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Comments: Summit County would like to provide the following comments on the draft Environmental Assessment (EA) for the Frisco Backyard project which were informed by feedback from the Summit County Open Space Advisory Council and staff review of the draft EA. Overall, Summit County is supportive of the comprehensive scope of the fuel reduction and recreation improvement project and agrees that there is strong need for both within the project area.

Fuels Treatments

Fuels staff should consider removing spruce and fir in aspen enhancement stands to further reduce competition and maintain seral stands as aspen. Seral stands are frequently invaded by conifers, mostly subalpine fir, and have variable moisture. These stands experience frequent, often severe fires because fir acts as a ladder fuel promoting canopy fires. Removing these ladder fuels will further reduce wildfire risk.

The "Recreation Values" section mentions proposed trail reroutes to "move trail corridors into areas with higher amount of retained tree cover". The County requests that reroutes solely for this purpose be avoided. The precedent that forest treatment will be paired with reroutes will lead to frequent and unnecessary disturbances to avoid temporary impacts to trail experience.

Mechanical treatments are proposed on just 78.6 acres within the 3,026-acre project area. Consider reevaluating these mechanical treatments to avoid unnecessary impacts to vegetation and soils within the "severe" erosion rating, especially considering that materials cannot be removed from the site and must be burned in place regardless of mechanical or hand treatment methods.

Finally, the long-term visual impacts of chipping should be considered, as well as the ability of forest species to regenerate on this bed surface. To minimize these impacts, chip depths should be restricted to less than 4" if this process is retained in the final action.

Summer Trails

In the project area, 5.43 - Elk Habitat is the primary management area designation in the 2002 White River National Forest Land and Resource Management Plan, yet the emphasis of this proposal is on providing recreational opportunities. This is understandable, given the demand for recreation as demonstrated by the extensive development of user-created trails. Summit County is supportive of the overall goal to provide enhanced recreational opportunities, reduce trail mileage, and concentrate use near Town of Frisco; however, we believe

that a better balance between recreational use and elk habitat conservation can be achieved. While overall trail mileage will be reduced, newly adopted and constructed trails will result in additional use by the recreating public as they are incorporated into system maps and visible on trail apps.

To this end, the County recommends seasonal wildlife closures on a limited number of trails in the southeast portion of the project area. These closures include trails 18, 19, 61, 62, and 9155 south from the intersection with 951.1B; and all of 9047, and 951.1A to their intersections with the CT/CDNST during elk calving season from May 15 - June 20. These seasonal closures would only have minor impacts on recreation and will help concentrate use closer to the Town of Frisco and away from critical elk habitat during this very sensitive time of year. These trails would be appropriate for seasonal closures as they are primarily user-created trails to be adopted and new trails to be constructed. Implementing closures from the onset will be much easier than retroactively closing if the need to further protect the Ophir Mountain elk herd arises. These closures will provide the additional benefit of protecting trails when conditions for use are marginal.

Finally, there is a user-created trail near Trail 63 and maps should reflect that this will be a social trail to be adopted or show the existing route on the recreation maps as a user-created trail to be decommissioned.

Winter Recreation

Grooming on the Recpath will require a license agreement with Summit County Government as we operate that section of the Recpath under Special Use Permit DIL546. Grooming of the Recpath east of Trail 58 and west of Miner's Creek Road is discouraged, as it would result in the groomed pathway "dead ending" at the plowed

section of the Recpath which provides vehicular access to homes along Temple Trail. Currently, Summit County has no plans to alter winter management of the Recpath in this location. Finally, improved winter recreation facilities may increase demand for parking at plowed trailheads and trailhead capacity should be considered prior to the implementation of these improvements.

Trailhead Improvements

Summit County looks forward to working collaboratively with the Forest Service and Town of Frisco on proposed consolidation and improvements to the Miner's Creek Trailhead. Reducing interactions between Recpath users and vehicular traffic would be a major safety improvement in this location and similar safety measures should also be pursued at the Zack's Stop TH. In concept, the County is supportive of a trailhead location separated from Miner's Creek Road, however, a final plan this will require further discussion, agreements, and land use approvals. The Forest Service and Town of Frisco will need to enter into appropriate agreements with the County for construction and management of any asset on Summit County property.

Noxious Weeds

Increased use and new trail construction will introduce listed weed species into more of the project area. A weed management plan should be required if the Town of Frisco is issued a Special Use Permit for this area.

Thank you for the opportunity to comment on the Frisco Backyard EA. Additional questions or clarifications on this letter can be directed to Jordan Mead at Jordan.Mead@summitcountyco.gov.