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First name: Jeff

Last name: Conklin

Organization: Wolf Land Company

Title: Attorney

Comments:

November 30, 2023

Re: Comments on USFS Blue Lakes Visitor Use Management Plan - Environmental Assessment

Dear Ms Guardino:

This firm represents Wolf Land Company, L.P. ("Wolf Land"). Please accept this letter as written comment on the USFS Blue Lakes Visitor Use Management Plan (the "Plan") - Environmental Assessment (the "Assessment"). This letter supplements comments provided by letter dated May 20, 2022 on the draft Plan.

Wolf Land operates an integrated agricultural operation in Ouray County and San Miguel County with significant land, water, and livestock investments in areas affected by users of the Blue Lakes planning area. Blue Lakes, the Blue Lakes Trail, Mt. Sneffels, and other recreational and scenic areas in the Blue Lakes planning area are all stunning public resources. Wolf Land values and appreciates USFS stewardship of the Blue Lakes planning area and encourages USFS to appropriately manage this area in the face of increased use and associated impacts. To that end, Wolf Land largely supports the Plan and Assessment, but wishes to further address travel-related impacts to County Road 7 (East Dallas Road).

As discussed in the Assessment, properties along County Road 7 (East Dallas Road) and the Forest Service boundary have been dramatically impacted by increased use of the Blue Lakes area resulting in trespass, disturbance with livestock management, wildfire hazards from camping, unauthorized drone use, and littering, among others. There are also related safety concerns with the number (and speed) of vehicles traveling up and down County Road 7, including those that are unable to find parking at the trailhead only to travel back down County Road 7. Wolf Land appreciates and agrees with the management prescriptions in the Plan to address these issues, including: permit system, designated camping, restricted parking, improvements to parking areas, installing signs/markers, and the other adaptive management tools set forth in the Plan.

In addition, Wolf Land suggests and requests that USFS work with Ouray County Road and Bridge to install signage at the bottom of County Road 7 (near intersection with County Road 62) that advises visitors as to the restrictions on use of Blue Lakes area (e.g. permits), that parking is only permitted in designated areas, and other appropriate information, as well as install "no camping" signs along County Road 7. We believe such signage would be instrumental in reducing impacts and increasing safety on and along County Road 7.

Finally, the Plan is likely limited by the ability to enforce it. We recommend that appropriate resources be directed towards enforcement of the Plan.

In short, Wolf Land largely supports the Plan and Assessment, with a request to consider the additional elements addressed above. If there is an opportunity for Wolf Land to participate in any of these solutions, please let me know. Thank you for the significant work on the Plan and responding to concerns.

If you have any questions, feel free to contact me.

Very truly yours,
KARP NEU HANLON, P.C.
Jeffrey J. Conklin