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Organization:

Title:

Comments: May 8, 2020

Re: Medicine Bow

LaVA Project

(Please forgive me if this is a double submission my computer did something before I was done so I don't know whether my previous letter was sent.)

Dear Reviewing Officials,

Two years ago I sent brief comments on the first version of the environmental impact statement and I was notified that you had produced a revised version of the EIS along with responses to comments including my own. The revised EIS contained several responses to my comments and the new revised version claims to have taken the concerns into account. And I appreciate being allowed to speak at last summer's public hearing. However, I do still want to register my objection pursuant to 36 CFR 218.

To summarize briefly, I was concerned about the unconstrained project timeline, the rush to maximize the commercial value of timber that seemed not to be sufficiently mitigated by the planning and monitoring described in the process, and the fact that the document is so vague about what will happen when and where that there is essentially no protection of values other than commercial timber harvesting. I was also concerned that the lack of notice to neighbors of the project did not bode well for promises to consult with stakeholders as the project was carried out.

As far as I can tell (it is a big document so I might have missed something), the only response to these concerns in the new document is in a section labeled "ISSUE: Failure to adequately analyze economics". There is lists, "Competing values won't be weighed sufficiently in the rush to capture as much of the commercial value of the wood as possible," as the gist of the objection. And it goes on to offer the following as a response, "Clarified the record of decision to emphasize that implementation would be contingent upon staffing and available funds."

By lumping the concern expressed together with legitimate worries about the cost of the project and concern that the federal government is in effect subsidizing commercial use of the forest at a loss to the citizens, the characterization of the objection, and the answer to it miss the point. The point is that the current document gives future forest managers unbridled discretion to do what they want with nearly 3/4 of the very large Medicine Bow National Forest for a period of 15 years, insofar as it allows for use of the "full suite of tools" on most of the forest. While appendix A lists admirable attempts to monitor what is going on, there is little that assures that issues identified through monitoring will actually effect what happens in the forest. The lack of a timeline for when what happens where allows a lot of work to be done before the monitoring generates any feedback. The fact that there still is no timeline or limit on the number of acres that can be clearcut in any given period makes the worry that commercial pressures will lead to front-loading much of the work very real. To make work contingent on staffing and funding is not at all to assure that the results of the monitoring will influence and constrain what is to be done.

It is worth remembering that some of us are literally your next door neighbors. I too want to make long-term plans. Do I want to continue to work on my cabin and keep it fire safe or will my neighbor, the Forest Service clearcut around me making the cabin no longer a place to spend my time? The range of answers is

unconstrained by anything in this document. To the extent that the document considers the interests of people like me who go out there to fish and be relatively secluded in a natural environment, it is in the form of a worry that dead trees might put me and others like me at risk of injury. And this is then used in the document to justify government subsidies for commercial timber harvest. That's more than a little ironic when it is already a stretch to characterize my initial concern as being about the economics of the project. I'm not against reasonable work to mitigate fire danger, but this proposal does not limit how much can be cut even in areas designated as recreational.

Stepping back, this project looks like an end run around the processes required by the National Environmental Policy Act which mandates Environmental Impact Statements. It is just impossible to predict the environmental impacts of projects that are so open-ended. The point of environmental impact statements is to make meaningful comparisons between relatively concrete options. The long timeline and the lack of specificity combine here to prevent just that.

Finally, I would like to note that it might not be a good time to solicit public comment since a number of us have only a limited ability to attend hearings since there are COVID-related travel restrictions in force. Perhaps some delay would be prudent.

Thank you for your consideration.

Sincerely,

Mark van Roojen