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### **NEPA Comments**

#### **Opposition to Parts of the Proposed Plans regarding Equestrian Use**

As the outfitters who have managed the Sweetwater Lake property for the last 30 years, we have some concerns about the proposed equestrian changes in the new USFS plan. We are concerned about pasture use; ideas about limiting trail access; and the proposed new location of the horse operation.

The footprint of the proposed park property is too big. Your plan is too spread out. It encroaches upon pastures and the ditch. The sprawling of this park will damage too much of the environment and negatively impact wildlife. The park should be contained in the previous resort area without adding more forest service property other than the 40 acres around the old USFS cabin.

There is no need for the park service to build facilities on two of the pastures. These pastures have historic significance. They were established by 1915 when the Keep Ditch was appropriated. They have been in continual use as pastures since that time. It is upsetting to think that these could be turned into RV parks with electric hookups as presented at the open meeting on June 6, 2024.

The pastures are green and used for feed by both horses and wildlife. They are only green due to continued irrigation. Once RV's are parked in a field, it could no longer be irrigated. The beautiful green scenery would turn to brown dust. This is not the scenic pasture that Gov. Polis viewed during his dedication.

These pastures have become an integral part of the wildlife corridor in the White River National Forest. Just this past May 7th, we photographed over 100 head of elk in the 1st, 2nd, and 3rd pastures. We also have a picture of a mule deer doe who may be about to give birth (since it is lying down at the correct time of year) just outside the 1st pasture taken that same day. These photos are attached. In addition, there has been a moose in the 3rd pasture all spring. He - or another moose - was commonly seen down at the inlet three years ago. The moose was there during Gov. Polis' visit. A moose chased a resident down the road near the lake pasture this past spring!

In addition, these pastures are essential to the A.J. Brink Outfitter's business. We have reduced our herd from 80 horses to 50 horses in the last few years since USFS required the horses housed here could only be used here and not in our other permitted areas. These 50 horses need to be in excellent condition to pack up to 200 pounds into the Flat Tops Wilderness for multi-day pack trips and for daily trail rides. To maintain this condition, they need to run and

graze every day. We only use healthy horses in top condition, unlike some other companies. If needed for the barn relocation and parking, we could probably operate without part of the nursery pasture. The barn, corral, and housing could be relocated there and only take up a quarter of the first pasture. However, we definitely need pastures 2 and 3 for horse food and exercise!

We would not use horses who had been standing still in a corral for extended periods. We are known for offering a quality experience for 49 years and immobile horses would greatly diminish this. The USFS has already cut off access to the pastures until June 1st, which means leaving the horses on hay longer than we prefer. We cannot envision our level of service presented on stock that had been standing still with expensive weed-free hay tossed over the fence for them to eat! This degraded experience would put us out of business.

Our second concern regards riding trail access. Historic riding trails go out from Sweetwater Lake in all directions:

**North** from the lake via Old Hill Top on Turret Trail or Shingle Peak Trail (which access additional trails in the Flattops) and Sweetwater Trail to the **west**;

**East** via Hack Lake Trail (part of Ute Trail) to the top of W Mountain;

**South** via the Deep Lake part of the Ute Trail which also branches out both **west** to Lake Creek, Cross Creek, and Dry Sweetwater Trail or branches further **south** to Cow Camp, as well as an additional nice half day loop route.

The Sweetwater area has long been known for exceptional riding trails. Probably the most diverse trails that White River National Forest has to offer.

Equestrians want to ride in all of these directions and not just up the Turret Trail which is what was prescribed at the input meeting! Riders want the variety offered by the current resort area parking to reach all of these diverse trails and not be limited to one access point, nor be required to trailer their horses to the other trailheads. One USFS representative suggested trailering horses to other trailheads. This is impossible. Horse trailers can't turn around above the lake nor in the current campground (proposed day use). The current central location of the barn and adjacent parking is really ideal for equestrian use of this area.

It was suggested at the input session in June that guests ride out along the Keep Ditch which ties into the Turret Trail and Nellie's Nipple/Johnny Meyers Trail. The Keep Ditch is not really a trail. It has a dizzying drop off alongside and is not safe for guests. And every year the ditch sluffs off leading to maintenance. The Nellie's Nipple trail is very steep and frightens many riders. It is dangerous and dizzying with its incredible steepness. As experienced outfitters, we only occasionally use this trail to ride up from Sweetwater Lake, and we NEVER ride back down this way with guests as it is just too dangerous with steep switchbacks. One can keep neither

riders nor saddles in place as they slide forward. In fact, we have used it rarely these last few years as it is not wide enough to meet other horses nor potential hikers.

Likewise, Turret Creek Trail is not a desirable trail. Many equestrians have no desire to even try to ride Turret with its creek crossings and boggy areas. We can't use the Turret Creek crossing from the ditch until mid summer when high water has receded; it is just too dangerous. In addition, this trail is overused and disturbed in August to November by other outfitters. Unfortunately, Turret Trail is highly disturbed, and wildlife has been chased away.

Moving a horse facility to the 2nd pasture and trying to direct horseback riding traffic up to these trails via the Keep Ditch is neither safe nor practical. Piping 1 ½ miles of this ditch would be an exorbitant cost, affect the irrigation system and still wouldn't be wide enough to be considered a safe route. Piping the ditch does not eliminate the scary drop off that can cause a rider to panic midway! Yet this is the path proposed by USFS as the only way to get riders into the Flattops! No one who made this recommendation has ever ridden a horse or even walked along this ditch nor up Nellie's Nipple Trail!

Our third concern is where the new equestrian center would be located. We don't understand why the plans strive to separate the horses from the other recreational events. The horses have always worked well together with the other uses. Guests enjoyed viewing the horses even if they weren't utilizing them. It gave the area a "western" aesthetic.

We are opposed to relocating the barn, staff housing, and the equestrian operations to the second pasture. Besides losing the pasture as a pasture, a road would need to be constructed through the penstemon presently growing there. This would be a large and costly road to be big enough for horse rig turnarounds, parking, and truck trailer camping. It just isn't practical or cost efficient. Maneuvering horse trailers around each other would be easier closer to the main road. By spreading out the human operations, too much of the environment is disturbed. There is no reason to do this!

As an alternative, we suggest keeping the barn and equestrian use where they are now, or near this current centralized area with good access to the road. If this current location cannot be maintained, then we suggest building a new barn in the southern end of the Nursery Pasture (1st pasture), perhaps using part of Dead Horse Flats, a previously disturbed area. The first pasture is big enough for barn, corrals, staff housing, and equestrian camping. Parking for public equestrian day use could be relocated to the present barn/corral area. Access would remain in all four directions for riding. The smaller footprint would be better for flora and fauna. It would mean less disturbance of wintering elk, spring calving, and deer habitat. This would be less disturbance of penstemon and other plant life.

Moving the barn to the 1st pasture would preserve the 2nd and 3rd pastures for horse use. It has simple access to water. It would be easier for hay delivery. It is straightforward access from the main road. It gives some separation yet is close to the current location. Camping spots for horse camping and primitive camping can all fit in this area. Horses could easily reach the

second pasture through the back of this one. It would not funnel an unreasonable amount of people up the Turret Creek direction. While not as good as the current location, the lower part of the Nursery Pasture would be acceptable to us for a horse base.

We hope you can accept our alternatives for equestrian location, trail access, and retaining historic pastures for horse use.

Sincerely,

Adrienne Brink

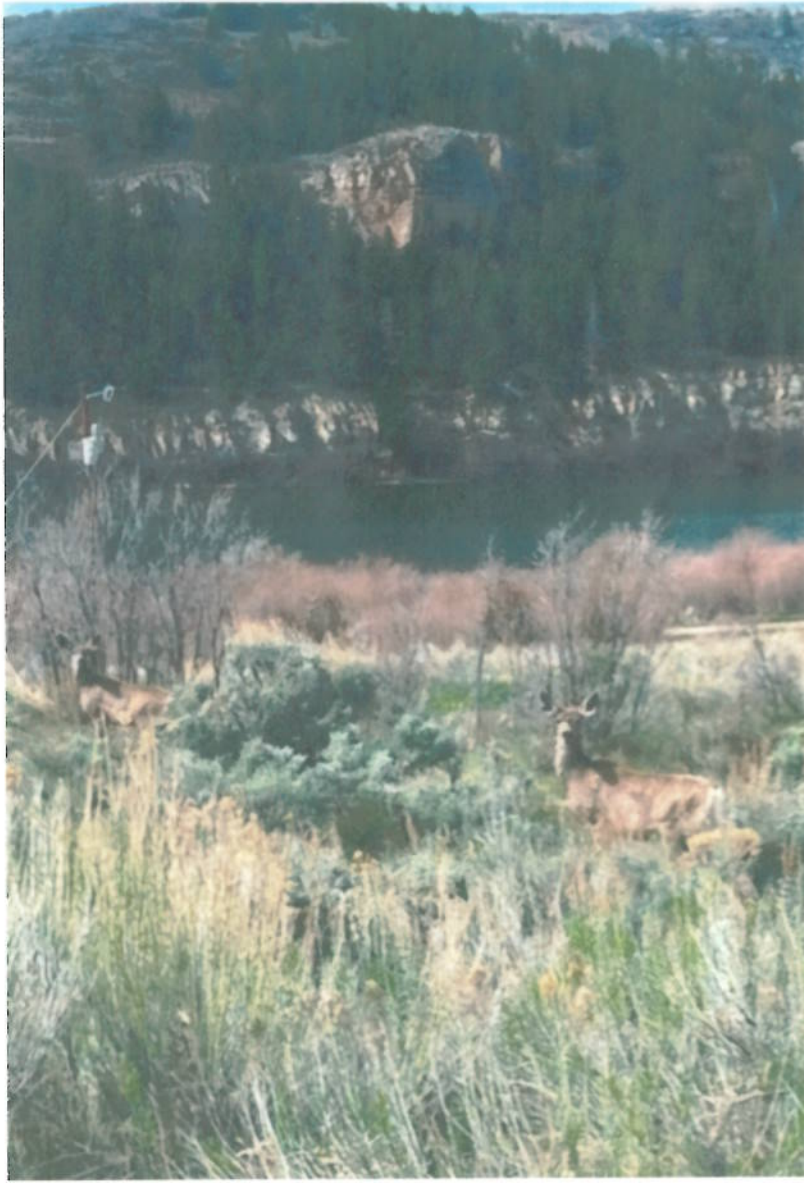
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Aura Schlegel

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PICTURE TAKEN MAY 7, 2024  
APPROXIMATELY 100 HEAD OF ELK  
PIC WAS SENT TO JACOB BREY ON MAY 12, 2024  
CPW



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PIC WAS SENT TO JACOB BREY MAY 12, 2024  
CPW