

Dear Forest Service/GMUG,

I grew up and have been in the Montrose/Ridgway for decades, have worked for the Forest Service, Conservation Crops, and frequent the areas described in this plan. There is no doubt that the Blue Lakes area has changed over the years and not for the better. My first memory of this hike I encountered only a few groups, some of which we recognized. Now in the height of summer it can be hard to find a parking spot, with out of state plates being predominate. However, this permit plan is far from the answer. I believe it will have many negative impacts and unintended consequences.

1. Human waste issue – Impact is undeniable.
  - a. Address waste with education and by requiring wag bags as described or providing pit toilets. This is required many other places and is successful. Glen Canyon NRA or more locally the Gunnison Gorge are good examples. Why not start with this as step one?
2. Environmental Impacts - Reducing impacts here will only move it elsewhere.
  - a. Why isn't centralizing and containing impacts to this particular area presented as a viable option? Centralized impact is a recognized and utilized management tactic that can be better for the greater area. Peach Valley and the free ride area is a great local example.
  - b. How can you ensure limiting people at Blue Lakes will not lead to similar impacts elsewhere? Guaranteed that within a month of permitting there will be multiple articles with headlines similar to "Don't have a Blue Lakes permit? Try these 3 places instead." I have hiked to Blaine Basin 6 times in the past two years and can count the number of groups I've encountered on one hand. Impacts in Blaine Basin are present but minimal and have not grown in my memory. When uninformed people show up and do not have a permit for Blue Lakes this is logically where they will go instead. The impacts you are trying to fix at Blue Lakes will materialize here first. Saying "it is unknown where that displacement will occur" and having that as an excuse is naïve and shows proper planning was not performed. Anyone who has lived in the area can point to neighboring places and lakes that will be impacted.
  - c. What is an acceptable level of impact? Will this continue to be monitored once the graduate students project is over? At what frequency to ensure success or the need to alter the proposed plan? What is our current impact level and by what metric will this plan satisfy those needs?
  - d. Social trails and trail degradation are a sign of poor trail planning and maintenance, not overuse. When is the next scheduled trail maintenance? Why was this trail not identified a decade ago for needing improvements?
3. User Experience - Is stated that this is being done to "maintain quality outdoor recreation opportunities". This plan is limiting access, by doing so it cannot maintain opportunities.
  - a. This plan is assuming what type of experience the user wants. Why can't the users determine what experience they want? I do not want to camp during the busy season at Blue Lakes for numerous reasons. Others may determine the pros outweigh the cons.

That is a personal decision. If somebody wants a different experience they can go elsewhere, the Forest Service does not have to try and create it.

- b. The users I have personally talked with all believe this will negatively affect their opportunities. Those surveyed in this study, provided biased views to a particular user group due to the seasons and times they were performed.
4. Local access – I understand that locals cannot be treated differently and I do not expect to be given priority. What this does do is prevent local, responsible and low impact users from using the trail in already low use times. I can run the trail on a weekday after work, in the height of busy season and have surprisingly few interactions or encounters with others.
  - a. Indian Peaks Wilderness, one of the closest wildernesses to the Front Range and the majority of the state’s population, requires overnight permits but not day permits. Why and how are day permits being suggested at Blue Lakes when Indian Peaks, with a much higher use, does not require them?
  - b. How were the daily and overnight permit limits determined?
  - c. The statement that locals have an advantage as they can use the area in unpermitted seasons is invalid as the trail is covered in snow the vast majority of that period so the same recreational opportunities are not present.
5. Public meetings – I was informed there was one public meeting which I have missed.
  - a. Why were multiple meetings or minimally a follow up meeting not held?
6. Setting a precedence – If this is enacted, it sets a precedence for the area.
  - a. What are the specific and tangible triggers that instigated this plan and how were these determined?
  - b. What are the top 5 other places in GMUG that are close to hitting this trigger?
  - c. How many more permitted areas can we expect to see in 5 years, 10 years and 20 years?
  - d. What is the process for a once permitted area to go back to not being permitted?
7. Permits -
  - a. Will permits be given out online or in person? (i.e. If someone is in Ridgway, will they have to drive to Montrose and back to get a permit?)
  - b. How far in advance can you get a permit?
    - i. Would this be the same for both daily and overnight permits? i.e. Day hikes can be very spontaneous but many people need more time to plan for an overnight.
  - c. It is stated that “This plan does not analyze or propose a fee. However, permit fees may be implemented through the Forest Service fee proposal process to help assist with management costs.” It is absurd that this was not analyzed and incorporated into the plan. Would you propose or vote on a tax increase without disclosing the increase? At an absolute minimum the following questions should have been asked and should be answerable now.
    - i. How much time per day/week is this expected to take the issuer(s) and enforcer(s)?
    - ii. What position will absorb this additional responsibility?
    - iii. What projects and goals will not be accomplished with permitting and enforcement being a new priority?
    - iv. At what point would a new position(s) be required?
      1. Is this person seasonal or permanent?

2. What GS level is this position?
  - v. What fee amount is required to support those hours and pay scale?
  - vi. How would the fee be paid and are their additional processing costs?
- d. What are the consequences for not having a permit?
- e. What does a cancelation system entail?
- f. It is stated that “triggered actions are phased in so that the least intensive intervention that achieves the desired conditions is utilized (minimum tool concept). In other words, we use the least restrictive method first to ensure visitors freedom” How does the proposed permitting system abide by this statement? Permitting is extremely restrictive and there are multiple least intensive alternatives that have not been utilized to date.
8. Parking – Parking issues have been listed as a major contributing issue.
  - a. Why hasn’t parking been improved or a designated overflow lot added?
  - b. Why isn’t signage present to illustrate what is allowable and not?
  - c. Why are cars not being ticketed?
  - d. If only authorized vehicles were allowed on the last 2 to 3 miles of the current road many of the issues would likely disappear. Was this looked into as an alternative?
9. Camping - Camping is limited to designated sites or campgrounds.
  - a. Specifics are given for the Blue Lakes zone but no others. How many sites and people are allowed in the other sites?
  - b. Where are the proposed sites outside of the Blue Lake Zone?
10. It is stated that “Without partners and funding, implementation will be limited.”
  - a. Who are the desired partners?
  - b. How much funding will be needed and what are the sources if there is no fee proposed?
  - c. How will implementation be limited and what are the priorities?
11. Triggered actions are phased in so that the least intensive intervention that achieves the desired conditions is utilized (minimum tool concept).
  - a. Starting a permit system is incredibly intensive. Why are other options not presented?

Thank you for your time. I look forward to reading your answers.

Chase Jones