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First name: Oakley Last name: Kelly

Organization: Double RL Ranch

Title:

Comments: Via Online Submittal

USDA Forest Service Reviewing Officer, James Pitts

Attn: Blue Lakes Visitor Use Management Plan

2250 South Main St.

Delta, Colorado 81416

Re: Blue Lakes Visitor Use Management Plan/Letter of Support

To Whom It May Concern:

This letter of support is submitted in reference to the Blue Lakes Visitor Management Plan ("Plan"). The Double RL Ranch is comprised of more than 17,000 acres in Ouray and San Miguel Counties, adjacent to the Blue Lakes Planning Area. Double RL is writing this letter to indicate its general support for the Plan and its proposed actions.

Despite its overall support for the Plan, Double RL remains concerned that implementation of the measures set forth in the Plan will result in the shifting of impacts to nearby lands. More specifically, as the Plan is implemented, visitors who are unable to obtain permits for Blue Lakes will likely begin using the nearby USFS land, including those surrounding Box Factory Park. At a recent site visit, Double RL and USFS representatives discovered evidence of at least 25 dispersed campsites, informal and illegal fire rings, loss of vegetation, litter, unauthorized and excessive parking and overcrowding in these areas. These issues are likely to be compounded after the Plan goes into effect. As a result, Double RL respectfully requests the USFS to implement concrete mechanisms and commitments to address increased usage of adjacent USFS lands. This could include more active management of adjacent lands (removal of illegal fire rings, enforcement of unauthorized camping, delineation of parking and enforcement of illegal parking, etc.) and commitments to implement mechanisms similar to those set forth in the Plan, including a permitting system. Without implementing such measures, visitor displacement resulting from the Plan could cause further damage to the natural quality of the land surrounding Box Factory Park, a preventable harm.

As contemplated by the Plan, Double RL respectfully requests the USFS to regularly patrol and regulate designated campsites and parking areas along County Road 7 to prevent unauthorized parking and to limit trespass on private land. This may include preventive measures such as new signage and additional barriers directing visitors to designated locations. Additionally, informal and illegal fire rings should be removed to prevent wildfire. Double RL hopes that the Plan can preserve valued USFS lands, but respectfully requests the USFS to remain diligent in examining if the Plan's implementation requires promulgation of further regulation, permitting systems and/or enforcement to protect against displacement to surrounding USFS lands and other adverse consequences (such as negative impacts to wildlife/livestock, trespass on private land, or interference with private water rights).