

Howard Hallman

Comments on USFS Frisco Backyard Project Scoping

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The Frisco Backyard Project (“*Project*”) as currently designed, combined with the other planned and implemented similar fuels reduction projects, would create a concern for direct and cumulative effects on climate, recreation, water quality, wildlife habitat, forest ecology and environmental values in the Frisco, Ophir Mountain, National Monument area.

General

1. A significant, if not primary, cause of the increased severity and occurrence of wildfires is climate change, which has led to hotter temperatures and prolonged drought. Therefore, it is critical to maintain or increase forest carbon sequestration both long-term and short-term. Removal of existing tree cover reduces woody biomass, releasing carbon into the atmosphere, and in the short-term decreasing carbon sequestration potential. There are established carbon accounting methods to quantify carbon release and carbon sequestration impacts. Data from the U.S. Forest Service Forest Inventory and Analysis (FIA) Program could be a beginning point for carbon storage/carbon sequestration evaluation. I would request a carbon accounting of all the specific actions, including slash burning, and the uses of wood leaving the forest. In addition, I request a total project accounting comparing carbon sequestration potential if the project were not performed with carbon sequestration potential of the project as proposed. Removal of tree cover over large areas also increases summer-time surface temperatures, drying slash and vegetation and potentially increasing fire ignitions.
2. There are very few homes or other structures located in the project area. While it is technically within the WUI reducing fuels in this area would have less value than reducing fuels closer to homes and the Town of Frisco. It is a high recreational use area for hiking and mountain biking. Reducing fuels in this area is less valuable than other areas located closer to towns or with greater housing density. Arguably, the project area may be generally downwind of Frisco, lessening wildfire hazard mitigation effectiveness. Historical weather data is needed on this issue. As currently written, the proposed Frisco Backyard Project appears to place high value on clear-cutting with less value placed on the removal of dead trees, thinning or strategic fuel break locations as alternative fuel reduction strategies. Forest health should have greater consideration than fuels reduction. Fuels reduction goals can be achieved within the context of forest health

Prescriptions and treatments

3. The fuels treatment actions on 1,233 acres cover the vast majority of the project area and most units share common boundaries. Ten of the 11 treatment units have been identified as clearcut, clearcut with leave trees, patch clearcut, group selection, overstory removal and salvage methods to be considered. The one treatment unit that is not listed with those methods is only 37 acres, so if all the other treatment units were clearcut or other similar methods, the majority of the project area would be cleared of trees. This does not seem consistent with the Camp Hale – Continental Divide National Monument, recreational uses in this area or visual and ecological expectations of the Town of Frisco residents and visitors.
4. “The units are comprised of lodgepole pine, mixed conifer and fir, and aspen cover types. All three vegetation community types exhibit varying levels of mortality from insects, disease, and drought.” However, the proposal does not identify where these forest types are located or the ecological condition of the units. Those conditions and locations require more specific treatments to be identified on the map.
5. Clear cutting is proposed as the majority treatment, with over 1,700 acres. Clear cuts, especially larger areas, create homogeneous areas of lodgepole pine regeneration. These areas can and often are characterized by very dense seedlings that can grow into dog-hair stand structures. I see these dense seedlings after clear cuts in many locations through Summit County. I would request that all clearcut units greater than 20 acres use the patch clear cut prescription. The greatest openings should be limited to 20 acres. The areas between the openings should be selected to contain live trees, preferring aspen, spruce, and fir. Areas of lodgepole pine would also be candidates for leave patches. These leave patches would likely experience some blowdown in future years but would provide some diversity on the landscape which would increase species and age class diversity. Similar clearcutting by settlers and miners 100 plus years ago included the cutting of trees of all species and is a contributing factor in the unhealthy homogeneous dense lodgepole forests that currently exist in many parts of Summit County. We need to learn from the past and promote a more diverse forest landscape.
6. Large mixed conifer (likely spruce, lodgepole pine and others) and fir trees exist in pockets that are likely pre-mining era remnants and younger spruce-fir trees likely exist in locations that are on a successional pathway to either mixed conifer or spruce-fir forest types. These forest types take long periods of time to develop and clear cutting would reset them back to pure lodgepole pine stands. Identifying areas that have old and/or younger spruce-fir trees and buffering them from exposure to wind and providing some shade would increase forest diversity and resilience.
7. I request that an additional alternative be created and assessed. This alternative would have the following features.
 - All clear cut units larger than 20 acres would use the patch clear cut prescription with openings limited to 20 acres. Some of these areas could also use a thinning prescription.

- For areas that are proposed for piling and burning, as much wood and slash as possible would be removed and put to a long-term use to minimize the short-term carbon impact of the project. It could be difficult to determine an efficient method to remove the slash and will likely increase costs, but the value of a better carbon outcome has value.
- Areas that have an aspen component would be the target of conifer removal with the objective to increase aspen on the landscape.
- Identify stream and wetland improvement projects and upland areas that are wetter and could support aspen planting. Aspen is lacking in this area and is a key component in forest diversity. The Nature Conservancy and Summit County recently completed some very successful aspen planting.
- Identify areas with live spruce-fir trees. Create a prescription that retains these areas in a condition that would lead to a mixed conifer or spruce-fir forest type. This could involve retaining dead and live lodgepole pine in and around those trees. I understand that there may be some blow down, but protecting spruce-fir and mixed conifer areas would create more forest type diversity compared to clear cutting these areas.
- Where trees are healthy, I propose that visual buffers with uncut trees be left standing along roads, trails, streams, and lakes. These buffers should have sufficient setbacks to protect recreational users from falling trees and to minimize trail and road closures due to fallen trees. The buffers should be designed to minimize blow-down due to wind.

Regeneration and management

8. Large treatments by their nature disturb soils and can promote outbreaks of noxious weeds and invasive species. The high levels of recreation in this area provide a vector for introduction and spread of noxious and invasive weeds. I request a project-specific plan with project funding to mitigate these outbreaks.
9. I request a long-term site-specific vegetation maintenance plan be created to keep vegetation densities at optimum levels for fuel loading, species and age diversity, ecological and esthetic values.

Respectfully,



Howard Hallman