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Comments: Lakeview Objection

I object to the proposed Lakeview Project, its stated need and objectives, its proposed actions, the decision to proceed with the plan and the finding of no significant impact. The project proposal is ill-conceived, has little prospect to achieve what it does seek, and should be reconsidered. Its objectives and impacts violate the spirit and letter of the National Forest Service mission, the National Environmental Policy Act and sound government operation; a full environmental impact analysis is necessary. The selected alternative makes only a modest change to the original proposal, otherwise totally ignoring public comments.

The Lakeview proposal skipped the standard draft environmental assessment stage. The "Notice of Proposed Action" was similar in detail to a scoping notice, posted in a scoping folder and never stated that no draft EA would be prepared. Without meaningful detail on the project, only general comments were possible and a subsequent opportunity to make more detailed comments should have been provided when the normal draft EA was released, if the project was pursued further. The NOPA was general in nature and didn't provide enough detail and discussion to clearly explain what was being proposed and what the impacts of the proposed treatment would be. Indeed, when the environmental assessment (not draft) was made available it included a plethora of information about the proposal and the assumptions and methodology behind it, including false assertions and serious omissions that cried out for comment. Such a procedure greatly subverts the public information and opportunity-to-participate process, could set or further a terrible precedent.

The proposal's public involvement process was also inadequate. The public open house format (one staff person with a map in the District Office for two hours) used for the only "public meeting" precluded any citizens from hearing what other citizens wanted to know about or had to say. I never saw any newspaper story or other media coverage. This minimal outreach, combined with the foreshortened document process resulted in only five parties-one a pro-forma endorsement from the state forest service and another from a Forest Service-collaborative organization-commenting. This is clearly insufficient and inappropriate for a major project on public lands and as a result a new public outreach effort and comment period be undertaken with the now-available EA treated as a draft EA.

Following this abbreviated document, public outreach and comment opportunity process, the draft decision notice directed that "issues raised in objections must be based on previously submitted timely, specific written comments regarding the project." This is a clearly inappropriate restriction under the circumstances, particularly as mentioned, the EA contains substantial new information not contained in the NOPA. I assert my right to comment on and object to issues raised by the EA and demand that others be afforded the same opportunity.

One stated purpose of the Lakeview Project proposal is to "increase the amount of forest maintained in a healthy condition with reduced risk and damage from insects and disease." and to do so by "maintaining or enhancing species, age class and structural diversity." EA (p. 1-2).. Both the NOPA and the EA, however, state that 89% of the forest in the project area is Engelmann spruce-subalpine fir cover type (73% of the area of which 82% is forested). As I stated in my scoping comments, such spruce/fir forest is the climax vegetation for this alpine project area. As such, the shade-tolerant spruce and fir are naturally regenerating. They form a stable, naturally age- and species-diverse climax ecosystem. The EA (p. 1, 13) describes spruce-fir as follows:

"Engelmann spruce-subalpine fir (spruce-fir) cover type is the most widely represented, comprising approximately 73% of the area. Species composition within stands is varied, with some areas growing in relatively pure stands while others contain a greater species mix. Both even-aged and uneven-aged forest structure is represented

within this cover type.

Engelmann spruce (*Picea engelmannii*) is a shade tolerant and slow growing species with a long-life span; dominant trees are often 250 - 400 years old. Subalpine fir (*Abies lasiocarpa*) is a shade tolerant and fast-growing species with a shorter life span, often reaching senescence between 120 - 140 years (Burns and Honkala 1990). The differing life history strategies enable spruce-fir forests to develop into dense and multi layered stands. As these forests age and density increases, the understory becomes shaded and accessible light limits grass and shrub establishment. Subalpine fir possess a greater degree of shade tolerance than Engelmann spruce which enables it to regenerate more prolifically in the understory. The longer-lived Engelmann spruce typically persists into the overstory as dominant trees. The analysis area is representative of these dynamics as shown in Table 4."

Sounds-and is-pretty great; what few stands of old-growth climax forest can be found in Summit County are a true joy to experience. As I stated in my scoping comments, it would be virtually impossible to improve upon the species-, age-class- and structural-diversity of this forest ecosystem community that has developed over millennia; certainly not by "removing 25-30% of the stand's basal area and creating "....openings one-half to two acres in size..... where all trees greater than 5 inches DBH would be removed." (page 4, NOPA) The EA and FONSI, however, baselessly persist in proposing to improve upon nature.

As described above, spruce-fir climax vegetation is highly diverse in age as well as species (also including aspen and lodgepole and a rich variety of understory flora) and thereby naturally resistant to diseases and insect infestations that can far more heavily impact monoculture forest stands such as lodgepole or predominantly spruce stands. While only mentioned in passing in the NOPA, spruce beetles (and to a lesser extent, spruce budworm; both constant, natural elements of the ecosystem) are the alleged risk of concern according to the EA. The EA's fear mongering about spruce beetles is largely on page 15. Here it cites that the White River Forest had a spruce beetle epidemic in the 1950's and a more recent "indicated increase in spruce budworm activity" (stated elsewhere to be minor, NOPA p. 3); but fails to say whether any of that was in the project area/Summit County/Dillon District-to my knowledge it wasn't. It also cites "...a medium risk for a spruce beetle outbreak[hellip]" according to a model that appears to be based on how much spruce is there. (As a stable multi-species climax, the relative proportion of spruce and fir in spruce-fir forest would be in a natural equilibrium developed over the millenia. Spruce beetle infestations would cause the proportion of fir to increase making the stand less attractive to the beetles, reducing their presence and leading to an increase in spruce.) In a clear case of killing the patient/cutting down the trees to keep him/them from getting sick, it then concludes: "Uncertainty exists with the timing of when a beetle epidemic may occur, however preemptive action may help improve forest resilience in the face of such disturbances."

As to anything that might actually reduce spruce beetle infestation risk, a Colorado State Forest "Quick Guide" (FM 2014-1),(attached) says that spruce beetles normally only inhabit downed trees (and removal of downed trees is one of the recommended best ways to control spruce beetles) and at epidemic stages (which occur only at long intervals), preferentially attack large-diameter (>16" older, weaker) trees. The planned treatment outlined in the EA, however, calls for selectively removing mid-diameter (5-12") trees (commercial thin treatments; other treatments, unspecified, p. 6) and the EA and "Response to Comments" table (p. 7) specifically say downed trees would at most be incidentally removed. There is no legitimate basis to remove either large-diameter or downed trees, but consciously ignoring the generally recommended best ways to try to control spruce beetles makes it highly unlikely that the proposed treatments would be at all effective in meeting this main espoused objective of the proposal. It also calls into question whether, like risk of high-severity fire, this main stated objective is at all genuine. The EA totally fails to discuss the effectiveness of other methods to suppress spruce beetles or to assess likely success or effectiveness of the project proposal in doing so. As a result the proposal should be dropped or delayed until evidence can be presented to support an adequate design to meet the purported objectives (which were not made clear in the NOPA). In short, the EA fails to provide a meaningful assessment in light of the stated purpose.

The second stated purpose of the Lakeview proposal is to "strengthen the potential effectiveness" of so-called "Potential Operational Delineations" (POD) along forest roads along a ridgeline. I'm glad to hear that this football-field-length-wide swath along the roads will not be a clearcut pipeline of flammable grass and weeds to rapidly spread fire throughout the area, the impression that I got from the NOPA. The Response to Comments table says that "No clearcutting is proposed in the Lakeview Project," and p. 40 of the EA says that "Under the proposed action, no grass fuel types are expected to be present within treatment units in the short term." But the proposed group selection treatments of up to 2 acres meet the definition of clearcuts. I would certainly expect them to revegetate initially as grasses and weeds to serve as likely fire ignition spots scattered throughout the project area rather than linear fire-spreading ones. These impacts were not addressed in the EA, warranting additional assessment.

Not clearcutting along the POD does, however, bring to question whether such a treatment would have any effectiveness at all towards its stated objective. It's very hard to see how removing a third of the "basal area," primarily in the form of mid-diameter (so presumably mid-height) trees could create an effective "control feature" that would be of any help in the event of a fire. Fire would not be likely to spread any slower across the "thinned" swath, especially in a high-wind-event fire as the POD concept is supposed to address. On the contrary, removing mid-height foliage would likely allow wind to blow stronger through the stand, especially across a ridgeline. Similarly, such thinning would not seem likely to allow firefighters or fire-fighting equipment any easier access to the area or ability to use it as a staging area. Again, there is no legitimate basis for greater tree removal, but it's hard to see how the proposed treatments would be at all effective in furthering the espoused objective. The EA fails to discuss the effectiveness of possible efforts to create a barrier to large fires from crossing a ridgeline or to assess the likely success of the project proposal in doing so. As such, the EA fails to meet its objectives (that were not made clear in the NOPA) and fails to provide a meaningful impact assessment.

The EA and FONSI fail to present a project plan likely to effectively address its stated needs. Rather, it appears as a make-work project that fits the current focus of "waste, fraud and abuse" by government agencies that should be eliminated.

In my scoping comments, I urged that the substantial spruce/fir portion of the proposal be considered as "old growth" and put on hold until completion of a then ongoing Forest Service old-growth study and development of policy for it. Old-growth climax forest stands are so special that they should all be considered sacrosanct. The Figure 6 map on p. 17 of the EA (obviously not available in the NOPA) indicates substantial mapped old-growth forest in the proposal area and p. 15 acknowledges that "Over the long-term, stands classified in mature condition class (4A, 4B, and 4C)* may reach the age and structural requirements to be defined as old growth forest." [*totals 62.5% of the "analysis area"] Thus, the project proposal area may be one of the most old-growth-forest-rich areas of Summit County/Dillon Ranger District. The EA fails to examine whether that project area might indeed be a very special area within the local region. This glaring omission undermines the EA analysis and requires detailed review..

Instead of a supportable analysis of impacts to old growth, the EA instead relies on unexplained and unmapped "Late Successional Analysis Areas" in the White River National Forest Plan and hews to the absolute minimum standard of an appendix of that Forest Plan of maintaining 10% old-growth spruce-fir within each LSAA. There is no analysis of the impacts of retaining only 10% old-growth for the areas affected by this project. The EA must assess the impacts to these most biologically rich and ecologically important forest stands remaining in the regional forest-wide and local county/district areas. The project proposal and the EA fail to consider these impacts. The EA also fails to assess the proposal's likely impact on preventing "mature condition" stands from possibly attaining old-growth status. No explanation is given how the absurdly low 10% standard for old-growth maintenance was arrived at or whether local areas should be allowed to instead set a higher goal. Termination of the old growth study (subsequent to the project proposal development) does not dictate destroying old growth stands or condone ignoring or minimizing their value.

The EA and Response to Comments table say that small-scale natural disturbances are occurring in the project area forest and then go on repeatedly to claim that proposed silviculture prescriptions seek to mimic these events. The EA does not demonstrate the effectiveness of attempting to mimic something that is already happening naturally-and has successfully occurred for millennia. The project and the EA analysis failed to justify this unneeded make-work.

The EA's description of the proposed project includes significant future harvesting activities for which the EA fails to provide analysis. For example, the project includes: "Continued maintenance of the POD boundary would occur periodically as spruce and fir trees can regenerate in partially shaded environments."; road construction and obliteration; regeneration surveys and fill-in planting (of cut down areas); Road Reconstruction, Reconditioning, and Maintenance; decommissioning previously built logging roads; collecting funds for "future use in improving existing structures and other natural resources within sale boundaries," invasive weed treatment, cone collection (p. 9-11) and other cases of digging holes to fill them in. The EA does not assess the impacts of these future activities. Further, none of this would be needed now or in the future if the beautiful, stable, climax spruce-fir forest was just left to maintain itself as it has for millennia. The result is an inadequate EA impacts analysis to justify wasteful spending of taxpayer dollars to degrade their public forests and public lands.

My scoping comments addressed the lack of analysis as to the net energy balance of the project and what the carbon emissions of transportation of timber, slash, equipment, etc would be. The EA sections on air quality, climate change and carbon sequestration failed to address these necessary components.

My scoping comments addressed the lack of information about financial costs and benefits of the project. The EA and FONSI fail to address this lack of responsible information for taxpayers.

The EA's assessments of wildlife impacts amount to: "we've already driven them away, so what more we do won't matter" or "they'll go elsewhere." The botany section fails to address the value of, and impacts to, not officially endangered flowers, mushrooms and other plants, including to recreational users, or to plan to avoid past agency actions such as building a burn pile on top of one of the county's most reliable orchid patches.

The fire and fuels portion of the EA is a jumble of obfuscating models and classifications that lay persons (and maybe agency staff) are highly unlikely to be able to decipher, all designed to convey that the proposal would reduce fire risk-stated elsewhere not to be a project purpose. It is all, in turn, based on the idea that "flame length" is the primary measure of fire risk. Flame length, however, is not the best measure of wildfire risk to development or surrounding forest. As tragically evidenced by the recent Marshall, Colorado; Maui, Hawaii; and Texas Panhandle fires; the speed of spread of fire (especially through grassy or shrubby vegetation) is likely a far more important parameter. The EA fails to assess speed of fire spread or any other parameter. It also totally ignores the common sense observation that, if the project area is largely climax spruce-fir and that much of it has reached old-growth status, the spruce-fir ecosystem is likely highly fire-resistant and probably can't be improved upon in that regard. I object to the continued use of the threat of fire to distract public attention away from forest degradation and the use of likely faulty or misleading measures to assert that risk. (See attached editorial text "Forest Fire Facts.")

The project proposal basically calls for a 30% basal area reduction of trees on 2900 acres. The EA's often convoluted or large-region-diluted analyses of impacts never address the common sense approximations that this would have a wide range of impacts of about that magnitude. These include reduced carbon dioxide intake, oxygen release and subsurface fungal network carbon sequestration; increased sublimation, local heat island impact, soil heating and drying, and numerous other effects such extensive tree cover reduction would have. In my scoping comments, I asserted that this would certainly have major environmental impacts and requires an environmental impact statement. I reiterate that recommendation now as the revised project and EA made no

effort whatsoever to respond to this general impact expectation. The use of unexplained models, as well as artificial indices for values such as recreation and scenery, constant use of acronyms, and other technical devices seem to constitute a deliberate bureaucratic effort to obfuscate the facts of the proposal and its impacts. The EA fails to provide the public with an easily comprehended, useful document for understanding what the proposal would do and what impacts it would have.