



Comments on the Sweetwater Lake Recreation Management and Development Project

September 23, 2026

Brian Glaspell, Forest Supervisor
White River National Forest
c/o Eagle-Holy Cross Ranger District

RE: Sweetwater Lake Recreation Management and Development Project, Environmental Impact Statement

Dear Supervisor Glaspell,

On behalf of the Eagle County Conservation District Board of Supervisors, we are writing to express our concerns and opposition to the proposed Sweetwater Lake Recreation Management and Development Project, particularly Alternative 2 and 4.

ECCD recognizes the importance of public access to public lands and recreational opportunities. However, as a local conservation district, our mission is to support the long-term stewardship of land and natural resources. We are concerned that the scale of development proposed could result in significant and lasting impacts to the ecological systems that make Sweetwater Lake unique.

Our concerns are reinforced by the project's Environmental Impact Statement (EIS), which identifies a number of direct and indirect resource impacts:

- **Wetlands and riparian areas:** The analysis identifies potential filling and disturbance associated with the lodge, cabins, roads, trails, and underground utilities, as well as vegetation removal, soil compaction, changes to microtopography, and disruption of hydrologic connectivity.
- **Water quality and hydrology:** Construction and disturbed soils could increase erosion, runoff, sedimentation, and nutrient inputs to streams and Sweetwater Lake. New impervious surfaces, roads, parking areas, deicers, gravel, and snowplowing could further increase sediment loading. Increased visitation also introduces additional water-quality concerns associated with waste disposal and increased road and trail use.
- **Water rights and water supplies:** Alternative 2 would directly impact the project area water supplies and water rights. The EIS projects an overall reduction in net diversions and depletions, however, the proposed changes will likely alter water use, water rights and biodiversity within the project area. Selected alternatives must avoid injury to water rights and coordinate with local producers.



- **Noxious weeds and invasive species:** Development and soil disturbance associated with additional campsites, equestrian facilities, parking areas, and buildings would create conditions favorable to invasive weed establishment. Increased recreation could then facilitate the introduction and spread of noxious weeds into the project area and adjacent natural areas, including Flat Top Wilderness.
- **Sensitive plant species:** The analysis identifies direct disturbance to occupied Harrington penstemon habitat (a designated sensitive species), from development, roads, trails, and increased recreation. Greater visitation also increases the potential for off-trail trampling, soil compaction, and damage to individual plants.
- **Wildlife and migratory birds:** The proposed action may affect individual sensitive wildlife species, including Suckley's cuckoo bumble bee, western bumblebee, bats, Virginia's warbler, and Brewer's sparrow. Elk and deer calving and fawning areas would be impacted by the campground and equestrian area and summer range would be impacted by increased visitation. The analysis also identifies approximately 100.4 acres of vegetation removal and grading within sagebrush, mountain shrub, and grass/forbland habitats that provide nesting habitat for migratory birds.

We have additional concerns that were not adequately addressed by the Environmental Impact Statement (EIS) that we feel warrant additional studies prior to adoption of any Alternatives:

- **Soil stability and geologic integrity:** USFS records indicate significant geologic instability north of the county road which is not reflected in the EIS. These historical records should be reviewed and incorporated into the final EIS. Construction, grading, roads, utilities, and trails in this area require site-specific geotechnical review to evaluate landslide risk, erosion, mass movement, and cut-and-fill impacts.
- **Water quality and watershed function:** The final EIS should analyze these impacts under peak-use and storm conditions and require baseline water-quality monitoring. The EIS notes that water quality will be affected by Alternatives 2, 3 and 4, additional studies are required and incorporated into proposed Alternative to ensure impacts will be limited.
- **Cultural and pre-historic resources:** Significant cultural sites both prehistoric and modern must be protected from ground disturbance, vandalism, and visitor pressure through appropriate Tribal and SHPO consultation, confidential location data, and visitor education.
- **Roads, traffic, and access:** Increased vehicle traffic will heighten dust, erosion, user conflicts, and safety risks. The EIS must address peak-season traffic, drainage, dust suppression, and road maintenance burdens.
- **Wildfire risk and emergency response:** Higher visitor numbers and overnight use elevate wildfire risk along constrained evacuation routes. The EIS must define enforceable fire restrictions, emergency response protocols, defensible space rules, and evacuation plans.



- **Public safety and emergency egress:** The EIS should model wildfire, landslide, flooding, and road-blockage scenarios to evaluate whether existing roads, bridges, communications, and emergency services can safely handle peak-use evacuations.

Taken together, these findings demonstrate that the proposed development would not simply increase recreational opportunities, it would introduce **multiple, interconnected pressures on water, soils, vegetation, wildlife, and habitat**. We believe these impacts warrant a more conservative approach to development.

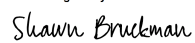
ECCD encourages the Forest Service to prioritize a **lower-intensity alternative** that avoids Sweetwater Lake's development within sensitive habitats; protects water quality and watershed function; implements robust invasive species prevention and monitoring; and establishes measurable ecological thresholds and adaptive management triggers. We believe public access and conservation can coexist, but public access should be managed at a scale that the landscape can sustainably support. The goal should not simply be determining how many visitors Sweetwater Lake can accommodate, but how much recreation it can sustain without compromising the ecological characteristics that make the area valuable in the first place.

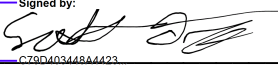
For these reasons, the Eagle County Conservation District Board of Supervisors opposes Alternative 2 and 4 as currently proposed and encourages the Forest Service to develop a lower-intensity alternative that prioritizes conservation, ecological resilience, public safety, agricultural land stewardship and the long-term protection of Sweetwater Lake.

Thank you for considering our comments and for your continued stewardship of the White River National Forest.

Sincerely,

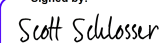
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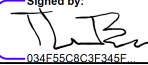
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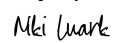
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