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First name: Izzy

Last name: Chavira

Organization:

Title:

Comments: While I agree with the need to develop a long-term solution for maintenance of the Lost Lake area, I believe that the current proposal for a late successional reserve acreage swap at Lost Lake is lacking key information and should be withdrawn and reevaluated through a more transparent process.

The details around how the proposed trade-in areas were selected leaves much to be desired. I would like there to be more transparency around which areas were surveyed and considered for the trade-in parcels of this proposal. The proposal provides data on potential Northern Spotted Owl habitat acreage in the trade-in areas, but gives little to no information on how these numbers were determined. In surveys of the trade-in parcel on Lost Lake Butte done by my peers, and LiDAR maps of the eastern trade-in parcel, it seems apparent that these areas are not ideally set up to develop late-seral characteristics any time soon, if ever. It feels like these trade-in areas were selected due to their lack of ability to be used for logging or other industrialization as opposed to their potential to develop late-seral characteristics. I find the lack of public involvement - particularly from groups who care for and have active involvement within this area - leading up to this proposal concerning. There are many interested parties whose input could've benefitted this proposal by giving insight into selecting more suitable trade-in parcels.

The proposal for an LSR swap feels like a rushed solution. In the Notice of Proposed Action it is stated that "The Forest is currently unable to mitigate the potential for wildfire in the area because tree cutting is limited by the lack of an assessment". Why is an LSR swap being proposed before any LSR assessment has even been attempted? The proposal notes the Bull Run Act and the proximity of LSR #RO-201 to the Bull Run Watershed as the reasoning behind why no LSR assessment has been done on the area, however the proposed trade-in area is not within the Management Unit defined by the Bull Run Act. With the given information, it feels unclear to me why an LSR swap is the only course of action that can be taken to actively manage this area.

Given the above information, I am concerned that pushes from private concessionaires, most namely the Lost Lake Resort, are the driving factors behind this proposed swap, as opposed to the best interest of both the forest and those who recreate at Lost Lake. The proposal mentions "future planning for the Lost Lake Resort" being constrained by the area's current LSR location, but lacks any information around what this "future planning" entails. I understand that the proposal "not include any ground-disturbing activities, such as new recreational uses, infrastructure, or developments," however it's clear that the re-designation of the Lost Lake Resort area from LSR to Administratively Withdrawn would make it easier for future proposed developments to occur. Potential expansion of the Lost Lake Resort is something that needs more transparency as the ecological impacts could affect the overall health of the forest area and consequently the enjoyment of those who recreate there.

Again, I agree that the area surrounding Lost Lake needs to be amended and maintained to support the increase in traffic and usage for recreation, however the proposal as it currently stands lacks enough information to show why this LSR swap is the best solution. I urge the Forest Service to withdraw the current proposal and reevaluate solutions for this area with more transparency and opportunity for public input.