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First name: Frederick Last name: Ihnken

Organization: Town of Frisco

Title: Mayor

Comments: April 22, 2025

Adam Bianchi
Dillon District Ranger
c/o Sam Massman
680 Blue River Parkway
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Silverthorne, CO 80498-0620
Samuel.massman@usda.gov

RE: Comments on Town of Frisco Backyard Fuels and Recreation Project (File Code 2410)

Dear Mr. Bianchi,

Please accept this letter as a formal comment for the draft Environmental Assessment (EA) prepared for the Town of Frisco Backyard Fuels and Recreation Project. The Town of Frisco supports the draft EA and supporting documentation. It is acknowledged that we are not wildfire mitigation experts, but that we can represent how the proposed actions may align, or conflict, with other Town goals and values.

The Town is acutely aware of the elevated risk of high intensity wildfire to our community along with the importance of managing high-use visitation through improvements to the trail system and recreation facilities. As a signatory to the Summit County Community Wildfire Protection Plan (CWPP), and member of the Summit County Wildfire Council, we think that the USFS and Town of Frisco have strong alignment in the commitment towards reducing the wildfire risk to Frisco and the surrounding Forest. We also want to strongly state our support for the EA balancing proposed actions with the look and feel of the area after treatment to support tourism and local enjoyment.

The Town recognizes that this project proposes approximately 1,576.3 acres of fuels reduction activities along with trail decommission and improvement activities on a 3,026-acre area known as "The Backyard". The project will reduce hazardous fuels and risk of wildfire and create more sustainable recreation opportunities. The project will mitigate wildfire risk via 1,576.3 acres of fuels reduction activities and more sustainably manage recreation by improving the trail system through implementing 40 miles of actions such as hardening and improving existing trails, constructing new connector trails, decommissioning unsustainable social trails, and installing wayfinding and interpretive signage, there are numerous benefits to this project.

Comment 1: Methods - Fire risk is of the utmost importance but we also understand that leave trees and live vegetation should remain for forest health, scenic value, and wildlife habitat. We support the scope of treatment options along with clear-cutting. We think that maintenance of the treated areas should be included to ensure long-term effectiveness of the mitigation efforts and forest health.

Comment 2: Timing - It is our community's desire to implement this proposed action as soon as practical. It is widely recognized that the wildfire environment is rapidly changing, and it is a matter of when, not if, we have a wildfire affecting our community.

Comment 3: Relationship to goals of CWPP - The Summit County CWPP has several goals that align with the proposed action for this project including "to identify and mitigate areas that are at particular risk from wildfire

loss", such as the Backyard area; and, to "develop plans to reduce potential loss of property, critical infrastructure, and valuable ecological resources, while protecting the safety of the public and firefighters." The draft EA addresses these goals. We feel that this project is critical in order to decrease wildfire risk to neighboring communities and infrastructure, and will complement the wildfire mitigation work that has already taken place in the Ophir Mountain and Rainbow Lake areas.

Comment 4: Frisco Trails and Pathways Master Plan - Demand and use of the Backyard's existing trail network has grown significantly over the past decade. The desire for trail maintenance and improvements has been a high priority of community members during the community outreach for both the 2017 and 2023 Trails and Pathways Master Plan. The Town is supportive of the efforts to formalize and improve well-loved, user-created trails. We respect Colorado Parks and Wildlife's concerns regarding elk habitat and feel that several of the trails being proposed will help to keep users on designated routes in areas where there is already heavy use, and in places where the existing trail use may have already altered animal behavior. Due to the heavy use of the Rainbow Lake area and access trails, the Town is strongly in favor of restoration and naturalization for this area, the proposed enhancements to parking areas, and trail maintenance and improvements.

Comment 5: Cultural Resources - We recognize the importance of the historic features and feel that the fuels reduction efforts will offer resilience and protection for these features in line with the intent of the National Monument designation.

The Town would like to thank you for the opportunity to comment on this project and express our support. If you have any questions regarding these comments, please direct them to:

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Regards, Frederick J. Ihnken Mayor, Town of Frisco