



BOARD OF COUNTY COMMISSIONERS

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May 10, 2023

Adam Bianchi, District Ranger
c/o Kathleen Gray
US Forest Service, Dillon Ranger District
PO Box 620
Silverthorne, CO 80498
Sent via Email To: Kathleen.gray@usda.gov

Regarding: Scoping Notice for Frisco Backyard Fuels and Recreation Project

Dear Mr. Bianchi,

The Summit County Board of County Commissioners (BOCC) appreciates the opportunity to provide comments on the scoping notice for the *Frisco Backyard Fuels and Recreation Project* as the USFS prepares for an Environmental Assessment (EA). The BOCC is supportive of the efforts discussed in the narrative, as wildfire hazard reduction and managed outdoor recreation are County priorities for a healthy forest and community.

Fuels Reduction:

Wildfire fuel reduction is key for forest management in the Wildland Urban Interface (WUI). The 11 zones identified for fuel reduction are generally within the higher priority zones for Wildfire Protection Assessment Value as identified in the Community Wildfire Protection Plan. Furthermore, this project will complement the fuel reduction work already completed along Hwy 9 to the east and in the northern area of the Frisco Backyard.

As this project moves forward, the BOCC suggests the following:

- A review of the map shows large, contiguous swaths of forest proposed for fuel reduction. Future outreach and planning efforts should better communicate the size, scope, and phasing of forest treatments in these zones to avoid public concern that tree removal will occur simultaneously across the entire area designated for potential forest treatments.
- Fuel reduction should occur in phases with the goal of an unevenly aged forest which is more resilient to disease and natural fires. As this project moves forward, information about phasing should be included.
- Once the trails in this area are analyzed and either formalized or obliterated, fuel reduction plans should account for trail management. In consideration of the trail user experience, a vegetative boundary should remain along trails where current cover type and future treatment prescriptions allow.

Trails and Recreation Management:

As discussed in the materials, this area contains a high concentration of user-created trails. Formalization and management of this network will provide benefits to the recreating community as well as the forest ecosystem.

As this project moves forward, the BOCC suggests the following:

- The map included with the review materials is broad in scope. A map exclusively focused on trails with key features such as stream crossings will be helpful for the public to recognize the trails shown on the map. Additionally, a more detailed map of the northern portion of the project area is recommended to

better represent the Recpath and different jurisdictional boundaries around the north side of Ophir Mountain and the Summit Medical Center.

- The County is supportive of these efforts to consider formalization of the user-created trails and enhance the existing, formalized trail network. Goals should balance recreation with forest ecosystem health, minimize habitat fragmentation and wetland impacts, and consider local management capacity. The County is specifically supportive of trails that create neighborhood access and separate user groups, when and as needed on busy sections.
- All trails shown in brown are considered for either construction and maintenance or decommissioning, meaning there is a broad range of outcomes for the user-created trails. Many of these routes are heavily utilized by the Frisco community and public feedback should be considered when determining which segments to retain and improve, and which segments to decommission. Some popular routes include the “switchbacks”, “ring”, and “cabin” loops.
- Summit County is the owner of the Mamie and Lillie Mining Claims on the northwestern portion of the project area where Trail Segment I is shown. The County, as the underlying property owner, should be included in management discussions with respect to this trail segment.
- The County supports the linkage proposed via Segment 24 that will integrate the Frisco Backyard trails with users on the north end of the Upper Blue Basin in unincorporated Summit County. Goal 7.4 of the Summit County Open Space and Trails Master Plan supports the creation of a trail network that connects local and regional trail systems with towns and neighborhoods.
- Segments of the user-created trail network may impact wetlands and wetland buffers presenting potential water quality impacts. The proposed wetland impacts on Federal lands are permitted under the jurisdictional authority of the ACOE. Under Section 404 of the Clean Water Act, the ACOE does not assert jurisdiction over isolated wetlands; however, Summit County has endeavored to protect all wetlands including isolated wetlands. As such, we request that a delineation of isolated wetlands and potential impacts be included for consideration by the USFS. If there are any impacts outside of USFS boundaries, in County jurisdiction, those shall be submitted to Summit County for review.

The Summit County BOCC appreciates the opportunity to comment on this project and express general support for this initiative. We look forward to reviewing plans as this project moves forward. Please reach out to the Open Space and Trails Department directly with any questions or opportunities for partnership.

Sincerely,



Joshua Blanchard

Chair, Summit County Board of County Commissioners