Data Submitted (UTC 11): 5/9/2020 9:13:10 PM
First name: Bern
Last name: Hinckley
Organization: Hinckley Consulting
Title:
Comments: Dear Ms. Martin,

My basic objection to the Reissued Draft Record of Decision is the same as to its previous version. I do not feel the proposal upon which you are inviting comment is a coherent "project" consistent with the spirit (perhaps even the letter) of the National Environmental Policy Act. Rather, it is a concept, a generalized program of activity, under which a broad range of individual federal actions will be taken, each of which, presumably, eventually, will be well-bounded with respect to size, location, timing, actions, etc. And each of which will generate specific environmental impacts as a function of those specific parameters.

Is a "project" that proposes unspecified levels of logging on 260,000 acres and construction of 600 unspecified miles of roads, conceptually different from simply proposing to have the US Forest Service manage the National Forests as it thinks best? Maybe there's a case to be made for the latter - I have no doubt that the Forest Service employs experts of high caliber and deep commitment to their mission and to implementations of best practices - but it is inconsistent with the requirements of NEPA.

In the same vein, I do not feel the Record of Decision fairly accounts available alternatives. The reasonable alternative to the LaVA project is not "do nothing". It is to articulate and evaluate specific federal actions to meet forest objectives and to expose those well-bounded projects to NEPA analysis.

- Bern Hinckley