

November 8, 2023

Comments on the Blue Lakes Visitor Use Management Plan Environmental Assessment

Thank you for addressing the multitude of issues plaguing the Blue Lakes planning area. I applaud the Ouray RD for tackling this complex project.

A general comment about data:

Clearly, the increasing negative resource impacts in the 5 zones need to be addressed. The data collected and presented to support the proposed management actions for the Wilderness and Lower East Dallas Zone (e.g. Proffitt's 2022 study and the sources he cites; maps of campsite monitoring shared at the 11/6/23 Ridgway Open House), seem sufficient to justify these actions. I did not see supporting data for Blaine Basin, Mt. Sneffels and Yankee Boy zones that show trends, only baseline numbers from Proffitt's OHV study results for motorized use. From my personal observations, I'd agree that there are significant negative resource impacts in those zones that should be addressed. Hopefully, the implementation of this plan will include further monitoring to better justify and defend management actions in these zones.

A general comment about language:

Please clarify throughout the EA that the proposed permit limit of 40 refers to 40 **groups** rather than 40 **people**. This has caused significant consternation within my circle of friends.

Also, I noticed that you've used the term "campground" along with "campsites" in the EA. While there may be a campground feel to the Lower East Dallas Zone, a more accurate term might be "dispersed camping area" so as not to confuse readers that you're referring to an actual developed campground.

Comments about proposed management actions by zone, beginning in section 2.2.3 of the Draft EA (page 39):

2.2.3.2: I support the implementation of a permit system for the Wilderness Zone as a tool to achieve your desired conditions. Given the generous commitment of time on the part of SJMA and other volunteers, monitoring of the system at the Blue Lakes trailhead seems do-able. Enforcement, of course, is another issue and it may be a good idea to articulate your enforcement plan to the public when you're ready to unveil the permit system.

2.2.3.3, Tables 1-3: All indicators seem appropriate. But I don't see an indicator that addresses the effectiveness of the implementation of the permit system itself. How will you know if the visitors are being adequately informed about the requirement? Is the rec.gov system working accurately? How many visitors have to show up at the trailhead without a permit before a threshold is reached and a management action is triggered?

Regarding thresholds that state "*...no more than two violations would be observed over an entire season of monitoring (assumption: there would be at least one patrol/week)*": I really hope

your management actions are successful, but I'm concerned that establishing that threshold might work against you. My pessimism stems from two issues:

- Two violations feels like an extremely low threshold. With waste disposal in particular, I think it will take more than two years of info/education to adequately address this problem. With designated campsites, compliance may be higher, but I suspect a weekly patrol would find more than 2 violators over the course of the season, even with only 40 permits.
- Can the Forest Service realistically conduct monitoring in all four zones (where monitoring is specified) at least once a week? I'd like to think so, but even if you ignored all other recreation management needs on the District for the summer, I think you're still aiming awfully high to think your staff could adequately monitor at this level, and ideally, year after year. And what are the consequences of not patrolling once/week? For example, if you're able to document 2 violations, but you were only able to patrol twice during the season, will you conclude that the threshold was not exceeded?

Perhaps a more manageable approach would be to monitor for **trends** rather than absolute numbers. For example, let's say you document 16 violations of the solid waste containment requirement in 2024 at Blue Lakes. Then, as a result of a targeted and comprehensive education campaign, you only document 8 violations in 2025. You've reduced your non-compliance by 50% in one year - a success story if ever there was one! But 8 violations would still trigger an adaptive management action that probably isn't needed.

(A comment here about the use of volunteers to assist with monitoring: Perhaps these well-meaning folks are key to your monitoring assumptions? I recognize their substantial value in some key roles (such as trailhead ambassadors), but hope that when it comes to monitoring, you're able to use paid staff that are well-trained and accountable to the agency as well as the public for their results. You'll need to be able to defend the accuracy of your monitoring reports when a management action is triggered - a defense that is hard to muster with a revolving cadre of volunteers who may or may not have their own agendas.)

Regarding the indicator for "Actual Encounter Rate During the Permitted Season:" The management action of increasing the number of permits to 75 if the 20 group encounters are exceeded is like telling your teenager that "Since you've missed your 10:00 curfew twice this week, I'm going to extend it to 11:00." It doesn't seem logical to change the permit system to match on-the-ground conditions.

Regarding Adaptive Management Action 3 for human waste: "Install pit toilet(s) at the lower lake." Aside from the myriad operations and maintenance issues - and additional signing - that would accompany a pit toilet, there is also the "...primeval character and influence, without permanent improvements" ideal that the Wilderness Act calls for. I know that structures are sometimes authorized in Wilderness, but it seems like overkill when you're only 3 miles from the trailhead. Let's hold the line on structures.

2.2.3.3, Table 4: Perhaps the Ouray SAR Team could provide some input and guidance to help you determine safe numbers of recreationists in this zone?

Overall, I think the Visitor Use Management Plan is comprehensive and appropriate. I wish you all the best in working through your next steps.

Sincerely,
Lois Ziemann
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