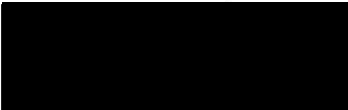


Mark van Roojen



May 15, 2019

Russell M. Bacon, Forest Supervisor
Medicine Bow-Routt National Forests and Thunder Basin National Grassland
USDA Forest Service, Region 2
Rocky Mountain Region, Attn.: Objection Reviewing Officer
1617 Cole Boulevard, Building 17
Golden, CO 80401

Re: Medicine Bow Landscape Vegetation
Analysis Project (LAVA Project)

Dear Reviewing Officials,

Last year I sent brief comments on the first version of the environmental impact statement and I was recently notified that you had produced a revised version of the EIS along with responses to comments including my own. Thank you for reading and responding to my comments. I also recently found out I am entitled to respond to those comments if I wish. I do still want to register my objection pursuant to 36 CFR 218.

The first response to my comment (found at 806.05: Project Timeline – Modified Proposed Action), which in fact quotes that comment, doesn't seem to me to address the issue of the project time-line which I specifically raised in my letter. The response talks a lot about a planning and monitoring process, but the worry was that concerns to harvest commercial timber would cause the project to be front-loaded with most of the work done in the early part of the 15 year period. The response focuses mostly on the adaptive planning process and monitoring. Such processes can be carried out more or less well and rushing to implement them would tend to make for less well-done implementation. Monitoring can of course give us information about whether work that has been done had good or bad effects. But it cannot undo those effects, and if enough of the work is already done those effects might be quite extensive.

Neither the response, nor the attachment to Appendix A, nor Chapter 2 of the EIS which the response references told me about the schedule for the proposed work over the course of the 15 years of the project. Perhaps there is something I missed - it is a difficult document to digest - but I could not find anything to rule out the possibility that there will be a rush to capture the commercial value of the standing dead trees before they become too degraded to sell. And the emphasis throughout the document on the value of commercial timber reinforces the worry.

This response to my comment also emphasizes the consultative nature of the planning process, I

guess as a response to worries about moving too fast without sufficient regard for competing values. I guess I think the process of approving the plan itself somewhat undermines those claims. As I noted in my original letter, I only had time to write a hasty last minute comment because I discovered the proposed action plan on the internet. My land borders the Medicine Bow National Forest. I am literally a next door neighbor to the Medicine Bow National Forest. The maps in the EIS clearly show an inholding in the National Forest where I have my cabin, so that can't be unknown to the USF. Ownership records are readily available through the county assessor's office and these would have told you my mailing address. And yet I was sent no notice about the LaVA project. That doesn't inspire confidence that the MSNF will "manage National Forest System lands adjacent to private lands to build and maintain cooperative relationships between landowners and other governments with jurisdiction."

Relatedly, there is very little detail anywhere in this plan about what is actually going to happen in the area of my cabin. While the new maps, noted in the first response to my comments, do tell me that the area will be managed for recreation, this seems to place little limit on what might actually happen there as the full suite of tools is available just as it is for those areas where commercial logging will be prioritized. My letter mentioned some areas in the general vicinity of Battle Pass and near my cabin that seemed inappropriate for commercial logging and which could still be protected in less invasive ways. The maps don't tell me what is going to happen in that area. To me this emphasizes my original worry. In the haste to allow increased commercial logging in the national forest, the EIS skips over the kind of careful planning and analysis that should happen before any such increase could be justified.

The second response where my comment is mentioned (found in 811.03: Cost/Benefit Analysis – Economics) seems also to miss my point. It was not so much that logging won't pay for itself – although apparently that is true given what the response says – but that other competing values won't be weighed sufficiently in the rush to capture as much of the commercial value of the wood as possible. That there are other non-monetized benefits to the plan does not show that benefits to those who enjoy the outdoors in a relatively unclearcut state won't be ignored. In fact the somewhat quick nature of the response – which also seems to miss the main point of the comment it quotes at the start of that section – demonstrates my point. Furthermore, the reference there to "targeted" treatments as cost effective ways to reduce fire fighting costs underlines one of the main unaddressed points in my letter – that there are more effective and less disruptive ways to reduce fire danger than clearcutting large swathes of forest as the current proposal seems to countenance.

Thank you for your consideration.

Sincerely,



Mark van Roojen

Digitally signed by Mark van
Roojen
Date: 2019.05.15 17:22:49
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