



Board of County Commissioners

970-328-8605

970-328-8629(f)

eagleadmin@eaglecounty.us

www.eaglecounty.us

September 15, 2026

Brian Glaspell, Forest Supervisor

White River National Forest

900 Grand Avenue

Glenwood Springs, CO 81601

Subject: Eagle County Response to the Draft Environmental Impact Statement (DEIS) – Sweetwater Lake Recreation Management and Development Project

Dear Mr. Glaspell,

Eagle County ("County") appreciates the opportunity to provide formal comments on the Draft Environmental Impact Statement ("DEIS") for the Sweetwater Lake Recreation Management and Development Project. As a cooperating agency, the County commends the White River National Forest ("WRNF") for conducting an exhaustive, inclusive analysis that thoroughly incorporates multi-year public engagement and cooperating agency feedback.

Below are the County's position statements and requested additions or clarifications for the Final Environmental Impact Statement ("FEIS") and Record of Decision ("ROD"):

1. County Alternative Preference & Requested Selected Alternative: The County supports a modified Alternative 2 in the Record of Decision as the primary management framework, as it best balances public access, historical preservation, traditional equestrian uses, and long-term site stewardship through an active Visitor Use Management Plan (VUMP). To ensure maximum natural resource and infrastructure protection, the County requests that the Forest Service adopt the following specific areas of County support and additional requests for modification:

- **Capacity Thresholds and Managed Access:** Support the 250 Persons-At-One-Time (PAOT) capacity limit in Alternative 2 through daily operational oversight, visitor-use management indicators, and restricted parking infrastructure limits rather than allowing unconstrained site access.
- **Phased Infrastructure Implementation:** The County supports a phased development approach that expands need-based infrastructure tied directly to the VUMP monitoring framework. Capital improvements and expansion should occur incrementally, triggered only when monitoring data demonstrates that existing facilities cannot sustainably or safely accommodate visitor demand.
- **Highest Environmental Safeguards:** The County supports adoption of resource protection standards, including the 120-acre wetland closure zone and enhanced raptor nesting buffers.
 - **Seasonal Wildlife Timing Limitations:** The current DEIS has elk winter closures for the Keep Ditch Trail as December 1 through April 15. The County requests that winter wildlife closures for critical elk calving habitat be extended through June 30 in specified elk winter closure areas. Colorado Parks and Wildlife (CPW) standard recommendation



for critical elk calving ranges in Eagle County and the White River National Forest is December 1 through June 30.

- **Comprehensive Resource Protection Measures (RPMs), Project Design Features (PDFs) and Mitigation Measures:** The County supports full integration of robust resource mitigation measures to safeguard sensitive riparian corridors, critical wildlife winter range, and historic/cultural resources across all phases of development.
- **Raptor Nesting Buffers:** The County supports the inclusion of mandatory spatial and seasonal buffer zones for active Peregrine Falcon and Bald Eagle nesting sites during construction and peak operational periods.
- **Enforced Wetland Closure Zones:** Inclusion of the strict 120-acre wetland closure zone to protect fragile ecosystems from motorized, non-motorized, and foot traffic.

2. Do not support the "No Action" (Alternative 1)

The County does not support Alternative 1 (No Action). Under current, passive management, Alternative 1 fails to provide the oversight necessary to protect the area's sensitive natural and cultural resources. Unmanaged foot traffic and unregulated recreation will lead to ongoing degradation of fragile wetlands and disruption of critical elk and raptor habitats. Additionally, the removal of all historic structures in this alternative does not retain the historic character of the area. Given the intense visitation pressures across the WRNF, and because the USFS currently lacks the localized staffing, internal operational capacity, and dedicated budget required to independently maintain the 846-acre site, passive management is fundamentally insufficient to safeguard Sweetwater's natural environment or preserve its historic heritage.

3. Recreation Trends and the Need for Actively-Managed Recreation

Population growth and increasing demand for outdoor recreation across Colorado has driven unprecedented demand for public land access. The Eagle-Holy Cross Ranger District is the second most visited district on the WRNF, recording over 5.58 million visits in 2022. Given this visitation pressure, leaving Sweetwater Lake unmanaged is no longer viable. The County strongly supports an opportunity-managed recreation model that establishes defined carrying capacities, visitor management thresholds, and structured facilities. This approach ensures locals and visitors can enjoy a high-quality, rustic recreation experience without causing resource degradation.

4. Partner Flexibility: CPW Lease & Alternative Concessionaire Models

The County endorses the issuance of a 20-year USFS Special Use Permit ("SUP") to Colorado Parks and Wildlife ("CPW") for day-to-day site administration. Crucially, the Record of Decision (ROD) and SUP must preserve reasonable administrative flexibility to accommodate future shifts in state funding, management priorities, or administrative structures. This flexibility permits seamless transitions to alternative concessionaires or management partners without necessitating a repetitive National Environmental Policy Act (NEPA) review process.

- **Site Designation:** Reflecting strong local community sentiment and natural resource protection priorities, the County explicitly requests that Sweetwater Lake be designated and managed as a Wildlife Area or equivalent CPW-managed recreation area, rather than a formal State Park.



EAGLE COUNTY

Board of County Commissioners

970-328-8605

970-328-8629(f)

eagleadmin@eaglecounty.us

www.eaglecounty.us

Operational directives, site branding, and facility scale must prioritize primitive recreation, natural resource protection, and rustic character.

- **Succession and Flexibility Clause:** The SUP and ROD must be structured to facilitate a seamless shift to a third-party concessionaire or collaborative management model—drawing from proven frameworks utilized at Maroon Bells or Hanging Lake—precluding the need for a supplemental Environmental Impact Statement.

5. Road Access, Safety, and Traffic Management

Due to the physical constraints of Sweetwater Road, including narrow width, steep grades, small turning radii, limited sight distance, and box canyon topography, the County requests clear traffic management commitments and coordination mechanisms, as follows:

- **County Road Infrastructure Limits and Funding Partnerships:** The County currently has no plans to alter or upgrade CR 40 to accommodate traffic growth generated by the project. Existing topographical constraints and local operational capacity dictate the county road infrastructure within this box canyon. Consequently, any future capacity enhancements, reclassifications, or roadway improvements, including those prompted by surpassing the 400 Average Daily Traffic (ADT) threshold, cannot be financed exclusively by the County. The Final Record of Decision should establish a formal intergovernmental partnership framework with designated partners and mandate dedicated cost-sharing agreements for any subsequent maintenance or infrastructure upgrades necessitated by increased usage.
- **Roadway Improvements:** The DEIS identifies inadequate curve geometry and horizontal sight distance on the approach to the Project Area entrance, due to, among other things, a 14% grade. The County requests the inclusion in the Proposed Action Alternative for the realignment and regrading of the Project Area entrance to meet a maximum grade and horizontal sight distance consistent with Garfield and Eagle County road safety standards.
- **Traffic Triggers:** The County requests clarification on the operational commitment and what occurs when the 400 Average Daily Traffic volume is exceeded and the details of the monitoring such as season of monitoring, who is responsible for road counts, and location of the area of road counts. The County suggests the intersection of the Colorado River Road (CR301) and Sweetwater Road (CR40) during a non-holiday weekend in July or August. The County collects counts at this location every 4 years. The DEIS acknowledges the potential for a road reclassification but does not specify funding sources or partnership agreements should road improvement become necessary. The County recommends that the Final Record of Decision must outline a formal intergovernmental partnership framework to identify cooperating partners and establish dedicated cost-sharing agreements for any future road improvements or maintenance needs.
- **Vehicle length Caps:** The County supports preserving historic equestrian use at Sweetwater Lake but requests that the Forest Service clarify its rationale regarding vehicle length restrictions. While DEIS engineering evaluations recommend limiting overall vehicle lengths to 30 feet due to narrow road geometry and canyon constraints, the Proposed Action grants an exception allowing up to 60-foot equestrian rigs based on traditional use, while capping standard RVs and campers at 36 feet. Since both vehicle types must navigate the identical narrow canyon corridor, the County requests that the Forest Service detail its justification for why horse trailers are permitted at lengths denied to standard recreational vehicles.
- **Enforcement:** The County requests clarification about the enforcement of vehicle lengths. The



EAGLE COUNTY

Board of County Commissioners

970-328-8605

970-328-8629(f)

eagleadmin@eaglecounty.us

www.eaglecounty.us

County also asks that managing partners fund installation of advance warning, turn-around signage and traffic calming measures at the intersection of CR40 and CR301. Additionally, a protocol for towing or escorting non-compliant vehicles must be established, especially for stuck vehicles that cause traffic blockages.

- **Dust Control:** Because of the potential dust impacts to residences within close proximity to the road from increased visitation, the County requests a formal cost-sharing agreement for biannual magnesium chloride treatment during peak visitation months.
- **Ingress/Egress Limitations and Assumption of Risk:** The County emphasizes that Sweetwater Lake sits at the end of a narrow, single-access box canyon with inherent single-way ingress/egress limitations and exposure to natural hazards, including wildfire, flooding, severe weather, and other mountain conditions that may delay emergency response or evacuation. The FEIS should recognize that these conditions cannot be eliminated through roadway improvements alone. Visitors to the Project Area should be informed of the inherent conditions of accessing remote public lands, while assuming personal responsibility for their individual safety, driving choices, and risk when traveling remote mountain corridors. Public land access does not come with a guarantee of urban safety standards or absolute risk elimination. At the same time, managing agencies should implement reasonable site-management measures, including emergency planning, basic traffic control, and safety signage. The Final EIS should reflect that site management goals focus on resource stewardship and basic capacity controls rather than expanding road infrastructure to guarantee urban-level emergency access.

6. Dark Sky Preservation

To maintain the primitive, high-country character of Sweetwater Lake, the final design should have International Dark-Sky Association compliance for all infrastructure. All lighting must be fully shielded, down-cast, motion-activated, and low-color-temperature to prevent light pollution and protect nocturnal wildlife.

7. Equestrian and Ranching Use

The County supports the preservation of the traditional equestrian use and ranching operations at Sweetwater Lake.

- **Interim Staging Plan:** There is an operational gap for equestrian use in the phased construction approach outlined in 2.2.2 - *Construction and Phasing*. Under Alternative 2 (Proposed Action), the existing informal equestrian parking (the Triangle Lot) will be removed in Phase 2 of construction. Phase 3 will establish formal equestrian facilities and staging. However, given that each phase is not required to begin immediately following completion of the last, there may be a lack of designated, safe staging areas for horse trailers leading to dangerous and environmentally degrading parking along CR40/150 during the construction phases. The County therefore requests an interim staging plan for equestrian uses.
- **Trailer Turnaround:** Given the proposed allowance for increased equestrian rig length and semi-truck usage in livestock operations, the County requests the improved access road in the South Day Use Zone must be explicitly engineered with adequate turning radii and circulation for the maximum vehicle-and-trailer combinations authorized by the final decision.



EAGLE COUNTY

Board of County Commissioners

970-328-8605

970-328-8629(f)

eagleadmin@eaglecounty.us

www.eaglecounty.us

- **Fencing and Signage:** The County requests permanent drift fencing (using CPW wildlife-friendly standards) and “Open Range” signage be installed at all locations where the stock driveway approaches the designated recreation trails to reduce conflicts between livestock and recreation.

8. Phased Development and Adaptive Management

The County strongly endorses the 4-phase development framework proposed in Alternative 2, Section 2.2.2 - Construction and Phasing. However, this phasing must be explicitly tied to the adaptive management framework in the Visitor Use Management Plan.

- **Threshold-Based Implementation:** Progression to the subsequent phase must be contingent upon remaining below the functional capacity of CR40 and maintaining the environmental thresholds established in the Visitor Use Management Plan. Where thresholds are exceeded, appropriate adaptive-management measures should be implemented before additional capacity is added.

9. Built Environment, Historic Character, and Architecture

The County concurs with the removal of the heavily degraded structures due to documented environmental hazards (mold, asbestos, and lead). However, the County is sensitive to the historic preservation of some of the identified buildings.

- **Replacement Buildings:** The County recommends that the proposed Sweetwater Lodge and supporting structures strictly adhere to the USFS *Built Environment Image Guide* (BEIG) standards for the Rocky Mountain Province with rustic and western architectural styles. Buildings should utilize natural stone, heavy timber, and organic forms to blend into the natural environment and preserve the area's historic charm.
- **Interpretive Zone:** The County strongly supports the creation of an interpretive zone outlined in 2.2.2 - *Interpretive/Education Zone* to preserve and restore the historically significant Westlake and Gregg Cabins.

10. Outstanding Constraints

- **Workforce Housing:** The County requests clarification on the proposed employee housing in the Administrative Zone including the anticipated number of units, beds, trailer pads, and total on-site capacity.
- **Water Quality and Keep Ditch:** The Proposed Action includes converting Keep Ditch from an open ditch to an irrigation pipeline. The County requests review of the conversion plans to ensure the sustained protection of downstream local irrigation water rights. Additionally, the County requests that the FEIS and ROD clearly identify the water-quality monitoring, drainage, spill-prevention, and other mitigation measures for potential non-point source pollution (e.g., leaking fuels, grease, heavy metals) entering Sweetwater Lake and Sweetwater Creek from both the new parking lots and the increased traffic load on CR 40.



Board of County Commissioners

970-328-8605

970-328-8629(f)

eagleadmin@eaglecounty.us

www.eaglecounty.us

In summary, Eagle County strongly opposes Alternative 1 (No Action) due to safety and environmental risks, advocating instead for a modified Alternative 2 dependent upon a phased implementation and managing partner flexibility in the Record of Decision. Thank you for your partnership and dedication to establishing a sustainable future for Sweetwater Lake. If you have clarifying questions, please contact the Open Space and Natural Resources Director, Marcia Gilles, marcia.gilles@eaglecounty.us.

Sincerely,

Jeanne McQueeney
Commissioner

Tom Boyd
Chair

Matt Scherr
Commissioner