

Data Submitted (UTC 11): 4/4/2022 6:59:51 PM

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Comments: I object to the proposed Willow Creek Land Exchange. The Forest Service has not conducted adequate analysis of the proposed land exchange to satisfy the requirements of NEPA. The Federal parcel proposed to be exchanged so that it may be developed is located in a sensitive wilderness area. The exchange of the Federal parcel, along with any development and constructed access to the Federal parcel, may cause irreparable harm to the environment.

The Notice of Proposed Action states the "purpose and need" for the proposed action is to acquire lands that are of high resource value and serve public objectives. However, the Forest Service has alternative methods for acquiring the non-Federal parcel, such as a direct purchase, without the need for conveying the Federal parcel to a private party. These other alternatives must be fully, fairly, and adequately considered and pursued before the proposed land exchange is considered. It is unclear whether the Forest Service has pursued any other alternative. Also, the Federal parcel is, in its current condition, of high resource value and serves public objectives; the transfer of the Federal parcel to a private party would be contrary to the stated purpose and need.

The Federal parcel contains a number of perennial and ephemeral streams and tributaries and sensitive wetland areas. The Federal parcel also provides habitat for various wildlife and aquatic life, which may include a number of threatened or endangered species such as varieties of owls and other birds, native trout, lynx and others. The Forest Service has not conducted adequate surveys and study to determine the potential impacts of the proposed exchange. NEPA and the Endangered Species Act require the Forest Service to investigate all reasonably foreseeable direct and indirect impacts of exchanging and developing the Federal parcel. Delaying such surveys and analyses until after the property is exchanged and becomes private property may obviate the federal requirement that such surveys and analyses be completed. The Forest Service cannot exchange this land to avoid the environmental study requirements imposed by NEPA without violating NEPA.

In addition to the foregoing, NEPA requires the Forest Service to assess the potential impacts to water resources, archaeological, cultural and historical resources, and visual resources, as well as all indirect and cumulative impacts of and mitigation needed for the proposed action.

NEPA requires the Forest Service to conduct an Environmental Assessment, and likely an Environmental Impact Study, regarding the proposed Willow Creek Land Exchange.