



BOARD OF COUNTY COMMISSIONERS

970.453.3402 ph | 970.453.3535 f
www.SummitCountyCO.gov

208 East Lincoln Ave. | PO Box 68
Breckenridge, CO 80424

US Forest Service
Adam Bianchi, District Ranger
PO Box 620
Silverthorne, CO 80498

Dear Mr. Bianchi,

The Summit County Board of County Commissioners (BOCC) would like to thank you for the opportunity to comment on the Draft Environmental Assessment for the Swan Mountain Project. Reducing community wildfire hazards, improving wildlife habitat, enhancing trail sustainability, and restoring stream connectivity are commendable efforts that require action from all land management agencies in Summit County. We are pleased that the proposed action includes all these elements of holistic resource management. The BOCC would like to provide feedback on the Swan Mountain Project in the following areas:

Treatment Methods – Broadcast Burning - The use of prescribed fire is essential for managing fire dependent ecosystems. However, broadcast burning has not been implemented in Summit County for many years. These operations will occur at different times of year and under different conditions than what residents have become accustomed to during pile burning operations. Considering this, public information and communications surrounding broadcast burn timing, conditions, and locations will be crucial. The US Forest Service should have explicit communications plans in place for each proposed broadcast burn unit. These plans should include contact lists for relevant smoke receptors; maps showing burn location, neighborhood distances and directions, fire breaks, and control measures; and a list of resources available for the burn operations, contingency plans, and pre-burn public engagement plans. Burn day communications will also be imperative to the success of performing broadcast burns in Summit County to ensure public support and maximize public awareness. Forest Service staff should also emphasize that units will only be burned following overstory removal, which will minimize the risk of escape.

Treatment Methods – Mastication and Chipping – The use of mastication and chipping treatments should be minimized in the project area, as these treatments may reduce tree regeneration to a large extent and germination of lodgepole pine may not occur on the masticated material and wood chips. Additionally, decomposition rates in Summit County are very low and the impacts of these treatments will be very long lasting. County staff have observed regeneration failure up to ten years later at sites on County land where mastication treatments have been utilized in the past. Where this treatment method is utilized, material depths should be minimized. This will reduce the need for fill-in plantings to meet required stocking densities in the future, resulting in lower costs and efforts associated with the project. When possible, materials slated for mastication should be piled with machinery and burned at the landing sites of mechanical treatment units to eliminate the need for mastication treatments and encourage natural lodgepole pine regeneration.

Temporary Roads – T100 and T114 – The proposal states that all temporary roads would be closed to the public while operations are occurring. This is action appropriate in all proposed locations, except for T100 and T114. The closure of portions of the “Aqueduct” and “Red Trail” corridors to public access would eliminate vital connections in the Soda Creek trail system for the duration of the proposed project, which could be several years. County staff have observed successful shared use of roads and trails by non-motorized recreational users and logging operations in the Golden Horseshoe near Breckenridge, utilizing signage, flaggers, and public outreach efforts. Maintaining public access on the existing “Aqueduct” and “Red Trail” corridors

during operations should be considered. Alternatively, temporary closures could be used, as needed, in these locations to minimize impacts to the recreating public.

Furthermore, T100 is proposed only to reduce impacts to the Keystone Ranch neighborhood. The additional natural resource disturbance required to create this temporary road, coupled with a closure of the trail during the project, would have a greater impact on the resources and the public than use of the existing paved road through the neighborhood.

Trail Realignments – The proposed trail realignments included in this project will help protect the resources in the Swan Mountain area and improve user experience on the trail system. In addition to the proposed reroutes shown on the project maps, improvements to the switchbacks on the Colorado/Continental Divide National Scenic Trail to the west of West Ridge should also be considered. This section of the Colorado Trail, like most, is used heavily by both hikers and mountain bikers. The current alignment includes tight switchbacks immediately preceded by high-speed straightaways, resulting in brake bumps and excessive erosion through the corners. Installing speed calming measures such as grade reversals before these tight radius turns, as well as widening the radius of the turns as much as possible, would lead to a more sustainable alignment on this section of trail.

Soda Creek Stream Health Improvements –The BOCC would appreciate the opportunity to review and comment on the design plans for the stream restoration activities in this area. Summit County has previously invited the US Forest Service to review and comment on river restoration designs for the Swan River on County-owned lands adjacent to the National Forest. County staff would value the opportunity to share experience and gain new insights for continuing collaborative stream restoration efforts.

Thank you again for the opportunity to comment on the Draft Environmental Assessment for the Swan Mountain Project. Please reach out to Jordan Mead, Resource Specialist at the Summit County Open Space and Trails Department at (970) 668-4065 or jordan.mead@summitcountyco.gov to address or follow up on these comments from the BOCC.

Sincerely,



Joshua Blanchard
Chair, Summit County Board of County Commissioners