

May 19, 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: Draft Record of Decision (ROD) for the Landscape Vegetation Analysis (LaVA) Project on the Medicine Bow-Routt National Forest

I submitted comments on the DEIS, and I have now read much of the FEIS, many of the responses to public comments, and most of the Draft Record of Decision (DROD).

I can understand why the Forest Service and its collaborators feel compelled to adopt an unprecedented approach to forest management following what appears to be an unprecedented epidemic of bark beetles, which has raised concerns about wildfires in the future. Moreover, the FEIS for the Alternative 2 Modified Proposed Action with Additional Modifications is an improvement over other LaVA documents I've read. However, the potential magnitude of the project, with up to 148 square miles of even-aged management and up to 600 miles of temporary roads, requires greater clarity or more compelling arguments on some points. That is the basis for my objections:

1. The concept of resiliency was developed to indicate the ability of an ecosystem to recover from a disruptive event to a condition that resembles its original state (Franklin, Johnson and Johnson (FJJ), 2018, *An Ecological Approach to Forest Management*). Recovery of the exact appearance of the forest is not expected because climate changes during forest development, which creates the potential for the dominance of other tree species or shifts in tree density and cover. Also, the kinds of trees that dominate often change as forests age. Thus, the focus is on forest "functionality" – which implies the recovery of wildlife habitat, native species, and erosion control as well as the establishment of new trees and the production of wood. Mixed conifer stands are more likely to accomplish that over the long term.

The DROD gives the impression that the forests of the LaVA project area, without management, are not resilient, that their functionality will not be restored. One sentence on page 17 reads: Under the no-action alternative, conifer stands with high mortality and minimal regeneration or seed sources may not recover their cover type component in the longer term." The basis for this statement is not given, but there is mention that too much of the forest understory is subalpine fir, a tree of little commercial value. There also is frequent mention that the goal is to create the desired future conditions specified in the 2003 plan, which implies rapidly growing forests of lodgepole pine over still more of the project area. To manage forests in the area to achieve this

goal is one thing, but it does not make the forests more resilient. Rocky Mountain forests have survived numerous disturbances during the last several thousand years. They are amazingly resilient without human assistance. As the climate continues to change during the 21st century, managing the forest to maintain the maximum species diversity is the best strategy for maintaining the resilient forests that we've come to appreciate during the previous century—for all their values, including the production of wood that can be harvested.

It is surprising that up to 148 square miles of even-aged management are proposed to achieve a supposedly higher level of resiliency, in a national forest where so much of the forests have already been harvested in this way. The project area is one of the most intensively harvested forests in the region, but that level of harvesting, starting in the 1950s and 60s, was not adequate to prevent the current beetle epidemic that LaVA now seems designed to prevent in the future. This raises questions about whether enhancing resiliency to “future insect and disease infestations” is possible while also maintaining the viability of other conservation mandates and multiple uses. Will the public approve of a forest manipulated to the extent that fires or “infestations” would not occur? Is the goal to create a lodgepole pine forest structure that would allow using prescribed surface fires, such as is done for ponderosa pine?

A more realistic stance was revealed in the DROD with the following statement on p. 16: “This project does not aspire to prevent wildfire.” But this was followed with a statement that the goal is to “reduce the likelihood of extremely large, high severity, long duration fires” that could impact the WUI, public safety, infrastructure, and “adjacent lands.” These two statements leave the definition of “wildfire” rather vague. Are there places in the LaVA project area where “wildfires” would be allowed to burn? Occupants of the WUI sometimes assume federal agencies will or should protect them using fuels management, but research has shown that wind and drought are the primary drivers of wildfires in the Rocky Mountain region, not fuel loading.

In this connection, while the impression is given that more timber harvesting is needed on the LaVA project area to improve resiliency, the second growth from previous harvests apparently is not yet ready for another entry. The photo on the front page of the LaVA documents suggests that these younger forests were less affected by the beetles. Considering that there is already considerable landscape diversity in the project area, in terms of forest patches of different ages (including old growth), the rationale for so much timber harvesting to increase the resilience of the forest is not convincing.

Thus, I object to the way in which the resilience concept is used to justify a project that could be unprecedented in magnitude.

2. The current forest plan was developed in 2003, early in the development of the current beetle epidemic and at a time when the implications of climate change were either not being given careful consideration or were not well understood. I think that a management plan for the next 15 years should be based on anticipated climate changes during the 21st century, the time when the

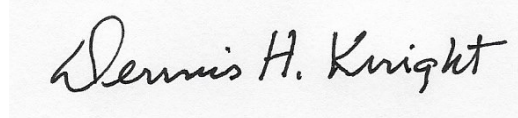
new post-beetle forests will mature. Rice et al. (2018), cited in the FEIS, provide a basis for doing that. This discussion could lead to modification of the LaVA project, or, alternatively, it could provide a more sound rationale for proceeding. My objection is that the plan does not adequately consider the effects of climate change on forest development during the next 80 years.

3. Much of the rationale for harvesting is to protect the Wildland-Urban Interface, yet, judging from the Inventoried Roadless Area maps now on the LaVA website, major buildings are not mapped. Ditches and fences are. Also, I'm concerned that harvesting will be authorized to protect undeveloped "non-Forest Service inholdings." I understand the need in some places for aggressive treatments in the WUI, but I object that such places are not clearly delineated on maps.

Related to this is my objection that so much of the Inventoried Roadless Areas could be subjected to feller-bunchers, skidders and masticators for the hoped-for protection of vaguely defined WUI's and undeveloped state/private inholdings on the IRA boundary. I think too much of the IRAs could be adversely affected. State and private landholders must accept some of the risk for the benefits of owning parcels of land in or adjacent to national forests.

In summary, the Adaptive Management and Monitoring Plan (Appendix A) describes a significant level of public involvement as more specific plans are proposed for specific areas. The Forest Service and its collaborators seem anxious to make this work, but I think the guiding DROD needs clarification.

I respectfully submit these objections on my own behalf.

A handwritten signature in black ink that reads "Dennis H. Knight". The signature is written in a cursive style with a large, stylized 'D' and 'K'.

Dennis H. Knight

