

A Forest Plan amendment may change which rule applies, but it cannot eliminate the biological importance of the habitat or the conflict the agency itself identified.

2. Alternative 2 departs from CPW's Sweetwater-specific scoping recommendations.

In its August 2024 [Sweetwater scoping letter](#), CPW requested:

- A less congested, lower-density, nature-based experience.
- Development focused in previously disturbed locations.
- Avoidance of adverse impacts before relying on minimization or compensatory mitigation.
- Adherence to CPW's Planning Trails with Wildlife in Mind recommendations.
- Analysis of direct, indirect, and cumulative wildlife effects.
- Joint identification of best management practices by CPW and Forest Service staff for every alternative.
- Enforceable seasonal restrictions and use of CPW's current High Priority Habitat information.
- Site design that avoids adverse impacts to existing big-game use.

The Proposed Action instead anticipates nearly five times the No Action visitation and places major new infrastructure in habitat the DEIS identifies as severe winter range, winter concentration area, migration habitat, and locally documented calving and fawning habitat.

3. The proposed winter protection is narrower and ends earlier than CPW recommends.

Appendix A contains only one big-game-specific protection measure: RPM-WLD-17. It would close the Keep Ditch Trail from December 1 through April 15 "to provide security for Elk." It does not provide a corresponding Mule Deer-specific protection and reopens the trail fifteen days before CPW's recommended end date.

CPW has stated that its severe-winter-range recommendations will "consistently be December 1–April 30 for deer and elk," with closure to all human activity—not merely one trail. See CPW's [2023 trail-grant wildlife analysis, pages 14–15 and 41](#).

CPW's published [High Priority Habitat recommendations](#) also recommend no permitted or authorized human activity in Elk severe winter range from December 1 through April 30 and use a benchmark of less than one linear mile of routes per square mile. The DEIS does not provide a route-density analysis demonstrating how the new road and trail system compares with that benchmark.

4. CPW's own Sweetwater Creek Mule Deer plan warned against this exact outcome.

The D-43 Sweetwater Creek section of CPW's [Northwest Colorado Mule Deer Herd Management Plan, page 125](#) specifically anticipated that state-park publicity would significantly increase recreation at Sweetwater. It warned about losing wildlife solitude and the "shifting baseline syndrome" of creating additional trails and access when recreationists feel crowded.