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Comments: The "Frisco Backyard" scoping letter suggests that its authors and the agency have little or no understanding of succession, climax vegetation, and other basic ecological concepts or of the alpine ecosystems of Summit County. The project concept is ill-conceived and should be dropped. Any subsequent forest management planning for the area needs to be done by personnel that do understand ecology and all district office personnel need to be taught or retrained about ecology. The complete disregard of the natural, cyclical role of beetle infestation and resulting lodgepole pine mortality in forest succession and ecology and of the natural and human-use benefits of the expectable succession of beetle-impacted lodgepole forest to stable, climax spruce/fir forest are particularly grievous.

The basic adopted central purpose of the proposed project of perpetuating lodgepole pine (essentially a weed) forest as opposed to allowing it to morph into (natural) climax spruce/fir forest demands a thorough evaluation of which is better or more desirable. The scoping letter suggests a project that is glaringly and totally deficient in this regard. I challenge anyone to somehow find the insect-prone, disease-prone, crown-fire-prone, windblow-prone, sterile, monoculture, unnatural lodgepole the better choice.

Deforestation of more than 1200 acres by definition is a major ecological impact. This is especially so because the proposed project is in a high alpine environment where forest growth is particularly slow. It is also in the drought-stricken arid West which also means slow growth; but which in combination with climate change, also raises the specter that clear-cut forests could possibly not regenerate at all, instead becoming sage brush or high-altitude desert. Although the project clearly should be scrapped, certainly no action should be undertaken without conducting a full environmental impact analysis.

The draft EA for the similar "Swan Mountain Project" does not address what will be done with the decimated trees from the proposed clear-cutting. Any further planning for the "Frisco Backyard" must. The Swan climate change discussion only generally refers to literature about possible uses of wood (p. 37), none of which are likely to happen with this project. If clear-cut trees are handled similarly to those of similar recent projects, they will mostly be hauled more than 70 miles for burning in a small power plant, which likely has only modest air-pollution-control equipment. The hauling and burning will both generate large amounts of both toxic and greenhouse gas emissions. These emissions need to be assessed and evaluated. The remainder of the wood will be burned in place generating even more highly toxic emissions and raising the highly significant danger of major forest fire. Several of Colorado's most damaging forest fires were the result of "controlled" burns or other intentional burning. All of the hauled and burned wood will preclude return of nutrients to the soil, a major part of natural processes that also needs to be assessed.. All of this suggests that the project is highly unwise, but certainly all handling of the decimated trees needs to be thoroughly assessed.

What little attention the "Swan Mountain Project" EA pays to climate change relates in general terms to possible impact on carbon capture and is based on the erroneous assumption that because younger trees grow faster than older trees, they capture more carbon. This ignores the fact that even a small percentage growth rate of a very large tree will still be much more growth and carbon capture than rapid growth of even a large number of small trees. It also totally ignores more recent research about the tremendous carbon storage of the large root systems and associated fungal networks of mature trees.

The basic assumption that the "Frisco Backyard" project's proposed "fuels reduction" will reduce fire danger is also highly suspect and needs more thorough assessment. While clear-cutting may reduce the total mass of potentially combustible material, that does not inherently reduce fire danger. The grasses and weeds that typically first grow in clear-cut areas and bushes that next grow are far more likely to initiate a fire than the

removed forest. (Both of Summit County's only recent large fires, almost certainly the Buffalo Mountain Fire and quite likely the Ptarmigan Fire originated in grassy/shrubby "buffer zones.") And while "fire breaks" may provide good fire-fighting staging grounds in the short term, wildfires unquestionably spread far faster in grassy/shrubby areas (just ask the residents of Marshall, Colorado), probably posing far-greater fire danger. And in the long-term, they will morph into dense, oil-rich doghair lodgepole, dense "adolescent" lodgepole (both very poor fire-fighting staging grounds), and, eventually of course, the same beetle-impacted lodgepole forest that the proposal would destroy on "fuels-reduction" grounds.

The proposed management of previously cut-down dead trees and subsequently blown-over live and dead trees along the Colorado (and other) trails under the "Hazardous Tree Removal Project" acknowledges the horrible mistake that was made by previous district forest "management" projects. Rather than justifying new projects, past forest and recreation degradation should call for more critical assessment of any new "management" projects, generally. Specifically, removing more standing dead trees, thus exposing other dead- and live-standing trees to being blown over as well, would very seriously compound the past grievous mistake. Even removing already downed trees would be suspect because of the impacts of removing and transporting them, loss of soil nutrients, etc. It's probably better to just let nature eventually recover from the "management" damage done to it.

Cross-country skiing and snowshoeing are major recreational uses of trails within the project area. Trails through forested portions of Summit County and the project area generally offer excellent winter recreation opportunities- and are becoming increasingly scarce. When passing through clear-cut areas, on the other hand, trails quickly get sun-crusted and wind-crusted, so often become quite icy. Other times, unsheltered trail stretches through clear-cuts can be totally blown over, so impossible to follow or present dangerous blizzard conditions when forested trail stretches are totally calm. No clear-cutting should be allowed within proximity of existing recreational trails (say 250 feet) of trails or roads within this proposed project area, within Summit County or within any national forest or other public land.

The "Swan Mountain Project" draft EA neither discloses nor analyzes any financial impacts of the proposed project. Any further planning for the "Frisco Backyard" plan must do so. Understanding the financial impacts of a government project is critical for citizens to evaluate the merits of a proposal. What will it cost (with and without including Forest Service personnel time)? Who will benefit or be harmed, financially or otherwise?

The previously recently completed "Ophir Mountain Forest Health and Fuels Project" did immense irreparable harm to the area of the "Frisco Backyard Project," with no apparent benefit. Any deforestation not contemplated or undertaken under the previous project obviously had lower potential benefit in that project's dubious estimation. All aspects of the new project should examine how conditions have changed in the interim to make them desirable now, when they weren't then.

The scoping letter does not convey enough information for me to evaluate the proposed 21 miles of trail projects other than that what is written suggests planning for a major urban area or intensely visited national park rather than a relaxed natural area near a small town. I would suggest that any new trail construction or trail closures be individually evaluated and planned in conjunction with the Town of Frisco and volunteer groups. Mention of "restoration of vegetation and habitat" does further emphasize the damage done by the Ophir and Hazardous Tree projects and further suggest the likely harm of any further "management" of the forest area.