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Title:

Comments: Grand Mesa, Uncompangre, Gunnison National Forests

Attn: Blue Lakes Visitor Use Management Plan Team

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Blue Lakes Management Plan Team:

Thank you for the opportunity to provide comments on the GMUG Preliminary Blue Lakes Management Plan. I definitely agree that something needs to be done to limit and manage visitor usage, and the basic outline of the plan seems reasonable. Following are my comments:

- 1) Permitting/Monitoring/Enforcement details: The plan states that most most of the camping, hiking, and parking permit and monitoring/enforcement details will be figured out "later". This is concerning because these issues are really at the crux of whether this will work. The management area is very big, with multiple entrance zones, and there is very little USFS presence at this point. The GMUG hopes to not charge for permits but it seems like charging would help provide for some of these costs. In addition, it seems like not charging would just invite people to rush in and sign up as soon as possible just to get a spot, and then have no incentive to cancel their reservation later if they couldn't use it. Perhaps it would make sense to have some permits issued ahead of time and some very close to the use time?
- 2) Use of Volunteers: The GMUG also hopes to use volunteers to help with stewardship aspects of the new plan. I have concerns that volunteers anywhere (Trailhead, camping areas, at the Blue Lakes) would be put in a position of monitoring usage and interacting with hikers and campers, completely unable to enforce anything, trying to be friendly, and yet viewed as the "police".
- 3) Solid waste disposal: I completely agree that users in most zones should be required to pack out human solid waste and toilet paper.
- 4) Dog rules: Allowing people to have their dogs unleashed but "under voice control" is unrealistic. I have seen too many dogs taking off after marmots or other animals in Yankee Boy Basin and in the Wilderness zone around the higher lakes. Also, please make it clear that dog waste needs to be picked up and packed out by the owners.
- 5) Bridge across stream below Lower Blue Lake: The current plan states that a "hardened" crossing will be available where the trail crosses the stream below the lower lake and the existing social trails on the far side of the stream will be removed. I don't believe that this will stop people from trying to find a shallower crossing (likely closer to the lake outlet) and then continuing on social trails. People don't like (and it is dangerous) to jump across rocks in very swift water, but if they have hiked to that point they want to continue. I realize that building a bridge in Wilderness is difficult, but it's not impossible and it would channel people to the real trail. Otherwise it will be a never-ending fight to try to get people to stop making social trails, in addition to nudging people into a river crossing that they may feel is personally unsafe.
- 6) Travel between permit-required zones: The plan divides the area up into 5 zones, but does

not address travel between the zones, over Blue Lakes Pass especially. There is currently (in the summer) significant travel in both directions over that pass. Hikers go from trailhead to trailhead in both directions. Also, Mt. Sneffels climbers do sometimes approach from the Blue Lakes side. It seems unlikely that someone would be stationed up at the pass to monitor or enforce travel, so will that travel be allowed or ignored?

- 7) Travel within the Blue Lakes Wilderness zone but away from the lakes: The Blue Lakes Wilderness zone is a large area but the over-use problem is really with the Blue Lakes Trail when it is close to the lakes, and around the lakes themselves. There is significant interesting and solitary off-trail hiking to the west of the lakes. Will that now be off-limits unless the user gets one of the parking and hiking permits? Perhaps the Wilderness zone should be subdivided between the Blue Lakes and the area to the west, and the permits should apply to the Blue Lakes area specifically? Could you hike on the trail up to below the lower lake and then go cross-country up to the west without a permit? Could you hike without a permit if you stayed off the Blue Lakes Trail all the way from the Trailhead or the Wilderness boundary? But, how could you do any of this if you can't get a parking spot down near the trailhead?
- 8) Blaine Basin Zone, Adaptive Management: The Blaine Zone is adjacent to the Blue Lakes Wilderness zone and is very beautiful and not in general over-used. The EA states that this zone will have designated camping areas but no permits required for hiking or camping at this time. There is significant concern that there could be initial spillover into the Blaine Basin Zone from visitors that do not have Blue Lakes permits, but it also seems like it could take more than a year for things to settle down, and to figure out what happens. The EA says that Blaine Basin permitting could change in the future depending on use, via Adaptive Management processes. I hope that the USFS would wait at least a year (maybe 2) to make decisions about limiting access to adjacent areas and that there would then be another EA to consider restrictions on this zone. I have concerns that decisions for further permitting would be made without public input.
- 9) Blue Lakes Trailhead Parking: It sounds like parking at the Blue Lake Trailhead will be limited and may require a permit, but at the same time you should be able to park if you are hiking to Blaine, or back along the Dallas trail, i.e. along a trail where you don't need a permit. Do you have to get a parking permit if you want to hike to Blaine Basin (so effectively a Blaine Basin permit) or do you have to plan to arrive at 4 a.m. to get a parking spot? Maybe there could be a (large) non-permit-required parking area? Of course people might then use it to "sneak" up the Blue Lakes Trail without a permit. I understand there are no good or easy answers here.

Again, thank-you for the opportunity to participate in this process.

Jennifer Cram