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Comments: See uploaded letter.

December 1, 2023

Dana Gardunio, Ouray District Ranger

USDA Forest Service

2505 South Townsend Avenue

Montrose, CO 81401

submitted electronically: https://cara.fs2c.usda.gov/Public/CommentInput?Project=61979

Dear Ouray District Ranger Gardunio,

Thank you for the opportunity to comment on the Blue Lakes Visitor Use Management Plan Draft Environmental Assessment #61979 (Plan.) The Northern San Juan Broadband of Great Old Broads for Wilderness (Broads,) a volunteer-led chapter of the national non-pro?t organization, has been in existence since 2013 with membership and engagement in Delta, Montrose, Ouray and San Miguel Counties. We have collaborated with the Ouray District on many stewardship projects including ?ve years of Solitude Monitoring from 2017-2021 (which included Blue Lakes Trail,) trail sign inventory, campsite and trail monitoring, and invasive weed reporting. Broads also provided our Solitude Monitoring data to Jennifer Stagner for the 2019 Blue Lakes Inventory. Many of our members volunteered (in conjunction with Ridgway Ouray Community Council and San Juan Mountains Association) in the Save the Blues campaign helping at the trailhead educational site to inform visitors of Leave No Trail (LNT) ethics and Wilderness Area regulations. In addition, Broads participated in the LNT Hot Spot Analysis for Blue Lakes during the summer of 2018.

Broads supports the proposed Plan as we have seen the impacts of overuse on ecological values and visitor experience over the last decade since our chapter's founding. We o?er the following comments to strengthen and clarify the plan.

DOGS
The Plan states that for All Zones: "Dogs must be (i) on leash; (ii) under direct verbal control of the dog's owner or handler at all times; or (iii) not disturbing or damaging wildlife, other animals, people or property." Page 16 of the EA (in the response to comment section) indicates that this direction is "consistent with language in the current Forest Order applicable to the Mount Sne?els Wilderness." If the Ouray District has the discretion and authority to amend the direction within this Forest Order based upon data and adaptive management protocol to protect wilderness character, Broads recommends that dogs be prohibited from the Wilderness Zone or at a minimum be required to be on a leash less than or equal to 6 feet long at all times.

Though Broads is unfamiliar with this practice on any other forest, some of our members feel

so strongly about the negative impacts of dogs that they request that dogs be counted in the group size limit in the Wilderness Zone so that no more than 10 people and dogs (combined)
555RivergateLane,B1-110?DurangoCO81301?970-385-9577?greatoldbroads.org
can hike together. An alternative would be to limit the number of dogs in any one group, but that would still allow every group of one person to potentially have one dog or two dogs depending upon the limit on dogs per group. Ultimately, our organization strongly recommends a prohibition on dogs in the Wilderness Zone if that is possible under the Forest Order or at a minimum every dog on a leash. Broads encourages the Ouray District and the Plan to take this critical step in ensuring that the undesirable e?ects of dogs in the Mount Sne?els Wilderness is minimized.

It is Broads' understanding that the Forest Order mentioned above only applies to the Mount Sne?els Wilderness Area and therefore, the Ouray District, through this Plan, has the authority to restrict dogs in the other four zones regardless of the District's ability to modify the Forest Order. Therefore, Broads strongly recommends the following:

Dogs be prohibited from Mount Sne?els Zone.

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Dogs be prohibited from the Blaine Basin Zone or at an absolute minimum be required to
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be on a leash less than or equal to 6 feet long at all times.

Dogs be required to be leashed at all times in the Lower East Dallas Zone and the Yankee
*
Boy Zone.

Data, observations and experience attest to the fact that voice command is inadequate in controlling dogs across the Plan area. Given the option, dog owners and handlers typically will allow their dogs to run free and claim, "My dogs are friendly." "My dogs don't chase wildlife." "My dogs respond to voice command." Those assurances have not been our members' observations nor are they consistent with Jennifer Stager's 2019 Blue Lakes Inventory that states on page 33, #7, "Dogs were problematic. Many dogs were completely out of their owners' control. Con?icts I became aware of in my short time patrolling this area included:

lost/found dogs; dogs & other dogs; dogs & porcupines; dogs & bears; dogs & people; dogs &
marmots; dogs & various wildlife. I observed many dogs roaming unattended around the lower lakes. Not just o? leash - running completely wild - often to the great annoyance of other visitors. The sounds of dogs squabbling was common." On page 25 of the same report, Ms Stagner writes, "Dog waste is also evident along the trail and near the lakes… In the timeframe of this inventory, I witnessed two di?erent dogs defecating directly into the lakes. There is also a frustrating trend of users bagging up dog waste and leaving it along the trail." Broads believe Ms. Stagner's observations speak for themselves. The deleterious impacts on water quality, wildlife, health and sanitation, user experience, visual impact, and noise pollution is obvious and not in alignment with a wilderness experience or the preservation of wilderness character. We urge you make the di?cult and often unpopular decision to restrict dog access as recommended above.

PERMITS
Broads applauds the Plans proposals to limit number of users in the Wilderness Zone by

implementing a permit system in 2025 (as well as designating parking spaces and campsites sooner.) The plan needs to clarify that the total number of day users on the Blue Lakes Trail will be limited to 40 individuals per day each with a permit (per communication with Neil Perry.) Currently the way the Plan reads, it could be construed that 40 day use permits will be issued and each permittee could hike in a group up to 10 visitors totally a possibility of 400 day hikers plus those 24 backpackers (which really could be 48 backpackers given those traveling into Blue Lakes and those departing from their camping experience.) Obviously 400-448 users on the trail on any one day would not be consistent with the intent of the Plan to limit use. Broads requests that these numbers be explicitly clear in the revised Plan.

Thank you again for your consideration of our comments and for the e?orts of Ouray District sta? to protect the Blue Lakes region. Please don't hesitate to contact us if we can clarify our position or assist with educating the public regarding changes to the visitor use requirements as proposed in the Plan.

Sincerely,

Robyn Cascade

Northern San Juan Broadband

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