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Last name: Cummings

Organization:

Title:

Comments: July 31, 2024

Dear Responsible Officers of the US Forest Service, Colorado Parks and Wildlife, White River National Forest and the United States Department of Agriculture:

Thank you for allowing the opportunity to provide community and local comment on the property at Sweetwater Lake. I strongly feel a state park or other type of "managed" park is NOT in the best interest of Sweetwater Lake, the wildlife that reside in this area, or the local community and will cause deleterious effects and unintended consequences to the environment, local community. I/we cordially submit objections, proposed actions and supporting actions regarding the proposed special permit project on the property around Sweetwater Lake.

I strongly support the plan to return the property of Sweetwater Lake to its previous use prior to the sale of the land and transfer to the USFS. This continues to allow a campground on the end of the lake and the resort to be remodeled and repaired open to the public. Due to the extended length of time the property has been with a realtor and now the USFS, the buildings require remodeling. I support, and will be happy to collaborate the grant writing efforts to secure funds to restore the buildings and restaurant. Restoring the restaurant and existing buildings has minimal if any impact on the area, wildlife and environment, whereby demolishing and building new structures, and expanding the footprint of human and equestrian activities causes significant impact. If repair and remodeling of the existing site is not possible, I strongly support the plan to have no development occur on the property. In this case, I support removing structures and allowing the property to return to an undisturbed, natural, primitive site. Aligning with the mantra of the Colorado Parks and Wildlife - Keep Colorado Wild -the current proposal for development of the site as part of the special use permit is in direct conflict with this state slogan.

Below are specific objections, proposed actions and supporting reasons for consideration by the Responsible Official(s) of the special permit proposal.

Opening Paragraph

Objection: Project name "Sweetwater Lake Recreation Management and Development Project". This name indicates expansion of recreation and development the area of Sweetwater Lake. It tells the reader that this is a place of high activity, noise, and disturbance.

Proposed Action: If a formal name must be assigned to this property, consider using native/Ute names for the area or consider the Ute term for Weeping Maiden, Yahgi Nanzitch (loosely translated) as the cave is known as the Weeping Maiden Cave. Collaborate with the Colorado Ute/Paiute tribes and request their input, knowledge

and assistance on a name for this area. Do not use the terms "recreation", "development", or "State Park" but rather focus on names that protect the area such as "Reserve", "Sanctuary", "Primitive", or "Wilderness".

Supporting Reasons: There has been significant renaming of Colorado mountains and parks to the given Native American names (e.g. Mt Evans to Mt. Blue Sky). Using a Native American name honors those who no longer call this area home. Using protective terms like "primitive" and "wilderness", tells the public this is not a place for your side-by-sides, 4-wheel/OHV vehicles, mountain bikes, campers or toy haulers, etc..It sets the expectation of what this area is about - nature, preservation, quiet, peace, and keeping wild spaces wild.

Objection: Sentence 4, 1st paragraph "[hellip]the White River National Forest intends to improve recreation access; update the facilities on site; and, through a long-term partnership with Colorado Parks and Wildlife, create a state-managed recreation area around Sweetwater Lake."

Proposed Action: Do not improve access or the facilities to the Sweetwater Lake property. I support every effort to refurbish all existing structures to meet codes and policies required by USFS. I object to building new structures and roads. If state management for this area is required, I propose it is managed as a wildlife preserve/primitive area in accordance with the State Wildlife Action Plan (SWAP) to protect the Tier 1 and Tier 2 species living in and around the lake and Flat Tops Wilderness. Per the State Wildlife Action Plan, which states it is not a CPW specific plan, but rather is intended to be used by all interested in conserving aspects of Colorado's natural heritage, any development of the Sweetwater Lake property is in direct conflict with the SWAP. Additionally, I request additional information and clarity regarding how the 20-year permit is considered a "long-term partnership" and what the plans are after year 20.

Supporting Reasons:

For the past few years, the areas surrounding the lake have been closed off for raptors. Per the 2020 Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors, this area meets the criteria to protect the Golden Eagle, a Tier 1 raptor. Colorado Parks and Wildlife recommends no surface occupancy within $\frac{1}{4}$ mile of active golden eagle nests beyond that which already occurs, as well as restriction of human activity to within $\frac{1}{2}$ mile of active nests from December 15 through July 15 (CPW 2008). I understand this as meaning there would be no camping, or activities allowed around the lake during this time frame. Ospreys are also present at the lake and per the Buffer Zone and Seasonal Restrictions report, there are no activities permitted between March 15 and August 15. Abiding by the Buffer Zone and Seasonal Restrictions for these raptors this would restrict usage of the lake/campgrounds nearly all summer and peak camping season over the summer. Per the report, "Permitted, authorized, or human encroachment activities- Any activity that brings humans in the area. Examples include construction activities, oil and gas development and production, driving, facilities maintenance, boating, trail access (e.g., hiking, biking), etc." Additionally, the creation of tent sites, housing, barns, stables, lodges, cabins and concrete pads would meet the restrictions for Surface Occupancy, defined as "Any physical object that is intended to remain on the landscape permanently or for a significant amount of time. Examples include houses, oil and gas wells, tanks, wind turbines, solar developments, roads, tracks, trails, etc." The specific development items outlined in this proposal would meet the criteria for Surface Occupancy and would not be allowed, per the recommendations.

Purpose and Need

Objection: First bullet point: "Enhance and provide sustainable management of the public lands around Sweetwater Lake".

Proposed Action: Do not enhance, build, or develop any aspect of the lands around Sweetwater Lake or the lake itself. Keep existing buildings and remodel them, keep primitive camp sites, do not provide amenities, hookups or concrete pads.

Supporting Reasons: The USFS states as part of its core principles that "sustainable management aims to maintain or restore the ecological functions and processes of forest ecosystems." Developing, enhancing, building, and expanding are contradictory to this core principle. Additionally, more information is needed regarding how sustainable management is actually upheld with a 20-year permit and no future plan in place after the permit period expires.

Objection: Second bullet point "Provide updated and sustainable nature-based recreational services to the public that are appropriate to the environment and are responsive to the recreational needs of the public."

Proposed Action: Do not provide "updated" recreational services at Sweetwater Lake and do not use this property to be responsive to meet the recreational needs of the public, but rather focus to allow this area to remain primitive, undeveloped, and wild for those who want an experience that is not found at the other state managed areas.

Supporting Reasons: Sweetwater Lake is one of the last pristine and relatively untouched areas in Colorado. I strongly object to updating and developing the area to make it a place where it meets the needs of the public. I would like to propose the area remains primitive with primitive camp sites, no development or amenities, and be a place where those who are prepared, understand how to responsibly recreate in the backcountry, and are seeking out a primitive area to camp and hike can do so without all the facilities and development found at the other 42 state parks, and possible up to 20,000 other types of campgrounds across Colorado (includes State Parks, National Parks and Monuments, National Forests, BLM, private campgrounds and county/local parks). This does not include the nearly limitless dispersed camping sites in the state.

Objection: Third bullet point "Improve the site's existing recreation infrastructure while providing updated facilities in alignment with applicable laws, policies, and known best practices."

Proposed Action: This bullet point is contradictory to what was presented at the meetings over the past few months. The proposed plan does not "improve existing infrastructure" but rather is presented as actions of "construct", "redesign", "develop" and "convert" buildings, putting up new buildings in addition to what currently exists, building a wastewater treatment plant, installing concrete pads, and more which results in an increase in traffic, trash, debris, and environmental damage and significantly changes the site.

Supporting Reasons: The proposed action on this land does not "improve the site's existing recreation" but rather causes significant development and impact to the wildlife, land and forest. Increased traffic, people, exhaust and pollution, waste (human and material), etc.. do not improve the existing infrastructure. Additionally, this plan may want to improve infrastructure but there is no information or discussion regarding accessing the property. Sweetwater Lake road is a narrow, windy road with steep exposure at times (see images taken from vehicle at night with LED high beam headlights on; 7/26/2024). This road is not designed for the amount of traffic proposed coming to this site, nor does it take into account the amount of traffic for the construction and "improvement" of the site to build out the propose plan. The site does not have cell phone service and no communication is available once you turn north off I-70. By significantly increasing traffic, there will be increased risk for accidents, collisions, and conflict and there will be no way for emergency services to be contacted. Additionally, the road will require significant improvements to accommodate the proposed traffic. Who will be paying for the improvement and expansion of the road to accommodate trucks, trailers, campers and high-volume traffic (compared to current day)? Are emergency response services prepared to respond to increased calls in this region? Are the county road and maintenance departments funded and equipped to sufficiently maintain the road? Is there funding or a plan for installing guard rails, expanding narrow sections of the road, policing speeding and traffic, and vehicle collisions with wildlife?

Object: Fourth bullet point "Develop and implement management strategies to reduce or mitigate potential impacts on the site's natural and cultural resources from public visitation.

Proposed Action: I support ways in which we can protect the site and the culture, particularly the Weeping Maiden cave as it has experienced significant damage over the years. Protecting the natural and cultural resources can be done by keeping the site a primitive site only. This bullet point is not supported by the proposed action items that discuss development, construction, building, and converting the site. These actions do not reduce or mitigate impacts on the natural and cultural resources but rather exacerbate damage caused by public visitation.

Supporting Action: The stated Purpose and Need of the special permit does not align with the Proposed Action items listed in the document, nor the information presented at the local meetings. The term "historical use" has been talked about at each meeting and in this document, yet there is no description of what is meant by this term. Is historical use that which has occurred over the past 100 years? 150 years? Or is it how the Ute and Paiute

historically used the land? I would consider "historical use" to return the site to how the Ute/Paiute lived on the land - in a primitive, ecologically sound and sustainable manner. I question how adding buildings and roads and concrete is truly reverting the site to how it looked and was managed 50 or 100 years ago. Allowing existing buildings to be refurbished and managed or returning the site to an undeveloped, primitive area are the two most sustainable actions for this property.

Objection: Fifth bullet point "Provide for year-round on-site management, including oversight and management for all the site's resources and facilities.

Proposed Action: Do not build or develop anything on the site. Allow existing structures to be remodeled and managed as they have been will not drain state resources or require year-round management and oversight by employees on site.

Supporting Reasons: Keeping the site as is with existing buildings or allowing it to return to a primitive area with no amenities or facilities will preserve the pristine area of this land, respect the cultures who were here before we arrived, and allow wildlife, particularly those animals classified as Tier 1 and 2 in the State Wildlife Action Plan, to thrive.

Support and Object: Sixth bullet point "Provide public recreational, interpretative, and educational opportunities.

Proposed Action: I support providing educational and interpretative opportunities but not at the expense of the land, wildlife and water but having to develop, build and create more infrastructure on the site to do so. These opportunities can be offered by small signs along the trails and a website that provides education to those seeking this type of information. A new build "visitor center" is not needed to provide these opportunities. I support public recreational activities as such as they align with the rules in the Flat Tops Wilderness - hooves, shoes, paws and claws only. I object to any type of water activity that is not conducted under human power or by an electric motor (limited horsepower). This area should remain quiet, dark at night, and not a place for recreating with a generator, radios, parties, motorized vehicles or other types of similar equipment.

Supporting Reasons: There are other State Parks and Forest Lands where one can recreate with motorized vehicles, campers, equipment, etc[hellip] Keeping Sweetwater truly wild is how we "Keep Colorado Wild".

Proposed Action

Objection: First bullet "Authorize a 20-year special use permit to Colorado Parks and Wildlife, under the Granger-

Thye Act, to implement and maintain improvements[hellip]manage the area consistent with the purpose and need." I specifically object to this as this Act allows for special use permits to various activities on national forest lands, including recreational, agricultural, and commercial uses. It also allows revenue sharing from the revenue generated by these permits. There is no language in this proposal that outlines the specific terms and conditions of this permit to ensure how CPW is using the permit and the site aligns with federal land management policies and objectives. A 20-year permit does not meet a long-term sustainable management goal.

Proposed Action: Per my objections to the "Purpose and Need" section, my proposed action is to offer this site as a primitive site with no new development, infrastructure, or enhancement. I propose USFS and CPW publish the specific terms and conditions of the permit to ensure the use of this permit aligns with federal land management policies. I also propose the publishing and enforcement of consequences of not adhering to the conditions of the permit are indeed actionable by the community to hold CPW/USFS accountable for any violations of the permit.

Supporting Action: Passed in 1950, the purpose of the Granger-Thye Act is "to improve the administration and management of national forests and other lands under the jurisdiction of the U.S. Forest Service." There is no information specifically identifying the details of the special use permit to CPW. For example: Could the White River National Forest could issue a permit for commercial operations on the site? Could the permit allow for a resort or cross-country ski resort? Does the permit allow for public-private partnerships and if so, what does this entail? This is relevant for understanding the development at the site. The Act can also impact road development and maintenance. What are the specifics around building new roads on the property? Clarification around the special use permit is needed, along with consequences and action that can be taken if the permit has violated its agreed use.

Objection: Second bullet point "Redesign the current site to promote recreational opportunities at a scale that is compatible with the capacity of the project area, its resources, and the surrounding area. The proposed site design would minimize impacts to wildlife and natural resources by utilizing those areas and lands that have been previously disturbed and would include the following actions."

Proposed Action: This statement is also at odds with the first bullet point in the purpose and need section. Redesigning a site is significantly different than providing "sustainable management" as described in the Purpose and Need in this proposal. The proposed actions of this proposal are in conflict with the Purpose and Need described on the first page of this proposal. While I recognize the USFS term "previously disturbed land" is liberal in definition as nearly all areas around Sweetwater Lake (and nearly everywhere in Colorado) have been impacted by human activity or natural events, I urge you to look at the native forage growing in pastures, the wildlife occupying those pastures for calving and feed, the raptors that feed in these pastures on the smaller rodents/animals and how nature has worked to heal these areas that we, humans, "historically disturbed". I would encourage USFS/CPW to not look at these areas as "opportunities for development" but rather "opportunities for nature to continue to heal and support those species that need attention, such as the Tier 1 and Tier 2 animals documented in the State Wildlife Action Plan. Just because our ancestors "disturbed" the land, does not mean this was right and we should continue to disturb and develop the land. How was "scale that is compatible with the capacity of the project area, its resources and the surrounding area" determined? While it may appear that the site can accommodate 250 people per day, I question how well the road, emergency services, communications, and wildlife can accommodate 250 people per day coming and going from the area? With no cell service once

you turn off of I-70, I am concerned that there is no way for those 250+ travelers to reach emergency services or get help when they have an accident on the road or in the wilderness and the local community will bear this burden to call for and administer emergency aid.

Supporting Action: Demolishing buildings, construction of new buildings and pouring concrete to redesign the site would have significant impacts on wildlife, particularly the nesting raptors and Tier 1 and Tier 2 animals in the area. Bringing heavy equipment, dumpster, noise of demolition and rebuilding, in addition to increase human activity and traffic cannot have minimal impacts to the wildlife and natural resources. What are the plans for mitigation of run-off and debris in the lake? How will the heavy equipment be transported up and down Sweetwater Lake Road - a narrow, winding road that often only allows 1 car to pass certain areas at one time?

Objection: Third bullet "Evaluate existing structures for retention with an emphasis on those buildings that provide the best opportunity to interpret the rich history at Sweetwater. If feasible, some structures may be restored to the historic character of their 1920-1940 construction and used as part of the cultural interpretative program for the site. Existing structures that are in a state of severe deferred maintenance and out of compliance with various laws, regulations, and policies may be removed."

Proposed Action: I support the restoration of the existing cabins and including some interpretive information about the history of Sweetwater. I object to the building of new structures, cultural interpretative buildings or other new structures or facilities on the site. A few small signage boards with historical information around the cabins and existing restaurant is sufficient..

Supporting Action: Is there a plan for routine maintenance and upkeep of the historical cabins? Who will be responsible for these cabins in 20 years? Is there a plan to help keep vandalism from occurring to these buildings?

Objection: Fourth bullet point "Develop a new campground area to provide 15-20 campsites in a historically disturbed area that currently contains little native vegetation ("lower pasture").

Proposed Action: The development of new campgrounds is in direct conflict with the Purpose and Need statement "Enhance and provide sustainable management of the public lands around Sweetwater Lake". These grounds do not need "enhancement" but rather sustainable actions that do not build, construct, or otherwise develop this site. The statement that the lower pasture contains "little native vegetation" is false and misleading. Native pentstemon, scrub oak, juniper, pine trees, native grasses, and wildflowers are growing in that area. The lower pasture is also home to deer and elk, provides a "historical use" for the birthing of fawns and calving of elk, and provides feed for native species. Per the USFS definition of 'historically disturbed', I think most land in Colorado would meet one of the criteria as there are very, very few places that have been not been used, grazed, built on at some point, used for harvest or mining or been impacted by a natural event. The use of this term to enable the USFS to use the pasture for new projects or activities is unjust. Nature has worked to restore that

pasture to native species. I object to applying the term "historically disturbed" to this pasture just because horses grazed there in the past. Developing the pasture into a campground and installing a road to the "middle pasture" creates significant disturbance to the flora and fauna growing and thriving in this pasture. Plowing the ground to make way for a campground and road is NOT sustainable management of a site and conflicts with the statement of purpose and need and guiding principles of the USFS. The USFS will be in direct violation of key guiding principles if this "development" of the site occurs. Specifically:

1) Conservation Ethic - promoting long-term health, diversity and productivity of the nation's forests and grasslands.

a. Building campgrounds and roads, installing concrete and waste water systems does not promote health or support conservation of the site.

2) Sustainability - ensuring the resources are managed in a way that meets the current needs without compromising the ability of future generations to meet their needs.

a. A 20-year contract with CPW and using State Funds for this "project" is not sustainable without a longer term plan for support. Building structures requires maintenance and money which is never guaranteed. Leaving the site as is or to return to a primitive, wild state, requires significantly less management and investment and supports the environment to continue to be sustainable on its own.

3) Science-based decision making - using best available scientific knowledge to inform management decisions.

a. Have the limitations placed on using areas around the lake to protect the raptors been completed? If so, what are the results from this study? What other studies have been completed in this area to understand the true environmental impact?

b. In the latest display presented in June, there was a waste water treatment facility included in the plans. What studies have been conducted to understand the impact this facility will have on the rivers and tributaries feeding into the Colorado River? What is the impact this center will have on the community downstream who rely on Sweetwater Creek for irrigation and water?

4) Restoration and Resilience - working to restore damaged ecosystems and increase their resilience to disturbances like climate change and invasive species.

a. Developing and constructing buildings, parking lots, campground, concrete pads, housing, and water facilities does not restore the ecosystem and will only harm the site's ability to be resilient against climate change, including wildfires, and with increased human visitation, it will only increase the risk of the introduction of invasive species. Allowing the site to return to a primitive state, minimizing human engagement allows the environment to restore damage and become naturally resilient to disturbances, rather than having human disturbances negate restoration of the area.

5) Environmental Justice - ensuring that management decisions do not disproportionately impact any particular community.

a. The proposed site plan will disproportionately impact the entire community of Sweetwater Lake. As it is currently proposed, the plan will significantly increase traffic, demand on resources, increase noise and conflict, increase traffic accidents as the road is narrow, winding and in several places only allows 1 vehicle to pass at a time, there is no cell phone service to reach emergency services, the plan will require additional amenities and services that will require semi-trucks to navigate this road which will create conflict with the local community travel in and out of the area.

Supportive Action: Allow this area to remain open pasture to continue to thrive as open, natural space for the deer, elk and other wildlife to use as they have 'historically'.

Objection: Fifth bullet point "Construct 8 - 12 new cabins to provide overnight recreation opportunity similar to that which historically existed in the vicinity. These cabins would be constructed with materials and architecture designed to provide a "rustic" western character similar to the styles of other cabins and lodges in the Flattops area of Colorado."

Proposed Action: Do not construct new buildings or cabins. Colorado has over 4,000 campsites for the public to enjoy. Adding 8 - 12 new cabins and 15-20 new tent sites will not impact the public in any fashion but will significantly impact this site, environment, forest and community.

Supporting Action: The financial investment and required management and upkeep of these sites does not make financial sense for State of Colorado or CPW. For example, using current rates published on the USFS reservation site, assuming you rent a basic cabin for \$50 per night (12 cabins) this generates \$600 a night if all are rented. If 20 campsites are rented at \$20 each night, this generates \$400 a night at full capacity. At maximum capacity this would generate \$1000 per night in revenue. Now consider camping season and rates of occupancy. If you generously consider people might start camping in April and the season ends at the beginning of November with hunting season, this would provide around 200 nights of camping a year. This would result in about \$200,000 in gross revenue. If all the construction costs are paid for by CPW/State of Colorado, you still have expenses for operating the site as and I would estimate between salaries and benefits, this revenue would be quickly exhausted with just 2 employee salaries. This leaves a deficit to the State of Colorado/CPW and USFS to pay for expenses, repairs and maintenance, etc.. The math does not make sense and is not economically responsible as this revenue would not allow this site to be fiscally solvent.

Objection: Sixth bullet point "Construct equestrian facilities in the "middle pasture". Proposed facilities would include barn and stable, 4-7 overnight equestrian camping sites and extra day-use parking for equestrian users. This area could also provide overnight parking and access to the surrounding Flattops Wilderness Area. This location is previously disturbed and is proposed for equestrian facilities to minimize the impact to the natural resources, while separating use between equestrians and other visitors."

Proposed Action: I fully support equestrian activities to continue as they have been in operation in the existing areas but object to building new structures in the "middle pasture". Using the term "historically disturbed" to allow for new construction in a wild and native grass pasture is irresponsible. I object to building in this pasture and would propose to invest in improving the existing corrals to accommodate equestrian use - both overnight and day use, as is currently occurring.

Supporting Action: Using and improving existing structures does not destroy native flora, disturb wildlife, cause potential water/rain-water run-off issues with new construction and concrete, and continues to support the equestrian community. The construction of the new road alone will have a significant impact on the environment and community as front end loaders, graders, cement trucks, etc.. will be needed to create this road suitable for trucks and trailers.

Objection: Seventh bullet point "Develop additional lake access points. Any new access will include minimal disturbance to the lakeshore and lakeside willows by utilizing perpendicular only paths through the willows to fishing docks or watercraft launching docks to minimize disturbance on the lake edge.

Proposed Action: I object to creating new paths and access points to the lake. Use the existing dock and access points to minimize environmental damage and erosion.

Supporting Action: The more access points provided to the lake, the more damage that will occur as people are not going to respect walking just on the trails or loading boats and they will venture off along the shore, causing damage and erosion. As it is now, the willow stands are the best barrier to damage to the lake as people are unwilling/unable to walk through them to get to the shore. Allowing small boat (small electric motors only; with a restriction on horsepower) or human powered water-craft only allows fishermen to get to these areas to fish without doing damage to the shoreline of the lake.

Objection: Eighth bullet point "Convert the existing Forest Service campground and parking to day-use individual or group picnic sites and maintain the existing day-use trailhead and lake-access parking in this area."

Proposed Action: I object to the proposed conversion of the existing campground to day use and support retain the existing camp sites and access to trails. Changing this location to a day-use area only area will contribute to increased traffic on the roads and erosion on the lake shore. This will also increase the number of dogs at large in the area and increase the risk of equestrian/hiker/dog encounters. I propose to continue to offer these primitive campsites as they currently are used. There is day use parking and a few picnic tables on the site now to accommodate day use.

Objection: Ninth bullet point "Construct a new lodge with administrative, educational, and interpretative spaces to enhance the visitor experience through site amenities and services. The new lodge building may offer small-scale food service capabilities such as a small coffee and pie shop or limited pre-packaged food offerings that would align with Forest Service policies for providing food service on National Forest System lands while not

necessitating an increase in wastewater accommodation. The construction of a group picnic site with a possible food truck or mobile kitchen parking will also be explored for this area for small events or day-to-day operations." This entire bullet point is in contradiction to the statements and discussions presented about honoring "historical" and "cultural" respect.

Proposed Action: Do not build a new "lodge", do not create group picnic sites, do not allow food trucks or mobile kitchens and do not allow events larger than 200 people.

Supporting Action: The construction of a new building and the proposed activities (group picnics, events, food trucks) is NOT in alignment with the purpose and need in this project. This type of facility brings more traffic, pollution, trash, noise, and conflict to a quiet, peaceful area. Any education or interpretative information can be presented on signboards or placards and does not require a new lodge to convey this information. Food trucks are not historical and would be a nuisance to the quiet, primitive site. A lodge with information is not useful or warranted as an educational or interpretative space, as this can be accomplished with signage near historical or cultural things. A small coffee and pie shop is unsustainable as just a small shop. If the larger proposal goes through, these 250 campers/visitors are going to be demanding food, water, meals, propane, amenities found at other sites, etc.. and this "lodge" will quickly turn into a convenience store for the visitors. Additionally, pre-packaged food items create trash waste and these wrappers will be found around the site and in the water. The visitors and campers will come to the lodge to use restroom facilities and this will necessitate excessive water and waste-water usage, rather than them using vault toilets.

Objection: Tenth bullet point "Construct appropriate maintenance facilities equipment storage and personnel housing necessary for management and maintenance."

Proposed Action: Do not build this proposed site plan and there is no need for these types of facilities and housing.

Supporting Action: If there is nothing built, there is nothing to require equipment facilities or housing.

Objection: Eleventh bullet point "For the cave within the project area, develop a cave management plan in consultation with the tribes to ensure the vital cultural history is preserved and incorporate the plan into the proposed special use permit."

Proposed Action: I object to incorporating a "plan" into the proposed special use permit as I am under the impression there are MOU's in place already regarding the preservation and management of the cave.

Additional Objections and Support to statements in the proposed plan:

1) I support the closure of the wetlands and pasture north of the lake but question why this "historical pasture" will be protected while the others will be destroyed with campsites, concrete, and buildings? What makes the 'historical pasture' that also meets criteria for a "previously disturbed area" different than the 'previously disturbed' areas slated for development?

2) The paragraph discussing amending the forest plan via the 2012 Planning Rule, is significantly different than the proposed site plan.

a. Sustainability (219.8) speaks to ecological sustainability by maintaining and restoring the ecosystem integrity as well as social and economic sustainability. Constructing and developing the site is in direct conflict with this rule. Additionally, I would request to see proposed income and budget statements as I do not think the site is economically sustainable.

b. Diversity of Plant and Animal Communities (219.9) speaks to maintaining or restoring ecological integrity, providing diversity for native species, and addressing the persistence of at-risk species. Developing, building and constructing new housing, camps, barns and road does not improve diversity of plant and animal communities, but rather sanitizes the area. Additionally, development is counter to protecting at-risk species, of which many reside in the area (e.g. Tier 1 and Tier 2 species listed in the State Wildlife Action Plan).

3) The proposal and presentations given do not address the multitude of other considerations that come from developing this site. These include:

a. No cell phone service on the Colorado River Road or Sweetwater Lake Road and no way to contact emergency services.

b. Emergency Services - who will be responding to vehicle accidents, medical emergencies, and other issues and how will these services be contacted?

c. How will home/landowners around and behind the property access their property if there is a regulation around number of people who can access the property each day? How will these landowners be able to have guests enter their properties?

d. Hilltop Trailhead concerns - how will this trail head be managed, patrolled and enforcement upheld and by whom? The parking lot on the top of the steep cliff with the 4 wheel drive only road is not conducive to accommodating overflow parking from the proposed site or increased traffic. Cars consistently come up this road that do not have 4 wheel drive despite driving by the sign at the bottom of the hill. If 2 cars meet on the road up to the trailhead, one car will have to back up. This will result in possible roll-over's, damage to the terrain, and damage to vehicles that may require a tow-truck. The parking at the top of the hill can accommodate 4-5 full-sized trucks comfortably without blocking the trail. Additionally, camping is not allowed at the trailhead, yet people continually camp in their cars and trucks (see photo taken July 26 at 9:30pm that shows the cabin lights on in a vehicle where people were camping for the night). There are no facilities at the trailhead and human excrement and trash is continually removed by the property owners of the cabin at the top of the cliff.

e. Will Garfield County maintain the road through the property and beyond up to the existing Hilltop Trailhead? To date, the road up to the trailhead has not been maintained by the county but rather the private landowner. This is also evidenced by abrupt end of maintenance on the road as recently as June 6 (see image of dust control

applied and stopped).

f. How will visitors know if the site is full or unable to accommodate their recreation activities? If one drives up the road thinking there will be a place for them to camp or recreate, how will they be notified or informed to turn around? Without clear communication at I-70 and on a reservation website, the amount of traffic up and down the Colorado River Road and Sweetwater Lake Road will be more than is already anticipated as people drive up, turn around, and drive down.

g. I am curious how many of the USFS and CPW have actually spent time in the area and understand the qualities of this site and how they will be impacted. As a recent example, on July 10 I encountered Mark from CPW at the Hilltop Trailhead. I met Mark during one of the meetings in Gypsum and he said he would be the point of contact/on-site manager for the proposed site. In our discussion we talked about the trail, he asked questions about what we "call this trail" and he said "I have never been up here before. It is very nice!". I was shocked that someone who has been at all the meetings and worked on this proposal had not actually been up to the area until this July. This is concerning as I now question who else has drafted the proposal without actually visiting the area and understanding the area.

h. Three years ago, we were coming out of the scrub oak on the back of the property and encountered a man on his bicycle at the back gate headed out to the Flattops. There was a very stern educational conversation that occurred to inform the man he was not allowed to bike in this area and he needed to leave.

i. Wildfires - Per the USFS website, between 1992 - 2020, 60% of wildfires in Colorado are caused by humans. Bringing more people to the area significantly increases the risk of wildfires to an area that does not allow access for emergency services, requires smoke jumpers and air support to manage wildfire activity.

In summary, I object to the proposed special permit plan for this property and my proposed action is: Rebuild, remodel the existing site and buildings with no new development. If this plan is not feasible, then 2nd option I support is no development in any manner, return it to a primitive camping/equestrian site only with no amenities or services and to not declare it a State Park but rather the "Sweetwater Wilderness Area".

Thank you for your time and consideration of these comments.

John C. Cummings