Date: September 11, 2026

To: Brian Glaspell, Forest Supervisor, White River National Forest
c/o Leanne Veldhuis, District Ranger, Eagle-Holy Cross Ranger District, P.O. Box 190, Minturn, CO 81645

RE: Draft EIS, Sweetwater Lake Recreation Management and Development Project, PALS #64047 / Project #284162

Submitted via: https://cara.fs2c.usda.gov/Public/CommentInput?Project=284162

On behalf of Save The World's Rivers (STWR) and its program Save The Colorado, we submit the following comments on the Draft Environmental Impact Statement (DEIS) for the Sweetwater Lake Recreation Management and Development Project. These comments follow up on our July 11, 2024 scoping letter, which asked that the EIS analyze water quality and quantity impacts to Sweetwater Creek and Sweetwater Lake, identify the water rights and sources to be used, and address riparian and wetland impacts. Having reviewed Section 3.4 (Hydrology and Water Rights) and Section 3.11 (Wetlands) of the DEIS, we submit that the underlying analysis has specific, correctable gaps that should be addressed before a Final EIS is issued.

1. The water quality baseline does not include a summer sampling event, nutrients, or bacteria — the exact parameters the DEIS itself identifies as the project's primary risk. The DEIS states that field water quality samples were collected at four locations on three occasions — fall, winter, and spring (DEIS at 88) — but no summer event, which is precisely when visitation, wastewater generation, and recreational lake contact will be highest. The parameters collected were limited to temperature, pH, conductivity, dissolved oxygen, and turbidity (DEIS at 88). Yet the DEIS's own effects analysis repeatedly identifies "an increase

in nutrient input from improper waste disposal" (DEIS at 94, 99) and bacteria from "human and pet activity" (DEIS at 195) as the principal water quality risk from increased visitation. Without baseline nutrient (total phosphorus, total nitrogen) and bacteria (E. coli) data — and without a summer sampling event — the DEIS has no baseline against which to measure the very impacts it predicts. This should be corrected before the Final EIS, and the additional data should be used to set numeric monitoring thresholds (see Comment 5, below).

2. The DEIS does not quantify projected nutrient loading to the Lake itself; its water quality analysis is watershed-runoff modeling, not lake limnology.

Section 3.4's water quality discussion (DEIS at 94, 99) is qualitative and narrative — it states that impacts "would be minimized by installing OWTS and implementing the VUMP" but does not model expected nutrient loading to Sweetwater Lake under any alternative, nor does it assess the Lake's assimilative capacity or risk of a shift in trophic status. Given that Alternative 4 alone projects 51,999–103,997 annual visitors (DEIS at 187) concentrated around a lake the DEIS itself values as near-pristine and Category 1a (fully supporting all uses) (DEIS at 88), the absence of any quantitative lake nutrient-loading or trophic-response analysis is a significant gap for the resource the project is centered on.

3. Wastewater (OWTS) siting analysis is not disclosed, despite cabins being sited in wetland/riparian habitat.

The DEIS states that 12 cabins under Alternative 2 would be built in the North Day Use Zone, directly causing "2.46 acres" of short-term disturbance, "primarily for cabins," in areas of "fragmented and…poor condition" riparian habitat (DEIS at 196). Wastewater from the Lodge, cabins, and maintenance facilities would go to individual on-site wastewater treatment systems (OWTS) (DEIS at 94, 99). The DEIS asserts these systems "would be located away from streams and not in the WIZ" (DEIS at 94) but does not disclose soil percolation data, depth to seasonal high water table, or setback distances from the 173.4 acres of wetlands and open water that dominate this "846-acre Project area" (DEIS at 191, Table 3-55). Given the site's high water table (evidenced by the large wetland complex itself) and its proximity to the Lake, the Final EIS should include the actual OWTS siting and soil-suitability analysis, not just an assurance that impacts "would be minimized."

4. The Community Water System source water assessment required by the Safe Drinking Water Act has not actually been performed.

The DEIS states that converting the King Spring supply to a Public Water Supply System will require a Community Water System Permit from CDPHE, and that CDPHE "periodically conducts source water assessments…as a starting point to evaluate potential risks" (DEIS at 94–95). This describes a future regulatory process, not a completed assessment. The

Final EIS should not defer this analysis; the source water assessment should be completed and disclosed before a decision is made, particularly because King Spring — the sole domestic supply — is a low-yield groundwater source (7.3–29.5 gpm, DEIS at 89) with limited buffering capacity against contamination.

5. Mitigation and adaptive management commitments lack enforceable numeric triggers.

The DEIS states that "water quality monitoring would assess whether standards are being met and ensure that minimal deviation from baseline conditions occurs" (DEIS at 94), but no numeric standards, monitoring frequency, or trigger thresholds are disclosed in Section 3.4, and the Wetland Impact Scale used in Section 3.11 (Table 3-57) is an explicitly qualitative, "best professional judgment" 1–5 ranking (DEIS at 193, 202–203) rather than a measured, monitorable standard. The Final EIS should establish specific numeric water quality thresholds (nutrients, bacteria, turbidity) tied to the corrected baseline described in Comment 1, with a defined management response — including visitor-capacity reduction under the VUMP — if those thresholds are exceeded. "Minimal deviation from baseline" is not a standard the public or the Forest Service can hold the permittee to. These thresholds should also apply if visitor levels are ever increased beyond the Proposed Action's VUMP-capped visitation toward the uncapped levels analyzed under Alternative 4, so that any future loosening of the cap is tied to the same enforceable water quality standard rather than a separate administrative decision made outside of this NEPA process.

6. King Spring diversion increases are not analyzed against Sweetwater Creek's low-flow baseflow.

King Spring's flow is documented to range from a high of 29.5 gpm in June to a low of 7.3 gpm in October (DEIS at 89). The Proposed Action would increase diversions from this source by 5.9 AF, and Alternative 4 by 11.4 AF (DEIS at 95, 100) — increases of roughly 200–290 percent over existing use. The DEIS does not analyze what share of Sweetwater Creek's baseflow King Spring represents during the October low-flow period, nor the resulting effect on instream flow or water temperature in Sweetwater Creek when the new diversion is layered onto an already-low natural flow. This baseflow-depletion analysis should be added to the Final EIS.

7. The DEIS does not disclose whether full development of the conditional water rights portfolio would cause depletions beyond those currently quantified.

Table 3-7 (DEIS at 89) lists numerous conditional water rights associated with the Project area that are not yet perfected — including Sweetwater Wells 1–6, the 200 AF Sweetwater Lake fill-and-refill right, and 5 cfs/200 AF exchange rights with Wolford Mountain and Ruedi Reservoirs. The water demand analysis in Section 3.4.2 quantifies only the diversions

needed to meet the specific facilities proposed under each alternative (e.g., 5.9–11.4 AF from King Spring). It does not address whether or when the balance of this large conditional portfolio might be perfected and exercised, which could authorize significantly greater future depletions to Sweetwater Creek and the Colorado River than this DEIS discloses. The Final EIS should clarify whether approval of this Project is intended to support development of these conditional rights, and if so, analyze the associated depletions.

8. Wetland jurisdictional status and mitigation ratios are deferred past the decision point.

The DEIS acknowledges that "some wetlands may not be federally jurisdictional under Sackett v. EPA" and that isolated wetlands "may be subject to State of Colorado jurisdiction following implementation of House Bill 24-1379," but states that "final permitting, mitigation, and ratios would be determined during design and permitting" (DEIS at 196–197). NEPA requires that environmental analysis inform the decision, not follow it. Given that 173.4 acres of wetlands and open water dominate this project area (DEIS at 191), the Final EIS should resolve — before the Record of Decision — which wetlands are federally jurisdictional, which fall under state jurisdiction, and what compensatory mitigation ratios will apply, rather than leaving these determinative questions for a later, non-public process.

9. Existing stream health findings rest on a single field visit rather than a systematic biological baseline.

The DEIS's conclusion that "the overall stream health of the Project area was good" is based on "a field review conducted on October 22, 2024" and a personal communication (DEIS at 87). No macroinvertebrate, fish, or periphyton community data are cited, in contrast to the more rigorous CNHP-based methodology used for the wetland assessment (DEIS at 193). For a project whose entire premise rests on protecting a "near-pristine" lake and creek, a single-day qualitative field visit is a thin basis for the aquatic baseline. We ask that the Final EIS incorporate or reference actual biological monitoring data for Sweetwater Creek and Lake.

10. Cumulative effects analysis excludes climate change and reasonably foreseeable regional growth.

Section 3.4.4 states that "no reasonably foreseeable future projects were identified" and that cumulative effects are therefore "identical to" the direct and indirect effects already described (DEIS at 100–101). This is an unusually narrow reading for a 20-year Special Use Permit term in the fast-growing Eagle/Garfield County recreation corridor, and it does not address the compounding effect of declining snowpack-driven streamflow and rising stream temperatures over that same 20-year period. The Final EIS should incorporate

climate-driven streamflow and temperature trends into the cumulative effects analysis for Sweetwater Creek.

11. Existing Water Influence Zone (WIZ) disturbance already exceeds the Forest Service's own design threshold, and the DEIS does not confirm the Project will bring the watershed back into compliance.

The DEIS discloses that Connected Disturbed Areas (CDAs) in the Upper Sweetwater Creek and Lake Creek watersheds already exceed the 10 percent threshold recommended by the Watershed Conservation Practices Handbook (10.2 percent and 10.9 percent, respectively) (DEIS at 87). The DEIS states that mitigation "would" disconnect existing CDAs (DEIS at 90, 96) but does not present a post-mitigation CDA percentage for these two watersheds under any action alternative to confirm that implementation actually returns them below the 10 percent design threshold. This quantification should be added to the Final EIS.

We appreciate the Forest Service's substantial technical work already reflected in this DEIS, and we ask that the issues above be addressed in the Final EIS. We reserve the right to supplement these comments before the close of the comment period on September 23, 2026.

Please contact me for with any questions,

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