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Comments: The Sweetwater Community Club, non-profit entity identification number 20041335108, respectfully submits this letter to voice their concerns and objections surrounding the current proposal for the development of the forest service land around Sweetwater Lake.

As a community we are opposed to the dramatic size increase, over 3 times the developed acreage, and the increase in visitor numbers which is over 4 times the historic numbers. We are also extremely concerned with the lack of planning for the impact this will have on the ecosystem, the community, local culture, the roads as well other, nearby public and private lands.

After many meetings and discussions, we have detailed a number of our concerns and objections. In an effort to make sure nothing is missed, we have organized these by category as listed in the table of contents below. There will be some redundancy as many areas of concern fall into more than one of the categories.

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The proposal with its increased volume projections and development is irresponsible, unrealistic and undesired by the Sweetwater Community. We urge you to review all of the following topics and objectives, and make a well informed decision based on our and multiple community members' comments to preserve the property and its historic state. This letter and the topics of objection are also attached as a PDF to this comment.

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NEPA topics of objections

(1) Safety

Search and rescue instances will increase with a greater number of visitors.

Search and Rescue is based at a minimum of an hour away.

Fire, mudslides and rockslides have all closed Sweetwater and the Colorado River Road in the last 5 years. Risk to people who will be stranded in a box canyon intensifies at an alarming rate with the proposed plan.

\*The Grizzly Creek fire in the Glenwood Canyon exposed how difficult it is to communicate with two counties (Eagle and Garfield) represented in the area.

Historically, emergency services helicopters could land safely in the nursery pasture. Per the Notice of Intent (NOI), this area would be the new campground. Power lines and other challenges make landing in other areas risky. Building a new landing pad would be strictly regulated and costly.

Communication difficulties: no cell service. Not just at the lake, but from I-70 to the lake for visitors (17+ miles). Increased traffic and related vehicle issues result in people coming to homes for help. This is already an issue that will be magnified by more traffic.

Restricted parking has led to conflicts and parking on non-state/USFS property including the side of county roads, private property and at the Hilltop trailhead area.

The area will box in the large numbers of visitors in a community recently evacuated due to nearby wildfires.

A concessionaire presence on-site, 24/7 has been and will continue to be necessary to ensure the safety and security of the concessionaire's assets. This also provides a consistent, year-round hub for public information, emergency communication and safety.

Glenwood Canyon closures have created additional traffic and safety problems for residents north of I-70 on Colorado River road. At times, it has taken in excess of 3 hours to drive from Gypsum to the Sweetwater Road when I-70 is closed through Glenwood Canyon. Congestion at Dotsero due to canyon closures makes accessing the Sweetwater area nearly impossible for residents, visitors and emergency services alike. There have been at least 12 closure events in 2023. Increasing visitors and the potential need for emergency services North of Dotsero will create more difficulties during canyon closures.

Hikers, horses, and hunters sharing paths:

The Keep ditch runs approximately one and a half miles from the Turret Creek head gate through some extreme and dangerous terrain to the three upper pastures. The NOI proposes that there would be a public trail along this path that would be shared by horses, hikers, and hunters. Building any public trail, especially a shared trail, through this steep and dangerous area would be irresponsible. It will lead to user conflicts that increases liability and risk of serious injury to all users. This should be completely removed from the plan.

The historic designated trailhead at Hilltop provides access to safe, established trails to the flattops and should be the only access to the Turret Creek area. Historically, the USFS has not maintained this steep one-lane road to the trailhead, and this road and trailhead cannot support large numbers of vehicles.

The absence of an overall trail utilization, guidelines, and maintenance plan leaves huge concerns. A full plan should be shared/developed and reviewed by knowledgeable locals prior to approval.

Sweetwater Lake is a historical point of access for several cattlemen's grazing permits. User conflict with cattle creates a huge safety issue. It is not uncommon for campers/park users to have a dog with them that may not be accustomed to dealing with cattle. The current proposal does not explain how current cattle lease holders and additional users of the area will function together. The Ute trailhead located in the proposed day-use area immediately leads potential users through a gate and into a permitted cattle grazing area. This gate for ranchers/grazing is a risk to all area users, as a gate left open will allow cattle to encroach on the day use area, resulting in property damage, injury to public and increased liability. A mother cow can be very dangerous when protecting her calf from dogs and people. This must be addressed before any proposals are approved.

## (2) Wildlife Impacts

Compared to historic use, the suggested 400% increase in visitors will have significant wildlife impacts:

Calving (Elk)/birthing (Mule Deer) grounds conflicting with campgrounds in the pastures.

Damaged migration patterns with additional roads and increased traffic.

Possible loss of Peregrine Falcons and Bald and Golden Eagles who tend to avoid areas of human activity. The

Roaring Fork Audubon Society conducted a survey over the past 2 years and found 84 bird species, 11 of which are Species of Conservation Concern with a potential of at least 5 more.

Vulnerable Pinyon Jay population.

Loss of wildlife habitat.

There are no provisions for drones in the current proposal. With the exception of utility (Holy Cross) and emergency services, all drones must be prohibited.

Increased stress on animals due to human numbers. According to the Roaring Fork Audubon Society, increased boat/paddle board activity will drive away many species that depend on this critical habitat for breeding and migratory purposes. The increase in water and land activity around the lake will cause birds like the Peregrine Falcon and Bald Eagle to abandon their historical nesting sites. Additionally, increased activity and noise will negatively impact feeding behaviors. The wildlife rely on the lake and pastures for survival and will be affected by increased disturbances. As CPW is tasked with protecting the wildlife, how will this be successfully managed?

According to the NOI's visitor projections, there will be more negative and potentially unsafe human/wildlife interactions. This is bear and mountain lion country and it is also located in the new wolf population's watershed. Encounters with moose, bear, mountain lions (etc.) will increase and lead to significant injuries and mortality.

Elk calving areas are very close to Sweetwater Lake. By bringing in additional visitors, the mortality rate for these animals will be increased. There must be a plan for trail and campground closures through June.

Riparian areas: All of the magnificent birds in the area will be impacted by the proposed sizing of development and holding capacity. It is not just protecting the areas by "roping things off"---the volume of people, traffic, noise, etc., will negatively impact the birds and other wildlife. This area includes Blue Herons, Golden Eagles, Bald Eagles, Peregrine Falcons, Black Swifts, owls, bats, etc.

The pastures are currently winter habitat areas and are heavily utilized by wildlife. Removing or developing the pastures into campsites will take this valuable resource from the wildlife.

(3)Traffic/Road

Sweetwater Road is a dirt road, which is maintained by Eagle County, and has a posted speed limit of 25 MPH.

Without a formalized, full traffic study and budgeted solutions for all problems found, development cannot proceed. The state/USFS should be required to define the increased volume expected and adjust plans for the lake to a volume that is well below what the roads/community can handle.

There is currently no enforcement of the speed limit.

The dirt road has washboards and potholes. Increased traffic will damage the road surface.

Not designed for two standard vehicles to pass in many places, certainly not for longer vehicles/trailers/etc. Sweetwater road is designated as a "Rural, Minor, Collector."

Semitruck turn-around (at lake currently) will potentially be removed with current site plan.

Roads will be clogged with increased numbers and some RVs can be too large for the road.

Increased road accidents due to increased traffic which will be further complicated by lack of communication abilities.

This proposal will increase traffic on both Sweetwater Road and the Colorado River Road, both of which are popular but already hazardous roads for bicyclists.

4-H animals and pets are walked on the road daily. Locals also ride their horses on the road to access trails from their homes.

Local youth ride their bikes on the road.

Wildlife on the road is common. Recently re-introduced turkeys to the area along with deer, elk, livestock, pets, are common and locals are always on the lookout. Visitors to the area will not be aware of these hazards.

Intersection of CR151 and Sweetwater Road is a huge concern. This is already a dangerous area without traffic increases. Increased traffic could result in a horrible accident-especially vehicles coming down from the lake. This must be studied along with other areas of the road before doing anything to increase traffic to the area. In the month of June, a local had a close encounter with a USFS vehicle coming down from the lake in this area.

Additional traffic will impact the maintenance required for upkeep resulting in increased taxpayer costs for both Eagle and Garfield Counties.

Both Eagle and Garfield Counties have stated in a public forum that they have no plans to make improvements to Sweetwater Road.

250 people with an average of 2.5 people riding in each vehicle, will result in an extra 100 vehicles (an extra 200 vehicle trips going up and then down the road) on the road in addition to local traffic. There are currently 93 homes on Sweetwater Road and County Road 151 which produce 240 trips daily per Eagle County traffic count in 2021.

The increase in just USFS and State Park vehicles has already been noticeable in the last few years and becomes more problematic as they increase staffing with proposed merge in staff housing.

Sizing of the plans for Sweetwater are over 50% the current size of Sylvan Lake. Sylvan lake traffic is significant; not just the cars/trucks/rvs etc, but also the increase in other uses at, and around, the state managed area. All roads within 15 miles are impacted by Sylvan Lake traffic and visitors. It is safe to assume similar impacts will occur in the Sweetwater area. Sheep Creek Road, CR 151 and Colorado River Road will all be impacted by development of the area by the state or the USFS.

(4)Environmental Impacts (flora and fauna)

Do no harm and leave no trace. The following topics are not addressed by the NOI.

Diminished fragile plant life. EX: Harringtonii Bearded Penstemon, Mountain Willow.

Shock to the sensitive riparian area with added use near the lakeshore.

Overused trails that border the park. Currently, the USFS has not been able to maintain the trails with the historic level of use.

Excess human waste in the areas outside of the campgrounds and cabins. Sweetwater Community Center, the Sweetwater Road and the Colorado River Road (including the river) become dumping grounds for trash and waste from increased visitor population.

Noise pollution - Late night parties in the cabins or campgrounds, late night traffic. No external speakers should be allowed. Paddle boarders use external speakers to listen to music while they recreate on the lake and this will affect wildlife around and in the riparian area due to the disturbing noises. The use of generators will disturb the peaceful surroundings.

Light pollution -this will affect the potential Dark Skies designation.

Elk calving/Mule Deer birthing areas are very close to Sweetwater Lake. By bringing in additional visitors, the mortality rate for animals will be impacted. What is the plan for seasonal closures? Trail closures in local communities are a constant battle as people do not abide. (see Town of Eagle and Eagle Ranch area)

Additional traffic on the roads will impact Sweetwater Creek and the Colorado River. The additional maintenance required for upkeep of the road is unbudgeted by Eagle and Garfield County at this time. Traffic will increase dust and sediment, which affects the flora and fauna in the Sweetwater Creek and Colorado River drainage. It will affect the water quality in both Sweetwater Creek and the Colorado River.

(5)Livestock

Historically, ranchers have driven and continue to drive cattle up Sweetwater Road from Sheep Creek, and from the Colorado River (Green Horn Permit area). This is done by horseback, and truck/trailer.

There was a comment at a meeting by the USFS/CPW in Gypsum that "they" would truck the cattle up to the lake, as well as pick them up in cattle trucks from the lake. As mentioned above, the current semi-truck turn around will be removed with the proposed plan, eliminating the use of trucks/trailers for moving cattle.



The Sweetwater area and Colorado River Road are designated "Open Range" with potential livestock/car collisions.

Loss of historical access to traditional open range cattle drives along the road will present considerable financial impact/burden on local ranching families. Many of these families have been ranching in this area for at least five generations.

The current proposal lacks any detailed plan around cattle management:

The expansion of the 832 acres from the actual purchase has now impeded on the cattle leases and potentially created new conflicts between users and ranchers.

The permit holders need facilities and a clear plan on how they will manage things before approval.

The additional acreage should be removed from the State lease area and/or a full justification of why acres of forest land that have historically been utilized and managed as USFS land were combined with this NEPA request.

Catch pens must be included in the plan so that cattle are not roaming freely with the campers when the cattle find/gain access to the lake area.

#### (6) Site size and Design

Development of the site to support 250 visitors daily, which has been mentioned during meetings with USFS and CPW, is completely unacceptable for the traffic, community, road conditions and ecosystem.

The restaurant at Sweetwater Lake has been the heart of our community, open for over 100 years. Replacing the restaurant with a "lodge" like the one up brush creek at Sylvan Lake for "administrative, education, interpretive spaces" does not support the historic and cultural type of facility/environment.

Adding infrastructure, such as RV pads and electric hookups, will attract more visitors and lower the quality of the current outdoor experience and affect water runoff.

Removing access to the lower and middle pasture will mean that the concessionaire will have to bring in weed-free hay to feed their horses. This will be a huge expense, and will cause the concessionaire to operate at a loss regardless of the new barn/increased business.

Catch pens need to be included in the plan for cattle that come down from the USFS area.

Development of the meadows will have a significant impact on wildlife habitat.

Sweetwater Lake is at the end of the community of Sweetwater, meaning that a visitor must drive to and from the lake through the entire community negatively impacting all residents.

The development and marketing of a recreation area of the size proposed will detract from the enjoyment of our unique environment and destroy the character of the area.

Once in state management, what would keep them from expanding the "park" in the future? The plan does not call out specifics or have "limits" on development. The vague nature for future plans is concerning and must be addressed.

(7)Volume (people)

Historic use before the property went on the market was an average of less than 60 people per day including staff. It was common to have as few as 10 visitors and on rare occasions, such as a wedding, up to 200. Moving from an average daily rate of 60 to the proposed 250 means over four times as many people in the area each day.

The historic high numbers occurred 4-5 times annually, throughout the months of June to October.

The actual average was found to be fewer than 60 visitors in a multiple months-long water study done during the

high season for the State of Colorado.

The Governor commented, "preserving and conserving some of our most amazing wild areas[hellip]We want to make sure that we have a sustainable level of visitation and people that visit here have that special experience and it's a different experience than people might expect at other parts of our state park system[hellip]preserving the undeveloped nature of the property."

We believe the "sustainable level of visitation" to be that level that occurred here in the two decades before the area was closed to visitors in 2018. That level allowed a "special experience" for a wide variety of people from locals to international visitors. At the same time it allowed the Bald Eagles to nest beginning in 2006, and the moose to graze, and the river otters to frolic on the banks. This was the ideal use level that allowed the humans, the wildlife, and the unique plant habitat to thrive. Sweetwater Lake gives visitors a euphoric experience like no other into the past of what the Colorado mountains/frontier was like. Areas like this and its wildlife have disappeared due to development and pressure from large numbers of visitors recreating.

#### (8)Locals Access

Formerly, locals (Sweetwater, Dotsero, Gypsum, Eagle, Edwards, Avon, Vail, (etc.) could use this area spontaneously.

Allow for a "locals pass" for Sweetwater residents to use at any time - no reservations needed

The Hack Lake Trailhead near Sweetwater Lake crosses BLM land on the way to Hack Lake.

Historical, free, public access to this trailhead should continue. Access to this trail is missing from the current proposal.

Concern that residents of Eagle and Garfield Counties might have to pay for day use and need reservations significantly in advance.

Bigger concern is that Sweetwater Lake will become like Sylvan Lake, removing a local amenity from the local communities, with the majority of the visitors coming from outside of Eagle/Garfield Counties. The fact that the State of Colorado, the Governor, Eagle Valley Land Trust, and USFS built out this plan without discussions with the local communities, Garfield County and Eagle County must require a complete "reset" to the process. Making plans and announcing this level of a change to a local area is unacceptable and irresponsible. It should not be

permitted without consulting the local government.

#### (9)The Goal of Increasing Access

Sweetwater Lake has long welcomed a wide variety of national/international visitors, yet the visitation has never needed to "be controlled." This would change with the designation and marketing of a state park. This area has always been open to the public with the exception of the private cabin rentals. While only half of the lakeshore was previously owned by USFS, the public was always allowed access on the "private" side.

Advertising surrounding a new state-managed area will inform new people about the lake, but there is no increased access to those people than had been previously open. False advertisement by CPW is currently causing a misrepresentation of amenities and access at the lake.

Increased access for front range visitors will mean losing access for the nearby residents, the very people who worked so hard to move the land to public ownership in the first place or the land to be preserved, not developed.

Public access has been consistently available at Sweetwater Lake, so the goal of "increasing access" is debatable. There is a historical USFS campground at the lake and over the years, there has been a public dock on the USFS side part of the time. There is a nice hike to a fenced overlook and the wonderful Indian Cave site and there has been a public parking area for equestrian use in the middle of the "private" side. Visitors could park and hike up to the top of the east side on private land without paying any fees ("big rock hike"). Additionally, the "private" dock has always been open to the public to launch boats at no cost. If CPW takes over management, all of this will require fees, which will decrease accessibility to those with less financial means. Today, the USFS has closed the inlet acres and the big rock hike, actually reducing access.

The "private" restaurant has always been open to the public. The public was always welcome to use the inlet side of the "private" land for free fishing or even launching small watercraft. Retaining the current concessionaire would retain the historical cultural experience.

Sweetwater Lake is at the end of the community of Sweetwater, meaning that a visitor has to drive through the entire community to get to and leave from the lake.

There has always been good public access at Sweetwater Lake. Again, the proposed CPW management plan might increase the numbers, but it will not increase the access, rather, it will shift access to those with more money and those with better internet for online reservation, but it will not increase access.

(10)Water Impacts

More development = watershed issues.

Impacts to Sweetwater Creek and the Colorado River.

Increased traffic will impact water quality on Sweetwater Creek/Colorado River

Increased maintenance of the road will decrease water quality.

(11)Visitor Overflow affecting surrounding areas

People encroaching into other areas (Sheep Creek, Cow Camp, Flat Tops Wilderness) will negatively impact these areas.

No designated parking

Not regulated by CPW (etc.)

250 visitors/day will also impact campgrounds along the Colorado River-increased visitors = increased trash, etc.

Increased visitors will result in increased traffic throughout the area. Sylvan Lake is a great example of increased traffic. Sheep Creek, Cow Camp (CR 151), even the Colorado River Road north to McCoy will see increased traffic. The additional burden on the area must be planned for by Road and Bridge teams, land owners, and the overall communities. Two current short-term rental locations on CR151 already create substantial winter travel issues. At least 10 vehicles/occupants seek assistance each winter from local residents. This will be nothing

compared to the volume that the proposal is planning for.

(12)Impacts within the neighboring community

People who live near Sylvan Lake State Park said that becoming a state park has "ruined" the experience for them.

Impacts to rural way of life

Increased trash

Increased trespassing

Increased traffic

RVs with trailers

Side-by-sides

Snowmobiles

Bicycle traffic

Hikers/Pedestrians

Vandalism

People moved to this area for the peaceful, country atmosphere.

New recreational consumers will target this area once marketed and promoted.

Concerns that the restaurant/cultural heritage center/community gathering spot will not reopen.

### (13)Historic Uses

Historically, there were 6 multi-bedroom wet cabins with wood burning fireplaces, no wifi, and space for multi-generational families to gather together. Lodging in houses with kitchens and bathrooms opens up the area to many folks who prefer not to, or are unable to go camping due to a disability, etc. This is an alternative for those who don't own RVs or those who choose not to use outhouses. In addition, "dry cabins" have not been a historical use.

Visitors who have historically enjoyed wet cabins will not move into tiny dry cabins.

The multiple dry cabins do not increase access, they just change access.

### (14)Alternatives to a State Management Area

Require the State of Colorado and the USFS to share examples of successful 20 year leases of land between the agencies that are also developed for recreational use. There are existing models of USFS leasing lands to private businesses and not to a state. Budes Lodge and Trappers Lake are more common models for a property like this; not a lease to the state and certainly not a 20 year lease if other examples of this type of arrangement do exist in Colorado.

USFS does not have the funds to operate and maintain the property. Most, if not all residents, prefer no new development. We would prefer that the current resort managers would become Forest Service concessionaires maintaining operations as they have for the past three decades, with only the landlord changing. Amenities would include boat rentals, horseback riding, the restaurant and the cabins. The concessionaire would be allowed to pursue private funding and/or grants to remodel. The USFS could provide realistic dates for raising funds and, if not met, the cabins could be dismantled and no new cabins would be constructed. The USFS could continue to run their current campground, or include it in the concessionaire contract like many campgrounds within Colorado and nationally. The pastures should remain intact, and continue as pastures and not become campgrounds. The basic "Sweetwater Lake Experience" would stay as it was historically.

Over the years, the USFS has expanded their utilization of concessionaires in different types of models. Smaller and more intimate campsites are working in similar areas like Budes, Trappers, and even Yeoman Park (campgrounds only).

The USFS retains sole management, so the local ranchers in the area can continue their historic relationship with the USFS and their cattle permits.

Alternative: Un-develop the entire site. Remove the buildings that do not have historic significance. Remove the traffic concerns and all the conflicts and remove all items and do not add any new facilities. Do not remove the barn and historically significant buildings. \*\*Please see the Sweetwater Lake advisory team alternative plan attached.