



May 13, 2022

Dear Ms. Gardunio,

Thank you for the opportunity to comment on the Blue Lakes Visitor Management Plan (Plan.) Great Old Broads for Wilderness – Northern San Juan chapter – is thrilled that the USFS Ouray District has developed a comprehensive plan for the Blue Lakes region. Our members have noticed the degradation of the environment over the last decade and only wish the plan had come years sooner. Nevertheless, we are grateful for the scope of your plan and the proposed restrictions. We offer the following comments.

Issues and Alternatives

Please prioritize ecosystem integrity and resiliency with consideration for climate change over and above human demands and needs such as recreation, infrastructure and economic benefits. Blue Lakes are rare alpine lakes in Ouray County that are worthy of the utmost protection in the designated Wilderness.

Public and Tribal Consultation

This section reads, “Local Tribes will be consulted...” The use of the future tense verb implies Tribes were not consulted during the development of the proposed actions. Tribes should be brought into the process at the outset to prioritize Indigenous concerns and interests and incorporate Traditional Knowledge into the Plan. The ultimate collaboration would consist of Free, Prior and Informed Consent as outlined in the UN Declaration for Indigenous Rights coupled with co-management of the area if the Tribes desire.

Plan Proposal

This section mentions an LRMP Management Area 8B with “Primitive wilderness recreation setting” however there is no reference to Primitive wilderness recreation settings in the Plan. The upper Blue Lakes should be designated primitive – not semi-primitive. In anticipation of passage of the CORE Act and the identification of Blaine Basin as recommended wilderness in the existing forest plan and revised draft GMUG Forest Plan, Blaine Basin and its upper alpine terrain should be considered as primitive recreation setting as well.

Zone Desired Conditions

Mt Sneffels Wilderness Zone: While semi-primitive wilderness recreation setting may be appropriate for the lower Blue Lake, the upper Blue Lakes should be managed for primitive wilderness recreation (meaning less than 5 encounters with parties per day.)

Mt Sneffels Peak Zone: Note that the western half of the summit of Mt Sneffels lies within existing designated Wilderness while the eastern half of the summit: 1. Will become Wilderness upon passage of the CORE Act, 2. Currently exists within the upper tier Whitehouse Roadless Area and 3. Is managed as recommended wilderness per the GMUG Forest Plan. The Blue Lakes Plan does not appear to consider maintaining wilderness characteristics within the Peak Zone, which seems inconsistent with its recommended wilderness designation.

Lower East Dallas Zone: Does/will the USFS have the capacity to maintain the restrooms and monitor compliance with parking requirements? Please do not propose or implement infrastructure improvements that cannot be maintained or monitored.

Blaine Basin Zone: Though it is appropriate to identify the access to Blaine Basin as semi-primitive recreation, the basin itself and the alpine regions above and within the basin should be managed for primitive recreation.

Management Prescriptions for Each Zone (our revisions in **bold type**)

APPLICABLE TO ALL ZONES

Camping

- Bullet two: “Designated sites will not occur above treeline” (addition) **nor within 100 feet of any water or trail.** This restriction should apply to dispersed camping along roadways as well as backcountry campsites.
- Last bullet: Please be specific about the type of food storage. Will bear proof containers be required or is food locked in a car or a secured ice chest deemed acceptable?

Facilities/Trails/Travel Management

- Strike bullet two. Instead first bullet should read: “Dogs must remain on leashes **in the Lower East Dallas Zone and Yankee Boy Zone and are prohibited in the Wilderness Zone, Blaine Basin Zone & Mt Sneffels Summit Zone. Dog feces must be collected and packed out.** We oppose the leniency of dogs under voice command as our members’ experiences demonstrate that rarely are dog under voice command to the standards that limit wildlife impacts and conflict with other users. (If the USFS decides to accept our proposed prohibition on dogs in 3 of the 5 zones, perhaps this bullet will not be included in “Applicable to all zones” section.)

- Bullet six. Challenging and rough 4WD roads can act as a deterrent to motorized users, which can help with managing visitation. Please think twice about improving roads to the extent that all vehicles can access all trailheads within the project area.

WILDERNESS ZONE:

- Bullet one/subbullet #5: “Require solid human waste **and toilet paper** to be packed out”
- Bullet two: Consider making the time frame for the permit, reservation and fee system for overnight use consistent with the day use dates May 1- Sept 30. At a minimum extend the fall date to Sept 15.
- Bullet two/subbullet #6: “Require solid human waste **and toilet paper** to be packed out”
- Bullet three: Does it make more sense to permit each day use party (i.e. designated party leader) rather than each individual? Would this approach ease the demand on USFS staff? Once a total of 40 day-users has been reached given the size of each party, no additional permits would be issued. Overnight camping needs some clarification. Are you indicating that there will be a maximum of 4 designated campsites at the lower Blue Lake or might there be more sites allowing for more than 4 parties as long as the total occupancy does not exceed 24 campers? We support limiting the campsites to 4 in which case if one or more parties are smaller than 6 people, fewer than 24 will occupy the campsites. The less impact, the better given the current degradation.
- Bullet six: Strike “or requirement to be physically controlled on a leash” such that this line reads, “**Prohibit dogs except for working stock dogs or dogs used for legal hunting purposes.**” Among our members, we have several former agency personnel as well as avid hikers who can attest to the reality that compliance with dogs on leash requirement is very low. A definitive prohibition on dogs is clear and specific, minimizing conflict with users and eliminating the need for enforcement of leash requirements. Please clarify if working stock are permitted in the Wilderness Zone. Although our members routinely encounter livestock within the Lower East Dallas Zone, we are not aware of livestock grazing in the Wilderness Zone (though we realize that grazing is allowed in Wilderness.) If there are no grazing allotments in the Wilderness Zone then working stock and working stock dogs need not be mentioned.
- Indicator ~ Compliance with solid waste containment; Management action/Phases 1 & 3: Does the USFS have the capacity to maintain/service trash receptacles and pit toilets? Please avoid installing pit toilets at the lower Blue Lake. Extended ban on overnight camping would be preferable to pit toilets on site.

LOWER EAST DALLAS & YANKEE BOY ZONES

Facilities/Trails/Travel Management

- Bullet two: We fully support restricting parking to designated parking areas and suggest even delineating each parking spot with numbers or some obvious marker to minimize people trying to pack in one more vehicle in a tight spot or on adjacent vegetation. Parking at the Blue Lakes/Dallas Trailhead is a nightmare and limiting the number of parking spaces could be a management tool. Has the USFS considered permitting parking (with or without fee) in the Lower East Dallas Zone as an option for visitor management?
- Bullet five: Again, does the USFS have the resources to maintain and service toilets in these two zones?

Camping

- Given that both zones include dispersed camping from roads (with vehicular access) and backcountry camping, clarification is required regarding designated campsites. Will there be designated campsites along the Dallas Trail or on the Blue Lakes Trail prior to the Wilderness boundary, for example, with fire rings? Given drought, climate change and wildfire potential, restricting campfires throughout the region should be considered. Also will permits and reservations be required for dispersed camping along roads within the forest boundary?
- Bullet one: “Designated **dispersed** campsites along roads will include **one and only one** permanent campfire ring **with a diameter of less than X inches.**”

BLAINE BASIN ZONE

- Additional bullet: **Prohibit dogs except for working stock dogs or dogs used for legal hunting purposes**
- Additional bullet: **Require solid human waste and toilet paper to be packed out**
- Note: Our members do have a concern that if permits, reservations and fees are applied to day and overnight use in the Wilderness Zone (which we support!) that Blaine Basin will become overrun with campers and day users. Has the USFS considered how to mitigate this likelihood? We don't want to sacrifice a relatively primitive/pristine landscape and riparian habitat (Blaine) to protect an overused impacted one (Blue Lakes.)
- Our members have had discussions about a potentially alternative approach that would focus on permitting parking as the management tool and not regulating where people recreate. So someone who parks at the East Dallas/Blue Lakes Trailhead could bike or hike the Dallas Trail, hike to Wilson Summit, Blue Lakes or Blaine and the limit would be defined by parking spaces. As simple and streamlined as this may sound, it would not satisfy the goal (to the extent proposed) of limiting day and overnight use to lower Blue Lakes. Permitting is not our expertise, but we do see some value in using limited, designated parking

as a management tool while also limiting user numbers to Blue Lakes. Perhaps our hope is that most of the parking spots would be taken by the limited number of Blue Lakes permittees thereby preserving the solitude of Blaine Basin.

MOUNT SNEFFELS SUMMIT ZONE

- Additional bullet: **Prohibit dogs.**

We appreciate your consideration of our comments and concerns. Again, we thank the USFS for taking this critical action to manage overuse in the project area.

Robyn Cascade on behalf of
Northern San Juan chapter – Great Old Broads for Wilderness