



BOARD OF COMMISSIONERS

HILARY COOPER KRIS HOLSTROM LANCE WARING

March 2, 2023

Megan Eno
Norwood District Ranger
PO Box 388
Norwood, Colorado 81423

Electronic email submission to: Megan.Eno@usda.gov

RE: Alta Lakes Site Improvements Project

Dear Ms. Eno,

The Alta Lakes area is a fragile high-altitude ecosystem enjoyed by both local residents and visitors. The infrastructure in this area is inadequate to prevent continued impacts to the ecosystem. We appreciate the GMUG's ongoing actions to address the impacts, including the Alta Lakes Site Improvements Project.

San Miguel County (County) appreciates the collaborative stakeholder process used to develop the *Alta Lakes Recreation Area Master Plan for Summer Recreation Activities*, the guiding document for this project. We strongly support the intentions of protecting environmental and cultural resources and providing well-planned recreational opportunities and multiple levels of camping opportunities.

The management actions in this decision are mostly consistent with the comments we submitted to the 2018 Alta Lakes Recreation Area Master Plan (ALMP). However, we would like to reiterate and add the following comments.

County Planning and Zoning

It appears that the ALMP is generally consistent with the County's High-Country Areas Master Plan and the Overall Goals, Policies, and Objectives in the San Miguel County Comprehensive Plan. Nevertheless, we offer the following language from our High-Country Areas Master Plan, specific to the Alta Lakes and Boomerang areas.

Preserve and protect the alpine and other important high-country areas in the upper San Miguel watershed for their historic, scenic, aesthetic and rural landscapes; their recreational amenities; and their economic value to the region.

Policies:

(1) Preserve public recreation on public trails and public roads, by preserving the

current rough and unimproved 4-wheel drive character of the roads, including but not limited to existing mountain passes such as Tomboy Road, Imogene Pass, Black Bear Pass, Bear Creek Road, Liberty Bell Road, Ophir Pass and Boomerang Road including that portion of Boomerang above the Valley Floor and below the Alta Lake town site excluding the Mountain Village and Ski Area boundary.

6.2B Public Lands

Goal to develop and maintain multiple uses of public lands for the protection and benefit of all users, both permanent residents and visitors.

Objectives:

- (1) Promote the creation and improvement of natural outdoor recreation areas
- (2) Encourage the preservation of historical, archaeological and natural resources and landmarks.

Policies:

- (1) Ensure access to public lands
- (2) Coordinate mining leases and activity on public lands with federal land management agencies
- (3) Cooperate with the appropriate state and federal agencies in planning and management for multiple uses on public lands
- (4) Encourage the development of designated camping areas on public lands to serve the existing and expected tourist population.¹

The County is in the process of updating the East End Master Plan, which includes the Alta Lakes area. We expect the new plan will strengthen goals regarding the protection of high-country areas and natural resources.

Wetland, Riparian, and Waterbody Setbacks

We recognize that these proposed actions will not require a County Wetlands Special Use Permit. Nevertheless, we would like to request consistency with our Wetland Land Use Codes. Setbacks from shorelines and specific actions related to camping are discussed in several sections of the ALMP. The 100-foot setback from the shoreline is generally aligned with the County's wetland regulations. We request that additional detail be given to the restoration efforts that will take place at closed campsites within 100 feet of the lake.

Resource Repair and Reclamation

Due to the sensitive nature of this area, the USFS needs to provide ample project oversight and apply clearly communicated and actively monitored Best Management Practices for the contractor.

According to the Alta Lakes Plan, resource damage and habitat restoration is addressed by:

- 1) Decommission and reclaim all existing non-system routes in the vicinity by ripping the compacted soil with heavy equipment and re-establishing drainage, then seeding them with a native seed mix and scattering rocks, logs, and other available downed material along the route corridors to effectively close them to vehicle use; and 2) restoring native riparian vegetation along the north side of the lake (Appendix E) by

¹ San Miguel County Comprehensive Plan, <https://www.sanmiguelcountyco.gov/252/Master-Plan>

ripping the compacted soil with heavy equipment then planting with native riparian species.”

Much of the camping areas are under conifer canopy, which is easily disturbed and does not easily revegetate. Also, the camping area is shady and holds snow for an extended amount of time. When decommissioning roads and trails, consider the timing, soil conditions and precipitation rates. We understand the contractors’ availability determines timing but we have seen increased damage from heavy machinery on USFS lands from the Ophir/Tristate Project and the East Fork Road closure (Dolores Ranger District). We ask that you prioritize the protection of this project's existing sensitive landscape and elevation by considering the project timing and weather conditions.

Roads and Signage

USFS action item for this project is “Prohibiting trailers on Alta Lakes Road except for administrative access.” The Alta Lakes Management Plan states, "Trailer/RV Signing: Install a larger sign at the bottom of the Alta Road (at its intersection with Highway 145) that discourages trailers and RVs from driving up the road and Trailers and RVs: Issue a GMUG Forest Special Order to prohibit trailers/RVs greater than 20 feet in length on the Alta Road.”

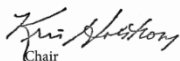
We understand there will not be any restrictions for residential or commercial use through this decision. We support the prohibition of trailers and would appreciate carefully designed signage that provides clear communication for those considering traveling on Alta Lakes Road.

Finally, San Miguel County would like to request regular communication during the implementation of these projects, including the final selection of the contractor, projects dates, regular projects updates that the County should be aware of for assistance with notification to the public and a direct contact for our Road & Bridge Department to coordinate the use of the County Road.

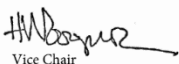
Thank you for your consideration.

Sincerely,

San Miguel County
Board of County Commissioners



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Commissioner