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Comments: Frisco Backyard Project Objection

I object to the proposed Frisco Backyard Project. It is based upon ill-advised objectives and false assertions. The environmental assessment is woefully inadequate and the finding of no significant impact is non-responsive to comments made by myself and others.

In my draft EA comments, I urged that the fuels treatment and recreation trail modification portions of the project be separated as unrelated and diluting attention to the problems with each. I also urged that the project finances and financial impacts be disclosed as they are central to understanding of the project and the project would impose significant financial burdens on the Town of Frisco. The FONSI and EA ignored these basic requests, totally failing to address them. My comments and objections focus on the fuels treatment portion of the proposal. With no financial information presented, I was unable to evaluate those impacts, nor could any other members of the public..

The main stated objective of the fuels treatment portion of the project is to "reduce high intensity wildfire risk." As I commented and as borne out by the attached table "Summit Fires Greater than One-Quarter Acre," based upon data from the Dillon Ranger District provided to me subsequent to the public comment period for the Frisco Backyard Draft EA, fire poses little risk to the Frisco area. It should not be used as a scare tactic to justify forest clearing or thinning in the name of fuels reduction. The table shows that no homes or other structures were burned by wildfire in Summit County in the last twenty years and no one remembers any before that. Basing its justification almost entirely upon reducing wildfire risk, the Frisco Backyard Project is fundamentally flawed and its EA totally inadequate. The FONSI totally fails to address my criticism of this basic objective. The EA must be revised to account for this data and an evaluation as to how the purported purpose and need of the Project can be supported based on the objective data contained in the attached table.

Also, as borne out by the table, only one of the 21 significant fires of the last twenty years was caused by lightning and nearly all of the twenty human-caused fires were either determined to be caused by campfires or their cause was not officially determined but they are expected to have been caused by campfires. Thus, simply banning campfires would virtually eliminate wildfire risk for the project area. The Frisco Backyard EA is fundamentally flawed and inadequate by not evaluating this as an obvious alternative action for addressing the proposed project's basic objective.

The Frisco Backyard Project's proposed actions for "reducing high-intensity wildfire risk" are based entirely upon the concept of "flame length" and models built on that concept. In my comments on the draft EA, I suggest that speed of spread of fire would be a far more meaningful measure of fire risk as evidenced by recent fires in predominantly grassy rather than forested areas such as those of Marshall, Colorado and Maui, Hawaii. Publications of the US Forest Service and state and regional fire-fighting agencies cited in the "Logging forests increases wildfire risk rather than helping" Summit Daily letter to the editor of October 1, 2024, text attached, bear out the fact that forest harvesting can increase fire risk and how dramatically faster wildfire spread is in grassy and regrowth areas than in natural mature forest. Spruce/fir, the natural climax ecosystem of Summit County, is totally absent from the fuel column of the "Summit Fires Greater than One-Quarter Acre" table. ("Mixed Conifer," appearing three times, indicates presence of spruce and fir, but also similar portions of lodgepole pine.) By assuming that reduction of fuel volume decreases fire risk, the Frisco Backyard Project proposal is fundamentally flawed. The EA must be revised to account for speed of wildfire spread as an alternative, if not superior, means of assessing the proposed project's basic objective of reducing wildfire risk. At minimum, the speed of wildfire spread data must be assessed to determine the effectiveness of the proposed project in meeting the purported

purpose and need The FONSI totally fails to address my recommendation of considering firespeed spread.

In my draft EA comments, I pointed out that the draft EA repeatedly says that thinning is unwise and that previously and proposed thinning and other fuels reduction treatments would require subsequent future treatment, whereas taking no action would allow the natural succession to stable, fire resistant, climax forest that would require no future treatment. I suggested that this makes the project proposal largely a dig-holes-to-fill-them-back-in make-work project, directly contrary to current government emphasis on efficiency and wasteful spending reduction. The EA must be revised to consider this aspect of the no action alternative and the no action alternative's relative value in preserving limited agency resources in terms of generating future obligations.

My comments on the draft EA include 32 additional bulleted false assertions and glaring omissions. I stand by all of these and include them as objections by reference. With the exception of the following three items, I also cite them as bearing witness to the final EA (virtually unchanged from the draft for the fuels reduction portion), the FONSI and the public comment process for this project as being totally non-responsive and completely at odds with the spirit of the National Environmental Policy Act.

On page 3 top, the FONSI talks about my comments about the growth of grass in treated areas and the greater fire risk of grass. The FONSI then claims that the area has little grass and would still after treatment. The FONSI also says that "we do not see grass wildfires within our subalpine fuel type..." The "Summit Fires Greater than One-Quarter Acre," table includes grass as one of the fuel types in more than half of the large fires over the last 20 years. The EA and FONSI must be revised to reflect this information and the utility of the Project re-assessed in light of this information.

On page 3 bottom, the FONSI says that the agency moved the more intensive fuel treatments farther from recreation and developed areas (maybe before the draft EA). This could be considered responsive to my comments about a major fuel break also being a major grass highway for spreading fire rapidly. But it also says that the agency felt compelled to have intensive treatment somewhere, so speaks loudly to the project being make-work. The EA and FONSI must be revised to assess the basis for this bias in favor of intensive treatment and document whether the existing data and science supports intensive treatment in this area, given the documented lack of historic fire risk from anything other than campfires and the science demonstrating that the no action alternative would render the same results, with less obligations for future agency resources.

On page 4 bottom, the FONSI says that one commenter opined that left alone the lodgepole stands would morph into spruce-fir climax, as though this was an unusual opinion rather than the normal succession process and provides no text or analysis to refute it.. Then, at the very bottom of that page, it says that "...text and analysis were added to the final EA describing that not all lodgepole forests are destined to become spruce/ fir in their climax state...." thus acknowledging that most lodgepole forests are indeed destined to become spruce/ fir in their climax state. This comment should therefore not be ignored and any refutation of it and the analysis that supports that refutation should be included in the EA and/or FONSI. Otherwise, the EA and FONSI should be updated to account for this fact of the normal succession process in its evaluation of alternatives and impacts from this Project.

Overall, based on the foregoing, the EA and FONSI should be remanded to the agency to address the identified gaps in its analysis. Without doing so, the agency's decision fails to comply with the National Environmental Policy Act and Administrative Procedure Act.