

# DOUBLE RL RANCH

5180 Highway 62, Ridgway, Colorado 81432

**Via Online Submittal**

USDA Forest Service  
Attn: Dana Gardunio, Ouray District Ranger  
2505 South Townsend Avenue  
Montrose, Colorado 81401

Re: *Blue Lakes Visitor Use Management Plan Environmental Assessment*  
*("Environmental Assessment")/Comments from the Double RL Ranch*

To Whom It May Concern:

The following comments on the Environmental Assessment are submitted on behalf of the Double RL Ranch. The Double RL Ranch is comprised of more than 17,000 acres in Ouray and San Miguel Counties, adjacent to the Blue Lakes Planning Area.

Double RL is generally supportive of Alternative B and the implementation of various management actions to reduce biophysical and social impacts as contemplated in that alternative. On a more specific level, Double RL provides the following comments:

1. *Displacement and Additional Planning Areas*. Double RL is concerned that implementation of the measures set forth in the Blue Lakes Visitor Use Management Plan ("Plan") will result in the shifting of impacts to nearby lands. More specifically, as the Plan is implemented, visitors who are unable to obtain permits for Blue Lakes will likely begin using the nearby USFS land surrounding West Dallas Road and Box Factory Park. Based on recent investigations of Box Factory Park by Double RL and USFS representatives, there is already evidence of at least 25 dispersed campsites, informal and illegal fire rings, loss of vegetation, litter, unauthorized and excessive parking and overcrowding. These issues are likely to be compounded after the Plan goes into effect.

While the Environmental Assessment says in Section 1.7.15.2 that displacement is expected, it does not address the issue any further stating only that it is uncertain where displacement will occur. The most obvious and likely location for displacement is the lands nearest to those identified in the Plan. To address these concerns, the Blue Lakes Planning Area should include a larger planning area that encompasses the USFS lands on both sides of the currently contemplated management area. In the event the planning area cannot be expanded for purposes of the Plan, the USFS needs to provide concrete mechanisms and commitments to address the likely increased usage of adjacent USFS lands. This could include more active management of adjacent lands (removal of illegal fire rings, enforcement of unauthorized camping, delineation of parking and enforcement of illegal parking, etc.) and commitments to implement mechanisms similar to those set forth in the Plan, including a permitting system, for adjacent lands. Without inclusion of such measures, visitor displacement resulting from the Plan is likely to cause irreparable damage to the

natural quality of the land surrounding Box Factory Park which could be prevented with more measured planning.

2. Enforcement of Permit System. Per Section 1.7.3.3, the USFS intends to enforce the permit system at access points and within the Wilderness areas. By the time members of the public have reached these points, it is too late. The likely result is that individuals without permits will end up camping illegally on USFS lands or nearby private lands. The USFS should instead check permits at the beginning of CR 7 (intersection with HWY 62) and significant additional signage should be placed at the beginning of CR 7 informing the public that permits are required. This will also help address illegal parking and camping along the length of CR 7.

3. Designated Campsites and Parking Areas Surrounding County Road 7. Double RL agrees that there should be sufficiently marked designated campsites and parking areas along County Road 7 as set forth in Sections 1.7.23.7 and 1.7.23.8. As set forth in Section 1.7.21.1 parking will be restricted to identified areas and spaces. To prevent individuals from parking along CR 7 outside of designated areas and/or on otherwise undisturbed lands adjacent to the Blue Lakes Trailhead, the USFS should give tickets for unauthorized parking and place signs at the beginning of CR 7 notifying the public when the designated parking areas are at capacity. Additional management approaches should be implemented to limit trespassing on private land including new signage and additional barriers directing visitors to designated locations. Further, informal and illegal fire rings should be removed to prevent wildfire. Double RL has discovered wildfires in the immediate vicinity over the last couple of years but was lucky enough to identify them early and extinguish them before they spread. The devastating impacts of wildfires in Colorado over the last several years are well-known (East Troublesome, Marshall Fire, Placerville fire) and preventative measures are needed.

4. Campsites, Parking, and Trails. Designated trails, parking or campsites should not be approved in areas near existing or future-planned grazing allotments (due to stress on livestock), near productive wildlife habitat (including elk and deer migration corridors), or near wildlife birthing grounds (possible link between increased recreation and abandoned offspring).

5. Watersheds and Water Resources. Double RL owns certain water rights and water rights infrastructure that originate within USFS boundaries, some of which are adjacent to the Blue Lakes Planning Area. Regardless of which alternative is ultimately pursued, the Plan should recognize existing privately owned water rights and related infrastructure (headgates, ditch easements, etc.) which originate or pass through USFS lands in accordance with FLPMA. Any designated trails or campsites should avoid existing private water rights facilities and recognize the rights of private water rights owners to continue to operate, maintain, repair and replace water rights infrastructure. In addition, management approaches should be implemented to limit new recreational opportunities, including designated trails and campsites in areas adjacent to or that cross important watersheds, especially those situated at the top of drainage basins. The USFS should include a mechanism to compensate water rights owners for damage caused to water right structures by recreational usage (i.e. mountain bike trails eroding ditch bank, ATV ditch crossings sluffing into ditch structure, etc.). This comment is applicable to Design Features for All Zones: 2.2.4.7.

6. Grazing Allotments and Invasive Species. The USFS should adopt the management strategy set forth in Section 3.4.3 for Range Resources, including promotion of watershed health, mitigation of noxious weeds and rehabilitation. If unleashed dogs disturb livestock near grazing allotments, designated areas requiring all dogs to be on leash, regardless of whether such dog is under verbal control, should be implemented to prevent such disturbance.

Sincerely,



11/29/2023

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Oakley Kelly, Ranch Manager

Date