Wildfires are a chief threat to public health and safety on the Western Slope, and the SLDP is surrounded by areas of "High Intensity Wildfire Risk" according to the Colorado State Forest Service (map attached).

The Sweetwater community was forced to evacuate on August 13, 2020, because of the Grizzly Creek fire burning approximately 13 miles away. Fire officials explained that the mandatory evacuation despite such a great distance was because Sweetwater is a box canyon with the single egress being Sweetwater Road. https://www.9news.com/article/news/local/wildfire/grizzly-creek-fire-latest-colorado/73-42f067f3-b2b3-4f7c-8151-778162eb0a4f

Since the NOI does not include adding another egress to this box canyon, wildfire as a threat to life and health must be treated with paramount respect. A fire closing Sweetwater Road between the Colorado River Road and the SLDP site could be especially catastrophic.

USFS' Booth Creek Fuels Project Environmental Assessment (May 2023) accurately reflects conditions in and around the SLDP area too:

> "Wildfire hazard has increased in Colorado and the West due to forest and land management activities, insects and disease, increased development within wildland areas (unoccupied land), and climate change. In 2020, five major wildfires burned over 300,000 acres (more than 25 percent) of NFS lands on the Arapaho and Roosevelt National Forests, with two being the largest in Colorado history (USDA Forest Service 2021). Also in 2020, the Grizzly Creek Fire burned approximately 33,000 acres of NFS lands outside Glenwood Springs, making it the largest wildfire in the history of the WRNF (USDA Forest Service 2021). Within the project area, fire suppression has resulted in elevated hazardous fuel loads due to the relative lack of landscape disturbance (fire) for over 100 years. Insects and disease, including mountain pine beetle (MPB), spruce beetle, and Armillaria root disease, have contributed additional hazardous fuel loads in the form of dead and downed trees…Lastly, climate change has resulted in more severe soil-moisture drought conditions in Colorado over the past 30 years due to a combination of below-average precipitation and the warming trends (Lukas et al. 2014). Climate projections indicate that the frequency and severity of heat waves, droughts, and wildfires would increase in Colorado by the mid-21st century due to warming. Collectively, these conditions have elevated wildfire hazard in the project area."

Leanne Veldhuis, District Ranger for the Eagle-River Holy Cross Ranger District, said in an interview with the Vail Daily, "Over the course of many decades we've been suppressing virtually all fire in our forests as we have communities and other values present now, but forests do need fire to some extent. By putting fire on the landscape in a controlled manner so that it doesn't become a catastrophic fire, the hope would be to bring our forests here back to a healthier state, with more species diversity, more age-class diversity. If (we) do get a wildfire in this area one day by having the forest treated for a lot of the hazardous fuels to reduce that fuel load, then it would make a potential wildfire easier to control." https://www.vaildaily.com/news/vail-fuels-reduction-booth-creek/

The NOI proposes to increase human occupancy within the SLDP by 1,000%. Documented historic usage was approximately 30 people a day as per USFS' own campground occupancy data plus visitation to AJ Brink Outfitters as verified by a 2017 State of Colorado water system study (both

attached). Proposed parking spaces multiplied by USFS' average vehicular occupancy of 2.4 increases total visitation to >300 people per day, which is a ten-fold increase.

This huge increase in visitation will occur at the terminus of an already dangerous 10-mile mountain road through the box canyon, which is both the only egress for evacuees and the only access for firefighters and EMS. 300+ State Park recreators will also significantly increase the wildfire risk as 89% of wildfires are human-caused per Congressional Research Service's June 1, 2023 Wildfire Statistics (attached). That report also indicated that "about 1% of wildfires become conflagrations—raging, destructive fires—but predicting which fires will "blow up" into conflagrations is challenging and depends on a multitude of factors, such as weather and geography."

This NOI proposes to increase both the risk of wildfires from increased human activity and the adverse impacts of a wildfire to private property, community infrastructure, public and firefighter safety, and Forest Service resources.

Hazardous fuels reduction projects are therefore warranted in and around the SLDP. Fire behavior modeling specifically using FlamMap within IFTDSS is necessary, with the goal to reduce crown fire risk and keeping flame lengths below eight feet on high fire danger days (Andrews & Rothermel 1982). This modeling can then be analyzed to determine the appropriate mitigation buffers that are required to safely allow evacuation of both the State Park visitors & the Sweetwater community while simultaneously allowing safe entry for firefighters responding to a wildfire.

An analysis of Sweetwater Road as simultaneously both the sole emergency evacuation route and the sole emergency response route and implementation of the requisite improvements to blind curves and constricted areas are also necessary given the scale of proposed development.

After approval of a State Park, USFS will retain responsibility for the reasonably foreseeable increase in activities and thus increased wildfire risks on USFS lands within & near the Sweetwater box canyon but outside the State Park borders (e.g. Sheep Creek, Sweetwater Cow Camp, Coffee Pot, Deep Creek). As White River National Forest public affairs officer David Boyd told the Summit Daily, "it only takes one (unattended campfire) to start a wildfire."
https://www.summitdaily.com/news/colorado-national-forest-abandoned-campfire/

Therefore, this high intensity wildfire risk must be mitigated through hazardous fuels reductions prior to approval of the SLDP. Hazardous fuel refers to a fuel complex defined by kind, arrangement, volume, condition, and location that presents a threat of ignition and resistance to control. (FSM 5140.5 – Definitions). District Ranger Veldhuis sums up the purpose of this NEPA comment, "That's the ultimate goal with any hazardous fuels reduction project; you're trying to anticipate and plan for a future wildfire that you hope never comes."