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Organization:

Title:

Comments: To: Heather Noel, Acting Forest Supervisor

White River National Forest

900 Grand Avenue

Glenwood Springs, CO 81601

August 4th, 2024

Re: The Sweetwater Lake Recreation Management and Development Project, as described in the Notice of Intent to Prepare an Environmental Impact Statement (NOI) at 89 Fed Reg 37165 et seq., May 6, 2024

Dear Ms. Noel,

We, the undersigned, are strongly opposed to the designation of Sweetwater Lake as a state park. Our concerns are rooted in the following key arguments:

1. **\*\*Preservation of Natural and Historical Values\*\***

Sweetwater Lake represents one of the last untouched frontiers in the American West, remaining largely unchanged for over a century. Its low to moderate recreational use, which includes horseback riding, hiking, fishing, hunting, bird watching, backpacking, photography, and non-motorized boating, supports its significant ecological, scenic, historical, hydrological, recreational, and cultural values (National Park Service, 2022; U.S. Forest Service, 2023). Transforming this area into a state park could compromise these values, which are critical to its preservation for future generations.

2. **\*\*Limitations of Development\*\***

The current state of the Sweetwater Lake area should be maintained, with only necessary improvements to existing structures. Any structures that cannot be preserved should be replaced with historically accurate replicas. The United States Forest Service and Colorado Parks and Wildlife's plan to accommodate up to 250 visitors is concerning, as it exceeds historical usage levels and negatively impacts the area (Environmental Protection Agency, 2023). Maintaining historic visitation numbers is essential to protecting both the natural resources and the quality of life for residents.

### 3. **\*\*Expertise of Current Management\*\***

The present concessionaire, AJ Brink Outfitters, has a proven track record of effectively managing the area, including maintaining trail integrity and addressing safety issues (AJ Brink Outfitters, 2024). Their extensive knowledge of the region, including backcountry operations, enhances visitor safety. In contrast, staff from Colorado Parks and Wildlife (CPW) may lack familiarity with the area, as evidenced by their lack of firsthand experience with the Keep Ditch and wanting to pipe it for multi-use trail as discussed during a June 6, 2024, forum (Glenwood Springs Library, 2024).

### 4. **\*\*Economic and Social Impact\*\***

The introduction of a state park would impose entry fees, which could discourage low-income residents who currently visit the area freely (Colorado State Parks, 2024). Additionally, the proposed fee system for surrounding trailheads would further restrict access. The increased recreational use resulting from state park status would impact wildlife and biological diversity, affecting areas such as Sweetwater Creek, the Colorado River, and adjacent basins (Wildlife Conservation Society, 2023).

### 5. **\*\*Traffic and Safety Concerns\*\***

The current road infrastructure is inadequate to handle the additional traffic that a state park would generate. Rural roads through agricultural areas are already heavily used by locals, tourists, and commercial traffic (Eagle County Traffic Studies, 2023). The Colorado River Road is problematic due to its heavy recreational use by various vehicles, including those pulling recreational equipment (Local Traffic Reports, 2024). But even more problematic is the Sweetwater Road because it is a narrow, winding gravel road (7 miles) and then the last three miles are chip and seal. This road does not have a shoulder and in many spots, it is too narrow for two cars to pass. Without a shoulder there is no room to get over. Many of the homes are near the road, some are as close as 17 feet from the front steps to the side of the road. Increased traffic will have a great impact on these homes, (Local Property Surveys, 2024) which will impact the historic quiet rural road that Sweetwater is.

On top of the local and recreational traffic, additional traffic from the Colorado River Ranch, Roundup River Ranch, and Walking Mountains already contribute to the additional recreational traffic in the area. The Colorado River Ranch traffic is primarily due to ongoing construction. The Roundup River Ranch and Walking Mountains are seasonal camps that contribute to increased traffic during camp sessions. During the summer sessions, the Roundup River Ranch requires around thirty employees to commute daily. Large buses (Greyhound bus size) transport campers and families during the fourteen camp sessions, resulting in twenty-four bus trips each summer. With a capacity of 72 people at the camp and each bus carrying 30-40 campers, it is estimated that an additional thirty-six cars travel up and down the Colorado River Road to drop off/pick up campers (Roundup River Ranch, 2024). Can the Colorado River Road and the Sweetwater Road handle an additional 200 cars a day (250 people at 2.5 cars will add 100 cars up and 100 cars down the roads daily) on top of the current high activity?

### 6. **\*\*Emergency Planning and Egress Routes\*\***

Compliance with NFPA 1141 standards is crucial for managing public spaces with high visitor counts. Ensuring efficient egress routes is essential for emergency evacuation and firefighting efforts (NFPA, 2023). Recent incidents across the state emphasize the importance of proactive fire safety and emergency planning. The lack of sufficient egress routes at Sweetwater Lake could endanger lives and property during emergencies. NFPA 1141 for roads in rural areas, [ldquo]provides requirements for the development of fire protection and emergency services infrastructure to make sure that wildland, rural, and suburban areas undergoing land use changes or land development have the resources and strategies in place to protect people and property from fire danger.[rdquo] Can the Sweetwater Lake area with a box canyon setting contain an unobstructed egress route where the park visitors can evacuate safely from the property where there is one way in and one way out?

Given these concerns, we urge the U.S. Forest Service to reconsider the proposed state park designation for Sweetwater Lake. We advocate for preserving the area in its current state while continuing to benefit from the expertise of the current concessionaire and avoiding any developments that could negatively impact the environment, local communities, and public safety.

We appreciate your attention to these matters and request that the U.S. Forest Service conduct a comprehensive review of these concerns. Transparency and public consultation throughout this process are vital to ensuring the best outcome for both the Sweetwater Lake area and its stakeholders.

Respectfully submitted,

Mary Stephens

Bill Stephens

Malorie Stephens

Lucas Stephens

Katie LaFramboise

Ty LaFramboise

**\*\*References\*\***

- AJ Brink Outfitters. (2024). \*Trail Management and Visitor Safety\*. Retrieved from [AJ Brink Outfitters](<http://ajbrinkoutfitters.com>).
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