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Comments: December 3, 2023

To: Dana Gardunio

Ouray District Ranger

United States Forest Service

2505 S. Townsend

Montrose, Colorado 81401

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

Dear Ms. Gardunio,

Please accept this comment on behalf of the Western Slope Group of the Colorado Mountain Club. We live in western Colorado and the public lands that surround our communities are important to us both for their conservation and recreation values. The Western Slope Group consists of over 100 members. Statewide, Colorado Mountain Club is a community of 6,500 individuals. Members enjoy a variety of organized activities including hiking, mountain biking, wildlife viewing and camping. Colorado Mountain Club's missions include promoting sustainable human-powered recreation and protecting wildlands in areas such as those at issue in the Blue Lakes area.

Many of us have had the opportunity to enjoy and experience the Blue Lakes area, with some experiences occurring decades ago. Collectively, we have hiked the trails in the area including the Blue Lakes trail, as well as summiting Mt. Sneffels from both the Yankee Boy Basin Trailhead and Blaine Basin. We have witnessed the degradation due to the increased popularity of the area and commend your efforts to protect and restore the region.

We largely agree with the proposed management set forth in Preferred Alternative B including the utilization of a permit system for hiking and camping, designated camping areas, restricted parking, education of visitors, enforcement and monitoring, and the installation of signs.

Concerns we have are as follows.

1. Tribal Consultation - §1.6 states the "[l]ocal tribes have been consulted ... and consultation is ongoing." We believe tribal consultation must be considered and we support any concerns expressed, however, there is no information in the EA regarding any feedback received by the USFS from the tribes.

2. Blaine Basin Zone - The EA acknowledges that Blaine Basin is proposed in legislation as wilderness. (CORE and the most recent GMUG Revised Wilderness Evaluation Report) §3.3.1.4 To preserve the wilderness characteristics that currently exist in the Blaine Basin Zone, we believe some of the prescriptions directed at the Wilderness Zone should be included in the management of the Blaine Basin Zone. Pursuant to §1.2.5 and §2.2.3.5, the burial of human waste is allowed in the Blaine Basin area whereas, it must be packed out from the Wilderness Zone. Campfires are permitted in the Blaine Basin Zone and banned in the Wilderness Zone. §2.2.3.3. Fire bans and packing out human waste should be included in the Blaine Basin Zone.

3. Recreational Effects to Blaine Basin Zone - The EA concludes that there will be minimal displacement of visitors from Blue Lakes to the Blaine Basin Zone, reasoning that Blaine Basin does not have any lakes. §3.3.3

Considering its proximity to Blue Lakes, and the fact that Blaine Basin is proposed as a wilderness area, we believe the potential impacts to the area justify some of the educational and monitoring measures intended for the Wilderness Zone. §2.2.3.3 Furthermore, the EA calls for wilderness rangers to check permits at access points. §1.7.3.3 It is reasonable to believe that if visitors without a permit discover the existence of a permit system at the access point, they will opt for a hike to Blaine Basin. Perhaps some of the designated parking should be reserved for those with day permits for the Blue Lakes Trail.

The EA characterizes both the Wilderness Zone and the Blaine Basin Zone as offering "semi-primitive" recreational opportunities based on the Forest Plan definition of 5 to 20 trail encounters per day. §1.4.5 It is imperative that measures be taken to maintain these wilderness characteristics of semi-primitive recreation and a degree of solitude.

4. Visitors With Dogs - Numerous comments have been made throughout the process regarding dogs. According to the EA, the rule allowing dogs off a leash if the dog is "under direct verbal control" is consistent with the current Forest Order applicable to Mt. Sneffels Wilderness. §1.7.6.1; §1.4.3.2 Based on our experiences as frequent hikers on public lands, it is undeniable that there are very few unleashed dogs that are actually under verbal control. With an increased number of visitors, the impact on wildlife is enough without the added pressure from uncontrolled dogs.

5. Enforcement - The EA recognizes that the ability to enforce the proposed management plan is limited, partially due to funding issues. Suggestions have been made to include signage or a kiosk at the intersection of CR 7 and Highway 62 in order to inform visitors of a permit system. This is an excellent suggestion that will complement the plan to have wilderness rangers check permits at access points and while on routine patrols.

Thank you for this opportunity to comment on an area that we know and love. We appreciate your efforts to restore and protect this beautiful area while addressing the increased demand.

Claire McCullough, Conservation Chair  
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