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Title:
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I, Howard Hallman (Hallman) generally agree with the purposes of the Lakeview Project ([ldquo]Project[rdquo])

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.

The following are the FHTF comments on the Notice of Proposed Action (NOPA).

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.

General

1. Improved resilience against future forest disturbances is listed as one of the two purposes. Threat of spruce budworm and spruce beetle mortality are identified as threats. The environmental analysis should disclose specific forest research as to how the treatments will improve the resilience of this area of the forest to spruce budworm and spruce beetle, as well as other insects and disturbances, versus no action.

2. 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.

3. Strengthened effectiveness of an identified POD boundary between Eagle and Summit Counties is listed as the other Project purpose. I recognize that a strengthened POD boundary can be important to reducing the impacts and possible extent of catastrophic wildfires in the Heeney area. However, removal of primarily live trees will reduce sequestered carbon and carbon sequestration potential for decades. I request a quantification of the short and midterm Project impacts on carbon sequestration and sequestration potential. I further request an evaluation of potential sites in the area where lost carbon sequestration potential at the Project site could be offset by tree planting and other forest stimulation methods.

4. A significant, if not primary, cause of the increased severity and occurrence of wildfires is climate change, which has led to hotter temperatures and prolonged droughts. Removal of existing tree cover reduces woody

biomass in the short-term decreasing carbon sequestration potential. I understand that there is a trade-off between forest treatments removing carbon in the short-term and improving forest resilience in the longer-term. There are established carbon accounting methods to quantify carbon release and carbon sequestration impacts. Data from the U.S. Forest Service Forest Inventory and Analysis (FIA) Program could be a beginning point for carbon storage/carbon sequestration evaluation. I would request a carbon accounting of all the specific actions, including slash burning, and the uses of wood leaving the forest. In addition, I request a total project accounting comparing carbon sequestration potential if the project were not performed with carbon sequestration potential of the project as proposed. Removal of tree cover over larger areas also increases summer-time surface temperatures, drying slash and vegetation and potentially increasing fire ignitions. A quantification of the short and mid-term impacts on carbon sequestration and carbon sequestration potential is requested and could include a probability factor for loss of sequestered carbon and carbon sequestration potential through catastrophic wildfire.

Prescriptions and Treatments

5. The NOPA is lacking in specifics regarding POD/forest boundary treatments. Feathering and/or creating irregular POD treatment boundaries in a manner that mimics [ldquo]natural conditions[rdquo] will increase landscape diversity, improve visual and esthetic values, improve wildlife habitat and the recreational experience. A feathering and irregular boundary prescription is requested for POD treatment areas.

6. A documenting of total live tree ton removal and percentage live tree ton/total tree ton removal by area is requested.

7. The carbon that is sequestered in trees removed during the treatments is an important part of the short- and long-term carbon footprint of the Project. I request that the fate of those trees be disclosed.

8. There number of downed trees in the Project area is extensive. This is a concern for fuels as well as other issues. How will those be used, removed or avoided? I suggest specific contractor requirements such as remove or chip, for reducing the quantity of down trees and woody materials in treatment areas.

9. The NOPA does not include specific criteria for identifying and documenting Old Growth in the Project Area. I request that Old Growth determination criteria be included in future Project documents along with a mapping overlay showing locations of Old Growth stands.

10. The project location is in a high value tourist and recreational experience area. There are potential visual impacts of the project on Heeney, Green Mountain Reservoir, Eagles Nest Wilderness area. A Project visual impact analysis is requested.

Regeneration and management

11. Large treatments by their nature disturb soils and can promote outbreaks of noxious weeds and invasive species. The recreational use in this area provides a vector for introduction and spread of noxious and invasive weeds. I request a project-specific plan with Project funding to mitigate these outbreaks.

12. The NOPA states that invasive weeds will be monitored and treated. More specific information would be helpful. How will this happen? There needs to be money budgeted to make this happen. We are fortunate to have numerous volunteer nonprofits with hundreds of volunteers doing weed eradication work on USFS lands here in Summit County, but they are overwhelmed with the current tasks and constant regrowth of invasive weeds. There is concern that this project will create more acres of weeds if not treated properly.

13. The Project is in the wolf reintroduction release zone. Has the USFS consulted with Colorado Parks and

Wildlife to analysis the impact of the Project on wolf reintroduction success in the Lower Blue River Valley. Will the Project cause wolf populations to migrate away from the Project area into ranchlands?

14. Can the Project include money for berms and other methods of restricting RV and trailer access beyond the POD treatment areas?

15. In response to changing climate conditions and for the sake of increased species diversity, I suggest the introduction of lodgepole pine and aspen in strategic locations where the introduction of alternative species is likely to succeed.

16. I suggest design elements for road safety be incorporated into the Project to include the avoidance of blowdown on roads during high wind events.

I request a long-term site-specific vegetation maintenance plan be created to keep vegetation densities at optimum levels for fuel loading, species and age diversity, ecological, visual, and 4 esthetic values. Can the Project area be mapped using drones to identify and confirm detailed soil and moisture conditions to inform the site-specific vegetation maintenance plan? Are there Project funds to do this?

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

Respectfully,

Howard Hallman