Data Submitted (UTC 11): 4/27/2020 6:10:11 PM
First name: Bart
Last name: Geerts
Organization: Univ. of Wyoming
Title:
Comments: I wish to express my vocal opposition to the Modified FEIS for the Medicine Bow National Forest concerning the Landscape Vegetation Analysis Project (LaVA). The process leading to this document violated the NEPA process, but setting that aside, there are several fatal mistakes.

1. An absolutely critical study regarding the lack of forest regeneration due to a shortage of moisture associated with climate change is cited, but the content of the MFEIS utterly fails to take this information into account. In short, the results of this peer-reviewed science by highly respected forest ecologists directly contradicts the core of the LaVA which still calls for 95,000 acres of clear cutting and provides no estimate of the area that will be subjected to prescribed burning. The document provides no reason why the latter disturbance would be any different than a wildfire regarding non-regeneration of burned areas. See:
"Evidence for declining forest resilience to wildfires under climate change." CS Stevens-Rumann, KB Kemp, PE Higuera, BJ Harvey, MT Rother, Ecology Letters, February, 2018.

2. A new element in the MFEIS is the plan for no more than 75 miles of temporary roads to be open at one time. However, there still are 600 miles being anticipated, which is an unacceptable management goal for the Medicine Bow National Forest which already has the greatest density of roads of any National Forest in Wyoming.

3. The economic costs of the LaVA Project remain a mystery. The only financial information that can be gleaned from the document is an estimation that the temporary roads will cost $6,000 per mile or $3,600,000 over the 15-year span of the project. Without a clear economic analysis, the public is being asked to write a blank check to the US Forest Service-and this is an utterly unacceptable position for a federal agency that has lost the trust of the people through its continual efforts to sidestep the NEPA process.

4. The "Modified" plan still calls for commercial harvest of 260,000 acres or nearly one-third of the forest. Currently the average production of lumber from Medicine Bow NF is 40,000 ccf annually. During the first 6.5 years of the LaVA Project, the annual harvest is estimated to be 325,000 ccf (an 8.8-fold increase over the current harvest) and 190,000 ccf over the following 8.5 years (a 4.8-fold increase over the current harvest).

5. The LaVA Project appears to be driven not by sound ecology but by unsound economics. Rather than fostering a healthy ecosystem (based on scientific evidence), the plan shows all the hallmarks of being a public subsidy of the forest industry. Why else would the US Forest Service be so unwilling to conduct and communicate an economic analysis or to take into account relevant studies of forest ecology? As the current Secretary of Agriculture stated in 2017: "Regarding the US Forest Service and our public lands, I think it's time we started looking at forests as crops, as agriculture."

6. Finally, LaVA is being framed as an Adaptable Management Plan. This means that if the MFEIS is approved, the US Forest Service is being given yet another blank check-this time for the destruction of a public asset. With this administrative move, NEPA will no longer be applied to the projects of LaVA over the duration of the 15-year plan. For example, it is possible for the Forest Service to permit a 6,000-acre clear-cut or to allow dozens of roads to cross streams. Given the record of the US Forest Service in terms of ignoring public input in the NEPA process and kowtowing to extractive industries, this environmental blank check is absolutely unacceptable.