Data Submitted (UTC 11): 3/23/2024 9:54:14 PM
First name: Howard
Last name: Brown
Organization:
Title:
Comments: The project scoping notice letter for the Lakeview Project asks that comments be specific to the proposal. Unfortunately, it is actually different from other recent projects that used the wrongheaded excuse of beetle-impacted lodgepole pine to prevent those stands from morphing into more natural and desirable Engelmann spruce-subalpine fir stands. The Lakeview proposal seeks to attack existing mature, healthy, possibly old-growth spruce/fir forest. ("approximately 73% of the area" ... "Spruce/fir stands are mostly mature" page 1; ..."defoliation caused by western spruce budworm is currently minor," ....page 3)

The first stated purpose for doing this is "maintaining or enhancing species, age class and structural diversity." But, because shade-tolerant spruce and fir are naturally regenerating, they form a stable, naturally age- and species-diverse climax ecosystem. It would be virtually impossible to improve upon 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)

The second stated purpose, a bureaucratic gobbledygook that I think means clearcutting a more-than-400-foot-wide swath along two forest roads for fire fighting, is a two-edged sword. On the one hand, these could provide useful staging areas for firefighters and possibly helpful fire-breaks for low-intensity fires (though likely of very limited value in the event of a high-wind, high intensity fire). On the other hand, as has become all too evident from the Marshall, Maui, Texas Panhandle and other recent catastrophic fires, the most serious fire threat comes from easily ignited grass fires fueled by wind events. A 400-foot wide network of swaths of grass and weeds could also be a highly flammable conduit to rapidly spread fire throughout the forest.

As a cross-country skier, I am also acutely aware of another problem with the "POD" proposal. Summit County's many old mining and logging roads are great for recreational access to forest lands. But their value is dramatically diminished if they are not actually immediately lined with forest. As with larger clearcuts, treeless corridors along roads and trails expose the snow and the skiers. The snow quickly becomes sun- and wind-crusted, sticky or slushy. Windblown tracks quickly disappear and skiers and snowshoers are exposed to winter winds and blizzards from which the forests previously provided shelter. With the razing of the forest along the Peaks, Gold Hill and other traditionally favorite ski trails, it is becoming increasingly difficult to find ski and snowshoe trails "in the trees." Summer hikers and mountain bikers--as well as the soil, flora and fauna--are also variously exposed to blazing sun or thunderstorms.

This is an ill-advised proposal that could possibly set a bad precedent of logging climax ecosystem spruce/fir, which should be treated as inviolable. The proposal should be reconsidered. It would certainly have major environmental impacts and requires an environmental impact statement.