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The Town of Frisco Backyard Fuels and Recreation Project Draft Environmental Assessment is based on ill-advised objectives, false assumptions and glaring omissions. It clearly demonstrates that the proposed project is ill-conceived and should be abandoned. The "fuels treatment" and trail modification portions of the proposal should be split into separate projects and assessed separately. The fuels treatment component especially should be abandoned; it will do substantial irreparable harm and clearly requires a formal environmental impact statement at the very least. Project finances and impacts need to be disclosed to allow citizens to evaluate the project's rationale and impact on the Town of Frisco, as well as on area residents.

ILL-ADVISED OBJECTIVES
The proposal's primary objective is described to be "reduce high intensity wildfire risk…" Wildfire risk is used throughout the report to justify all of the proposal components and adverse environmental impacts and to foster fear so as to reduce resistance to the proposal. Wildfire risk in Summit County's high-alpine environment is actually relatively low. Few, if any, homes have been lost to wildfire in the county in recent history and retired Forest Service personnel referred to Summit County as "the asbestos county." "High-intensity," hypothesized throughout the report in terms of "flame length" and assumed to be a function of "fuel loading," is also not the best measure of wildfire risk to development. As tragically evidenced by the recent Marshall, Colorado; Maui, Hawaii; and Texas Panhandle fires; the speed of spread of fire (especially through grassy or shrubby vegetation)--totally ignored by the report-is a far more important parameter.
Despite stating that thinning lodgepole is unwise (as has always been said when trying to justify clearcuts): [Thinning these stands results in blowdown of the uncut trees, … (p 12)] , all of the treatment prescriptions call for future additional lodgepole thinning: [Lodgepole regeneration would be thinned up to 25 years after treatment (p 15, 16, 18, 19); Future actions previously approved under the 2021 White River Mountain Forest Health and Fuels Project include retreating approximately 215 acres of lodgepole pine within the project area within the next 10 years, along with re-treating additional areas… (p 76)] and other unspecified future treatment: [...to allow for planned maintenance treatments at 20 years….after which the forest fuel condition would be assessed, and future projects would be considered (p 32) These adverse cumulative effects are expected to increase as the pace and scale of wildfire mitigation projects in Summit County increase. (p 76)]. All of this can only sound like a blatant objective of providing job security-directly counter to the current Presidential emphasis on government efficiency. Allowing beetle-impacted lodgepole tree stands to naturally morph into spruce/fir climax not only avoids the need for the initial ill-advised treatment; but makes future treatment unnecessary, as the resulting age- and species-diverse spruce/fir stands would be highly stable and resilient.

FALSE ASSUMPTIONS/ASSERTIONS
Wildfire threat in Colorado has increased due to … insect and disease outbreaks p.4 - pine bark beetles and other infestations are part of the natural ecology and have been happening for millenia, so have not changed anything. And dead trees pose less of a fire hazard.
Wildfire threat in Colorado has increased due to … past land management activities p.4 - yes, but primarily from clearing forests leading to more flammable grasses, shrubs, doghair lodgepole and lodgepole pine stands instead of climax spruce and fir; this proposal would further exacerbate this.
For thousands of years, fire shaped Colorado ecosystems p.4 - not in Summit County's high-altitude spruce-fir ecosystem. Except, perhaps, for some fires dating to mining days (possibly purposely set), nearly all current lodgepole stands in Summit County likely resulted from clearcutting for timber sale during the Depression, cleared and abandoned ranchland, or recent clearcutting or other "treatment" by the Forest Service.
…fire has been largely excluded …. Fire's absence has allowed overly dense forest stands to develop which are highly susceptible to high intensity wildfire, insect and disease, and drought p.4 - Again, not in Summit County;

applies in fire adapted ecosystems such as California redwoods, but not not here. Here, this has not been the result of fire, but of clearcutting the natural, stable, climax spruce-fir vegetation, leading to more flammable grasses, shrubs, and lodgepole pine. The naturally dense lodgepole are also susceptible to windthrow and crown fires.

,....mountain pine beetle epidemic killed many lodgepole pine …..excessive buildup of hazardous fuels…at risk of extreme wildfire behavior (p 4); Tree mortality from the mountain pine beetle creates a greater risk of high intensity wildfire (p. 12) - once their needles drop after a year or two, dead lodgepole have no foliage to burn, so are far less susceptible to fire than live ones (spruce and fir are, of course, also less susceptible to fire); such dead lodgepole are also less susceptible to windthrow (bare mast).

Increases in temperature over the last 30 years have amplified wildfire risk…by lowering soil moisture and intensifying drought conditions p4 - Soil moisture has almost certainly been lowered more significantly by removal of tree cover, exposing the soil to both the heat and the drying effect of sun exposure, as this proposed project would do further.

Protecting historic and Tribal resources…are integral to this project (p7) - Hard to believe with the agency's track record of tearing down historic structures (Mesa Cortina meadows cabin, Etta M mine boarding house, Alfred Bailey home, etc.)

Units that have aspen, spruce, or fir species can have prescriptions that focus on dead and/or lodgepole removal to promote species diversity…(p 12) - Such treatment is actually more likely to let in too much wind or light or otherwise alter conditions too much and lead to remaining trees blowing over or regeneration of sun-loving lodgepole instead of shade-tolerant spruce and fir, as projected under all the proposal's treatment prescriptions (p. 14, 16, 18).

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GLARING OMISSIONS

The No Action Alternative (p.9) totally fails to examine how the forest would change without "treatment;" namely gradually morphing into more stable, biologically richer (lodgepole stands are largely sterile) less-insect/disease/windthrow/crown fire-susceptible, climax spruce/fir forest.

The Town of Frisco Backyard Fuels and Recreation Project is totally based on supposed reduction of fire risk by reduction of volume of fuel so as to reduce fire severity as measured by flame length. As mentioned above under "ill-advised objectives," speed of spread of fire is probably an equally, if not far greater, threat to development. The draft EA never even mentions speed of fire spread and totally fails to assess the impact of the proposal on speed of fire spread. (((attach or reference letter to editor or pamphlet referenced in it ???)))

The project area has already been severely degraded by the infamous 2011 Ophir Mountain Forest Health (sic) and Fuels Project, the 2009 Forest-wide Hazardous Tree Removal and Fuels Reduction Project, the 201 White River National Forest Health (sic) and Fuels project, and others. Any possibly helpful "fuels reduction treatment" would already have been done under those projects and additional deforestation under this new project could therefore have marginal fuel reduction benefit at best and simply be additional deforestation for the sake of "doing something." The draft EA fails to recognize the cumulative low-hanging-fruit removal of those projects and the therefore limited remaining potential benefit of further tree removal from the area.

The Town of Frisco Backyard Fuels and Recreation Project proposal for supposed fire risk reduction and draft EA assessment of the impact on fire risk of the proposal-to the total exclusion of common sense-are totally based on "FVS," "FlamMap," and other models. Air quality impacts are assessed by a "Blue-Sky Playground" model. The draft EA totally fails to explain how any of those models work, what assumptions they are based on, how they differ from other models, or how their use is justified.

The reliance on these models, as well as artificial indices for values such as recreation and scenery, constant use of acronyms, and other technical devices seem to constitute a deliberate bureaucratic effort to obfuscate the facts of the proposal and its impacts. The draft EA totally fails to provide the public with an easily comprehended, useful document for understanding what the proposal would do and what impacts it would have.

The draft EA also totally fails to present or assess the finances of the project. Citizens and taxpayers should be able to follow the money and understand the reasons why a project, especially one without any obvious necessity, is being proposed.

Similarly the draft EA totally fails to present or assess the energy use of the project, a central factor for judging the proposals merit and one that will greatly affect other environmental impacts such as air quality and climate change

For many users these fuels treatment areas detract from their expected recreation experience; (p7) The proposed action includes 1,576 acres of fuels treatments….covering a total of 52.1 percent o the project area…(p 9) - Having more than half of the project area unnatural and artificially treated hardly sounds like "...Maintaining a High-Quality Recreation Experience …" (p 7) on its own, let alone considered cumulatively with the huge swaths of totally denuded land adjacent to the project area as a result of the Ophir Project. The proposal totally fails to assess or justify this cumulative insult to the natural forest and users enjoyment of it.

The proposed action was also designed to ….. and achieve a safer year-round recreation experience (p 9-10) - The draft EA totally fails to assess how exposure to blizzards, thunderstorms, microbursts, normal high winds and summer heat, and blown-over and wind- and sun-crusted winter trails as a result of removal of tree cover will impact safety of recreational users. Again this should have been assessed cumulatively with the huge swaths of totally denuded land adjacent to the project area as a result of the Ophir Project and others.

The project proposal would cut (and largely remove or burn?) all dead trees ("snags") in all of the proposed treatment areas. With no foliage, dead trees can contribute little fuel to potential fires (and are quite likely not to even burn.). Nor do they release substantial toxic or greenhouse gases, if they do burn. But standing dead trees do still contribute significantly to shade, wind shelter, soil retention, underground fungal and microbial communities and other values as well as eventually decomposing and providing soil nutrients. Especially notable are the unique home sites and food sources that snag ecosystems provide for insects and the woodpeckers and other birds, rodents and bats that feed on them, many specialized to only such ecosystems.The draft EA totally fails to assess the loss of the many contributions that dead trees make to the forest.

Standing dead trees are particularly critical components of lodgepole stands in alpine spruce/fir ecosystems such as Summit County. For one thing, they help protect surrounding live and dead trees from blowing over. [Thinning these stands results in blowdown of the uncut trees, … (p 12)] Most importantly, the mix of live and dead lodgepole that typically results from beetle infestation provides conditions that foster the growth of spruce and fir seedlings and the eventual morphing of the forest back into the stable, less-insect/disease/windthrow/crownfire susceptible, biologically richer (lodgepole stands are largely sterile) climax spruce/fir forest that they were prior to previous clearcutting or other "treatment." Purposeful thinning is more likely to let in too much wind or light or otherwise alter conditions too much and lead to remaining trees blowing over or regeneration of sun-loving lodgepole instead of shade-tolerant spruce and fir, as projected under all the proposal's treatment prescriptions (p. 14, 16, 18). Aside from these projections and a couple acknowledgements in passing (...as it would take several decades for mature trees to establish in the treated areas. p 66 p.), the draft EA totally fails to assess the impact that the proposed cutting of live and dead trees would have on the natural succession process of the forest. Indeed, the draft EA exhibits a nearly total uninformed or more likely willful ignorance of the natural ecology and desirable succession process of the Engelmann spruce/subalpine fir climax ecosystem of high-altitude Summit County. If the project is not abandoned-as it should be-it needs to be totally rewritten with acknowledgement of the natural ecology of the project area in mind.

Fuel break zone: A swath of forest was designed to connect….to create a continuous zone of "lower fire behaviour." (p 10) - While a continuous strip of treeless land may prove helpful to fire fighters in fighting a wildfire, it may also provide a conduit for a wildfire to spread rapidly through a forest via highly flammable grasses. [Although flame lengths would remain high in some areas due to grass fuel types, fuel treatments prescribed under the proposed action would reduce flame lengths in the areas surrounding grass fuel types (p. 45-46)] The draft EA totally fails to assess this risk of increasing speed of wildfire spread throughout a whole forest area.

The air quality and climate change section of the draft EA uses a lack of local monitoring stations (p 32) to punt on local impacts, totally diluting them in a large region. Common sense says that local impacts can be quite substantial. Pile burning obviously generates large volumes of toxic (as well as greenhouse) gases and particulates. Removal of tree cover, especially when considered cumulatively with the total denuding of large swaths of adjacent forest by the Ophir Project has numerous impacts blatantly obvious to anyone who walks through the Ophir clearcuts or the recent one of the hillside above the Peaks Trail between Zach's Stop and

Rainbow Lake. Temperature differences from tree cover to these clearcuts on a hot summer day are dramatic. This major heat-island effect probably affects temperatures in nearby Frisco. Moisture removal and soil drying likely significantly increase fire risk. The draft EA totally fails to consider the role that trees play in filtering toxic pollutants and reducing carbon dioxide by photosynthesis and how tree removal and prevention of succession to climax vegetation under the proposal would reduce these beneficial impacts. The new federal administration's emphasis on increasing coal burning and reducing renewable energy use makes any modeling and projections for climate change out-of-date. The air quality and climate change assessment of the draft EA is totally inadequate and needs to be totally redone in an environmental impact statement.

The botany section of the draft EA fails to consider any species other than officially endangered ones. Wildflowers, mushrooms and other plant life contribute greatly to the experience of recreational forest users. The no action alternative would allow relatively sterile lodgepole pine stands to morph into diverse climax vegetation with rich and diverse understory, greatly enhancing the forest experience. As evidenced by the recent dead tree removal project on Lower Straight Creek's building a burn pile directly on top of one of the most reliable fairy slipper orchid patches in the county, the project proposal is likely to do significant harm to valuable, if not officially endangered, plant populations. A responsible environmental assessment would consider this.

The hydrology section of the draft EA identifies the potential of tree removal to decrease evapotranspiration, but fails to recognize the counterbalancing and likely largely potential of tree removal to increase snow sublimation and the possible impacts of that on water supply.

The soils section of the draft EA totally fails to consider the heating and drying impact on soils, as well as local climate, of solar exposure from removal of dead and live trees. This section is inadequate.

The wildlife and aquatics section of the recreation section says that more than two thirds of the proposed fuels treatments area is high-quality lynx habitat (p 98) and that the treatments would make make 525 acres unsuitable for lynx (p 99), but that the area is already not real high quality because of previous treatments and that the lynx would probably go elsewhere. This hardly qualifies as great logic or a faithful commitment to protecting a highly valued endangered species and totally fails to consider recreational and aesthetic value to the local area.

Impacts on the monarch butterfly and local value of being able to see tham are similarly written off because: …the proposed action is not likely to jeopardize the continued existence of the monarch butterfly. (p 99). This section is inadequate

The draft EA's list of agencies and persons consulted (p 102-3) indicates a near-total absence of effort to involve actual forest users other than bicyclists. It includes no hiking groups, no cross-country ski groups (the county's senior center has several of each as likely do the high school and social media) and no individuals with known interest in the management of national forest land as evidenced by comment on previous projects or newspaper letters-to-the editor. The public open house format used for the only public meeting precluded any citizens from hearing what other citizens wanted to know about or had to say. The proposal's public involvement process was woefully, if not purposefully inadequate.

Pine bark beetle infestations generally occur on about a 30-year cycle. The draft EA states that the last one caused lodgepole deaths from 1995 to 2010, but never says anything about the next one. Those dates suggest that the next one is likely coming soon. The proposal and draft EA fail totally to project what impact the next infestation might have, what, if anything, could or should be done to lessen its impact, how it would impact the proposed treatments or whether it would likely lead to consideration of other treatments. It would be totally irresponsible to undertake any treatments, until after the next infestation or projection of anticipated impacts and full reevaluation of proposed treatment and environmental impact.

While not clearly stated, it appears that, in addition to pile burning, the proposal would haul some of the trees to be cut elsewhere. The draft EA fails to say where, what would be done with them, what the energy, air quality and other impacts would be of the hauling and disposition of the removed trees.

The recreation portion of the draft EA indicates that the proposal would allow bicycle use of the project area trails in the winter (p 28; currently not allowed). This would be a significant policy change that should not be made without following separate appropriate procedures, including meaningful opportunity for public input. As stated in the draft EA, summertime bicycle use already causes substantial conflict with hiking, horseback riding, hunting and other traditional summer trail use. In addition to user conflicts, trail rutting by wintertime bicycle use would severely degrade snow conditions for cross-country skiing. Just because a "new" mechanized sport could allow

some bicycle shops to make expensive equipment sales, this should not justify riding roughshod literally over public trails and figuratively over cross-country skiing, snowshoeing and other traditional winter trail users. The exclusion of traditional trail users from public consultation was a travesty that should not be compounded by such a policy change.

The recreation portion of the draft EA also indicates that the proposal would commit the Town of Frisco to maintaining the trails in the project area and to grooming certain trails in the winter, even though they are on national forest land. The draft EA fails to indicate whether the town has formally approved this or committed to funding it or whether provisions have been made for the event that it stops doing so in the future.

The draft EA fails to indicate whether trails proposed for decommissioning have been studied as to whether they were originally animal trails or now used by animals.

Hardening trails, rebuilding trails to meet high-volume-use standards, keeping people away from historic sites, grooming snow, formalizing parking lots - the cumulative impacts of such aspects of the recreation portion of the proposal suggest a possible change in ambience from that traditionally associated with national forest land to that of a ski resort or theme park. The draft EA fails to recognize such a possible ambience change and assess its impact on user experience.