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Brian Glaspell
Forest Supervisor
900 Grand Avenue
Glenwood Springs, Colorado 81601

RE: Comments on Sweetwater Lake Recreation Management and Development Project and Plan
Amendment Draft Environmental Impact Statement

Dear Forest Supervisor Glaspell:

Our family has used and enjoyed Sweetwater Lake area for over 20 years. Since we first arrived pulling a small tent trailer and setting up, I have been simply awestruck with the beauty of this place. I can't count the number of times we've been to Sweetwater Lake to camp at the primitive campground, and not a time has gone by where we haven't seen a bald eagle or an osprey catch her dinner or watch the falcons and other birds of prey "get into it". Sweetwater Lake is a special place. Its remote location, difficult road, and primitive accommodations give it a unique charm that is endearing to our family, and we've heard the same sentiment from others lucky enough to have had the opportunity to also find the joy offered by this special place. Being primitive certainly had something to do with why it has been preserved and stayed wild and ecologically diverse for so long. But alas, I am very disheartened that this may all change.

My disagreement does not arise from opposition to public lands or reasonable public access. On the contrary, I value Sweetwater precisely because it has remained relatively undeveloped, remote, environmentally isolated, and fundamentally different from the developed recreation areas found elsewhere in Colorado. The qualities that make Sweetwater special should not be looked at as deficiencies that need to be corrected through development.

I am writing to oppose the Proposed Action for the Sweetwater Lake Recreation Management and Development Project and to request that the White River National Forest reconsider both the premise underlying the Project and the level of development proposed for this unique area.

I am particularly concerned that the Draft EIS appears to accept increased visitation and recreational development as an inevitable starting point rather than critically examining how that condition arose, whether the asserted "need" for additional development has actually been demonstrated, and whether earlier agency actions have improperly influenced or constrained the alternatives now before the public.

The Forest Service should critically reevaluate whether the Project's stated "need" is independently established.

The Forest Service has stated that its 2021 acquisition of the Sweetwater Ranch "greatly increased public access," which in turn led the agency to develop a proactive management plan to address increased or potentially increased recreation while protecting sensitive resources.

That sequence raises a fundamental NEPA question that the Draft EIS should directly address: **to what extent does the asserted need for this Project exist independently of the Forest Service's own prior discretionary actions?**

The Forest Service did not simply encounter an existing recreation-management problem. It acquired the property, and expansion of public recreation was an expressly contemplated objective of that acquisition. Contemporary descriptions of the acquisition stated that it would both protect the property and create or expand recreational access for boating, fishing, swimming, camping, and other activities. Shortly after the acquisition, the Forest Service and Colorado Parks and Wildlife were publicly discussing management of Sweetwater as Colorado's 43rd state park and improvements to recreational facilities.

The Draft EIS therefore should not treat increased public visitation as though it was an external, unavoidable condition that simply appeared and now necessitates development. If increased recreational pressure is substantially the consequence of a discretionary federal acquisition and subsequent access and management decisions, NEPA requires a hard look at the actual underlying problem and the reasonable means of addressing it.

There may certainly be legitimate needs for resource protection, sanitation, enforcement, maintenance, emergency management, and management of existing recreational use. Those needs, however, are analytically different from a purported need to increase access, modernize or expand facilities, create additional recreational opportunities, or develop infrastructure to accommodate additional visitation.

The Forest Service should clearly distinguish between **management necessary to protect Sweetwater from existing impacts** and **development intended to facilitate or accommodate increased recreational use**. The latter should not be characterized as necessary merely because the agency's earlier decisions made increased visitation possible or foreseeable.

The Draft EIS should address whether prior actions prejudiced or limited the choice of reasonable alternatives.

The chronology surrounding Sweetwater also raises a serious concern regarding whether decisions preceding the current NEPA process effectively committed the agencies to a particular management trajectory before the environmental review was even begun.

The Forest Service acquired Sweetwater Ranch in August 2021. Within approximately two months, the Governor publicly announced a partnership involving the Forest Service and Colorado Parks and Wildlife to create Colorado's 43rd state park at Sweetwater Lake. Public statements at the time contemplated

improved recreational facilities, expanded recreational opportunities, CPW involvement, and additional infrastructure.

Yet the formal NEPA process for the current Recreation Management and Development Project came substantially later.

NEPA is intended to inform agency decision-making **before** an agency becomes committed to a particular course of action. The Forest Service therefore should address whether the acquisition, subsequent expansion of public access, early commitment to a CPW partnership, interim recreational improvements, public announcement of a state park, or other actions taken before completion of the current NEPA review prejudiced the ultimate decision or limited the practical range of reasonable alternatives. That is, would the sum of these prior decisions result in a choice-limiting action, particularly as it relates to the stated purpose and need?

I am not asserting that acquisition of the property, standing alone, necessarily constitutes a potentially unlawful choice-limiting action. Rather, the Draft EIS should disclose and evaluate the sequence of decisions and commitments sufficiently to demonstrate that the present NEPA process remains a genuine evaluation of alternatives rather than an environmental review of a development trajectory which was substantially established years earlier.

This question is particularly important because historical planning documents indicate that the Forest Service sought CPW assistance soon after acquisition and that the partners identified goals that included improving access, modernizing facilities, and providing updated recreational services. The public deserves an explanation of when these objectives were established, what environmental review preceded them, and whether the Forest Service remained free to select a materially different management approach.

The Purpose and Need should not incorporate the preferred solution into the definition of the problem.

The distinction between **need** and **solution** is critical under NEPA.

A legitimate management need might be stated as protecting sensitive resources from documented recreational impacts, reducing unsafe conditions, managing sanitation, resolving specific user conflicts, maintaining existing facilities, or ensuring adequate emergency management.

By contrast, "improved access," "modernized facilities," "new recreation offerings," expanded infrastructure, or management by CPW are potential **responses** to those needs. They should not themselves define the need in a manner that predetermines the appropriate solution.

If existing or projected visitation is causing identifiable impacts, the Forest Service should identify and, where practicable, quantify those impacts. The Draft EIS should demonstrate what problems actually exist today, what visitation levels cause those problems, what future use is reasonably anticipated, and why existing Forest Service management authorities are insufficient to address them.

Without that foundation, there is a danger of circular reasoning:

The Forest Service acquired the property to expand public access; expanded access creates increased recreational pressure; increased recreational pressure then becomes the justification for facilities and development needed to accommodate additional public access.

That cycle does not, in itself, demonstrate that additional development is necessary.

Reduced visitation and low-intensity management should be treated as genuine alternatives, not merely deviations from an assumed development objective.

The Forest Service's acquisition of Sweetwater does not require maximizing the number of people who can visit it or developing the area to accommodate the maximum reasonably foreseeable recreational demand.

A reasonable alternatives analysis should seriously consider whether Sweetwater's resources are better protected by **managing recreational demand rather than continually increasing capacity to accommodate it.**

That distinction is particularly important. The Proposed Action would establish recreational zones, authorize long-term management by CPW, and provide additional or improved recreational infrastructure. Alternative 3 appears to move considerably closer to the type of management that many existing users believe appropriate: a primitive recreation experience with limited facilities and limited staffing.

The Forest Service should give genuine consideration to that approach and to variations that prioritize conservation and existing low-intensity uses. Such alternatives could include maintaining limited infrastructure, restricting or managing visitor capacity, reservation or permit systems where warranted, seasonal restrictions, protection of environmentally sensitive areas, maintaining existing rather than expanded camping capacity, and other measures designed to protect Sweetwater without creating additional recreational demand.

The question should not simply be **how Sweetwater should be developed and managed for increased recreation**. The agency should also ask **how much recreation Sweetwater can sustain without losing the characteristics that made its conservation important in the first place.**

Increasing recreational capacity likely conflicts directly with protection of the resources the acquisition was intended to conserve.

Sweetwater is not an ordinary developed recreation site. Its value lies substantially in its relative lack of development, wildlife habitat, wetlands and aquatic resources, scenic character, remoteness, and ecological setting adjacent to extensive National Forest lands.

Increased visitation and infrastructure inevitably bring consequences that deserve careful consideration: wildlife disturbance; effects on raptors, including eagles; wetland and riparian impacts; increased traffic; human-wildlife interactions; noise; water-quality impacts; waste and sanitation issues; dispersed

recreation; invasive species; wildfire ignition risk; and pressure for additional infrastructure once initial development occurs.

These impacts are particularly important because some of the same environmental resources cited as reasons for protecting Sweetwater are certain to experience greater pressure as a consequence of the recreational development made possible by that protection. This again is circular logic that does not add up.

The Forest Service should therefore carefully evaluate whether the Proposed Action creates a self-reinforcing cycle in which additional facilities generate additional visitation, which subsequently creates demand for still more facilities and management intervention.

Wildfire, emergency response, evacuation, and road capacity deserve particular scrutiny.

Sweetwater's remote setting is part of its character, but it also creates real limitations.

Access is constrained, emergency response is necessarily more difficult than at developed recreation areas near population centers, and wildfire presents potentially serious consequences. Increasing the number of visitors—and particularly increasing overnight use—can simultaneously increase ignition potential and the number of people who would need to be notified, managed, sheltered, or evacuated during an emergency.

These risks should not be addressed simply by assuming that management plans or future emergency procedures will resolve them. The EIS should evaluate realistic emergency scenarios, including wildfire occurring during peak visitation; evacuation capacity and time; conflicting inbound emergency and outbound visitor traffic; emergency response times; road limitations; communications limitations; and the consequences of an incident that prevents use of the primary access route.

The appropriate question is not simply whether these risks can theoretically be "managed." The Forest Service should determine whether substantially increasing recreational intensity in this particular remote and fire-prone location is reasonable and prudent in the first place.

Local opposition is relevant to understanding the character and appropriate scale of Sweetwater.

The drive up to Sweetwater demonstrates where the locals stand on this proposal where dozens of signs clearly show opposition; I've not seen a single sign showing support. I also encourage the Forest Service not to dismiss local opposition as simple resistance to change.

People who have lived near, worked around, and recreated at Sweetwater for decades possess important knowledge about the area's seasonal conditions, wildlife, roads, emergency access, historic recreation patterns, and physical limitations. The substantial concern expressed by local residents should cause the Forest Service to examine whether its assumptions about appropriate recreational scale reflect the actual character and carrying capacity of Sweetwater.

The public effort to protect Sweetwater should not be interpreted as a mandate to transform it into a more intensively developed recreation destination. **Preserving public access and preserving the character of a place can coexist.** Public ownership does not inherently require intensive development.

Requested Action

Before proceeding with the current Project, the Forest Service should establish that there is a legitimate and independently supportable **need for the Proposed Action** and that prior agency decisions have not materially constrained the present NEPA process.

The Forest Service itself states that the 2021 acquisition "greatly increased public access," which led to the need for a recreation management plan. This raises a fundamental question: **What is the actual problem requiring action today, and to what extent was that problem created or amplified by the Forest Service's own acquisition, expansion of public access, and subsequent recreational planning?** Increased visitation resulting from those decisions should not simply be treated as an inevitable baseline that then justifies additional development.

Likewise, the Forest Service should determine whether the acquisition and subsequent actions—including expanded public access, the CPW partnership, state-park planning, interim improvements, and planning for additional recreational facilities—prejudiced the present decision or limited the choice of reasonable alternatives. If prior actions materially constrained the alternatives now available, the Forest Service should restore a meaningful decision space rather than proceed from decisions effectively made before completion of NEPA review.

Therefore, before issuing a Final EIS or Record of Decision, the Forest Service should:

1. **Clearly define and substantiate the actual need for action**, including the specific existing problems, their magnitude and causes, and why action is necessary now.
2. **Distinguish genuine management needs from agency-created recreational demand.** Explain how much of the asserted need results from the 2021 acquisition, increased public access, and subsequent decisions encouraging or accommodating greater recreational use.
3. **Address potential choice-limiting actions.** Provide a transparent chronology of the acquisition, CPW partnership, state-park planning, interim improvements, and other commitments, and demonstrate that these actions did not prejudice the outcome or materially limit reasonable alternatives.
4. **Separate needs from preferred solutions.** Resource protection, public safety, sanitation, and management of existing use may be legitimate needs; expanded access, new facilities, increased visitor capacity, and CPW management are potential solutions and should not themselves define the need.
5. **Give meaningful consideration to conservation-oriented alternatives**, including primitive or low-intensity recreation, limited development, visitor-capacity management, and restrictions necessary to protect sensitive resources and preserve Sweetwater's existing character.

6. **Fully evaluate the consequences of increased use and development**, including impacts to wildlife, raptors and eagles, wetlands and riparian areas, water quality, wildfire and evacuation risk, emergency response, traffic, and the area's remote character.

If the asserted need is substantially a consequence of the Forest Service's own prior decisions, the appropriate response should not automatically be additional infrastructure and recreational capacity. The Forest Service should first consider whether the underlying concerns can be addressed by **managing demand and protecting resources rather than increasing capacity**.

If prior actions have constrained the decision to the point that meaningful alternatives can no longer be considered, the Forest Service should withdraw or fundamentally reconsider the present proposal. **Public ownership created an opportunity to protect Sweetwater; it should not become the justification for changing the very qualities that made the area worth protecting.**

I strongly support keeping Sweetwater Lake in public ownership and protecting it for future generations. But **public ownership and intensive recreational development are not synonymous**.

After nearly 20 years of using this area, I believe the extraordinary value of Sweetwater is found in what it already is. The Forest Service should be extraordinarily cautious about permanently altering those characteristics in an effort to accommodate a level of use that its own prior actions may have created or encouraged.

NEPA is most valuable precisely when an agency still has meaningful choices available. I therefore urge the Forest Service to use this process to genuinely reconsider the appropriate scale and intensity of recreation at Sweetwater rather than using it to validate a development and management direction established well before the environmental review began.

Respectfully,



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