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Comments: I strongly oppose the Modified FEIS for the Medicine Bow National Forest for the Landscape Vegetation Analysis Project (LaVA). Setting aside the consistent and pervasive violations of the NEPA process that led to this document, there are six crucial shortcomings.

First, the MFEIS violates the NEPA process.

Second, the MFEIS fails to take into account the impact climate change will have on water resources in the project area. Declining water resources will negatively impact forest regeneration, and there is peer reviewed science which supports this, including a critical study cited in the MFEIS but not taken into account. 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.

Third, the MFEIS plans for up to 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. The Medicine Bow National Forest is already the most heavily roaded forest in the Forest Service system.

Fourth, what will be the economic costs of the LaVA Project? This is not fully addressed in the MFEIS, but the public has an absolute right to know this. What is the Forest Service hiding and why? This is totally unacceptable.

Fifth, the supposedly 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).

Sixth, 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. Managing national forests is not, and has never been, agriculture. The national forests are not crops, but are complex ecosystems of flora, fauna, minerals, and other parts. The mission of the Forest Service is to sustain all parts of the national forests for multiple uses and users.

Seventh, LaVA is 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.