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Comments: I am writing to provide comment on the proposed Frisco Nordic Center Iron Springs Trails, Hut, and SUP Adjustment project. My comments address the proposed projects separately, as I believe they differ substantially in character, impact, and the appropriateness of the categorical exclusions being applied.

Trail Projects: Supportive with No Objection

The proposed winter Nordic trail and summer multi-use trail connecting Summit High School to the existing FNC trail network are reasonable improvements that I support. The 2017 Highway 9 realignment created a logical gap in connectivity, and a soft-surface alternative to the Dillon Recreation Pathway addresses a genuine need. These trails will benefit high school Nordic athletes, reduce congestion on existing routes, and provide access to the Backyard trail network without fundamentally altering the character of the area. The application of 7 CFR § 1b.4(d)(44) to these trail projects is a reasonable fit, and I have no objection to their proceeding.

Overnight Hut: Opposed

I oppose the construction of the proposed overnight hut and urge the Forest Service to either deny that component of this project or require a separate Environmental Assessment before proceeding. My objections are both substantive and procedural.

On the merits, the Frisco Peninsula is not an appropriate location for a backcountry hut experience. The stated purpose of the hut is to introduce novice users to the backcountry environment, but the Peninsula is not a backcountry environment. It is a heavily used recreational corridor, regularly crowded with Nordic skiers, hikers, and mountain bikers, particularly on weekends. The 1.05-mile access route from the parking area does not provide the separation from developed areas that defines a meaningful hut experience. The proximity to town, combined with the ease of access, is likely to attract a very different pattern of use than traditional hut facilities, including noise, increased waste, and heavy social use incompatible with the recreational character that existing users value.

The proposal acknowledges that construction and maintenance access will rely primarily on the Buzzsaw Trail, and that registered hut guests will use Buzzsaw and Crown Point Trails for winter access. Buzzsaw is a popular and well-used route in both winter and summer. Converting it into the primary access corridor for an overnight facility will materially change the experience of that trail for existing users. This impact deserves more than a cursory review.

It is also worth noting that accessible hut options already exist in the area. NOLO and other facilities with comparable amenities already serve users seeking an introduction to hut-based recreation. The stated need to serve novice users does not require a new facility on one of the most heavily used parcels in the FNC.

Procedural Concerns: Categorical Exclusion Applicability

I am concerned that the Forest Service is bundling two substantively different projects under a single FANEC in a manner that obscures the distinct impacts of the hut and stretches the applicable categorical exclusions beyond their intended scope.

The CE under 7 CFR § 1b.4(d)(44) applies to construction at an "existing recreation site." The proposed hut is sited within a SUP area being expanded specifically to accommodate this project. Whether that newly incorporated parcel qualifies as an "existing recreation site" under the regulation is a threshold question the Forest Service should address explicitly in the FANEC rather than assume.

More significantly, the CE under 7 CFR § 1b.4(c)(19) governs ministerial actions related to ski area permit

renewals under the National Forest Ski Area Permit Act of 1986, such as changes in ownership, permit expiration, or changes in applicable statutory authority. The Frisco Nordic Center is a Nordic center, not a downhill ski area, and this provision was not written to cover new hut construction or trail development. Applying it here as a vehicle to avoid NEPA review of a new overnight facility is an inappropriate use of that exclusion.

Because these projects are being analyzed together, the trail work, which is appropriate for categorical exclusion, is being used to carry a more consequential project through without adequate review. I urge the Forest Service to separate the hut from the trail projects in its NEPA analysis, apply the extraordinary circumstances review rigorously to the hut component, and determine whether the cumulative impacts of a new overnight facility on an already heavily used parcel truly fall below the threshold requiring an Environmental Assessment.

Thank you for the opportunity to comment.