



March 15, 2022

Scott Fitzwilliams
Forest Supervisor
White River National Forest
900 Grand Ave
Glenwood Springs, CO 81601

Dear Mr. Fitzwilliams,

Please accept this letter as formal comment for the Booth Creek Fuels Treatment Project and thank you for the opportunity to comment on this project. The Town of Vail would like to formally support this proposed action with consideration of the comments below. The Town of Vail is keenly aware of the elevated risk of wildfire. As a co-developer and signatory to the 2020 Vail Community Wildfire Protection Plan (CWPP), we feel that the USFS and Town of Vail have strong alignment in the commitment towards reducing wildfire risk to Vail and the surrounding Forest.

The proposed action as described in the Notice of Proposed Action directly addresses several goals of the CWPP and when completed will address a high priority treatment area as identified in the CWPP. We feel that this project will directly decrease wildfire risk to neighboring communities and infrastructure and complement the wildfire mitigation work that is occurring on Town of Vail land as well as adjacent private lots. Please consider the following comments in making your decision.

Comment 1: Due to the proximity of designated Wilderness to developed lots within Vail it is critical that fuels reduction work occur within the Eagles Nest Wilderness Boundary. While the Town understands the intent of minimizing the trammeling of the Wilderness area, significant consideration should be given to ensure managers have adequate tools to effectively meet the goals of the project. Of particular importance is the use of aircraft and UAS for ignitions, monitoring and containment. Due to the steep and rigid terrain, hand ignitions will be slow and will have considerable risk to personnel on the ground. This will limit the size of burns and slow the implementation. Arial ignitions can rapidly ignite large areas greatly increasing efficiency and safety of operations. This will decrease the total number of burn days needed to meet the project goals and also decrease the number of days the project impacts the adjacent community, recreation and the wildlife in the area.

Comment 2: The Project Design Criteria (PDC) are well thought out and address the specific concerns of impact to each of the identified resources. Taken individually each PDC seems relatively easy to comply with causing minimal impact to overall project implementation. Collectively the PDCs may present

overall challenges to rapid implementation of this proposed action. Operating windows in the project area are already very small due to extended winter conditions and potential burn windows are even smaller due to the need to meet air quality regulations and ideal fuels conditions. In making your final decision we encourage you to consider the collective impact of the PDCs on project implementation. It is our community's desire to implement this proposed action as soon as practical. It is widely recognized that the wildfire environment is rapidly changing, and it is a matter of when, not if, we have a wildfire affecting our community.

Comment 3: This project takes into consideration Strategy 6 of the Vail CWPP, "Create compartmentalization across the planning area where unplanned wildfire can be managed for multiple resource benefits when appropriate". Units 104, 106 and 108 are of particular importance in achieving this goal within the project area. The combination of these units creates a north to south compartmentalization along the Spraddle Creek drainage connecting the bottom of the drainage to the tundra on Bald Mountain. This compartmentalization will be a critical holding feature for a fire in surrounding watersheds and may prevent landscape scale ecosystem losses like have been seen in other large fires.

The Town of Vail Feels strongly that this proposed project is in alignment with the goals and objectives as identified within the CWPP. While fire plays an important natural role in the ecosystem it also presents the largest single threat to the safety and vitality of the community. If we are to achieve our collective goal as described in the CWPP of "decreasing the probability of landscape scale high severity wildfire events" we must implement projects such as you have proposed as rapidly as possible.

The Town would like to thank you for the time you have taken to fully analyze this project. If you have any questions regarding these comments please direct them to:

Paul Cada
Vail Fire and Emergency Services
Wildfire Program Manager
970.477.3475
pcada@vailgov.com

Regards,

A handwritten signature in black ink that reads "Kim Langmaid". The signature is fluid and cursive, with a large loop at the end of the last name.

Kim Langmaid

Mayor-Town of Vail