

Kenneth Wright

July 19, 2026

Brian Glaspell

Forest Supervisor and Responsible Official
White River National Forest
900 Grand Avenue
Glenwood Springs, CO 81601

Cc: Leanne Veldhuis, Eagle-Holy Cross District Ranger and EIS Interdisciplinary Team Leader

Re: Sweetwater Lake Recreation Management and Development Project Draft Environmental Impact Statement - Request to Delay Decision Pending Site-Specific All-Hazards Emergency-Access and Evacuation Analysis

Dear Mr. Glaspell:

I submit this timely, specific written comment on the Draft Environmental Impact Statement for the Sweetwater Lake Recreation Management and Development Project (Draft EIS or DEIS). The DEIS identifies you as the Responsible Official and states that the Draft and Final EIS will provide the environmental analysis supporting your Record of Decision, including selection of an alternative and required Resource Protection Measures, Best Management Practices, and monitoring. DEIS, Abstract at i; DEIS at 11.

I request that you delay issuance of the Final EIS and Record of Decision and refrain from approving the proposed Forest Plan amendment or issuing the proposed 20-year special-use permit until the Forest Service has completed, published, and obtained meaningful public comment on a site-specific, all-hazards ingress, egress, emergency-access, and evacuation analysis.

The DEIS and released technical reports do not establish that the proposed project population, neighboring land users, and emergency responders could safely leave or reach Sweetwater Lake during a wildfire, flash flood, debris flow, landslide, rockfall, culvert failure, road failure, or other foreseeable emergency. Instead, the DEIS leaves preparation of an Emergency Response and Evacuation Plan to a future special-use-permit condition without providing the plan, its underlying feasibility analysis, or a commitment that either will be completed and publicly reviewed before the decision. DEIS at 33.

An operating plan cannot substitute for predecisional feasibility analysis when the missing information could materially affect the selected alternative, permissible occupancy, overnight development, necessary road improvements, emergency-refuge provisions, construction phasing, or permit terms. This comment is intended to preserve the issues for the predecisional objection process and, if necessary, review of final agency action.

I. The Forest Service record establishes a site-specific public-safety issue

A. The project is at the terminus of a dead-end road

The DEIS states that the project is located "at the terminus of a dead-end road." It also states that through traffic beyond the project area is not possible because Sweetwater Road terminates at the Hilltop Trailhead, where motorized access ends. DEIS at 173.

Visitors and other corridor users leaving the area would use Sweetwater Road while firefighters, ambulances, law-enforcement officers, road crews, and heavy equipment could be attempting to enter through the same corridor. The DEIS does not analyze concentrated outbound evacuation traffic, simultaneous inbound emergency traffic, route-clearance time, or the consequences of a vehicle, fire, flood, debris flow, landslide, culvert failure, or road failure obstructing the corridor.

B. Ordinary traffic estimates do not establish emergency evacuation capacity

The DEIS identifies 399 vehicle trips per day as Sweetwater Road's stated functional-capacity or roadway-classification threshold. It estimates existing peak summer-holiday traffic at 333 trips per day at the county boundary and 473 trips per day near the Colorado River Road intersection. It acknowledges localized congestion at narrow segments or intersections, limited passing opportunities, safety concerns, and portions of the road in Eagle County that do not meet county standards. DEIS at 174-76. This ordinary daily-volume threshold is not an emergency evacuation-capacity calculation.

Under the Proposed Action, the DEIS estimates gross future average daily traffic of 322 to 396 trips per day. It explains that this gross estimate assumes all project traffic is additive and that net future AADT may be lower because some project visitors may already use the corridor. Even with that qualification, the DEIS acknowledges that peak-day traffic could exceed the counties' 400-trip threshold. DEIS at 181-82.

The DEIS estimates projected peak-day market demand of 239 to 479 visitors, corresponding to approximately 200 to 400 one-way vehicle trips, and projected peak-day operational site capacity of 304 to 972 visitors, corresponding to approximately 254 to 810 one-way vehicle trips. Although the Visitor Use Management Plan would limit on-site use to approximately 250 visitors at one time, the DEIS recognizes that daily visitation could be higher because of visitor turnover. DEIS at 181-82.

The project itself would authorize overnight facilities, increased occupancy, large recreational vehicles, equestrian rigs, and approximately 10 years of construction at this dead-end location. Those project elements create evacuation demand and opposing emergency traffic that ordinary AADT and Level-of-Service estimates do not evaluate.

The DEIS states that project partners would "seek to address" existing roadway constraints before implementation and would coordinate with Eagle and Garfield Counties to identify and fund improvements. It does not identify the improvements, committed funding, completion schedule, or a condition prohibiting construction or occupancy until necessary work is complete. DEIS at 178-79.

C. The DEIS does not calculate simultaneous evacuation demand

The Proposed Action would manage on-site capacity to approximately 250 visitors at one time and provide approximately 125 to 135 parking spaces. DEIS, Abstract at i; DEIS at 182. The DEIS also estimates approximately 10 one-way employee commuter trips per day and approximately 750 one-way construction haul trips per year during an approximately 10-year construction period. DEIS at 180.

The DEIS does not use these figures to determine the number or mix of vehicles that could require simultaneous evacuation, the time needed to clear each occupied zone to a defined place of safety, or the effect of employee, contractor, construction, resident, horse-trailer, recreational-vehicle, and inbound emergency-response traffic. It also does not clearly state whether the 250-visitor limit includes resident staff, concessionaire or outfitter personnel, contractors, construction workers, or persons traveling to lands beyond the proposed permit area.

D. The Proposed Action departs from the Roadway Assessment Report's vehicle recommendations

The DEIS states that existing gravel and chip-seal access roads include tight turns and narrow areas. It reports that the Tetra Tech Roadway Assessment Report recommended limiting travel trailers to 30 feet and prohibiting Class A motorhomes. The Proposed Action instead permits travel trailers and Class A, B, and C motorhomes with a combined length of up to 36 feet and expressly allows equestrian rigs up to 60 feet. DEIS at 27.

Because the DEIS identifies physical turn-radius constraints as the basis for the recommendations, the Forest Service should disclose the engineering and emergency-egress basis for departing from them, particularly during simultaneous evacuation and responder entry.

The DEIS appears internally inconsistent about the report date: the project description calls it a Roadway Assessment Report completed in 2025, while the reference lists identify "Tetra Tech 2024, Roadway Assessment Report for Sweetwater Road." DEIS at 27, 224, 230. The correct, complete, and final report should be published, together with the May 27, 2025 traffic-volume technical memoranda submitted to CPW and any preliminary road-improvement recommendations relied upon in the DEIS.

E. The Forest Service has recognized that vehicle queueing can create dangerous conditions

The DEIS rejected a suggested lodge and check-in configuration because vehicles, including vehicles with trailers, could back up along Sweetwater Road, resulting in dangerous traffic conditions and illegal parking. DEIS Appendix A at A-20. That recognition warrants analysis of the greater queueing and opposing traffic that could occur during an emergency evacuation.

F. The DEIS recognizes wildfire and geological hazards

The DEIS states that the 2025 Derby Fire demonstrated that wildfire continues to pose a risk to public safety and the natural and cultural resources of Sweetwater Lake. DEIS at 4. It states that fuels reduction is not currently proposed as part of the special-use permit, while larger-scale future fuels mitigation could be included in an Annual Operating Plan. DEIS at 32. The proposed Forest Plan amendment states that defensible space should be maintained around overnight facilities and along primary ingress and egress routes for public safety during wildfire or other emergency response. DEIS Appendix B at B-12.

The DEIS also identifies sheetwash alluvium, debris flows, landslides, significant landslide activity, evidence of recent sediment movement, mass-wasting deposits near infrastructure, flood-prone sheetwash areas, recent small landslides, and an alluvial fan bisected by the public road. DEIS at 160. It states that buildings and roads could be damaged by future mass-wasting events and that the potential for such events in and near the project area "is not fully known at this time." DEIS at 165.

G. Alternative 4 and the construction period present additional unresolved conditions

The DEIS estimates approximately 78,010 annual visits under Alternative 4, does not impose the Proposed Action's 250-visitor managed limit, estimates future AADT as high as 496 trips, and estimates peak-day operational capacity of 302 to 978 visitors producing approximately 252 to 815 one-way vehicle trips. DEIS at 156, 187-88. It provides no corresponding evacuation-feasibility analysis.

The Proposed Action assumes approximately 10 years of construction and approximately 750 one-way haul trips per year. The DEIS acknowledges possible congestion, slower travel, flagging, and short road closures, but does not separately evaluate emergency access and evacuation during construction phases involving heavy equipment, deliveries, worker vehicles, incomplete internal roads, and possible partial public occupancy. DEIS at 180-81.

II. The transportation chapter directs the public to an analysis that Section 3.8 does not contain

The transportation chapter directs reviewers to Section 3.8 for an analysis of "public transportation, emergency medical services, and ingress/egress for natural disaster emergencies (e.g., wildfire)." DEIS at 170. The Traffic, Parking, and Roads Technical Report contains the same cross-reference to the Socioeconomics Technical Report.

Section 3.8 identifies emergency-service providers and jurisdiction, describes countywide socioeconomic conditions, estimates visitation and spending, and discusses general increases in public-service demand. It does not analyze the physical or temporal feasibility of evacuating the project area. The cross-reference therefore does not lead to an abbreviated evacuation analysis; it leads to a different subject of analysis.

Section 3.8 states that Garfield County would lead emergency response and that added CPW and Forest Service support would improve initial response and coordination but would not replace county jurisdiction. DEIS at 153. The existence of on-site CPW personnel is not a substitute for project-specific technical review by the county and emergency-response organizations that would direct and perform an evacuation.

I have not located in Section 3.8, elsewhere in the DEIS, or in the released technical reports a quantitative, route-specific analysis addressing:

- Maximum simultaneous evacuation population and vehicle demand;
- Notification, decision, pre-movement, and physical road-clearance time;
- Time available before wildfire or another hazard affects an occupied area or necessary route;
- Road widths, grades, choke points, turnouts, bridges, culverts, sight restrictions, and vulnerable segments;
- Simultaneous outbound evacuation and inbound emergency-response traffic;
- Horse trailers, recreational vehicles, construction vehicles, stalled vehicles, and visitors needing assistance;
- Smoke, darkness, severe weather, power loss, and communications failure;
- Wildfire, flash-flood, debris-flow, landslide, rockfall, culvert-failure, and road-loss scenarios;
- Obstruction at different locations along Sweetwater Road and Colorado River Road;
- Temporary refuge, safety-zone, or shelter-in-place capacity;
- The feasibility of a physically independent secondary route;
- Construction-phase evacuation conditions; or
- Comparative evacuation risk under each alternative.

A discussion of ordinary traffic, emergency-service providers, or countywide service demand is not an evacuation-feasibility analysis. If the Forest Service contends that such an analysis exists, it should publish the complete document, including its authors, methodology, assumptions, input data, models, scenarios, findings, uncertainties, limitations, maps, and agency consultations.

III. The Forest Service received a specific request during the 2024 scoping period

The Forest Service's CARA Public Reading Room identifies Kenneth Wright as the author of a submission received on August 5, 2024, and lists "Wildfire risk NEPA comment.pdf" among its attachments. CARA Public Reading Room Letter 4581794. The DEIS states that the scoping period closed on August 5, 2024.

DEIS at 7.

My 2024 comment expressly requested:

"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."

Kenneth Wright, Wildfire Risk NEPA Comment 2 (Aug. 5, 2024), attached as Exhibit A-2. The comment also requested analysis sufficient to determine mitigation needed to allow proposed park visitors and the Sweetwater community to evacuate while firefighters entered the area and identified the foreseeable scenario of a fire closing Sweetwater Road between Colorado River Road and the project site. Exhibit A-2 at 1-2.

The DEIS states that the Forest Service received 263 unique scoping submissions, of which 122 contained substantive comments, including requests for specific environmental-effects analyses, and that the scoping-comment disposition analysis is maintained in the project file. DEIS at 7-8. The DEIS does not disclose how my comment was classified or coded, the assigned issue statement, the disposition rationale, the responsible specialist, the supporting analysis, or why the requested simultaneous evacuation-and-emergency-response analysis was not included.

Please state for the project record whether the Forest Service considers my timely August 5, 2024 scoping submission concerning wildfire evacuation, simultaneous emergency-response access, and the absence of independent secondary egress to constitute "specific written comments" under 36 C.F.R. §§ 218.2 and 218.5(a). Please also state whether it was counted among the 122 submissions that the DEIS identifies as containing substantive comments, identify its assigned issue statement or code and disposition, and identify where the DEIS or its supporting technical reports analyze the issues it raised.

If the Forest Service determined that the submission was not a specific written comment, was not substantive, did not warrant analysis, or was otherwise excluded from consideration, please identify that determination and its supporting factual and legal basis in the project record.

Regardless of the Forest Service's characterization or disposition of my 2024 submission, I expressly renew and restate its concerns regarding wildfire evacuation, simultaneous inbound emergency response, and the absence of independent secondary egress. Those issues are independently presented and further supported in this DEIS comment. Exhibit A-2 is incorporated as additional documentation that the Forest Service received notice of these concerns during scoping.

IV. A future operating plan is not a substitute for the missing predecisional analysis

The DEIS states that CPW would prepare and maintain an Emergency Response and Evacuation Plan as a permit condition and anticipates emergency helicopter landing areas and visitor notification and evacuation protocols. DEIS at 33. An operating plan describes intended response procedures. A feasibility analysis determines before approval whether the proposed population can reach safety given notification and pre-movement time, vehicle demand, road-clearance time, hazard-arrival time, route vulnerabilities, and opposing emergency traffic.

The National Institute of Standards and Technology's 2025 ESCAPE guidance treats wildfire evacuation as a time-based life-safety problem. It compares the time required for detection, notification, pre-movement, and physical evacuation with the time available before dangerous conditions affect a community or evacuation route and addresses refuge or shelter contingencies when full evacuation cannot be completed. NIST Technical Note 2262r1 (2025). This guidance is not asserted as a binding regulation; it is a relevant federal technical framework for defining the missing analysis.

The U.S. Fire Administration recommends all-hazards roadway planning, primary and alternate routes, two ways out of a community, road widening, fuel reduction along roads, review of bridges and culverts, and advance planning for trailers, recreational vehicles, stalled vehicles, and incoming first responders. U.S. Fire Administration, Wildfire Evacuation Outreach Materials (page reviewed June 24, 2026).

Emergency helicopter landing areas should not be treated as roadway evacuation capacity unless the analysis identifies available aircraft, mobilization and arrival time, passenger and medical lift capacity, landing-zone capacity, staffing, smoke and visibility limitations, nighttime and weather restrictions, fire exposure, and the number of people who could realistically be transported before conditions become unsafe.

V. The special-use and NEPA frameworks require a supported predecisional record

A. The special-use regulations independently require information sufficient to evaluate feasibility and safety

A special-use proponent must provide a project description, maps, and appropriate resource information in sufficient detail for the authorized officer to determine the feasibility and safety of the proposal and appropriate terms and conditions. The officer may require additional information necessary to determine feasibility and suitable permit terms. 36 C.F.R. § 251.54(d)(4)-(5).

The authorized officer must screen the proposed use to ensure that it will not pose a serious or substantial risk to public health or safety. During second-level screening, the officer may request information needed for a full description of the use and its effects and must reject a proposal that cannot demonstrate technical feasibility or would not be in the public interest. 36 C.F.R. § 251.54(e)(1)(iii), (e)(5).

A special-use authorization must contain applicable, more-stringent state public-health and safety standards and terms the officer deems necessary to protect other lawful users, lives and property, and the public interest. 36 C.F.R. § 251.56(a)(1). These provisions require a supported record for the Forest Service's safety determination and permit terms; they do not dictate a predetermined result.

Regardless of the precise extent to which NEPA independently requires each requested modeling component, the Forest Service cannot make the separate feasibility, safety, and public-interest determinations required for the proposed special use on an unexplained assumption that evacuation will be feasible.

B. The selected NEPA framework requires analysis and disclosure before decision

The DEIS states that the Forest Service will finalize the EIS and ROD under its former NEPA procedures and the 2020 CEQ framework and that the project is subject to predecisional administrative review under 36 C.F.R. Part 218. DEIS at 1.

Under the procedure selected for this project, the Responsible Official must complete environmental review before deciding the proposal, consider the environmental documents and public and agency comments, include them in the administrative record, and consider the analyzed alternatives. 36 C.F.R. § 220.4(c) (2020). NEPA requires analysis of reasonably foreseeable environmental effects, unavoidable adverse effects, and a reasonable range of technically and economically feasible alternatives, with professional and scientific integrity and reliable data. 42 U.S.C. § 4332(2)(C)-(F).

Former 40 C.F.R. § 1502.21 (2020) requires disclosure when relevant information is incomplete or unavailable and inclusion of information essential to a reasoned choice among alternatives when the cost is not unreasonable. Current NEPA likewise provides that new scientific or technical research is not required unless it is essential to a reasoned choice among alternatives and the overall cost and time are not unreasonable. 42 U.S.C. § 4336(b)(3).

The selected 2020 CEQ framework states: "If the agency determines that a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and publish a supplemental draft of the appropriate portion." 40 C.F.R. § 1502.9(b) (2020). The absence of evacuation-demand, clearance-time, route-obstruction, hazard-arrival, and opposing-traffic analysis prevents meaningful evaluation of whether the Proposed Action and Alternative 4 can be safely occupied and whether the alternatives require material revision.

The Final EIS must respond to substantive comments through modifications, additional alternatives, improved analysis, factual corrections, or a reasoned explanation. 40 C.F.R. § 1503.4 (2020). A general statement that CPW will prepare a plan later would not answer whether evacuation is feasible or whether the answer requires a different alternative, occupancy limit, road design, development program, or permit condition.

C. Applicable precedent supports focused, project-specific review

In *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349-53 (1989), a Forest Service recreation special-use case, the Supreme Court explained that NEPA ensures that an agency considers detailed information concerning significant environmental effects and makes that information available to the public. The Court also held that NEPA does not compel a particular substantive result or a fully developed mitigation plan. This comment does not demand a final operational script for every emergency; it requests the analysis needed to determine whether the proposal, alternatives, or enforceable permit terms must change before approval.

Seven County Infrastructure Coalition v. Eagle County, 605 U.S. 168, 178-91 (2025), emphasizes substantial deference to reasonable agency judgments about EIS scope and detail and focuses NEPA on the project at hand. This request concerns the project itself, not a separate upstream or downstream project: the federal action would authorize overnight facilities, increased occupancy, large vehicles, construction, and emergency operations at a dead-end location. The resulting evacuation demand and access constraints are direct consequences of the project being considered.

The Tenth Circuit applies a rule of reason distinguishing minor imperfections from omissions that defeat informed decisionmaking and public comment. *Utahns for Better Transportation v. U.S. Department of Transportation*, 305 F.3d 1152, 1163 (10th Cir. 2002), modified on rehearing, 319 F.3d 1207 (10th Cir. 2003). Whether the proposed population can reach safety bears directly on project capacity, road design, overnight use, alternatives, and enforceable permit terms.

VI. Requested action

1. Delay issuance of the Final EIS and ROD and, until the requested analysis and public review are complete, refrain from approving the Forest Plan amendment, issuing the proposed 20-year special-use permit, or authorizing implementation.
2. Publish the complete and final Roadway Assessment Report, identify its correct date and version, and explain the 2024/2025 discrepancy. Also publish the May 27, 2025 traffic-volume memoranda submitted to CPW, any preliminary road-improvement recommendations relied upon, the accepted special-use proposal or application, the initial- and second-level screening determinations, and any safety-related information submitted by CPW under 36 C.F.R. § 251.54.
3. Prepare a site-specific, all-hazards ingress, egress, emergency-access, and evacuation analysis in consultation with the relevant county emergency managers, sheriffs, road departments, fire-protection districts, EMS and search-and-rescue providers, and qualified transportation, wildfire, geological, and hydrological specialists. Define the analysis area from every occupied management zone to a specifically identified place of safety, including every road segment whose obstruction could prevent evacuees from reaching safety.
4. Establish maximum simultaneous occupancy and vehicle demand for visitors, overnight guests, employees, resident staff, contractors, concessionaires, outfitters, construction workers, residents, wilderness users, and other corridor users, including horse trailers, recreational vehicles, persons needing transportation or medical assistance, and inbound emergency-response vehicles.
5. For each material scenario and project phase, disclose required safe-egress time, time available before dangerous conditions affect an occupied area or route, safety margin, uncertainties, and refuge or shelter contingencies. Conduct sensitivity and failure analysis addressing higher occupancy, delayed notification, rapid fire spread, smoke, darkness, severe weather, power and communications loss, trailers, stalled vehicles, responder entry, route obstruction at multiple locations, construction traffic, flagging, temporary closures, incomplete roads, and partial occupancy.
6. Compare results across the Proposed Action, Alternative 4, Alternative 3, and No Action. Evaluate lower occupancy, reduced or eliminated overnight development, large-vehicle restrictions, road improvements, a physically independent secondary route, refuge areas, seasonal or fire-danger closures, phased development, and other technically feasible configurations. Define an independent secondary route as one that does not depend on the same Sweetwater Road corridor, choke points, bridges, culverts, or foreseeable failure locations. Do not credit helicopter landing areas as evacuation capacity without a supported operational analysis.
7. Obtain written, project-specific technical comments from affected emergency and road authorities and an independent review by a qualified evacuation-transportation specialist who did not prepare the existing traffic or socioeconomic reports. Publish the requests, responses, disagreements, reviews, and the Forest Service's resolution of them.
8. Publish the complete analysis - including assumptions, data, maps, models, methodology, consultations, findings, uncertainties, limitations, and technical reviews - in a revised or supplemental Draft EIS. Do not rely for the first time in the Final EIS or ROD on an undisclosed study, consultation, model result, capacity conclusion, or mitigation proposal. Provide at least 45 days for public and cooperating-agency comment, consistent with 36 C.F.R. § 218.25(a)(1)(ii).
9. If the decision relies on road improvements, fuel treatments, refuge areas, staffing, notification systems, visitor limits, closure protocols, or an Emergency Response and Evacuation Plan, make them enforceable through the ROD and permit. Identify responsible entities, performance standards, deadlines, committed funding, approving officials, monitoring and reporting, objective closure or occupancy-reduction triggers, corrective measures, and any prohibition on construction or occupancy until required life-safety measures are completed and approved.
10. State whether my August 5, 2024 submission, CARA Letter 4581794, constitutes specific written comments under 36 C.F.R. §§ 218.2 and 218.5(a), whether it was counted among the 122 submissions containing substantive comments, its assigned issue statement or code, disposition rationale, responsible specialist, supporting analyses, and documents relied upon. Identify where the DEIS analyzes its request concerning Sweetwater Road as both the emergency-evacuation and emergency-response route. If it was not treated as specific, substantive, or warranting analysis, state that determination and its factual and legal basis.

11. If the Forest Service declines to prepare or publish the requested analysis, identify the evidence supporting its public-safety determination under 36 C.F.R. § 251.54, the evaluator, methodology, assumptions, population and vehicle demand, evacuation and hazard-arrival times, route-obstruction scenarios, alternatives and mitigation, and every supporting project-file document. Before selecting an action alternative, state expressly whether the maximum reasonably foreseeable project population can be notified and reach a defined place of safety before a necessary route becomes unsafe or impassable, and identify the calculations, safety margin, reviews, and enforceable measures supporting that determination.

VII. Notice and preservation of review rights

The DEIS states that individuals and entities submitting timely, specific written comments will have the opportunity to object to the proposed project and Forest Plan amendment and that the amendment is subject to predecisional administrative review. DEIS Appendix B at B-4 to B-5. This comment provides my name and postal address, identifies the project, and presents specific written comments with supporting reasons as required by 36 C.F.R. § 218.25.

I expressly raise and intend to preserve for administrative objection and, if necessary, review of final agency action under the Administrative Procedure Act: the missing evacuation-feasibility analysis; the misleading cross-reference to Section 3.8; incomplete or unavailable information essential to a reasoned choice; reliance on future planning and unspecified measures; the special-use safety and feasibility determinations; the alternatives and enforceable measures the analysis could affect; the Forest Service's disposition of my 2024 scoping comment; and the requested remedies. See 5 U.S.C. §§ 704, 706(2)(A), (D).

The DEIS assigns the choice of alternative and required protective measures to the Responsible Official. If a ROD is issued without curing the omission, the project record will reflect that the Responsible Official was specifically notified that the Forest Service had not disclosed whether the proposed population could safely reach a defined place of safety from this dead-end location during foreseeable emergencies.

The prudent and legally defensible course is to delay the decision, complete and disclose the analysis, obtain meaningful public and expert review, revise the proposal as necessary, and decide the project on a complete record.

Please include this comment, its cited authorities and sources, and Exhibits A-1 and A-2 in the project file and address the issues substantively in any subsequent environmental document.

Respectfully submitted,

Signature: _____



Kenneth Wright

Date signed: _____

7-19-2026

Enclosures:

Exhibit A-1 - Forest Service CARA Public Reading Room Record 4581794

Exhibit A-2 - August 5, 2024 Wildfire Risk NEPA Comment

Authorities and sources cited

U.S. Forest Service. Sweetwater Lake Recreation Management and Development Project Draft Environmental Impact Statement (June 2026).

U.S. Forest Service. Traffic, Parking, and Roads Technical Report (June 2026).

U.S. Forest Service. Socioeconomics Technical Report (June 2026).

U.S. Forest Service. CARA Public Reading Room Letter 4581794, Project No. 284162 (submitted Aug. 5, 2024). <https://cara.fs2c.usda.gov/Public/Letter/4581794?project=284162>.

Maranghides, Alexander, and Eric D. Link. WUI Fire Evacuation and Sheltering Considerations: Assessment, Planning, and Execution (ESCAPE), NIST Technical Note 2262r1 (2025), DOI 10.6028/NIST.TN.2262r1.

U.S. Fire Administration. Wildfire Evacuation Outreach Materials, page reviewed June 24, 2026. <https://www.usfa.fema.gov/wui/outreach/wildfire-evacuation.html>.

Council on Environmental Quality. Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act, 85 Fed. Reg. 43,304 (July 16, 2020).

36 C.F.R. §§ 218.2, 218.5, 218.25, 220.4 (2020), 251.54, and 251.56.

40 C.F.R. §§ 1502.9(b), 1502.21, and 1503.4 (2020).

42 U.S.C. §§ 4332(2)(C)-(F), 4336(b)(3); 5 U.S.C. §§ 704, 706(2)(A), (D).

Robertson v. Methow Valley Citizens Council, 490 U.S. 332 (1989).

Seven County Infrastructure Coalition v. Eagle County, 605 U.S. 168 (2025).

Utahns for Better Transportation v. U.S. Department of Transportation, 305 F.3d 1152 (10th Cir. 2002), modified on rehearing, 319 F.3d 1207 (10th Cir. 2003).

EXHIBIT A-1

FOREST SERVICE CARA PUBLIC READING ROOM RECORD 4581794

Sweetwater Lake Recreation Management and Development Project No. 284162

The following metadata is reproduced from the U.S. Forest Service's official CARA Public Reading Room page. The official record is available at:

<https://cara.fs2c.usda.gov/Public/Letter/4581794?project=284162>

Project	Sweetwater Lake Recreation Management and Development Project (SLDP) #284162
Author Name	Kenneth Wright
Organization Name	
Date Submitted	08/05/2024

Attachments listed on the official record:

- 2017 Colorado potable water system study at AJ Brinks.pdf - 593.53 KB
- Congressional Research Service - Wildfire Statistics.pdf - 425.61 KB
- cowrap_20240801_181947PM.pdf - 1.73 MB
- Letter Text.pdf - 2.85 MB
- Sweetwater USFS CG Use_2016-23.pdf - 85.26 KB
- Wildfire risk NEPA comment.pdf - 48.63 KB

This exhibit documents the author, project, submission date, and attachment listing for the August 5, 2024 wildfire and emergency-egress scoping comment. The two-page "Wildfire risk NEPA comment.pdf" follows as Exhibit A-2. Official record accessed July 19, 2026.

EXHIBIT A-2

AUGUST 5, 2024 WILDFIRE RISK NEPA SCOPING COMMENT

Sweetwater Lake Recreation Management and Development Project No. 284162

Original two-page file submitted through the Forest Service CARA system on August 5, 2024:

"Wildfire risk NEPA comment.pdf"

The original document follows this divider without alteration.

Exhibit A-2 is included to establish the content and timing of the issue raised during scoping. Except for the language expressly quoted in the current comment, the current comment does not rely on the exhibit's earlier visitation estimates or incorporate its other factual assertions. Other attachments referenced in the historical comment are listed in Exhibit A-1 but are not reproduced in this packet.

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."