

August 5, 2026

Submitted via CARA for the Sweetwater Lake Draft EIS record, via the CPW Commission Engage Page, and by email as a supplement to the Sweetwater Lake Working Group's July 29, 2026 letter

James "Jay" Tutchton, Chair
Colorado Parks and Wildlife Commission
6060 Broadway
Denver, CO 80216

Re: Supplement—project-record warning that the sole county road could become impassable

Dear Chair Tutchton:

The Sweetwater Lake Working Group supplements and incorporates its July 29, 2026 letter concerning the missing natural-disaster ingress/egress analysis.

The Forest Service has now publicly posted Karen Houck's December 2023 report, *Geologic Hazards at the Sweetwater Lake Property*. This information was not new to the EIS process: the report predates the DEIS by more than two years, is cited in the DEIS's description of existing geologic conditions, and is listed in the DEIS bibliography as available in the project record.[1]

Houck's warning is specific and consequential. On page 14, she concludes that:

- upstream landslides and debris flows could cause "catastrophic flooding";
- hazards near or inside the property could "destroy infrastructure and cause loss of life"; and
- downstream landslides and debris flows "could damage or bury the county road and make it impassable."

Houck also explains that off-property hazards were not field-checked and that additional landslides and debris flows may threaten the property and entrance road. She recommends hydrologic analysis to determine the magnitude and annual probability of flooding risk. Houck, pp. 12, 14, and 18.

The DEIS cites Houck while omitting these road-access and life-safety conclusions from its emergency-ingress/egress discussion. Specifically, the DEIS:

- acknowledges significant landslide activity, recent ground movement, flood-prone deposits, and an alluvial fan bisected by the public road, citing Houck (p. 160);
- states that the location of future debris flows and landslides is unknown and defers additional geotechnical, hydrologic, and drainage work until before implementation or ground disturbance (pp. 167–168);

- confines its cumulative geology analysis to the 846-acre project area because of the purported “immobile nature of soils resources,” although Houck describes mobile hazards outside that boundary that may make the county road impassable (p. 170);
- directs readers to Section 3.8 for natural-disaster ingress/egress analysis, but that section identifies emergency-service providers and increased demand without analyzing evacuation or responder access (pp. 148, 153, and 170);
- defers an Emergency Response and Evacuation Plan to a future special-use-permit condition (p. 33); and
- describes the project area as the terminus of a dead-end road (p. 173).[2]

A review of all 292 PDF pages found no analysis of road-blockage locations or duration, evacuation demand or clearance time, available safe-egress time, simultaneous outbound evacuation and inbound emergency response, or alternative access if the county road becomes impassable.

This changes the omission from a general analytical gap into a known single-point-of-failure problem. A future emergency protocol does not demonstrate evacuation feasibility when the project’s own cited geologist warns that the only public road may become impassable.

NEPA requires professional and scientific integrity in environmental analysis and the use of reliable data and resources. 42 U.S.C. § 4332(2)(D)–(E).[3] The life-safety consequences of a report already cited in the DEIS should be analyzed before an alternative is selected—not deferred until permit planning or construction.

Accordingly, please:

1. Identify the DEIS document and page numbers where Houck’s warning that the county road could become impassable was evaluated in connection with public evacuation and emergency-responder access. If it was not evaluated, please confirm that on the record.
2. Explain whether and how CPW, the Forest Service, and SE Group evaluated Houck’s pages 12, 14, and 18, and why the road-blockage and life-safety conclusions were not disclosed in the DEIS’s ingress/egress discussion.
3. Publicly request a revised or supplemental, alternative-specific analysis covering the entire access corridor and testing blockage of Sweetwater Road by wildfire, flooding, debris flow, landslide, or rockfall. The analysis should compare evacuation-clearance time with the available safe-egress time and address simultaneous outbound evacuation and inbound responders, large vehicles and trailers, notification delays, secondary access, and refuge options.
4. Request that the Forest Service extend or reopen the DEIS comment period for at least 90 days after that analysis is publicly disclosed.

All requests in our July 29 letter remain in effect, including our request for a written CPW response by August 21, 2026, submission of that response through CARA, and circulation to every member of the Commission.

This is not a request to study a newly raised concern. It is a request that CPW follow through on the emergency analysis it called “critical” using material already contained in the project record.[4]

Thank you for your prompt consideration.

Respectfully,



Kenneth A. Wright III

Authorized Representative

Sweetwater Lake Working Group

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cc: Laura Clellan, Director, Colorado Parks and Wildlife

Travis Black, Northwest Region Manager, Colorado Parks and Wildlife

Garfield County Commissioners Tom Jankovsky, Mike Samson, and Perry Will

Ali Longwell, Vail Daily

Jason Blevins, The Colorado Sun

Sources

[1] Karen Houck, *Geologic Hazards at the Sweetwater Lake Property* (University of Colorado Denver, December 2023), pp. 12, 14, and 18:

[Houck geologic-hazards report](#)

[2] *Sweetwater Lake Recreation Management and Development Project Draft EIS*, pp. 33, 148, 153, 160, 167–168, 170, 173, and 229:

[Forest Service project and DEIS page](#)

[3] 42 U.S.C. § 4332(2)(D)–(E):

[National Environmental Policy Act requirements](#)

[4] CPW scoping comment, July 23, 2024, p. 6:

[CPW scoping comment in CARA](#)