

Grand Mesa, Uncompahgre, Gunnison National Forests  
Attn: Blue Lakes Visitor Use Management Plan Team  
2250 S Main St  
Delta, CO 81416

December 1, 2023

Blue Lakes Management Plan Team:

On behalf of the Ouray Trail Group (OTG) please accept these comments on the Blue Lake Visitor Use Management Plan. OTG is a non-profit corporation of volunteers, founded in 1986, dedicated to the preservation and safe public use of Ouray County's trails. Our members take a stewardship role in protecting, preserving and maintaining the natural and recreational resources we all enjoy. We appreciate the opportunity to be a part of the GMUG planning process, and we recognize the scope and effort that has been invested by the USFS in the plan.

OTG does volunteer work on non-motorized trails in the Ouray Ranger District of the Uncompahgre National Forest, under a long-standing MOU and Volunteer Service Agreement with the Ouray Ranger District. We coordinate trail maintenance and sign work with USFS, publish a hiking guide, maintain a website, maintain trail registers, and organize trail workdays and training for our volunteers and school students. OTG volunteers recorded 2,654 hours on USFS-related work in 2021, and at least 1,000 additional hours on OTG administration, meetings, fundraising, map development and sales, trail reconnaissance, and other tasks that support OTG's mission.

Following are the OTG comments on the Preliminary EA for the Blue Lakes Visitor Use Management Plan. Overall we agree that something needs to be done to limit and manage visitor usage, and the basic outline of the plan seems reasonable. We agree that permitting is needed to limit hiking and camping around the Blue Lakes, and we agree with the designated camping and human waste protocols outlined for each zone. Following are some aspects of the plan that we have concerns about:

**1) Permitting and monitoring/enforcement details:** The plan states that most most of the camping, hiking, and parking permit details will be figured out "later". This is concerning because that is at the crux of most of the effects and decisions. The plan won't work if it can't be reasonably monitored and enforced, and yet none of those plans are fleshed out yet. The GMUG hopes to not charge for permits but it seems like charging would provide for some of these costs. The GMUG also hopes to use volunteers to help, but we have concerns that volunteers anywhere (Trailhead, camping areas, at the Blue Lakes) would be put in a position of monitoring usage and interacting with hikers and campers, completely unable to enforce anything, and yet having to act to some extent as the "police".

**2) Travel between permit-required zones:** The plan divides the area up into 5 zones, but does not address travel between the zones over Blue Lakes Pass. There is currently (in the summer) significant travel in both directions over that pass. Hikers go from trailhead to trailhead in both directions. Mt. Sneffels climbers do approach from the Blue Lakes side. It seems unlikely that

someone would be stationed up at the pass to monitor or enforce travel, so will that travel be allowed or ignored?

**3) Travel within the Blue Lakes zone but away from the lakes:** The Blue Lakes zone is a large area but the problem route is really the Blue Lakes Trail and close to the Lakes themselves. There is significant opportunity for interesting and solitary off-trail hiking to the west of the lakes. Will that now be off-limits unless the user gets one of the parking and hiking permits? Perhaps the Wilderness zone should be subdivided between the Blue Lakes and the area to the west, and the permits should apply to the Blue Lakes specifically? Could you hike on the trail up to below the lower lake and then go cross-country up to the west without a permit? Could you hike without a permit if you stayed off the trail all the way from the Trailhead or the Wilderness boundary?

**4) Blaine Basin Zone:** The Blaine Zone is adjacent to the Blue Lakes Wilderness zone and is very beautiful and not in general over-used – it is much-loved by locals. The EA states that this zone will have designated camping areas but no permits required for hiking or camping at this time. There is concern that there could be spillover into the Blaine Basin Zone from visitors that do not have Blue Lakes permits – it seems like it could take a year or more to figure out what happens. The EA says that Blaine Basin permitting could change in the future depending on use. Would the USFS just implement permits per their Adaptive Management process; we hope that there would be another EA to consider restrictions on this zone? We have concerns that decisions for further permitting could be made in the future without public input.

**5) Parking:** It sounds like parking at the Blue Lake Trailhead may require a permit - but how can you park if you are hiking to Blaine, or back along the Dallas trail, i.e. along a trail where you don't need a permit? Do you have to effectively get a Blaine Basin permit because you need a parking permit? What if there is a non-permit-required parking area but people use it to 'sneak' up the Blue Lakes Trail without a permit?

Finally, OTG does have concerns about how we will be able to do trail maintenance in the Plan area. Will we need to have a permit? Will parking be available? Will we need to coordinate ahead of time with the USFS for work in all 5 zones or just the Blue Lakes zone? Will we be restricted to working on certain days? Will group size be restricted? These trail maintenance concerns may not need to be addressed in the final Management Plan, but they do need to be considered and addressed before any plan is implemented.

Again, the Ouray Trail Group thanks the GMUG Blue Lakes Planning Team for the opportunity to participate in this process.

Ames Risch

Ouray Trail Group President