges to identify strategies to best mitigate the negative effects of the current beetle epidemic to the various resources found within each mountain ranges." But that statement goes on to list Project Activity as "Fuel treatments; Forest vegetation improvements; Special products sales; Timber sales ". There is no way any honest, sensible person would characterize the listed "activities" as a "review of strategies" or "vegetation analysis". The project under review is full-scale, operational, "treatment", "management", "road construction", on-the-ground, dozers, skidders, prescribed fire, etc. etc. I find it deeply disappointing that our federal employees have become so swept up in bureaucratic euphemisms, that they are incapable of calling a simple spade, a "spade".

The statement, "The Forest Service makes every effort to create documents that are accessible to individuals of all abilities", ignores the public's limited ability to penetrate Forest Service terminology and procedural mazes. I hesitate to suggest this is deliberate obfuscation, but the result is the same as if it were. "Accessible" it is not.

Sincerely,

Bern Hinckley