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Comments: Both from personal experience over the past 15-20 years and from reading the 2022 Visitor Use Study it is clear that the Forest Service needs to take aggressive action to maintain the integrity of the Blue Lakes area ecosystems, the quality of water flowing through and out of these locations, and the expectations that many users of Wilderness, Primitive areas, and Semi-Primitive areas have. Over the past 4-5 years I have simply quit hiking to Blue Lakes; I have been increasingly disturbed by the number of group encounters, the lack of solitude, the human impacts to the environment, the flying of drones in the Wilderness, and the excessive number of camps around the Blue Lakes as well as the crowded parking lots and excessive number of dispersed camps near the trailhead. I am very supportive of significantly reducing visitor numbers through a permit system to help restore this ecosystem and the recreational experiences and expectations that are supposed to be obtainable in Wilderness and these adjacent areas. In the future I look forward to applying for a permit each summer and occasionally enjoying the area in a more pristine state with more opportunities for a quality Wilderness experience and solitude.

Thank-you to all the Ouray District and Supervisor's Office employees who are working to make this happen. Kudos to Dana and her staff for taking on this large and complex issue. Recreation is the new mission of the Forest Service, whether that is recognized by the agency or not.
My comments are primarily aimed at the Wilderness Zone and the Lower Blue Lakes Zones since those areas are my major interests.

Comments:

What are the boundaries of the Mt Sneffels Zone? Are they identifiable on the ground and will they help management or are they nebulous, leading to confusion both for visitors and managers? (I don't need an answer, just something for managers to consider.)

I am very supportive of continued 'No Fires' in the Wilderness Zone. Users 'browsing' for firewood at any intensity in this high elevation, slow growing ecosystem create negative impacts to vegetation, micro-habitats, and visuals. Additionally, care must be taken to prevent human-caused wildfires in this highly used and special location.

Up to 20 encounters with other parties/day in the Wilderness does not lend itself to solitude. As an advocate for, and frequent user of Wilderness I am unsettled by encountering more than 10 or 15 parties/day while I am in the Wilderness; 20 encounters/day borders on being a disturbingly high number. Under that scenario if I spend 5 or 6 hours in the Wilderness Zone on a day hike I could encounter 1 group every 15-20 minutes; hardly enough time to settle into 'outstanding opportunities for solitude' as dictated by the Wilderness Act. I would like to see permitted user numbers lower than those in the Proposed Action, perhaps as low as 40-50 users/day. The Blue Lakes and Blue Lakes Basin is a spectacular example of Wilderness and should be managed as the most pristine recreational setting possible. I believe a large portion of the Wilderness Zone should be managed as a primitive wilderness recreation setting (8B) and only a corridor along the trail and around Lower Blue Lake should be managed as a semi-primitive wilderness recreation setting (8C). 8B requires that encounters should be with less than 5 other parties/day. 8C allows for 5-20 encounters with other parties in a day. I would also like to see group size kept small in the Wilderness Zone; larger groups tend to create more noise and impacts to other users than smaller groups do. There are multiple reasons to manage for fewer people and fewer parties, not just ecological integrity and water quality; Wilderness is America's most 'pure' landscape and solitude is a required component of that landscape. Keep this place special and maintain it ecologically as well as experientially as a Wilderness with all the benefits that were intended with that designation.

Adaptive management appears to only provide for an increase in permitted numbers during the permitted season triggered by the number of daily group encounters (<20). However, adaptive management should also require a decrease in permitted numbers during the permitted season, which would be triggered by 'more than 20 group encounters/day'. (Maybe I missed that in the Draft EA but I looked a couple of times.)

The adaptive management thresholds for camping violations and human waste violations in the Wilderness Zone, as well as the Lower East Dallas and Blaine Basin Zones are incredibly tight. Two human waste violations found throughout an entire season? Signs of two camps not in designated sites in an entire season? Those may be excessively tight and seem likely to be violated, requiring changes to the number of groups/campsites/or closure to all camping. I'm fine with that since I'd prefer fewer people and groups and greater solitude in my wilderness travels, but it seems too tight regardless of me being happy to see reduced use in these Zones.

I'm supportive of requiring human waste, as well as dog waste, to be packed out using wag bags. If 'Adaptive Management Strategy 3' for human waste in the Wilderness Zone is reached I do not believe a pit toilet should be installed. A pit toilet just creates another problem down the road in an environment where a large mass of buried human waste won't just 'go away'. I would recommend that a toilet similar to what the Grand Canyon uses in numerous backcountry locations be utilized. These are essentially tanks with rigging built in for helicopter pickup. A privacy fence slides into mounts on 3 sides of the tank and lifts off prior to removal by helicopter. One helitack qualified person on the ground is needed. An empty tank is flown in, a full one is flown out. A couple of these at Lower Blue Lakes would solve numerous issues and could be flown in/out a few times/summer during lower use periods (mid-week). The helicopter would be a disturbance to the visitor for a few minutes. Something to consider if wag bags and a requirement to 'pack out your poop', doesn't solve the human waste issue.

I am very supportive of creating a hardened ford on East Dallas Ck just below Lower Blue Lake. Additionally, I am supportive of needed rehabilitation efforts both in the Wilderness Zone and Lower East Dallas Zone to restore ecosystem function, soil condition, water quality, and naturalness/pristine-ness.

Nowhere in the draft EA have I seen any indication of how horse use would be managed in the Wilderness Zone? Would horses be allowed? How would horse groups be permitted? A horse and rider spending two nights in the Wilderness have much more impact on the environment than a backpacker spending two nights does; horse use/numbers should be limited accordingly. I see that 'stock' is proposed to be restricted in the Mt Sneffels Zone but nowhere else is there any mention of how stock will be managed. This seems to be a significant oversight. Over the past 20 years horse use has become untenable with all the hiking/backpacking use on the Blue Lakes Trail but as the permit system significantly reduces the number of foot travelers horse use is likely to once again become viable. How will it be managed?

Regarding the need for freedom and spontaneity in Wilderness, I believe those qualities of Wilderness do not apply to anyone's 'pre-recreation' planning and logistical process. We all drive vehicles and are restricted the 'rules of the road' on the way to the Wilderness (that's the law). We can certainly log on to Recreation.gov weeks or months before our trip and work to obtain a permit and then plan our menus and equipment needs before the trip (that's the process, for any trip, wilderness or resort). I can really only expect my Wilderness experience, and subsequently my related 'freedom and spontaneity', to start when I put on my pack and start hiking, or perhaps in the case of the Blue Lakes Trail, when I actually enter the Wilderness 1.4 miles up the trail. Neither I, nor anyone else, can believe we are being trammeled before that point by a permit system or by our needed planning and logistical preparations! Trammel me all you want before I enter the Wilderness; just ensure that I have a high degree of solitude, a pristine environment, and freedom and spontaneity once I'm in the Wilderness.

Will a non-permitted hiker be allowed to hike the non-Wilderness portion of the Blue Lakes Trail for 1.4 miles to the Wilderness boundary? If so, what mechanism will be used to 'turn them around' at the Wilderness boundary?

Parking should be severely restricted/engineered at Blue Lakes Trailhead. Perhaps there should be a designated 'Blue Lakes Trail/Wilderness Zone Parking Area' for permit holders and another parking area for Blaine Basin/Dallas 200/non-Wilderness Zone users. This might help keep folks out of the Wilderness Zone who are not permitted.

Along Country Road 7 below the trailhead I am supportive of significantly reducing the number of dispersed sites while designating limited sites only in areas where impacts to soils, vegetation, and water resources/quality, will be minimal to non-existent. Another option that should seriously be considered is to build a formal campground with toilets/fire pits/picnic tables. This would allow large areas outside of a campground that are currently used and abused for dispersed camping to be rehabilitated and/or to recover naturally, providing improved ecological condition, more wildlife habitat, and improved water quality.

Yankee Boy Zone needs to have improved control of routes. There should be fewer routes, increased education of OHV users to stay on designated routes, and rehabilitation of excessive/unneeded routes. Most users accessing this area should consist of hikers using their vehicles to access the Mt Sneffels Trailhead or the Blue Lakes Pass Trail. Wrights Lake could have vehicle access eliminated and the loop road could be turned into a ½ mile hiking loop over relatively mild terrain with the lake as the destination (see attachment). This would also reduce the impact to hikers coming up the trail from the east who suddenly encounter vehicles along their trail after hiking for a significant distance. There is also no real good reason every Jeeper/UTVer needs to drive up to the Mt Sneffels Trailhead. That spur road could be signed as a 'Dead End, Vehicle Access for Hiking Parties Only'.

Thanks for the opportunity to comment.

Dan Huisjen, Retired BLM/USFS Fire Ecologist/Fuels Management Specialist