



BOARD OF COUNTY COMMISSIONERS

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208 East Lincoln Ave. | PO Box 68
Breckenridge, CO 80424

US Forest Service
Adam Bianchi District Ranger c/o Ashley Nettles
PO Box 620
Silverthorne, CO 80498

Dear Mr. Bianchi,

The Summit County Board of County Commissioners (BOCC) would like to thank you for the opportunity to comment on the Notice of Proposed Action for the Swan Mountain Project. Reducing community wildfire hazards, improving wildlife habitat, enhancing trail sustainability, and restoring stream connectivity are commendable efforts that require action from all land management agencies in Summit County. We are pleased that the proposed action includes all of these elements of holistic resource management. The BOCC would like to provide feedback on the Swan Mountain Project in the following areas:

Wildlife Habitat – Snowshoe hare are briefly mentioned in the wildlife habitat section of the NOPA for their role as a primary prey species for Canada Lynx, a federally listed species. More information about how lynx use the proposed project area and the short and long-term implications of this project on lynx habitat would be appropriate. The NOPA states that “dense regenerating lodgepole pine and mixed conifer stands” are used by lynx and hare. This habitat may be negatively impacted by “stimulating grasses and forbs in the understory,” as well as by mastication and chipping treatments, which are discussed below.

Treatment Methods – Broadcast Burning - The use of prescribed fire is essential for managing fire dependent ecosystems. However, broadcast burning will be a new practice in Summit County and will occur at different times of year and under different conditions than what residents have become accustomed to during pile burning operations. In light of this, public information and communications surrounding broadcast burn timing, conditions, and locations will be crucial. The US Forest Service should have explicit communications plans in place for each proposed broadcast burn unit. These plans should include contact lists for relevant smoke receptors; maps showing burn location, neighborhood distances and directions, fire breaks, and control measures; and a list of resources available for the burn operations, contingency plans, and pre-burn public engagement plans. Burn day communications will also be imperative to the success of performing broadcast burns in Summit County to ensure public support and maximize public awareness.

Treatment Methods – Mastication and Chipping – Mastication and chipping treatments should be avoided, as these treatments may reduce tree regeneration to a large extent and germination of lodgepole pine will not occur on the masticated material and wood chips. Additionally, decomposition rates in Summit County are very low and the impacts of these treatments will be very long lasting. County staff have observed regeneration failure up to ten years later at sites in the County where mastication treatments have been utilized in the past. The management goal for montane lodgepole pine forests should be a mosaic of even-aged lodgepole pine stands, which can be achieved by allowing natural regeneration of lodgepole pine on native mineral soil in treated areas and subsequently treating adjacent areas as the treated stands mature. This will also reduce the need for fill-in plantings in the future, as well as the long-term costs and efforts associated with this project. Materials slated for mastication should be piled with machinery and burned at the landing sites of mechanical treatment units to eliminate the need for mastication treatments and encourage natural lodgepole pine regeneration dynamics.

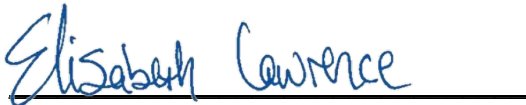
Temporary Roads - T114 – The proposal states that all temporary roads would be closed to the public while

operations are occurring. This is action appropriate in all proposed locations, with the exception of T114. The closure of the "Red Trail" corridor to public access would eliminate a vital connection in the Soda Creek trail system for the duration of the proposed operations and require a 2+ mile detour around the trail closure. County staff have observed successful shared use of roads by non-motorized recreational users and logging operations on Gold Run Gulch Rd and Prospect Rd near Breckenridge. Maintaining public access on the existing "Red Trail" corridor during operations, and until the reroute is constructed, should be considered.

Soda Creek Stream Health Improvements –The BOCC would like the opportunity to review and comment on the design plans for the stream restoration activities in this area. Summit County has previously invited the US Forest Service to review and comment on river restoration designs for the Swan River on County-owned lands adjacent to the National Forest. County staff have stream restoration experience and can advise on design considerations.

Thank you again for the opportunity to comment on the Swan Mountain Project NOPA. Please reach out to Jordan Mead, Resource Specialist at the Summit County Open Space and Trails Department at (970) 668-4065 or jordan.mead@summitcountyco.gov to address or follow up on comments from the BOCC. Be well.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Lawrence". The signature is written in a cursive style and is positioned above a solid black horizontal line.

Elizabeth Lawrence

Chairperson, Summit County Board of County Commissioners