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Granby, Colorado 80446

April 9, 2025

Adam Bianchi, Dillon District Ranger  
C/O Sam Massman  
USFS White River National Forest  
680 Blue River Parkway Silverthorne, Colorado 80498-0620

**Subject:** Comments on Town of Frisco Backyard Fuels and Recreation Project

Dear Mr. Bianchi,

Thank you for the opportunity to provide comments on the Town of Frisco Backyard Fuels and Recreation Project Draft Environmental Assessment (EA). Having reviewed the assessment and the proposed treatment units, the Colorado State Forest Service (CSFS) offers the following comments. Our review focused on silviculture and fire behavior considerations, while recognizing that the project area also holds significant recreational value and is heavily used by the public.

1. Consider adding an approximately 3-acre addition to the overall project area, closest to the Town of Frisco
  - a. Rationale:
    - i. There are approximately 15 private parcels with homes, located off Pine and Mt. Royal streets, which have their Home Ignition Zone (HIZ) (up to 100 ft.) within federal land adjacent to the current boundaries of the project. This would help have greater direct impacts to potential fire spread and impacts into the adjacent high density residential area.
    - ii. These homes are closely spaced and have minimal setbacks from USFS land.
    - iii. The ~3-acre area can be treated as a single high-value risk zone, rather than addressing each home individually.
  - b. Proposed Treatment:
    - i. The vegetation consists of mid-density lodgepole, a high fire risk species.
    - ii. Focus on pre-treatment within HIZ on USFS to facilitate firefighter access during a wildfire.
  - c. Prescription should consider Wildland Urban Interface (WUI) standards such as:
    - i. Remove all standing dead and deadfall.
    - ii. Reduce stand density to achieve a minimum of 10 ft. of individual tree spacing OR 30 feet between groups of trees to reduce fire intensity and prevent canopy-to-canopy spread.
    - iii. Prioritizing the removal of lodgepole pines and ailing trees over spruce and fir to encourage species and age diversity.
    - iv. A strategy like this would reduce stand density without significantly disrupting views or privacy for homeowners.



- v. This interface area is crucial in preventing fire spread from the wildland into the WUI neighborhood, and a treatment like this would enhance firefighter safety and effectiveness.

## 2. CSFS Recommendations for Treatment Units

After conducting reconnaissance, CSFS recommends the following changes to some of the proposed prescriptions:

- a. Dead and Patch Cut Live Lodgepole Units (Units 38, 29, 25, 31, 32, 33, 36, and 48):
  - i. A Clearcut with Leave Trees prescription would be more effective for fire mitigation, helping to stop fire spread across the landscape.
- b. Dead Only Removal Units (Units 47 and 50):
  - i. These units have a low component of dead/downed trees. A Clearcut with Leave Trees prescription would have a greater impact.
- c. Dead Only Unit #3:
  - i. This unit does not have a significant number of dead trees. A Clearcut with Leave Trees prescription, like Unit 2, would be more beneficial.
- d. Dead Only Unit #6:
  - i. This unit contains a high component of aspen. An Aspen Enhancement prescription would be more appropriate.
- e. Dead Only Removal Unit #9:
  - i. This unit has few dead/downed trees. A Clearcut with Leave Trees prescription would have a greater impact.
- f. Dead Only Removal Unit # 23:
  - i. This unit has few dead/downed trees but contains a high component of aspen. An Aspen Enhancement prescription would be more effective.

CSFS fully supports this project and will work with the USFS, Summit County, Town of Frisco and Summit Fire & EMS to ensure this project is implemented in an impactful way to mitigate potential fire impacts to the community. It aligns with the CSFS's Forest Action Plan themes of conserving, protecting, and enhancing Colorado's forest conditions, watersheds, and wildlife. It also focuses on improving forest resilience and reducing fuels through science-based forest management techniques.

Thank you for considering these comments.

Sincerely,

Zach Wehr

Supervisory Forester, Granby Field Office  
Colorado State Forest Service