



COLORADO

Parks and Wildlife

Department of Natural Resources

Northwest Regional Office
711 Independent Avenue
Grand Junction, Colorado 81505
970.255.6100

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

Dear Mr. Fitzwilliams,

Colorado Parks & Wildlife (CPW) appreciates the opportunity to comment on the Sweetwater Lake Recreation Management and Development Project Environmental Impact Statement (EIS). The mission of Colorado Parks and Wildlife is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. Under our mission, CPW is vested in the outcome of the Sweetwater Lake EIS. CPW is agreeable to managing the property at Sweetwater Lake, should that be the selected action, and will engage as a cooperating agency throughout the EIS process. The USFS must thoroughly analyze the topics detailed below to ensure that the outcome of this process meets the needs of the Sweetwater community, the visitors of the property, the State of Colorado, and the United States Forest Service (USFS). EIS analyses should recognize the historic uses, honor the cultural values, and perpetuate the natural resources of the Sweetwater Lake property.

Property Management, the Mitigation Hierarchy, and Adaptive Management

As an agency focused on overall system financial sustainability, rather than individual site sustainability, CPW has the opportunity to manage Sweetwater as a site with a less congested, more nature-based feel. CPW would like to ensure that the Sweetwater property provides a unique visitor experience within our system, based upon a lower density of amenities and overall site visitation than many equate with a typical State Park experience. The USFS should carefully consider site capacity, model impacts on all associated infrastructure in the Sweetwater community, and select actions that maintain the nature-based feel for which the parcel is known.

Any selected actions that significantly alter any of the many resources of this property should be subject to a full mitigation hierarchy analysis that includes avoidance measures, minimization measures, and mitigation strategies. Adverse impacts to identified resources should be first avoided. If resources must experience adverse impacts, best management practices should be detailed to minimize the impacts. After minimization measures are



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applied, residual impacts remain and must be offset by compensatory mitigation. Known impacts at the time of the Record of Decision should be fully mitigated. If the Record of Decision allows for CPW to manage the property, an adaptive management framework must be clearly described.

CPW would like to ensure that the focus for future recreational and administrative development occurs in places previously subject to human, livestock, and recreational uses. If it is deemed necessary to utilize portions of previously undisturbed spaces in any alternative, the reasoning should be clearly described and the full mitigation hierarchy should be applied.

Recreation Opportunities & Visitor Experience

Sweetwater Lake provides excellent outdoor recreation experiences valued by both the local community and visitors. CPW would like to see the focus on future recreational opportunities align with those that have occurred in the past, including camping, hiking, equestrian use, lake use, and site interpretative activities. All uses that are identified as appropriate, as well as uses that were considered but were excluded, should be robustly analyzed for benefits and impacts. The cooperating agencies should collaboratively identify the list of allowable and excluded recreation opportunities. Alignments of new trails should consider the following design criteria:

- Minimization of user conflict via the implementation of current design elements that reasonably reduce known risks to user groups;
- Adherence to CPW's [Planning Trails with Wildlife in Mind](#)¹ recommendations;
- Avoid adverse and irreversible impacts on natural resources; and
- Analyze impacts upon cultural resources, adjacent private lands, and adjacent public lands.

Recreation designs should promote angler access and opportunities throughout the year, including open-water and ice fishing. Additional lake access points for shoreline fishing should be analyzed and existing opportunities should be enhanced to improve the visitor experience. Fishing platforms and hardened pathways should be considered to promote ease of lake access. Americans with Disabilities Act (ADA) compliant fishing access standards should be incorporated where feasible.

CPW supports restricting gas-powered boat motors and suggests limiting watercraft to hand-launched vessels. These measures prevent user conflicts and disruption to the “nature-based” experience of anglers and local neighboring residents. Gas motor and boat

¹ Colorado Parks & Wildlife. (n.d.). Planning Trails with Wildlife in Mind.
<https://cpw.state.co.us/aboutus/Pages/Planning-Trails-for-Wildlife.aspx> July 23, 2024



trailer restrictions also minimize the potential for introducing aquatic nuisance species. Possible exceptions could include administrative use and emergency response; this should be discussed with cooperating agencies.

Sweetwater Lake currently has the potential for world-class night sky viewing. Night sky viewing impacts should be considered as infrastructure is proposed. Site design should be compatible with a future [International Dark Sky Place](#)² designation.

The visitor experience could be enhanced by providing a financially viable opportunity for a commercial entity (or entities) to provide high-quality recreational experiences for site visitors. The commercial services below should be analyzed:

- Administrative space;
- Staff housing;
- Equipment rentals;
- Horseback riding trips;
- Grazing opportunities;
- Guided fishing trips; and
- Other additional commercial services as identified by cooperating agencies and stakeholders during the EIS process.

Fishery & Wildlife Analyses

All existing fishery & wildlife resources, as identified by CPW and USFS staff throughout the cooperating agency process, should be analyzed for direct, indirect, and cumulative impacts. Direct impacts result from the conversion of habitat due to the project footprint. Indirect impacts result from altered wildlife behavior on, and adjacent to, the site. Cumulative impacts consider the interaction between multiple land use decisions and resulting increased disturbance to fishery and wildlife resources.

All identified fishery & wildlife resources should be subject to the full mitigation hierarchy described above. USFS and CPW staff should collaboratively identify best management practices to minimize impacts on fishery & wildlife resources for all alternatives. Best management practices may include, but are not limited to:

- Applying & enforcing seasonal timing limitations on human activities in sensitive wildlife habitats;
- Applying & enforcing no surface occupancy buffers to sensitive locations;

² Colorado Department of Agriculture. (n.d.). *Noxious Weed Species Id.* Noxious Weed Species ID. <https://ag.colorado.gov/conservation/noxious-weeds/species-id> July 23, 2024



- Requiring that all fencing adheres to CPW's [Fencing with Wildlife in Mind](#)³;
- Applying human-wildlife conflict reduction measures (such as installing IGBC-certified bear-resistant canisters, requiring all dogs to be leashed, designing carnivore conflict education material, providing fish cleaning stations for anglers, etc.).
- Incorporate Aquatic Nuisance Species prevention programming, including Illegal Fish Stocking prevention; and
- Protect riparian habitats through intentional access points that direct human activity along appropriate pathways, avoid extensive trail building through riparian habitats, and deter user-created trail development.

Thoughtful site design to avoid adverse impacts on big game current use of the parcel is critical. CPW's most current High Priority Habitat maps should be analyzed throughout this process.

Additional Resource Considerations

Revegetation of disturbed sites, and any identified habitat uplift projects, should be subject to a CPW consultation. CPW has staff experts available to consult on appropriate seed mixes and restoration methods. A site-specific revegetation specifications standard should be developed for this location based on plant species known to occur at this location, plant species that are known to be successful in revegetation projects, plant succession, soil types, slope and aspect, and local climate. This specification should include seed mixes for the different habitat types on the site and conform with the CPW native plant directive for state parks ([Colorado State Parks Administrative Directive No. B-302 \(1995\)](#))⁴. CPW's [Colorado Seed Tool](#)⁵ should be utilized as a resource when analyzing proposed and existing seed mixes.

CPW has lent resources to the USFS and this site through the mapping of the non-native and invasive plants and the creation of an Integrated Weed Management Plan for the property, focusing on plant species included on the [Colorado Noxious Weed](#)⁶ list. As part of the analyses, the USFS should identify methods for future mitigation of noxious weeds compatible with the environment as well as USFS standards and guidelines.

³ Colorado Parks & Wildlife. (n.d.). *Fencing with Wildlife in Mind*. <https://cpw.state.co.us/Documents/LandWater/PrivateLandPrograms/FencingWithWildlifeInMind.pdf> July 23, 2024

⁴ Colorado Parks & Wildlife. *Colorado State Parks Administrative Directive No. B-302. Native Species Directive. 1995*. <https://cpw.state.co.us/aboutus/Pages/RS-RevegetationDirective.aspx> July 23, 2024

⁵ Colorado Parks and Wildlife. (n.d.). *Colorado Seed Tool Fact Sheet*. *Colorado Seed Tool (Application)*. <https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/SeedMixFactSheet.pdf> July 23, 2024

⁶ Colorado Department of Agriculture. (n.d.). *Noxious Weed Species Id*. *Noxious Weed Species ID*. <https://ag.colorado.gov/conservation/noxious-weeds/species-id> July 23, 2024



An analysis of the forest fuels and fire safety will be performed and an analysis of tree health related to visitor use areas will be performed to ensure that individual trees that pose hazards to visitation are managed or removed when appropriate.

The EIS should facilitate historical grazing allotments on adjacent public lands that utilize the Sweetwater property as a staging area or access point. The USFS should consider the reasonable development of infrastructure to facilitate historical access to grazing. Infrastructure should be strategically located, with consideration of property boundaries and adjacent land uses.

Portions of this property have been designated as a forage reserve. If the forage reserve is to be converted, or otherwise become unavailable to grazing permittees, an alternative forage reserve of equivalent value should be identified as a replacement.

Historical & Cultural Resources

CPW requests that tribal entities be consulted to determine their wishes on co-stewardship of natural and cultural resources, future activities, and to verify historical and future tribal uses on the site. Collaboration with tribal representatives to develop interpretive materials for public distribution as their interest determines should occur. The USFS should gain concurrence from the State Historic Preservation Office in identifying the best methods for interpreting Sweetwater's historical attributes and collaborate with the Division of Natural Resources Tribal Liaison.

Recognizing the specific nature of the Sweetwater Cave as a place of past and present tribal importance, CPW requests that the tribes be consulted to the degree necessary to honor its history. Cave management strategies should be implemented to provide the greatest level of preservation of the non-renewable cultural resources in the cave and thoroughly analyze the appropriateness of potential opportunities for the public to experience the Sweetwater Cave while addressing current levels of degradation and avoiding further damage to cave resources. These include, but are not limited to:

- Consult with appropriate tribal representatives on the significance of the cave, how it should be accessed for traditional uses, and if public visitation is appropriate at the location;
- Collaborate with the tribes to monitor the condition of the cave and its artwork;
- Potential renaming of the cave to an Indigenous name determined by the tribes;
- Control, manage, and monitor access into the cave by site administrative and commercial use personnel; and
- Vetting of information to accurately interpret the cave's history.



The USFS should identify historic structures and determine those that are most suited for retention. The existing structures are in varying states of disrepair. As such, the long-term and short-term financial feasibility of improvement to structures for public use should be carefully analyzed. The USFS should also consider the historic structures' contributions to the site's historical story and potential for future interpretation. CPW supports an interpretive trail describing Sweetwater's history through a combination of existing structures and interpretive displays.

If the selected alternative calls for CPW management of the site, CPW requests sufficient space for site administration. Administrative elements that should be analyzed include:

- A visitor services center with administrative office space;
- A facilities maintenance site;
- Water/wastewater treatment facility; and
- Administrative housing to meet the site's basic needs.

Travel Management, Campground Vehicle Management, & Emergency Protocols

The USFS should analyze campsite densities and dimensions that address stakeholder and cooperating agency concerns along the Colorado River and Sweetwater (CR 150) roads. Should there be development of recreational vehicle-based campsites, CPW requests electrical amenities that negate the use of generators to reduce noise impacts and preserve the site's aesthetics. The USFS should analyze various classifications of camper/RV size to determine an appropriate length suitable to safely access the site via the Colorado River and Sweetwater Roads.

CPW finds it critical that a robust response plan for emergencies be analyzed for each alternative within this process. Considerations should include, but are not limited to:

- Communication ability, methods, and protocols;
- Emergency egress;
- Onsite ability to address critical incidents (ex. wildfire mitigation and control, serious injury, etc.).

CPW appreciates your consideration of our comments on this critical piece of the planning process for the future at Sweetwater Lake and look forward to our further engagement as the process moves forward. Please do not hesitate to contact Mark Lehman, CPW Park Manager, at mark.lehman@state.co.us, or me at travis.black@state.co.us with any questions you may have.

Respectfully,



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