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Ouray Ranger District, Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG)
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Submitted electronically via email per instruction by Neil Perry to niccole.mortenson@usda.gov; neil.perry@usda.gov
& via website submission form: <https://cara.fs2c.usda.gov/Public/CommentInput?project=51806>

RE: **Blue Lakes Visitor Use Management Plan Environmental Assessment (EA) #61979**

Dear Responsible Officials,

Thank you for the opportunity to comment on the Blue Lakes Visitor Use Management Plan Environmental Assessment. Ouray County has been paying close attention to this planning process over the last several years. We previously provided information and feedback to the U.S. Forest Service (USFS) regarding the Blue Lakes visitor study area through an ArcGIS Story Map website survey.

During the pre-scoping, scoping, and other collaborative opportunities, Ouray County advocated that the following bullet points be considered in one or more alternatives. It appears that GMUG has given most of these topics consideration in the EA.

- Resting and repairing the damaged Blue Lakes trails and habitat. The damage from overuse and abuse may require little to no use to restore the land and reduce the undesirable human imprints. ROCC volunteers suggested closing the Blue Lakes for two to three years to heal. Limiting Blue Lakes users to traveling only on official trails may be necessary.
- Limiting the number of day users and campers to restore and preserve wilderness characteristics with day use and overnight quotas and implementing a fee permit system. For example, Sierra National Forest has a Wilderness permit system, for the stated purpose of "A daily entry quota system is in effect for all wilderness areas to protect the natural resources and to preserve the quality of the wilderness. The land can only support a certain number of visitors. When excessive use occurs all at once, the opportunity for solitude decreases, vegetation gets damaged, erosion is accelerated, and the risk of water pollution increases."¹ **Sierra National Forest's quota system preserves 40 percent of Wilderness Permits for walk-ins and 60 percent for advance reservations.**
- Incorporate a Leave No Trace Ethics and Etiquette informational brochure and signature page for users to sign when picking up backcountry/wilderness permits, similar to Sequoia National Forest.²
- **Ouray County and Ridgway value and protect dark skies, and any quota system should still allow visitors to view and photograph the incredible night skies at Blue Lakes.** This means banning overnight parking/vehicle camping at trailheads but allowing unoccupied vehicles to remain for permitted backpackers or photographers.
- Addressing sanitation with a pit toilet convenient to hikers and designated campsites and/or a requirement to pack out

¹ https://www.fs.usda.gov/detail/sierra/passes-permits/?cid=fsbdev7_018115; accessed October 13, 2021.

² https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_058507.pdf; accessed October 13, 2021.

all human waste.

- Clearly designating a small number of dispersed campsites at one of the lakes while prohibiting camping at others.
- “Vehicle corrals” (marking parking lot limits with boulders or worm-fencing) at appropriate parking areas where traffic can safely turn around and pass in opposite directions.
- Work to remove Blue Lakes as a must-see attraction from popular tourist websites. For example, a Google search for “blue lakes hike top attraction things to do ouray telluride” brings up over 500,000 results. However, the first 30 results are mostly local or regional websites, including Telluride and Ouray visitor/chamber sites, trying to drive web traffic to themselves¹⁴. Explore a campaign to request omitting Blue Lakes Trail from these lists and sites. Explore public outreach, including on the GMUG web pages, All Trails, and Trip Advisor, to explain that due to overuse and abuse, any new protective policies that are in place and message that those seeking solitude and wilderness experiences should avoid Blue Lakes.
- Evaluate reducing the number of people and pack animals allowed in a group, currently 15 people and 25 pack animals. Public comment suggests that 15 people per group is too many. Perhaps 8 to 10 people (approximately 2 families) per group should be the max.
- Identify and strengthen partnerships and sustainable funding for education/outreach, an embedded alpine ranger, and enforcement of Leave No Trace and protective regulations.
- Rehabilitate and close widened areas and trail braids. Protect water quality and riparian areas by providing a primitive footbridge over stream crossings.
- Evaluate where additional trail markers or signage can prevent hikers from inadvertently going off-trail.

We appreciate the thought that has gone into the visitor use management plan so far. It appears that most of our topics were considered in a pre-alternative or the proposed alternative. The EA has two alternatives – a preferred action alternative and a no-action alternative.

Suggestions for improvement:

- **Please clarify and define terms.** The Environmental Assessment is written in technical USFS language and shorthand without defining some key terms. Definitions of “**encounters**” and “**encounter rate**” are needed.³ Definition of “**permit holder**”, “**permit**”, and “**non-transferable**” are needed.⁴
- Clarification of what GMUG means by group sizes are needed. The plan suggests group sizes of up to 10, but also up to 6 people. **Please clarify if a day-use group size maximum is different than an overnight/camping group size maximum.** If these are different, is their sufficient ability to explain and enforce? Being extra clear about when a group is up to ten and when a group is up to six matters. Perhaps the group maximum should be six in all cases, unless more than four members are children from the same family unit?
- **Can a lone permit holder be considered a “group” for adaptive management trigger** – “Consider allowing more day use permits if monitoring ensures additional permits would not result in the exceedance of 20 group encounters per day...”?
- With respect to the limitation, “**Maximum four permits per person per year**”: Is a person limited to being a group leader four times per year, or may they only pull four permits per year, regardless of what group they

³ On page 41 -- the term “**encounter rate**” seems to refer to “20 encounters with other groups per day.” A reasonable person might think this means one party coming into contact with 20 other groups of up to XX people. On page 52, the term “group encounters” is used. **Please clarify – is this one group encountering a different group, or one person encountering a group of up to six? or up to ten? visitors in each group?**

⁴ Pages 39-40 -- 2.2.3.2 – Wilderness, Lower and East Dallas Zones – “Permit holder must be present.” “Maximum four permits per person per year.” “Permits would be limited to no more than 40 permits per day for day use and max 24 permits for overnight (4 sites with up to 6 people per site).” **This language appears to infer that each person applies for their own permit and they are non-transferable? Or can a group leader apply for up to six? or ten? permits, and they are the ones who must be present?**

are in?

- Will day-use and camping/overnight-use **permit holders be guaranteed a parking spot** in the appropriate parking area designated to their zone with their permit(s)? Will there be a maximum number of vehicles per group?⁵ We suggest that an adaptive management approach of starting with permit-only parking in designated day-use and overnight-use parking lots may both simplify visitor management and achieve desired levels of visitor numbers while eliminating the need for additional more complicated permit systems.
- Definition of “hygiene product” needs to be provided on permits and kiosks, and explicitly say “**toilet paper and hygiene products.**” Cultural norms connote an understanding that hygiene product is a term most frequently used to refer to feminine hygiene products. **Explicitly requiring that all “toilet paper, feminine, or other hygiene products regardless if biodegradable or not, must be packed out”** will remove public confusion and connote the appropriate mental picture of what is being required. **PACKING OUT TOILET PAPER AND ALL OTHER HYGIENE PRODUCTS SHOULD BE REQUIRED IN ALL FIVE ZONES.**
- **With respect to feces, human and dog feces should be packed out in all zones, not just the human waste and “hygiene” products within the Blue Lakes zone.** Previous comments indicated that digging cat holes for human feces resulted in uncovering previous cat holes, buried toilet paper, and related contents. Making the management strategies as uniform as possible across zones will provide uniform education and outreach opportunities. As the four alpine counties (Ouray, Hinsdale, San Juan, and San Miguel) learned, it is difficult to have rule changes across artificial political or management boundaries when visitors consider the landscape and trails to be interconnected.
- **Dallas Trail** is popular with equestrian and mountain bikers who may traverse most or all of the 16+ mile trail in a single day. We are unsure if the visitor use management plan will require all Dallas Trail through-users (who may be traveling from County Road 5 to Last Dollar Road) to require day-use permits to go through the “Lower East Dallas” zone. Please address if this plan will prohibit east-west through-travel on Dallas Trail without a permit. **We recommend allowing those few bikers, hikers, and equestrians who are hiking east-west from beginning and ending points (such as County Road 5 or Last Dollar Road) outside of the visitor use management area to be able to continue to do so without a day-use permit.**
- **San Juan Huts and permittee/outfitter/guide** clients – will these clients be able to stay at one or more of the huts or do guided activities without pulling one of the day or overnight use permits? We recommend clarifying if public and outfitter clients are competing for the same day use or overnight permits.⁶
- We appreciate the analysis of sensitive species, and riparian habitats, and wetlands. We appreciate the mention of **fens**. We recommend reviewing the substantive fen comments offered by Ouray County and others for the GMUG Revised Land Management Plan. **For fens, which are complex groundwater-dependent ecosystems that provide peat accumulation and carbon sequestration – we recommend striving for at least a 600-foot buffer** rather than a 100-foot buffer.⁷
- We appreciate that an additional bathroom and hardened stream crossing mentioned in the EA will be accomplished very soon.
- We did not see mention of looking for visitor management opportunities by improving cross-links and education/outreach through the GMUG website and through requesting that Blue Lakes be removed from

⁵ **Page 31**, and in other places the EA states, “Parking would be restricted to designated sites which would reduce the number of people present. Those with an over-night permit would not require an additional day-use permit. **Permit requirements vary by zone and adaptive management actions.**” Except for those summiting Sneffels, this could be confusing for public.

⁶ **Page 55** – the EA states, “Multiple outfitters and guides are permitted within the planning area and adjacent public lands. Permitted activities include guided hunting, hiking, backpacking, horseback riding, backcountry hut accommodations, photography, mountaineering, and climbing.” **There is no clarification on whether these businesses will be operating within or external to the proposed 40 (?) day use and 24 (?) overnight permits.**

⁷ **Page 46** -- EA states, “Buffer fen systems depending on the site (i.e., may be > 100 feet); pre-inventory is recommended.” **Recommend changing this to >600 feet.**

“must do” or “top attractions” lists in external visitor attraction web sites. Please give these actions consideration in the EA. These actions are opportunities for collaboration with local and regional partners:

- Discourage Blue Lakes from being described and advertised on dozens of regional, state, and national websites as one of the top attractions/things to do in Ouray-Telluride;
- Provide clear and specific communication and/or enforcement of current Blue Lakes use restrictions on the GMUG Mount Sneffels webpage.⁸ This page should, but currently does not, hotlink directly to the GMUG Mount Sneffels Wilderness-specific wilderness regulations rather than requiring astute and patient website users to accidentally find the Mount Sneffels-specific wilderness regulations.⁹ The GMUG Mount Sneffels web page which simply states that
 - “Camp sites in the Blue Lakes are limited in number” (provide a map or information on the actual number of campsites and how campsites are delineated/marked);
 - “Campfires are prohibited in the Blue Lakes area”;
 - “No camping within 100 feet of water and designated trails in the Blue Lakes area.”
- Recommend GMUG mention and/or cross-link the current Blue Lakes use restrictions on the GMUG Blue Lakes #201 (trail-specific) web page is a lost opportunity for user education and outreach.¹⁰ The use restrictions above, and the prohibition of camping at the Blue Lakes – Yankee Boy Trail Head need to be mentioned more clearly and comprehensively on both the Mount Sneffels and Blue Lakes #201 web pages. The Mount Sneffels general web page provides “at a glance” information on Norwood Ranger District trails with no relevant info on Blue Lakes #201, which is in the Ouray Ranger District.⁸ There is a lack of GMUG enforcement of these regulations.

It is unfortunate that the EA does not provide permit system implementation details. How a permit system is implemented is more important than *if* it is implemented.

Simply saying,

- *“Permit requirements vary by zone and adaptive management actions.”*
- *“Permit details such as these... would be worked out with the vendor when a permit system is set up. There would be additional public involvement when permit systems are put in place.”*

without giving details, while at the same time providing limits of permits and limits of the number of days and nights of annual use per person, **we do not fully understand the plan and cannot visualize its successful implementation within five different zones, each having separate rules.**

Please consider having the camping and day-use permit system allow for different release dates of the permits. We understand that all the public must be treated equally. Please follow other forests, and allow for a quota or other system that reserves a certain percentage of permits to be released the day of or at least less than seven days in advance. Allow for cancellations, so permits can be re-released, and a maximum number of parking spaces per group.

Please consider **parking management as an initial tool for visitor management** – requiring parking within designated locations off of the roads could have immediate positive impacts and patrolling for parking permits may be something that GMUG and Ouray County can collaborate on.

Thank you for your effort so far in creating a visitor use management plan and for the opportunity to comment and collaborate.

⁸ <https://www.fs.usda.gov/recarea/gmug/recarea/%3Frecid%3D80858> ; accessed October 13, 2021.

⁹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3807986.pdf ; accessed October 13, 2021.

¹⁰ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32558> ; accessed October 13, 2021.

SIGNED:

A handwritten signature in black ink, appearing to read "Lynn M. Padgett". The signature is written in a cursive style with a prominent initial "L" and "P".

LYNN PADGETT, COMMISSIONER

ON BEHALF OF

Board of County Commissioners of the County of OURAY, State of Colorado

Upon Ratification