May 12, 2023

Dillon Ranger District

680 Blue River Parkway

P.O. Box 620

Silverthorne, CO 80498-0620

Re: Frisco Backyard Fuels and Recreation Project

Mr. Bianchi,

Colorado Parks and Wildlife (CPW) has received a request for comments on wildfire fuel mitigation and improvement of trail-based recreation within the Frisco Backyard. CPW staff met with USFS Dillon District Biologist Lindsey Martinez and USFS Dillon District Ranger Adam Bianchi and discussed the project on April 26, 2023. After reviewing the plans of the proposal CPW has the following comments to offer.

**Fuel Treatment**

The avoidance of fuel treatments from May 15 - June 30 in units closest to mapped elk calving areas (units 3 & 1). The avoidance of fuel treatments during hunting season (September - November) is recommended as well. CPW recognizes that following the avoidance of fuel treatments over this time period only allows for a short window with contractors. CPW emphasizes that avoidance over the calving period takes priority over the hunting season avoidance, and that a one-time disturbance during hunting season for fuel treatment is acceptable.

**Rec and Trails**

CPW recommends eliminating proposed route 23 in order to avoid fragmentation of elk winter concentration areas. Seasonal closures on route 9155, 79, and all 951 segments are also recommended in order to protect winter concentration area for the resident elk herd that still inhibits the area.

CPW recommends decommissioning trails 13, 14, 15, 16, 17, 18 because they encroach onto winter concentration area for elk. CPW recommends replacing trails 13-18 with a downhill section from upper trail 45 to the corner of trail 9047. This will pull the trails closer to pre-existing disturbance. Merging trail 18 into 11 will create a low loop and allow for the avoidance of winter concentration encroachment.

CPW also recommends decommissioning the Non-system “Cabin” trail and connector trail 10. A compromise would be to eliminate the upper section, and incorporate a lower section with trails 10 and 9 creating a loop to Miner’s Creek Rd.

To summarize, CPW recommends avoiding trails that fragment adjacent intact habitat and border or encroach into elk calving areas, and concentrating use where disturbance already exists.

CPW thanks the USFS Dillon Ranger District for the opportunity to comment on this proposal. If you have any questions, you can contact Alex Strasser at 970-485-2922 or [alex.strasser@state.co.us](mailto:alex.strasser@state.co.us).

Sincerely,

Alex Strasser

District Wildlife Manager, Summit County

CC: Elissa Slezak - Wildlife Biologist (CPW)