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First name: Howard

Last name: Brown

Organization: Ophir Fund

Title:

Comments: The "fuels reduction" portion of the proposed "Frisco Backyard" project is unnecessary, ill-conceived and likely counterproductive. The project area has already been severely degraded by three previous projects: (a) The infamous 2011 Ophir Mountain Forest Health (sic) and Fuels Project will be a grievous reminder of benefit-less overkill deforestation for the next 100 years or more for visitors to two of Summit County's formerly most iconic trails the Peaks Trail and the Gold Hill portion of the Colorado Trail. (b) The 2009 Forest-wide Hazardous Tree Removal and Fuels Reduction Project clearly demonstrated the folly of selective cutting of dead lodgepole used everywhere else as rationale for clearcutting. As recognized by the Swan Mountain Project draft EA, this ill-advised cutting of dead trees along trails because a previous district ranger was afraid she would get blamed if one fell of someone only led to ugly trails and more live and dead trees falling. (c) While cutting of areas along forest borders with private land may provide good staging areas for forest fire fighting, the more easily ignited and faster-fire-spreading weeds and grasses that grow up after clear-cutting probably pose a far greater fire danger--witness the Marshall Fire. At any rate, such areas have all already been cut down and the proposed deforestation of the proposed new project is all far from any homes.

Any possibly helpful clearcutting or other "fuels reduction treatment" would already have been done under those three 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."

In using mixtures of live and dead trees resulting from the most recent (natural 30-year cycle) beetle infestation as an excuse for "doing something," the proposed new project both totally disregards basic knowledge of ecology and dishonestly plays on fear of forest fire. Rather than being good targets for deforestation, the mixtures of live and dead lodgepole are forest areas that should particularly not be disturbed. Sun-loving lodgepole are essentially weeds that grow up as same-species, same-age monocultures after fires or other disturbances, most notably clear-cuts. Virtually all of Summit County's lodgepoles are the result of mining or Depression era clear-cutting. With the most-recent beetle infestation (a natural 30-year-cycle phenomenon), much of our forest is now finally at the stage when conditions are right for shade-tolerant spruce and fir (the natural, stable and wonderful climax vegetation) to start reestablishing. Cutting the forests down at this stage just sets the natural succession process back a hundred or so years, with highly undesirable vegetation for the first fifty or so of those years, before finally getting back to where we are now. See p 13 of the following for a good intro
<https://epaper.summitdaily.com/html5/reader/production/default.aspx?pubname=&edid=fb938c86-c752-4708-a0ee-f5e211b68c06>

When it comes to doing something to actually reduce danger from forest fire, creating defensive space immediately (i.e. directly adjacent on the private properties) around homes and other development is by far the most effective possible action. Aerial photos of one of the Colorado Springs area fires makes that very clear with untouched houses closely interspersed with ones that were totally destroyed. "Defensive space" in the forests, however, is a very different matter. The proposed project would decimate forest far from any homes or other development and while playing on fear of forest fire would have little impact on danger to homes or other development. The areas targeted for deforestation are primarily areas of beetle-impacted older lodgepole pine that now contain a mix of live and dead trees. (All of these sun-loving dense, single-species, single-age, monoculture lodgepole forests were created by previous clear-cutting, mostly during the Depression; the natural climax vegetation of Summit County is multi-species, multi-age forest dominated by Engelmann spruce and subalpine fir and far less susceptible to insect infestation, disease, crown fire and wind blow than lodgepoles.) While the dead trees probably were more flammable for the first year or two after death (red-needle stage), with the needles now long gone (not much left to burn), they are now far less of a fire hazard, particularly for more-likely-to-spread crown fires. What the mix of live and dead lodgepoles do pose is ideal conditions for shade-

tolerant spruce and fir seedlings to establish and the forests to gradually morph back into the stable, beautiful and less-fire-prone climax forest that they once were.