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Ben Burr, Executive Director
BlueRibbon Coalition
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May 15, 2023

Adam Bianchi
680 Blue River Parkway
P.O. Box 620
Silverthorne, CO 80498

Dear Mr. Bianchi,

BlueRibbon Coalition (BRC) is writing to provide feedback for the Frisco Backyard Fuels and Recreation Project. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of the U.S. Forest Service. Many of our members and supporters live in Colorado or travel across the country to visit Colorado and use motorized vehicles to access USFS managed lands throughout Colorado. BRC members visit this land for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature

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study, camping, observing cultural resources, and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

Project Specific Comments

BRC supports the broad project objectives to keep public lands healthy and reduce the risk of wildland fires. We recommend using commercial treatment on the full 1,250 acres and more if more lands within the project area show the need for reduced hazardous fuels. Best available science should be used in making these decisions. Past forest fires that have burned rampant because of the lack of hazardous fuels reduction projects should be looked at when making decisions. These wildfires cause temporary and often permanent closures and irreparable damage to wildlife. It is the Forest Service's obligation to pursue these treatments to prevent these fires to protect public lands.

Habitat loss is the largest threat to wildlife and wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife. However, many conservation groups actively litigate forest projects that help mitigate fires. One of the best things that can be done to protect wildlife and habitat is to actively manage forests to prevent wildfires. In order to adequately manage the forest roads are a critical component. Roads not only provide access to carry-out forest management projects but also act as a natural fire barrier. Furthermore, sediments from runoff after wildfires and from impaired tributaries and poorly maintained roads can fill lakes and streambeds. This leads to obstructed natural stream flows which adversely affect navigation, recreational use, and valuable aquatic habitat.

“Over the last three decades, the acreage burned annually by wildfire across the United States has doubled. (Williams et al., 2019). While wildfires can impact the environment and human health through various pathways (e.g., impaired drinking water, soils, and crops)”¹. It is also well documented the impacts of wildfire smoke as it is composed of various compounds known to be hazardous to human health. “In the United States, the overall population experiencing wildfire smoke will continue to increase due to projected increases in wildfires. Considering climate change projections through 2050, it is estimated that more than 82 million people in the United States will be subject to a 57% and 31% increase in the frequency and intensity of smoke waves, respectively (Liu et al., 2016a).” The USFS has an obligation to the public's health to implement hazardous fuels reduction projects in the maximum area.

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https://www.lung.org/getmedia/fd7ff728-56d9-4b33-82eb-abd06f01bc3b/pse_wildfire-and-prescribed-fire-brief_final_2022.pdf

If prescribed burns is chosen for an area, and a wildfire arises at any point, that wildfire should be treated as such and the USFS should not allow the wildfire to burn in order to meet prescribed burn objectives. This involves a lot of risks and wildfires should always be treated with as much urgency to suppress the fire as possible.

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Roads and Trails

This land should benefit as many users as possible. All users can be accommodated through proper education or alternative management techniques. If any recreational use needs to be temporarily closed for the completion of the project, those areas and activities should be opened as soon as possible. Roads not only provide access to emergency response teams but also allow for continued maintenance access on the forest as well as acts as a natural fire barrier. We strongly encourage the USFS to consider the miles of road that is being incorporated into the system to be open to recreation users as well. There is a purpose and need for these roads and all users should be able to responsibly enjoy them. We strongly discourage decommissioning or closing any roads. The 25 miles of “user created” routes have a valuable purpose and need that need to be retained. Most of the routes in the Forest Service route system across the nation are user created for various purposes. Instead of decommissioning these routes the USFS needs to acknowledge the history of use and adopt them formally into the system. An analysis of the benefits of these miles of routes both economically and socially needs to be conducted before closures occur.

Conclusion

We would like to close by saying we support “shared use”. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV’s often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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P.O. Box 5449
Pocatello, ID 83202
brmedia@sharetrails.org

Sincerely,

A handwritten signature in black ink, consisting of stylized initials 'BB' followed by a long horizontal line extending to the right.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, appearing to read 'Simone Griffin' in a cursive style.

Simone Griffin
Policy Director
BlueRibbon Coalition