

Comments regarding the Frisco Backyard Fuels and Recreation Project (the “Proposed Project.”)

The Forest Service and the Town of Frisco (TOF) are proposing this project as a “fuels reduction treatment” on 1,233 acres of forest adjacent to Frisco, with the stated objective being to mitigate wildfire risk and reduce the potential for high intensity wildfire.

The methods for “fuels reduction” are Clearcutting, Clearcut with Leave Trees, Patch Clearcut. Other terms follow, but it is apparent that Clearcut is the predominant treatment planned.

Here in Summit County and throughout the West, everyone is deeply concerned about the dangers of wildfires. We want to prevent or reduce as much as possible the threats to human life, including our firefighters, animal life, forests, and our homes and businesses. But being even more “scared” than we already are is not productive. Instead, I choose to study the up-to-date science regarding effective ways to prevent wildfires and to reduce the spread of wildfires.

1. Based on my studies, I do not agree that clearcutting will reduce the potential of a wildfire igniting or spreading. In fact, clearcutting may increase the likelihood of a wildfire igniting and spreading.

(a) After areas are clearcut, invasive grasses will grow in the patches of cleared land. As stated in the following study, invasive grasses are becoming more widespread and can develop strongholds in forested mosaics. *Invasive Grasses: A New Perfect Storm for Forested Ecosystems*, USDA Forest Service, Forest Ecology and Management 463:117985 (2020).

Invasive grasses are fire starters and increase wildfire risk, some doubling or even tripling the likelihood of fires in grass-invaded areas. Future wildfire risk management should include invasive grasses. *“Invasive Grasses Promote Wildfire.”* Cooperative Institute for Research in Environmental Sciences at the University of Boulder Colorado - 2019.

There is rapid expansion of non-native invasive grasses that increase fuel connectivity and fire spread. “These invasions promote uncharacteristic frequent fire and loss of native ecosystems at large scales, accelerating the need to place greater focus on managing invasive species in wildland fire management.” *Re-thinking the Focus on Forest Fires in Federal Wildland Fire Management* US Dept of Interior, BLM, Journal of Environmental Management 327:116718 (2023).

(b) In addition to the introduction of invasive species that increase flammable understory vegetation, clearcutting can increase the rate of fire spread not only in the subject areas but in adjacent forest, by opening up the forest to increased wind velocity. Clearcutting also causes the areas to be drier and hotter, thus contributing to the intensity of wildfires.

(c) After a clearcut, plantation trees of the same age and species results in a forest that burns hotter and faster than the more diverse forests they replace.

2. The most common cause of wildfires is human activity—nearly 90% of wildfires are due to human involvement. Other causes are lightning and climate—with climate change being the leading contributor to the increase in the number of wildfires and in the intensity of wildfires.

In the West, climate and weather—not fuels—primarily drive wildfire severity. The EPA reports that “climate change has led to an increase in wildfire season length, wildfire frequency, and burned area (EPA website: “Climate Change Indicators: Wildfires.”) Also, climate change threatens to increase the severity of wildfires through increased temperatures and drought.

We should not implement plans which contribute to climate change which then contributes to the spread of high intensity wildfires. Clearcutting eliminates carbon sequestration.

3. According to a Western Fire Chiefs Association study: “human activity is the cause of nearly 90% of wildfires in the US. Discarded cigarettes, unattended campfires, burning debris, and equipment or vehicle malfunctions are all examples of how human errors can ignite wildfires.” *When and Where do Wildfires Occur?* October 18, 2022, Western Fire Chiefs Assn. Stronger measures to prevent human-caused wildfire ignitions should be implemented and enforced.

4. (a) Reducing fuels in areas closer to homes makes more sense than clearcutting further away (which makes no sense). (b) Creating defensible spaces close to developments has been proven to be effective. (c) Having fuel breaks is understandable, but the term “fuel breaks” must not mean fuel breaks linked to fuel breaks nor fuel breaks linked to over 1,000 acres of clearcut to be added to the already large swaths of clearcut along the Peaks Trail, Rainbow Lake, Ophir Mountain, and Gold Hill and other areas clearcut by the Forest Service in the years 2005-2022.

5. I think it is inappropriate for the Proposed Project to cite the Proclamation of Establishment of the Camp Hale-Continental Divide National Monument (the “Proclamation”) as a justification for the Proposed Project. Instead, the Proclamation advocates for the protection of the natural and cultural resources of these areas.

6. Regarding the proposed trails project, I would support limited improvement of some of the trails provided there is additional evaluation. But I ABSOLUTELY OPPOSE “creating a trail network . . . with more user-friendly grades and terrain” which is stated as a goal on page 2 of the Scoping Notice. THAT IS CONTRARY TO WHAT WE WANT IN A FOREST. Further, I unequivocally do not support any changes to the trails and the areas around Rainbow Lake, or along the Peaks Trail or Miners Creek that **would lessen the atmosphere as a forest**. I fear the Town envisions more of a park or someone’s “backyard.” These areas should remain forest. People need these areas for recreation and exercise, and people need these areas for solace and peace.

7. Recommendations: instead of clearcutting, we should use our taxpayer dollars, including the \$250,000 the TOF allocated to pay its engineering company, SE Group, to: (a) establish and maintain smart defensive spaces, which are key to protecting homes and to firefighter safety during a wildfire; (b) implement staging areas if needed by firefighters BUT NOT clearcutting under the guise of fuel breaks; (c) incorporate the management of invasive species in forested ecosystems into wildland fire risk assessments; (d) enforce stronger measures to reduce human-caused wildfire ignitions; (e) enact and enforce stricter rules relating to campfires in these areas, at least in the driest months; and (f) do not change the trails in the areas and in the areas around Rainbow Lake or along the Peaks Trail in ways that lessens the atmosphere as a forest.