

DOUBLE RL COMPANY

5180 HIGHWAY 62
RIDGWAY, COLORADO 81432

April 25, 2022

Via Electronic Submittal and U.S. Mail

Dana Gardunio, Ouray District Ranger
USDA Forest Service
2505 South Townsend Ave.
Montrose, Colorado 81401

Dear Dana:

We are providing these comments on behalf of the Double RL Ranch, in response to your April 8, 2022 letter regarding the proposed visitor use management plan for the Blue Lakes area. Please include these comments in the formal record for purposes of maintaining Double RL's objection standing to any future Forest Service decisions made under 36 CFR part 218, Subparts A & B and 36 CFR 219.16. Double RL reserves the right to raise further comments on the management plan as it is developed and refined over time.

Double RL is the owner of private property directly north of the subject Blue Lakes planning area. Increased recreation over the past several years has significantly impacted Double RL, as the Ranch is now forced to deal with increased trash, trespassing issues and dispersed camping/fires throughout its property. Double RL is therefore generally supportive of a plan to provide for the comprehensive management of visitors in the Blue Lakes area and reduce visitor impact. However, additional management priorities should be included, as set forth below.

Double RL owns decreed water rights (the Switzerland Ditch) that originate in or adjacent to the Lower East Dallas Zone and/or Blaine Basin. Heavy public usage in the area already results in frequent damage to Double RL's water rights structures. All trails should be designed to avoid private ditches and water rights structures and a management priority/proposed action should be added requiring designation of private property and water rights structures (ditches, headgates, etc.), with an emphasis on protecting such structures from public use and degradation.

Double RL is supportive of a limited overnight permit system. To further manage and protect this valuable resource, consideration should be given to expanding the permit program to also limit daytime usage.

Additional consideration should be given to use of the roadways proposed to access the subject management area. Certain roads are not maintained by any public entity and are already in disrepair and cannot handle increased traffic. In addition, there are already ongoing trespass issues with members of the public pulling-over/parking vehicles on private property. Parking and/or road management plans should be considered to address these issues, minimize risk of wildfire and otherwise protect private property rights.

Double RL leases certain National Forest lands in the vicinity of the subject management area for livestock grazing. In addition, the area serves as important wildlife habitat, elk and deer migration corridors and winter and summer range. Livestock grazing and wildlife habitat should be added as priorities and the area should be managed to protect these resources. This might include further limitations or prohibitions of motorized use, mountain biking and/or high-volume daytime trail usage.

Additional consideration should be given to management and reduction of wildfire risk including prohibiting fire, campfire or wood burning stoves in additional areas, emphasis on creation of designated campsites with fire-rings in limited areas and greater prohibitions of motorized use. Wildfire is an increasingly dangerous risk throughout this area and priority should be given to an emergency preparedness plan and exploration of opportunities for public/private partnerships on the use of water storage rights for fire-fighting purposes.

Thank you for the opportunity to provide comments on this proposed management plan. Double RL looks forward to continuing its work with the Forest Service on protecting this valuable resource.

Sincerely,



Oakley Kelly, Ranch Manager