

**American Whitewater’s Summary of
BLM’s Colorado River Valley Field Office’s
draft Resource Management Plan
January 2012**

Table of Contents

Introduction	1
Wild and Scenic	2
Current Conditions (Chapter 3).....	2
Alternatives Summary (Chapter 2).....	3
Environmental Consequences (Chapter 4).....	4
Effects on Potential WSR Segments from Implementation of Other Resource Management Actions	5
Alternative A.....	5
Alternative B.....	5
Alternative C	6
Alternative D	7
Recreation and Visitor Services	7
Designated BLM Recreation Areas.....	7
Current Conditions – Boating.....	8
Environmental Consequences: Impact of Wild and Scenic Management on Recreation	8
Recreation Management Area Analysis.....	9
Upper Colorado River SRMA.....	9
Eagle River ERMA	10
New Castle ERMA	10
Thompson Creek.....	11
Deep Creek	11
Hack Lake	11
Other Special Designations	12
Wilderness Study Areas.....	12
Areas of Critical Environmental Concern	12

=====

I. Introduction

The [Colorado River Valley Field Office \(CRVFO\)](#) of the Bureau of Land Management (BLM) is currently seeking comments on their [draft Resource Management Plan \(dRMP\)](#). The Plan has far-reaching implications for the management of Off-Highway Vehicles, mineral and oil & gas development, grazing, timber, and recreation on Colorado’s rivers and public land. The dRMP is a very large document, and American Whitewater is providing this summary to allow you to more easily navigate the proposed management actions outlined in the Plan that affect river-based recreation and river health, including the iconic Upper Colorado River. See maps on pages [ES-2 and ES-3](#).

Since 2007, American Whitewater has been a key member of a group of stakeholders who have been involved in negotiations around the future management of the Colorado River. We have joined with water and conservation districts, utilities, counties, and other environmental and recreation organizations to find a collaborative

All dRMP documents can be accessed at:

**[http://www.blm.gov/co/st/en/BLM_Programs/land_use_planning/
rmp/kfo-gsfo/crv.html](http://www.blm.gov/co/st/en/BLM_Programs/land_use_planning/rmp/kfo-gsfo/crv.html)**

solution to meeting the growing needs and demands on the Colorado River. Implementation of our mutual agreement is part B2 of the Preferred Alternative (Alternative B).

The BLM's dRMP proposes four management plan alternatives – A, B, C, and D. Alternative A is the no action alternative, which would involve managing public lands and waterways as they are currently managed. Alternative B, which is the preferred alternative, attempts to find a balance between resource protection and resource use. Alternative C focuses more on resource protection, while Alternative D focuses on resource use. While the DRMP reviews a variety of key issues and impacts from numerous land and resource use activities¹, American Whitewater has created this guide to the dRMP with a specific focus on Recreation & Visitor Services and Special Designations, with an emphasis on Wild and Scenic River Designation, Areas of Critical Environmental Concern, and Recreation Management Areas.

The Environmental Consequences section (Chapter 4) of the dRMP alone is almost 800 pages. We hope this summary of the dRMP will help you navigate the dRMP and find the relevant sections you need to make substantive comments and make a difference for the future of flows in the Colorado and other important rivers within the CRVFO lands.

II. Wild and Scenic

BLM's goal for Wild and Scenic Rivers is to “manage suitable river segments and identify suitable segments for inclusion in the National Wild and Scenic Rivers System (NWSRS), protecting outstandingly remarkable resource values in accordance with the Wild and Scenic Rivers Act and BLM guidance” (p. 2-110).

Helpful tables in the dRMP include:

Table 2.2 (p 2-26): outlines/compares different alternatives; p. 2-110 is where the Wild and Scenic River comparisons start.

Table 3.4.3-1 (p. 3-193): Complete list of eligible segments, their lengths, classifications and ORV's in CRVFO.

Table 3.4.3-2 (p. 3-196): Complete list of eligible segments, their lengths, classifications and ORV's in White River National Forest.

Current Conditions (Chapter 3)

Currently there are 26 river segments being managed as eligible for inclusion in the NWSRS. These segments were identified in previous studies done in 1995, 2002 and 2007 (p. 3-191). In 2010, a Suitability Report was completed, and found that only four of the 26 segments were suitable for inclusion in the NWSRS – Colorado River Segments 6 and 7, and Deep Creek segments 2 and 3. The remaining segments were found to have too little land under BLM jurisdiction, with local governments expressing

¹ BLM examines 5 Key Issues (recreational demand and uses, special designations, energy development, wildlife, and sagebrush habitat and sagebrush dependent species); and 7 other issues (vegetation, travel management and transportation, lands and realty, wildland/urban interface, range health/upland management, water/riparian resources, and cultural resources.). They are explained on pages 2-9 to 2-13. Land use activities include vegetation management, soils management, forestry practices, livestock grazing management, etc...

disinterest in managing a Wild and Scenic River; could be adequately managed using other protective designations; or to only have one ORV which could be protected through other BLM management actions and protective designations (Appendix C, p. C-3). For a complete list of eligible segments, their lengths, classifications and ORV's, see Table 3.4.3-1 on pages 3-193 and 3-194 in Chapter 3 of the DRMP. See also "[CRVFO RMP WSR Eligible Rivers](#)" for an outline of why the segments were likely not Suitable.

Currently, there are no Wild and Scenic Rivers or Study Rivers within the CRVFO. There are 26 eligible segments, and river recreation in the area is increasing. Sustaining this activity requires certain streamflow levels, which currently are at risk as demand for additional water diversions increase. Additionally, as demand on surrounding lands for energy and mineral development increases, there is also an increased risk of water quality contamination (p. 3-192).

As these pressures increase, so does the potential for conflict. There has been disagreement on how to proceed among water rights holders, recreationists, environmental groups and local governments. Should the protection of these values come from Wild and Scenic designation or other land management prescriptions? What is the best way to manage flows to support ORV's? Would a federal reserved water right under the Wild and Scenic Rivers Act be most protective, or would using state-based instream flow rights and cooperative measures among water rights holders be better? These are questions for you to consider as you develop your comments to BLM. More information about these topics can be found in the RMP at pages 4-695 through 4-697.

Alternatives Summary (Chapter 2)

First, a note about Suitability vs. Eligibility. Within the area, there are currently 26 segments that are considered to be eligible for Wild and Scenic River designation. A suitability determination is the next step towards seeing these segments formally designated, and such a determination would be made through this dRMP process. While not a guarantee of official designation by Congress as a Wild and Scenic River, a river with suitability determination has a much greater chance of permanent federal protection than a river that is only eligible, and is a necessary step before Congress will formally designate a segment for inclusion in the NWSRS.

Under Alternative A, 26 stream segments (143 miles total, 88.1 miles on BLM) would remain eligible and managed under this interim protection to preserve the free-flowing nature, ORV's and tentative classification. (p. 2-15).

Alternative B is divided into Alternatives B1 and B2. Under Alternative B1, the BLM would find four river segments suitable for inclusion in the NWSRS, including two segments of Deep Creek (4.5 miles, all on BLM land) and two segments of the Colorado River between the CRVFO boundary near State Bridge and Glenwood Springs (61.1 miles total, 30.7 miles on BLM). "Under Alternative B2, the BLM would defer a determination of suitability for the Colorado River segments and would recommend adopting and implementing the Stakeholder Management Plan to protect the free-flowing nature, outstandingly remarkable values, and tentative classifications on the Colorado River segments." (p. 2-16). The Deep Creek segments would be determined suitable. All remaining 22 eligible Wild and Scenic River segments would be found to be not suitable for federal designation and removed from further consideration.

Under Alternative C, all 26 stream segments currently eligible (143 miles total, 88.1 miles on BLM) would be found suitable for inclusion in the NWSRS. This total includes 13 eligible segments in the Roan Plateau planning area. (p. 2-17).

Under Alternative D all segments currently eligible for Wild and Scenic designation would be found not suitable for congressional designation and removed from further consideration for inclusion in the NWSRS. (p. 2-18).

Environmental Consequences (Chapter 4)

The Environmental Consequences of each Alternative on key and other issues are outlined in Chapter 4. Potential impacts of other management actions in the DRMP on Wild and Scenic Rivers are discussed in Section 4.4.3 on pages 4-694 to 4-731.

Specific river protection elements² in each option (not suitable, eligible, suitable, stakeholder group, designation by Congress) are compared in table 4.4.3-1. "Wild and Scenic Rivers Analysis Framework" on pages 4-700 through 4-708.

Protections available for rivers include various levels under the Wild and Scenic Rivers Act and numerous other unrelated BLM land management actions. Under the WSRA, an eligibility or suitability determination obligates an agency to manage segments to protect the free-flowing nature, ORV's and tentative classification. Formal designation by Congress affords a river segment permanent protection and requires the agency to develop a formal Resource Management Plan. (p. 4-695 to p. 4-696). Protections outside of the Wild and Scenic Rivers Act involve no surface occupancy or surface disturbing activities (NSO) and controlled surface use (CSU) stipulations. These protections can protect ORV's, but can also be changed at any time.

Numerous ORV's depend on the protection of flows. The Forest Service and BLM do not have comprehensive authority to manage flows on eligible, suitable or designated segments. Instead, the state government oversees flow rates and administers existing water rights on these segments. Under Federal Lands Protection Management Act (FLPMA), BLM and USFS can influence flow rates by denying applications for new facilities or modification of existing facilities, or attaching terms and conditions to an authorization for the purpose of protecting flow rates. Additionally, the WSRA creates a federal reserved water right with a priority date equal to date of

² The full list: Data collection on characteristics, quality and extent of ORV's; Data collection to monitor any impairment of ORV's; Monitoring of overall plan effectiveness in protecting river corridors and ORV's; Flow protection: how quickly can it be implemented?; Flow protection: how permanent is the mechanism?; Flow protection: how effective is the mechanism? Can the protection mechanism cooperatively address existing and future flow-related problems?; Protection of water quality to support ORV's, including temperature; Response to water project that could affect ORV's and classification; Response to other land-based river corridor projects that could affect ORV's and classification (bridges, roads, power lines, etc...); Integration of protection with other ongoing resource management programs; Ability to implement adaptive management as conditions change; Financial, personnel, and other resources available to maintain and enhance ORV's; Uses on private lands within river corridor that could affect quality of ORV's classification and stream flows; Projects on private lands that could affect ORV's, classification and stream flows (stream diversions, riprapping stream banks, etc...)

designation. BLM and USFS can quantify the flow rate needed to support the ORV's and seek adjudication. (p. 4-697).

For more information on the Stakeholder Management plan and its analysis, assumptions, and information about oversight, see p. 4-697 to 4-699.

Effects on Potential WSR Segments from Implementation of Other Resource Management Actions

Alternative A (p. 4-709 to 4-715):

Continue to manage 26 segments as eligible, protecting the free-flowing nature, ORV's and tentative classification as wild, scenic or recreational. ORV's would be protected by NSO and CSU stipulations related to management of soils, vegetation, fisheries and aquatic wildlife, special status species, cave and karst resources; and by other protections present in the management of vegetation, water resources, wildlife, visual resources, Areas of Critical Environmental Concern and Wilderness and Wilderness Study Areas. The long-term impact of the management of cultural resources would be negligible. From a Recreation and Visitor Services management standpoint, Deep Creek would be closed to camping. ORV's on the Colorado River, Eagle River and Deep Creek would be protected from noise due to a firearm prohibition. NSO stipulations through the Upper Colorado and Deep Creek SRMAs would protect the recreational ORV's of the Colorado River and Deep Creek. Further, 1,560 acres would be off limits to coal leasing, which would protect portions of the CO River, Hack Creek, Deep Creek and Thompson Creek. ORV's on portions of the Colorado River and Hack Creek would be protected by a prohibition on fluid minerals leasing, although potential geothermal resources on Mitchell Creek and the Colorado River could bring development to the area. ORV's are not expected to be impacted. Additionally, Deep Creek, Thompson Creek, a portion of Hack Creek and the Colorado River will be recommended for withdrawal for locatable minerals (p. 4-713).

Livestock grazing would continue to be allowed in all eligible river corridors, however impacts to ORV's would likely be minimal. Certain rangeland improvements may be incompatible with some scenic ORV's. Off-Highway Vehicle use could impact ORV's and eligible classifications, however use would remain prohibited on Hack Creek, Deep Creek, Thompson Creek, and on portions of the Colorado River. All other areas would be vulnerable to the impacts. Wind energy development could impact Hack Creek, Thompson Creek and Deep Creek (p. 4-712).

Alternative B (Preferred Alternative) p. 4-715 to 4-721

Alternative B1: 4 of the 26 segments currently eligible would be found to be Suitable for Wild and Scenic classification – Upper Colorado Segments 6 and 7, and Deep Creek Segments 2 and 3. Management would be similar to today, but the awareness of these segments would be elevated, and Congressional designation would become more likely. The remaining 22 segments would be determined to be not suitable, but would still receive protection from other management resource measures. Soils, weed, wildlife, livestock, fluid minerals, wilderness/ WSA's would be similar or the same as Alternative A.

Impacts to the segments would be similar to those outlined under Alternative A, however additional impacts are described throughout the section. Overall, they are more protective than Alternative A for both Suitable and non-Suitable segments, including protections from management of water resources (p. 4-716), riparian vegetation management³, fisheries and aquatic wildlife (except some protection on Roan Plateau and Hack Creek), wildlife, (p. 4-717), special status species (plants and terrestrial wildlife), cultural resources, visual resources, forestry resources, recreation and visitor services⁴ (p. 4-718), some restrictions on fluid minerals (p. 4-719) and locatable minerals, Areas of Critical Environmental Concern (p. 4-720). Some segments found not Suitable, however, will likely have increased adverse impacts resulting from management of cave and karst resources (p. 4-718), reduced OHV closures in Thompson Creek, lands and realty (development impacts are likely, although other resource protections could add indirect protections), fluid minerals leasing (protections would still be in place, but would not be as protective as if they were deemed Suitable) (p. 4-719), and locatable and salable minerals along certain non-Suitable stretches could adversely impact ORV's (p. 4-720).

Alternative B2 (p. 4-722 to 4-723): The management impacts are identical to Alternative B1, with the exception of Wild and Scenic River management actions. 22 segments would be determined to be not Suitable, Deep Creek would be determined as Suitable, and the Suitability of the Colorado River would be deferred. The river's eligible status would be maintained and the river would be managed under a Stakeholder Plan, which was designed to provide sufficient flow rates to support ORV's using a cooperative and voluntary approach. The Plan would recommend that the CO Water Control Board appropriate instream flow water rights for CO River segments 4 through 7 (only segments 6 and 7 are addressed in this DRMP. Segments 4 and 5 are addressed in the Kremmling Field Office's DRMP). This approach is likely more protective in the long term for ORV's, and is the Alternative that American Whitewater supports.

Alternative C (p. 4-724 to 4-727):

Alternative C is identical to Alternative B1 for the Deep Creek and Colorado River segments. The protections described in Alternatives A and B also apply, as do additional special management designations not related to WSR suitability. Impacts to WSRs from weed management, wildlife management, livestock grazing management, fluid minerals management, and WSAs management, would be the same as or similar to those under Alternative A. Impacts from management of other resources and uses would be the same as or similar to those under Alternative B, except as described below.

Under Alternative C, all 26 segments currently managed as eligible for Wild and Scenic designation would be found Suitable, and managed as such until the DRMP is revised or Congress formally includes them in the National Wild and Scenic Rivers Program. See again Table 4.4.3-1 on pages 4-700 to 4-708.

Generally, impacts from other resource management actions are more protective of ORV's under Alternative C, including management from fisheries and aquatic wildlife,

³ Note, however, that some riparian vegetation management actions may restrict some recreation activities.

⁴ Note again that some CSU restrictions at recreation sites may harm certain recreational ORV's.

Areas of Critical Environmental Concern, visual resources, lands with wilderness characteristics, cave and karst resources, forestry resources, recreation and visitor services, lands and realty, and restrictions on leasing/extracting fluid minerals (p. 4-726) and locatable minerals, (p. 4-727).

Alternative D (p. 4-727 to 4-731)

All 26 segments would be found not Suitable for inclusion in the NWSRS and would be released from further consideration for the system. BLM would no longer manage to protect the free-flowing nature, ORV's and tentative classifications on 26 segments of currently eligible for WSR designation. Other measures may include other protections, but they would not be as protective. As a result, long-term adverse impacts on these 26 segments are likely. Impacts under Alternative D to the currently eligible segments from weed management, wildlife management, livestock grazing management, coal management, wilderness and Wilderness Study Areas would be the same as or similar to those under Alternative A. Impacts from management of other resources and uses would be the same as or similar to those under Alternative B. This Alternative is the least protective of ORV's, and information about the impacts that are different from Alternatives A and B can be seen on the pages outlined above.

III. Recreation and Visitor Services

BLM's goal for Recreation and Visitor Services is to "produce a diversity of quality recreational opportunities that support outdoor-oriented lifestyles and add to participants' quality of life while contributing to the local economies" (p. 2-74). Recreation use on BLM lands in CO is increasing, and will continue to, increasing the possibility for conflict between uses. Currently, the BLM's objective regarding Recreation and Visitor Services is to ensure the continued availability of outdoor recreation opportunities, to reduce the impacts of recreational use on fragile and unique resource values, and provide for visitor safety. The WRNF is the main outdoor recreation provider in the area. Others include the State Parks, Wildlife areas, City parks etc... (p. 3-143).

Designated BLM Recreation Areas

The BLM manages two types of Recreation Management Areas. "Special Recreation Management Areas" (SMRA's) and "Extensive Recreation Management Areas" (ERMA's). SMRA's are administrative units where the existing or proposed recreation opportunities and recreation setting characteristics are recognized for their unique value, importance and/or distinctiveness, especially as compared to other areas used for recreation. EMRA's are administrative units that require specific management consideration in order to address recreation use, demand, or R&VS program investments. Designation depends on demand and issues, recreation setting characteristics, resolving use/user conflicts, compatibility with other resource uses, and resource protection needs. Undesignated lands are where recreation is not emphasized, but management actions may be necessary (p. 3-145).

For a comparative list of the SMRA/ERMA possibilities under each alternative, see Table 4.4.3-1 - Summary of Existing and Proposed Recreation Management Areas by Alternative p. 4-475.

Current Conditions – Boating

River Recreation Management is described on p. 3-146 to 3-147. Activities include floatboating (rafting, kayaking, canoeing), fishing, camping, picnicking, sightseeing, photography, hiking, wildlife viewing. “From Glenwood Canyon to Parachute on the Colorado River, the CRVFO only manages a few parcels of land along the river, with the South Canyon Boat Launch being the most prominent for river access.” State Bridge to Glenwood Canyon sees light use – mainly day use activities. Solitude and primitive camping is limited. Challenging whitewater discourages casual floaters, and this stretch sees 5-10% of the use of Colorado above State Bridge. Existing facilities currently meet recreation demand.

On the Eagle River, there are a handful of BLM managed sites, which see moderate use during 6-8 week whitewater season and light use rest of the year. Use is expected to increase because of its proximity to I-70. Currently the area is used by travelers and local residents as “urban-type” parks, and current facilities are not designed for this type of use. As a result, additional infrastructure is needed.

The BLM also manages one small parcel on the Roaring Fork River. The Right of Way is managed by CDOT and is used by public and local outfitters/guides for river access. BLM also manages several developed recreation sites along the Eagle and Roaring Fork Rivers (p. 3-147).

Overall, there are 19 day-use sites, all of which provide river access and 10 with boat launches. There are 5 developed campgrounds with 36 total sites. Most are used seasonally, except for year-round Gypsum campground. Two collect fees. 75 Special Recreation Permits are administered each year, with 36 issued each year for river recreation. Infrastructure and staffing limitations have resulted in BLM not issuing additional SRP’s (p. 3-148).

Environmental Consequences: Impacts of Management Decisions on Recreation and Visitor Services. Special Designations (p. 4-471 to 4-518) - Impact of Wild and Scenic Management on Recreation

According to the dRMP, the impact of the management of Wild and Scenic River Segments on recreation would be minimal under all alternatives. Under Alternative A, segments of the Colorado River would continue to be managed as part of the Upper Colorado River SRMA, and other segments would be the same because they’ve already been found to be eligible (p. 4-485). Under Alternative B, management in the short term would not change, however formal designation could affect some forms of recreation if the river is classified as Wild or Scenic. Alternative B2 may “better support a wide range of recreational uses b/c the water stakeholders would attempt to operate their facilities in a manner that meets water supply objectives and recreation ORV’s within the Upper Colorado River SRMA.” With no stakeholder plan, water flows would be subject to a water rights system, which may allow flows to gradually recede (p. 4-491). Alternative C would be more protective of recreation because 26 segments would be found Suitable (p. 4-494). According to the dRMP, Alternative D would have no impact to recreation and visitor services because no segments would be eligible or suitable (p. 4-496).

Protections in RMA's which may protect certain ORV's

The Glenwood Springs Resource Area – Oil & Gas Leasing & Development – Record of Decision and DRMP Plan Amendment (BLM 1999b) identified stipulations to protect recreation values and areas (3-147). Table 3.3.3-2 on p. 3-148 outlines them. Through this Plan Amendment, NSO stipulations⁵ are on Major River Corridors for protection of recreation values for Colorado, Roaring Fork, Frying Pan, Eagle, and Piney Rivers to protect recreation values. Recreation Management Areas under this plan also protect non-motorized recreation opportunities at King Mountain/King Creek area, Siloam Springs area, Castle Peak area, Bull Gulch area (the portion of the Bull Gulch WSA not within the Bull Gulch SMRA), Sunlight Peak area, Fisher Creek area (Haff Ranch), and Pisgah Mountain area.

Recreation Management Area Analysis: p. 4-496 to 4-515

While there are numerous RMA's being considered in the DRMP, only a few relate to boating interests. These include the Upper Colorado SMRA, Eagle River ERMA, New Castle ERMA, Thompson Creek SRMA, Deep Creek SRMA, and Hack Lake SMRA/ERMA.

1. Upper Colorado River SRMA (State Bridge to Glenwood Canyon) p. 4-514 to 4-515 and Appendix K p. 65-72.

All Alternatives maintain the CO River corridor as a SRMA, supporting floatboating and related activities as targeted activities. Current management provides facilities and permits, but does not regulate commercial and private use. Under the Action Alternatives, floatboating and fishing would be recognized as a use from State Bridge to Burns (RMZ 1), and floatboating and tubing as a use from Burns to Glenwood Canyon (RMZ 2) (Chapter 4).

The plan proposes to retain the current level of remoteness and cause little change to characteristic of natural landscape. Numerous management actions would accomplish this (NSO/CSU stipulations, non-motorized travel designations, closure to timber harvest, ROW avoidance of recreation sites, precluding mining development, etc...) (Chapter 4).

BLM will have a moderate to high presence at developed recreation sites on the Colorado River. Restrictions on firearm use, forestry, minerals leasing, materials disposal, etc... and NSO and CSU restrictions will help to maintain the natural character of the area (some only apply to Alternatives B and C – some surface-disturbing activities would be allowed under Alternatives A and D (see Chapter 4)). Camping restrictions will limit human disturbances (14-day limit from Sept 1 to March 31; 7-day limit from April 1 to August 31. Campers must relocate at least a 30-mile radius away and not return within 30 days to a previous campsite.) (Appendix K)

Under Alternatives B and C, expansion of visitor facilities (restrooms, boat ramps) may occur but new recreation developments will be rare. Under Alternative D, existing facilities will be expanded (boat ramps, restrooms), and new recreation

⁵ The DRMP is unclear about what the NSO restrictions on the major river corridors are.

developments would be constructed to accommodate more private and commercial use. This would spread out river traffic and create different length of times for commercial float trips. Proposed Social Recreation Setting Characteristics are to have visitors have an average of 10 encounters of other people per day in RMZ 1 (State Bridge to Burns) and 15 encounters per day in RMZ 2 (Burns to Glenwood Canyon). (Appendix K)

Floatboating group sizes would be limited to 15 people, including guides, in RMZ 1 (State Bridge to Burns) and 25 people in RMZ 2 (Burns to Glenwood Canyon). Alternatives B and C propose to not allow any new river related SRPs. Under Alternative D, group sizes would be limited to 25 people per group in both RMZs initially. No action alternative proposes a permit system currently. One would only be implemented if there was too much contact between groups (Chapter 4). Under Alternative D, new river-related SRPs will be issued, provided that a) the recreation objectives are being achieved and b) land health standards are being achieved and c) use conflicts are minimal. User fees may be charged for standard or expanded recreation sites and services (Appendix K).

2. Eagle River ERMA p. 4-501 to 4-502 and Appendix K p. 77-79 unless otherwise noted

Under Alternative A, the Eagle River corridor would continue to be part of the Glenwood Springs ERMA. Current river-related uses would continue (moderate use during the 6-8 week whitewater season - p. 3-147), as would a moratorium on commercial river-related Special Recreation Permits (SRP's). Under Alternatives B, C, and D the Eagle River Corridor would be designated as an ERMA. Certain recreation activities may be subject to finding Eagle River eligible for inclusion into the NWSRS (Chapter 4).

BLM's objective for the Eagle River ERMA is to maintain existing facilities and access and provide information to support participation in float-boating, fishing and day use activities on the remaining undeveloped riverfront parcels in the otherwise urban landscape. A NSO stipulation for major rivers (1/2 mile on both sides) and ROW avoidance would provide protection of resource values, as would restrictions on travel, trail activity and parking (Appendix K). Under Alternatives B and C, overnight camping would be prohibited. Under Alternative D, camping would only be allowed in designated campgrounds. Under Alternative C, recreation would be subject to finding the Eagle River suitable for inclusion in the NWSRS. Alternatives B and C will not allow new Special Recreation Permits, while Alternative D would (Chapter 4).

Under Alternatives B and C, no new river-related SRPs will be issued, and new activities will have to comply with the SRP Handbook and undergo an approval process. For Alternative D only, river-related SRPs would be issued if monitoring shows land health standards are met and use conflicts are minimal. Commercial and private groups will be limited to 25 people per group (including guides) under Alternative C only (Appendix K).

3. New Castle ERMA p. 4-508 unless otherwise noted

The New Castle area is currently part of the Glenwood Springs ERMA. Alternatives B, C, and D would designate the area as a separate ERMA. Under Alternative A, actions would continue to maintain the undeveloped Garfield Creek

Colorado River access recreation site. Alternatives B, C, and D would support and sustain these existing recreation activities. They would afford additional land use protections, although they would be stronger in Alternatives B and C than in Alternative D. According to pages 92 through 94 of Appendix K, these management actions include a prohibition of camping/overnight use outside of designated areas on BLM lands surrounding the Garfield Creek access to the Colorado River. Camping restrictions will apply in these areas (14-day limit Sept 1 to March 31, 7 day limit April 1 to August 31, 30 mile radius in 30 days). Certain restrictions on firearm use and NSOs/CSU's will minerals leasing will be implemented. SRPs would be issued as a discretionary action for a wide variety of uses, but would not include vending permits outside of special events or downhill biking shuttles or events.

4. Thompson Creek p. 4-512 to 4-513

Includes river segment eligible for inclusion in NWSRS.

Emphasized activities in the SRMA/ERMA would vary by alternative.

Alternative A: maintains the current SRMA designation.

Alternatives B and C: ERMA designation, managed to sustain principle recreation activities (hiking, hunting, horseback riding and camping). Under Alternative C, recreation would be subject to management of an Area with Wilderness Characteristics (primitive and unconfined recreation opportunities) and finding Thompson Creek Suitable for inclusion in the NWSRS.

Alternative D: maintains the SMRA designation while recognizing and expanding existing recreation opportunities with an emphasis on mountain biking in RMZ 3.

Climbing issues are outlined on p. 4-513. Appendix K (p. 55-64) describes activities in RMZs 1-3 for Alternative D. None include mention of boating.

5. Deep Creek 4-500 to 4-501

Includes river segment eligible for inclusion in NWSRS. SRMA would only be maintained under Alternative A. All other alternatives do not have a BLM recreation designation because the SRMA overlies an ACEC, which would be maintained under Alternatives A, B, and C. The change would only be administrative, and visitor use and experience on the ground would not change.

6. Hack Lake 4-504 to 4-505

Includes river segment eligible for inclusion in NWSRS. P. 4-485 indicates that floatboating is a use being managed in this SMRA, but this is not reflected elsewhere.

Alternative A: maintains current designation of Hack Lake SRMA, which emphasizes non-motorized activities.

Alternative B: manage area as a SMRA, recognizing existing recreation opportunities, including hiking, hunting, horseback riding and camping. Recreation values would be protected through NSO/CSU stipulations, VRM class designations, ROW avoidance area identification, and closure to mineral materials sales, wood cutting, commercial timber management, nonenergy solid mineral leasing, and travel designations).

Alternatives C and D: manage area as ERMA, recognizing existing and anticipated use and demand, with recreation being influenced by finding Hack Creek as

Suitable for inclusion in the NWSRS under Alternative C.

Appendix K (p. 35 to 38) describes activities in the Hack Lake SRMA for Alternative B. Boating is not mentioned.

IV. Other Special Designations

Wilderness Study Areas 3-186 to 3-190:

Under all alternatives, the 4 existing Wilderness Study Areas would be maintained (p 2-15, 2-17, 2-18). These areas are Bull Gulch, Castle Peak, Eagle Mountain and Hack Lake. Floatboating is a current use of the Bull Gulch WSA, which is located 10 miles northwest of Eagle. All of the natural values, current uses and management prescriptions of each WSA can be viewed in Table 3.4.2-2 on p. 3-188 to 3-189.

Areas of Critical Environmental Concern p 3-183 to 3-185:

An Area of Critical Environmental Concern (ACEC) is defined in the Federal Lands Protection Management Act as an area “within the BLM lands where special management attention is required to protect and prevent irreparable damage to important historical, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards” (p. 3-183). BLM’s objective is to “designate ACEC’s where special management is needed to protect important geologic, botanic, historic, cultural, and scenic values, fish and wildlife resources, or other natural systems (rare or exemplary), or to protect human life and property from natural hazards” (p. 2-96).

ACEC’s may protect certain ORV’s on river segments that are currently eligible for inclusion in the NWSRS, and may continue to protect them if they are found not Suitable for inclusion in the NWSRS. Note, however, these protections can be changed in a dRMP revision in the future.

Currently there are 6 ACEC’s managed by the CRVFO. They are Blue Hill, Bull Gulch, Deep Creek, Glenwood Springs Debris Flow Hazard Zone, Lower Colorado River, and Thompson Creek (see p. 3-183 for associated values).

Under Alternative A, 6 Areas of Critical Environmental Concern (ACEC’s) would continue to be managed (27,700 acres) (p. 2-15). Under Alternative B, 9 ACEC’s would be designated (p. 2-16). 16 ACEC’s (65,800 acres) would be designated under Alternative C (p. 2-17), and 3 ACEC’s would be designated under Alternative D (p. 2-18).

Comparative summaries of each alternative for the ACEC’s are included below, and are drawn from Table 2.2 in Chapter 2 on pages 2-96 through 2-109, which you may also want to take a look at. While it’s likely that all ACEC’s would provide some direct or indirect protection for the rivers within the CRVFO, only those in close proximity to a river are listed. While some ACEC’s would only be designated under certain alternatives, we suggest you consider supporting ACEC’s that protect riparian values in your comments regardless of the alternative. Note that geographic descriptions provided below may not be accurate, as they were taken from comparing [Figure 2-65](#) (Alternative C: Segments Suitable for Inclusion in the NWSRS) and Figures 3.3-1 through 3.3-3 (Glenwood Spring

Field Office Eligible Segments, Maps 1 through 3 in the [2007 Final Wild and Scenic River Eligibility Report](#)) to Figures [2-59](#), [2-60](#), [2-61](#) and [2-62](#) (Special Designations, Alternatives A through D).

Abrams Creek (p. 2-97 to 2-98)

(Eligible as a WSR, suitable only under Alternative C for fish)

Alternative A: No ACEC designation

Alternative B: No ACEC designation

Alternative C: Designate Abrams Creek ACEC (190 acres) to protect a genetically pure population of native, wild, naturally reproducing Colorado River cutthroat trout. NSO, VRM, and travel restrictions.

Alternative D: No ACEC designation

Blue Hill (p. 2-98)

(Adjacent to the Upper Colorado River)

Alternative A: Designate ACEC (3,700 acres) to protect significant historic and cultural values and natural hazards. 100 meter buffer around cultural sites, VRM, travel restrictions, ROW avoidance.

Alternatives B, C, D: Designated ACEC (3,700 acres) to protect significant historic and cultural values and natural hazards. Close to leasing fluid minerals, NSO, VRM, ROW exclusion, no increase in motorized routes, travel restrictions, vegetation treatment restrictions

Bull Gulch (p. 2-98)

(Adjacent to Upper Colorado River)

All Alternatives: Designate ACEC (10,400 acres) to protect scenic qualities, sub-occurrences of the Harrington's penstemon and maintain natural landscape adjacent to the Colorado River. Close to leasing fluid minerals, NSO, VRM, ROW exclusion area, closed to unauthorized travel (the degree of these restrictions depends on the alternative).

Colorado River Seeps (p. 2-99)

(Adjacent to Upper Colorado River)

Alternative A: No ACEC designation

Alternative B: No ACEC designation

Alternative C: Designate ACEC (470 acres) to protect to significant plant communities. NSO, ROW avoidance, prohibit increase in motorized routes.

Alternative D: No ACEC designation

Deep Creek (p. 2-99 to 2-100)

(Deep Creek is Suitable for inclusion in NWSRS under Alternatives B and C.)

Alternative A: Designate ACEC (2,400 acres) to protect scenic (outstanding landforms, water features and vegetation) and geologic values (faults and unusual erosion formations, cave and karst resources). NSO, ROW exclusion, travel restrictions, recommend withdrawal from mineral location.

Alternatives B and C: Designate ACEC (2,400 acres). Protective measures same as Alternative A, plus close to leasing fluid minerals, additional NSO and travel restrictions, and vegetation management only for benefit of important values.

Alternative D: No ACEC designation

Dotsero Crater (p. 2-100)

(Less than 2 miles from Colorado and Eagle Rivers)

Alternative A: No ACEC designation

Alternatives B and C: Designate ACEC (100 acres) to protect the geologic values related to the youngest volcanic event in Colorado. NSO, VRM, ROW exclusion, travel restrictions.

Alternative D: No ACEC designation

Glenwood Springs Debris Flow Hazard Zones (p. 2-100)

(Encompasses Mitchell Creek, eligible for inclusion in the NWSRS for fish, Suitable only under Alternative C)

All Alternatives: Designate ACEC (6,100 acres) to ensure public safety from mass wasting processes, and protect a genetically pure population of native, wild, naturally reproducing Colorado River cutthroat trout. VERM, ROW avoidance area, prohibit increase in motorized routes, allow prescribed burning. Other use and travel restrictions vary by alternative.

Grand Hogback (p. 2-101)

(No WSR eligible segments, but would likely include parts of Elk Creek, Rifle Creek and Government Creek, which are tributaries of the Colorado.)

Alternatives A, B, and D: No ACEC designation

Alternative C: Designate ACEC (14,000 acres) to protect scenic, geologic and cultural values. NSO, VRM, ROW avoidance, unavailable for coal leasing, prohibit increase in motorized routes, allow prescribed burns.

Hardscrabble-Mayer Gulch (p. 2-103)

(Adjacent to Brush Creek, within 3 miles of Abrams Creek (tributary of Brush Creek and eligible for inclusion in NWSRS for fish) and other Brush Creek tributaries, which is a tributary of the Roaring Fork River.)

Alternative A: No ACEC designation

Alternative B: Designate ACEC (3,400 acres) to protect the BLM sensitive plant species Harrington's penstemon. NSO, VRM, ROW avoidance, prohibit net increase of motorized routes, other travel restrictions, prescribed burns allowed.

Alternative C: Designate ACEC (4,200 acres) to protect the BLM sensitive plant species Harrington's penstemon. Management actions similar to Alternative B, plus additional surface occupancy and disturbing activities restrictions (200 meter buffer around current or historically occupied habitat), VRM.

Alternative D: No ACEC designation

Lower Colorado (p. 2-104)

Alternative A: Designated ACEC (130) acres to protect riparian and wildlife habitat values. VRM, ROW avoidance area.

Alternatives B, C, and D: No ACEC designation

Lyons Gulch (p. 2-104)

(Adjacent to part of Sweetwater Creek, a tributary of the Colorado River, and within 3 miles of Colorado River)

Alternative A: No ACEC designation

Alternatives B and C: Designate ACEC (480 acres) to protect BLM sensitive species Harrington's penstemon. NSO (degree varies by alternative), no net increase in motorized routes, prescribed burns allowed.

Alternative D: No ACEC designation

McCoy Fan Delta (p. 2-104 to 2-105)

(Adjacent to Colorado River)

Alternatives A and B: No ACEC designation

Alternative C: Designate ACEC (220 acres) to protect geologic values. NSO, VRM, ROW avoidance, prescribed burns allowed, close to fossil collection

Alternative D: No ACEC designation

Sheep Creek Uplands (p. 2-106 to 2-107)

(Adjacent to Hack Creek (eligible for inclusion for NWSRS for historic value) and Sweetwater Creek, which is a tributary of the Colorado River.)

Alternative A: No ACEC designation

Alternatives B and C: Designate ACEC (4,500 acres) to protect Harrington's penstemon. NSO, VRM, ROW avoidance area, no net increase on motorized routes, travel restrictions, prescribed burns allowed if will maintain or enhance relevant and important values.

Alternative D: No ACEC designation

Thompson Creek (p. 2-108 to p. 2-109)

(Thompson Creek is eligible for inclusion in the NWSRS.)

Alternative A: Designate ACEC (4,300 acres) to protect scenic, geologic, historic and ecological values. Close to fluid minerals, NSO, VRM, ROW exclusion, travel restrictions, recommend withdrawal from mineral location.

Alternatives B and C: Same as alternative A, plus more extensive closures to fluid mineral, additional NSO, VRM, travel restrictions. Prohibit installation of bolts on important geologic features, allow vegetation treatment only if maintain or enhance relevant and important values.

Alternative D: No ACEC designation

The impacts of other management actions (including WSR and Recreation and Visitor Services) on each of the ACEC's, can be found in Chapter 4 in Section 4.4.1 on pages 4-607 to 4-687.