

# Howard Hallman

## Comments on USFS Lakeview Project

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May 23, 2025

I start by saying how much I appreciate USFS service locally and in the region, and the willingness of its employees to engage and take into careful consideration the knowledge of local stakeholders. As I previously stated in my March 28, 2024 comments, I generally agree with the purposes of the Lakeview Project (“Project”)

1. Improve forest resilience to disturbances by maintaining or enhancing species, age class and structural diversity within the spruce-fir cover type.
2. Strengthen the effectiveness of an identified POD boundary along the ridgeline between Eagle and Summit County.

Following are my replies and comments regarding the April, 2025 Environmental Assessment and the USFS Response to my March 28, 2024 comments.

### **LAKEVIEW PROJECT ENVIRONMENTAL ASSESSMENT**

The Environmental Assessment is well crafted, professional and generally thorough with the exception of several important areas of inquiry critical to an Environmental Assessment which are incomplete or missing. (Items A through E below.)

- A. Notably, there is inadequate investigation as to whether the project is necessary or a wise use of limited USFS funding and personnel. **Is the Lakeview Project necessary?**
- B. Further, there is **no cost benefit analysis** as to whether the Lakeview Project is worth the cost.

### **USFS RESPONSES TO HALLMAN'S MARCH 28, 2024 COMMENTS**

#### **C. Cumulative Effects**

*"There is an area just north of the proposed actions that was treated between 2014 and 2018. Those units were mostly clearcut and some thinning. There are likely more past actions in the area. An analysis of the cumulative effects should be included in the environmental analysis. The proposed project combined with the other similar planned and implemented Dillon Ranger District projects, could create a concern for direct, indirect, and cumulative effects on climate, water quality, wildlife habitat, forest ecology, visual and environmental values in the Heeney, Green Mountain Reservoir, and north Eagles Nest Wilderness area.*

*This proposed project covers an area of approximately 3,400 acres on the flanks of the Gore Range about 5 miles west of Heeney, in an area of potentially high visual impact.*

*Most of the area to be treated is live spruce-fir forest of various sizes and ages. According to our reading of the NOPA, the Project area is currently age and structurally diverse, but could be lacking in species diversity.", Hallman, March 28, 2024*

Despite Pages 13-50 of the Environmental Assessment being cited in the USFS response to the issue, there is no analysis of cumulative effects on the surrounding forest area beyond the boundaries of the project, only a brief speculation about future projects in the area.

*"Cumulative Effects of the Proposed Action*

*At this time, there are no foreseeable federal actions planned within the analysis area. Since there are no anticipated foreseeable projects in the analysis area, the cumulative effects are the same as the direct and indirect effects listed above.", USFS Response.*

Similar statements are repeated multiple times in the Environmental Assessment, without benefit of data or research in support of the USFS claim. Yet, the proposed Lakeview Project treatments can and will have an impact on surrounding and nearby USFS managed forest lands as well as forest lands owned and managed by other agencies or private owners.

**The Environmental Assessment is incomplete in that the Cumulative Effects were never analyzed and therefore there is insufficient basis to claim the "threshold of significance" was not reached.**

#### **D. Subsurface Forest Ecosystems**

*"The subsurface/soil forest ecosystem is an important component of forest health as well as carbon sequestration. An evaluation of the Project impacts on the subsurface forest ecosystem is requested.", Hallman, March 28, 2024.*

*"Project effects to soils was analyzed as in the EA as Issue #7 (EA pgs. 25-27) and effects to carbon sequestration was analyzed in the EA as Issue #21 (EA pgs. 45-47)", USFS Response.*

A careful reading of Pages 25-27 shows that while there is discussion of soil types, erosion control, compaction and other physical measures, pre and post treatment; there is NO evaluation (nor mention) of Project impact on existing or future subsurface forest ecosystems. The subsurface ecosystem is critical to re-establishment of a resilient future forest in areas logged, and should be taken into consideration. This was not done the Environmental Assessment.

**The Environmental Assessment is incomplete in that Project impact on present or future Subsurface Forest Ecosystems was never analyzed and there is insufficient basis to claim the "threshold of significance" was not reached.**

### **E. Old Growth**

The leaving of 10% - 20% Old Growth while in compliance with USFS regulations is inadequate to protect the environmental character and habitat of the Lakeview Project Old Growth stands. I request at least 30%-40% of the Old Growth be left in place

I very much appreciate this opportunity of comment on the Proposed Lakeview Project.

Respectfully,

A handwritten signature in blue ink, appearing to read 'H. Hallman', with a stylized flourish at the end.

Howard Hallman