May 10, 2020

USDA Forest Service, Region 2

Rocky Mountain Region

Attn: Objection Reviewing Officer

1617 Cole Blvd, Building 17

Golden, CO 80401

*Submitted to:* *https://cara.ecosystem-managemt.org/Public//CommentInput?Project=51255.*

**RE: Objections to the April 2020 Reissued Draft Record of Decision (ROD) for the Landscape Vegetation Analysis (LaVA) Project on the Medicine Bow-Routt National Forest**

It appears that my objections to the 2019 Draft Record of Decision (DROD) were not addressed. Maybe there is good reason, but I’m sufficiently concerned to submit them again. Briefly, here are my objections:

1. Much of LaVA is justified by the concept of resiliency. I asked for clarification and a rationale for the way it is applied. This was not done. The word is not even in the glossary.
2. The implications of climate change are not discussed.
3. The Wildland-Urban Interface is so loosely defined that it is impossible to see the need for much of the mechanical treatments in Inventoried Roadless Areas.

Here is my rationale for each concern:

1. The concept of resiliency refers to the ability of an ecosystem to recover from a disruptive event to a condition that resembles its original state (Franklin, Johnson and Johnson, 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 native species, wildlife habitat, and erosion control as well as the establishment of new trees and the production of wood. Mixed conifer stands are more likely to provide resiliency over the long term.

Thus, 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, much of it 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 with even-aged management while also maintaining the viability of other conservation mandates and multiple uses.

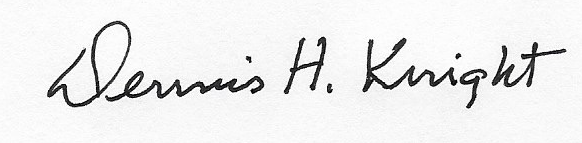
2. The current forest plan was developed in 2003, early in the development of the current beetle epidemic and at a time when the implications of climate change were either not being given careful consideration or were not well understood. So much has been learned since then. I think that a management plan for the next 15 years should be based on anticipated climate changes during the 21st century, the time when new post-beetle forests will mature. Rice et al. (2018), cited in the FEIS, provide a basis for doing that but the relevance of that study is not discussed. 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 still 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 or cannot be detected. Ditches and fences are clearly marked. 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 a genuine WUI, but such areas for LaVA seem loosely defined. The presence of “homes and other structures” is identified as a part of at-risk communities, according to the glossary.

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 Forest Service and its collaborators seem anxious to make LaVA work. The Adaptive Management and Monitoring Plan (Appendix A) describes a significant level of public involvement as more specific plans are proposed for specific areas, but the Modified FEIS and DROD need clarification.

I respectfully submit these objections on my own behalf.



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