

**American Whitewater’s Guide to the
BLM’s Colorado River Valley Field Office’s
draft Resource Management Plan
January 2012**

Table of Contents

Introduction	1
Wild and Scenic	2
About Suitability	3
The Alternatives and Wild and Scenic Rivers	3
The Impact of Wild and Scenic Management on Recreation	5
Recreation and Visitor Services	5
Current Recreation Management	6
Recreation Management on BLM Lands	6
The Alternatives and Recreation Management Areas	7
Upper Colorado River SRMA	7
New Castle ERMA	9
Eagle River ERMA	9
Other Special Designations	9
Wilderness Study Areas	9
Areas of Critical Environmental Concern	10

I. Introduction

The [Colorado River Valley Field Office \(CRVFO\)](http://www.blm.gov/co/st/en/BLM_Programs/land_use_planning/rmp/kfo-gsfo/crv.html) of the Bureau of Land Management (BLM) is currently seeking comment 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, recreation, and much more on Colorado’s rivers and public lands. The draft RMP is a *very* large document, and American Whitewater is providing this guide to help you digest the proposed management actions outlined in the Plan that affect river-based recreation and river health, including flows on the iconic Upper Colorado River. (See maps on pages [ES-2 and ES-3](#)). American Whitewater has also put together a more comprehensive summary of issues relevant in the dRMP, “[CRVFO RMP Summary](#)” for those of you who may want more detail than this guide provides. **The Chapters, Tables and Figures within the dRMP mentioned throughout this document can all be found on the [CRVFO dRMP webpage](#):** http://www.blm.gov/co/st/en/BLM_Programs/land_use_planning/rmp/kfo-gsfo/crv.html.

The BLM’s dRMP proposes four management plan alternatives – A, B, C, and D.

- Alternative A: No action alternative, meaning public lands and waterways would continue to be managed as they currently are.
- Alternative B: The BLM’s preferred alternative, which attempts to find a balance between resource protection and resource use.
- Alternative C: Focuses more on resource protection.
- Alternative D: Focuses on resource use.

Alternative B is divided into two possible alternatives - B1 and B2, which are described more below. American Whitewater supports Alternative B2 because we believe that it is the Alternative that is the most protective of flows in the Colorado River.

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 RMP with a specific focus on how the four alternatives will impact the following special designations:

- Wild and Scenic Rivers (WSR's): Congressional designation which protects the outstandingly remarkable values and free-flowing nature of rivers.
- Wilderness Study Areas (WSA's): Agency designation which preserves the wilderness values of an area. These areas preserve “a representative sample of ecosystems in a natural condition for the benefit of future generations” (p. 3-186). May lead to Congressional designation as a Wilderness Area.
- Areas of Critical Environmental Concern (ACEC's): BLM designation for 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).
- Special Recreation Management Areas (SRMA's): BLM designation 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” (p. 3-146)
- Extensive Recreation Management Areas (ERMA's): BLM designation for areas “that require specific management consideration in order to address recreation use, demand or [Recreation and Visitor Service] program investments” (p. 3-146).

We hope this guide will help you navigate the dRMP and find the relevant sections you need to make substantive comments to the BLM and make a difference for the future of flows in the Colorado and other important rivers within the CRVFO lands.

II. Wild and Scenic

Of main concern to those who love rivers is how the dRMP will decide the fate of 26 river segments in the CRVFO region (see Figures [2-64: Alternative B: Segments Suitable for Inclusion in the NWSRS](#) and [2-65: Alternative C Segments Suitable for Inclusion in the NWSRS](#)). These segments are currently eligible for inclusion in the National Wild and Scenic Rivers System (NWSRS) for their Outstandingly Remarkable Values, or “ORVs.” Whitewater Boating is one of the primary flow-dependent ORVs in the CRVFO area, and interest in this and other related activities is increasing. One of the key issues facing river managers is how to sustain whitewater boating activities. These activities require certain flow levels, and these levels currently are at risk as demand for additional water supplies increase along Colorado’s eastern Slope and as the Windy Gap and Moffat Projects come closer to being a reality. 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).

¹ For a complete list of the issues BLM examines, see pages 2-9 to 2-13.

The Upper Colorado River is the largest supplemental source of water for the cities of Denver, Aurora, Colorado Springs, and eastern Colorado towns and farms. Currently, water agencies that provide and manage water supplies for these communities hold significant legal rights to take more water out of the Colorado River, even though these rights are not currently exercised. In essence, under current water rights structures, in the future the Colorado River will not likely flow at the same levels that it does today. Under Colorado's Water Laws, these existing rights are recognized as senior to any potential water rights in the future, meaning they have priority over even those intended to protect recreation or the environment. This is true even of a federal water right established in conjunction with a Wild and Scenic River designation by Congress. This means that even if the River was added to the Wild and Scenic River Inventory, there could be no water left in the river to protect after all senior rights were met. And so, while a Wild and Scenic designation has been a key method of protecting rivers across the country, it unfortunately may not be the most protective management option for the Upper Colorado River.

As you consider the implications of management decisions on *all* of the eligible Wild and Scenic River segments, we suggest you look at the following:

- [American Whitewater's Toolkit on Wild and Scenic Rivers](#).
- Table 2.2 in Chapter 2 on pages 2-110 to 2-115. This table compares Wild and Scenic management under the different alternatives.
- Tables 3.4.3-1 on page 3-193 and 3.4.3-2 on page 3-196, which provide a complete list of eligible segments, their lengths, classifications and ORV's in CRVFO and White River National Forest, respectively.
- Table 4.4.3-1 on pages 4-700 through 4-708 for the BLM's Wild and Scenic Rivers Analysis Framework, which compares the Specific river protection elements for each Wild and Scenic option (not suitable, eligible, suitable, stakeholder group, designation by Congress).

A. About Suitability

The Wild and Scenic designation process:

- 1) Agency designates river segment as eligible, manages to protect the free-flowing nature, Outstandingly Remarkable Values and tentative classification.
- 2) Agency studies whether river segment is Suitable or not. Profile of river segment is raised and becomes more likely for Congressional designation for inclusion in the federal Wild and Scenic Rivers System. Management is the same as when eligible.
- 3) Congressional designation – river segment is included in the national Wild and Scenic River system and is given the formal protections under the Wild and Scenic Rivers Act. A federal reserved water right is given with the designation.

The 26 segments currently under management review in the CRVFO include the Upper Colorado River, Eagle River, and others important to whitewater recreation. These segments are currently being managed as eligible for inclusion in the NWSRS, and depending on the alternative selected, these segments will either remain eligible, be

found Suitable, or be determined not Suitable and released from further consideration for inclusion in the national system.

In 2010, BLM released its Suitability Report (see Appendix C) which found:

- Suitable Segments (see [Figure 2-64](#))
 - o Colorado River Segments 6 and 7
 - o Deep Creek segments 2 and 3

- All remaining segments were found to not be Suitable because they either:
 - o had too little land under BLM jurisdiction, with local governments expressing disinterest in managing a Wild and Scenic River;
 - o could be adequately managed using other protective designations,² or;
 - o only had one ORV which could be protected through other BLM management actions and protective designations.

(See Appendix C, p. C-3; See "[CRVFO RMP WSR Eligible Rivers](#)" for more information about which segments fall into which category).

B. The Alternatives and Wild and Scenic Rivers

Alternative A: Continue to manage the 26 segments as eligible.

Alternative B1: Colorado River segments 6 and 7 and Deep Creek segments 2 and 3 would be found Suitable for designation under the Wild and Scenic Rivers Act. The management of these segments would remain the same as it is today until either the RMP is revised again or Congress formally includes them in the NWSRS. The remaining 22 segments would be found not Suitable and released from consideration in the NWSRS.

Alternative B2: Deep Creek segments 2 and 3 would be found Suitable for designation under the Wild and Scenic Rivers Act. Suitability for Colorado segments 6 and 7 would be deferred the river would retain its eligible status. A stakeholder agreement plan that protects flows would be implemented. The remaining 22 segments would be found not Suitable and released from consideration in the NWSRS.

Alternative C: All 26 segments would be found Suitable for inclusion in the NWSRS.

Alternative D: All 26 segments would be found not Suitable and released from future consideration for inclusion in the NWSRS.

Since 2007, American Whitewater has been a key member of the stakeholder group mentioned in Alternative B2, joining with water and conservation districts, utilities, counties, and environmental organizations to find a collaborative solution to meeting the growing needs and demands on the Colorado River. Because a WSR designation can do very little to protect streamflows, the Stakeholder Plan has worked hard to find a way, under Colorado water law, to protect flows critical to river health and a robust outdoor recreation economy. According to the RMP, "if implemented successfully, this

² These segments are Thompson Creek, East Middle Fork Parachute Creek complex, and East Fork Parachute Creek complex. For more information about how other management actions can protect ORV's, see p. 4-696.

cooperative approach could provide higher long-term certainty that adequate flows would be present to support ORVs. Since water rights administration and management is outside BLM's management authority, success of this approach could result in a long-term beneficial impact on the WSR characteristics of the suitable streams" (p. 4-722). American Whitewater has worked hard with other stakeholders to protect instream flows into the future, and as a result we support Alternative B2.

C. Impact of Wild and Scenic Management on Recreation

The impact of the management of Wild and Scenic River Segments on recreation would be minimal under all alternatives.

- Alternative A: Segments of the Colorado River would continue to be managed as part of the Upper Colorado River Special Recreation Management Area ("SRMA"), and other segments would be the same because they've already been found to be eligible (p. 4-485).
- Alternative B: Short-term management would not change. Formal designation could affect some forms of recreation if the river is classified as Wild or Scenic (i.e. certain types of recreation are not suitable for Wild and Scenic Rivers, and would not be allowed if formally designated) (p. 4-486).
- Alternative B2: The Stakeholder Plan may better support a wide range of recreational uses because of long-term instream flow protections (p. 4-491).
- Alternative C: more protective of recreation because 26 segments would be found Suitable (p. 4-494), although may not necessarily be protective of flows.
- Alternative D: no impact to recreation and visitor services (p. 4-496).

More in-depth information about the Alternatives and Wild and Scenic Rivers can be found in:

- American Whitewater's 15-page summary of the relevant sections of the dRMP. See "[CRVFO RMP Summary](#)"
- [Figure 2-64: Alternative B Wild and Scenic Segments](#)
- [Figure 2-65: Alternative C Segments Suitable for Inclusion in the NWSRS](#).
- Chapter 2: Alternatives, Generally, and Table 2.2 on pages 2-110 to 2-115.
- Chapter 3: Current Conditions, Section 3.4.3, pages 3-191 through 3-198.
- Chapter 4: Environmental Consequences, Section 4.4.3, pages 4-694 through 4-731 (of particular interest, there's a discussion of Protection of Flow-Related ORV's on p. 4-697).
- [Appendix C: Wild and Scenic River Suitability Report, 2010](#)

III. **Recreation and Visitor Services**

BLM lands in the CRVFO area offer numerous outdoor recreation opportunities, including what they term "floatboating", which encompasses rafting, kayaking and canoeing. Overall, there are 19 day-use sites in the area, all of which provide river access and 10 of which have boat launches. The agency issues 75 Special Recreation Permits ("SRPs") each year for commercial activities, competitive events, certain organized group activities and in some designated special areas.³ Thirty-six SRP's are

³ See <http://www.blm.gov/co/st/en/fo/crvfo/recreation/SRP.html> for more information about SRP's.

issued for river recreation. Infrastructure and staffing limitations have resulted in BLM not issuing additional SRP's (p. 3-148).

A. Current River Recreation Management (p. 3-146 through 3-147)

Colorado River

- Glenwood Canyon to Parachute: South Canyon Boat Launch and a few other parcels.
- State Bridge to Glenwood Canyon: Day-use activities are the main use. Camping and solitude are limited. Challenging whitewater discourages casual floaters. Stretch sees 5-10% of the use of the river above State Bridge. Existing facilities meet recreation demand.

Eagle River

- Several sites managed by BLM see moderate use during the 6-8 week whitewater season and light use rest of the year.
- Use is expected to increase because of proximity to I-70.
- Current use by travelers and local residents is as "urban-type" parks. Current facilities are not designed for this type of use and additional infrastructure is needed.

Roaring Fork River

- BLM manages one small parcel.
- Right of Way is managed by CDOT and is used by public and local outfitters/guides for river access.

B. Recreation Management on BLM Lands

Recreation activities on BLM lands are managed through two types of Recreation Management Areas - "Special Recreation Management Areas" (SMRA's) and "Extensive Recreation Management Areas" (ERMA's). Defined recreation activities guide management decisions in these areas. Designation depends on demand and issues, "recreation setting characteristics", resolving use/user conflicts, compatibility with other resource uses, and resource protection needs (p. 3-145).

- SMRA
 - o Managed to protect and enhance a targeted set of activities, experiences, benefits, and desired "recreation setting characteristics". In these areas, recreation management is recognized as the main land management focus (Appendix K, p. 3).
 - o Can be divided into different zones, as is done on the Colorado River.
- ERMA
 - o Managed to support and sustain recreational activities, however management of other resources is given the same weight (Appendix K, p. 4).

General information about SMRA/ERMA's can be found [from the BLM here](#). 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. Maps of the proposed SMRA/ERMAs under each alternative can be

found in Figures [2-34](#) (Alternative A), [2-35](#) (Alternative B), [2-36](#) (Alternative C) and [2-37](#) (Alternative D).

Other management actions may protect some Wild and Scenic ORV's whether or not a river segment is included in the NWSRS. They include:

- NSO: no surface occupancy or surface disturbing activities
- CSU: controlled surface use
- VRM: Visual Resource Management areas
- ROW: Right of Way avoidance areas (Right of Way restrictions for power lines, roads, communications, etc...)
- Other restrictions on travel, logging and mineral explorations

Supporting these and other protective management actions in your comments will help to protect the rivers in the CRVFO region.

C. The Alternatives and Recreation Management Areas

While there are numerous Recreation Management Areas being considered in the RMP, only a few have boating or river access as the primary recreation management activity. These include the Upper Colorado SMRA, Eagle River ERMA, and New Castle ERMA. Each is summarized below. Other SRMA/ERMA areas may relate to boating interests or have a Wild and Scenic segment within them, but boating is not mentioned as specific activity that BLM will manage for. These areas include Thompson Creek SRMA, Deep Creek SRMA, and Hack Lake SMRA/ERMA. For more information about these areas, see page 11 in the "[CRVFO RMP Summary](#)" or pages 4-512 to 4-513, 4-500 to 4-501, and 4-504 to 4-505 and respectively, and [Appendix K](#).

For a complete view of the environmental consequences of all management decisions on recreation and visitor services, see Chapter 4, pages 4-496 through 4-515 and [Appendix K](#).

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 Alternatives B through D, 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).

Key management proposals (all info from Appendix K unless otherwise noted):

- Retain the current level of remoteness and cause little change to characteristic of natural landscape through NSO/CSU stipulations, non-motorized travel designations, ROW avoidance of recreation sites, and closure to timber harvest, minerals leasing, materials disposal etc...
 - o Some only apply to Alternatives B and C
 - o Some surface disturbing activity allowed under Alternatives A and D (see Chapter 4 for more information)

- BLM recreation areas would be recommended for preclusion of mining, but not oil and gas (Chapter 4, p. 4-514).
- Camping restrictions: 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.
- Visitor facilities:
 - o Alternatives B and C: expansion of visitor facilities (restrooms, boat ramps) may occur but new recreation developments will be rare.
 - o Alternative D: existing facilities will be expanded (restrooms, boat ramps), and new recreation 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:
 - o Visitors will 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)
 - o Boating group sizes:
 - Alternatives B and C: limited to 15 people, including guides, in RMZ 1 (State Bridge to Burns) and 25 people in RMZ 2 (Burns to Glenwood Canyon). No new river related SRPs will be issued.
 - Alternative D: limited to 25 people per group in both RMZs initially.
 - o Special Recreation Permits (SRPs)
 - None of the action alternatives propose a permit system. One would only be implemented if there was too much contact between groups (Chapter 4).
 - 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.
 - o User fees: may be charged for standard or expanded recreation sites and services.

2. New Castle ERMA (p. 4-508 unless otherwise noted)

The New Castle area is currently part of 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. Additional land use protections would be implemented, 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. See Appendix K for additional management restrictions that may protect the recreation values of the area.

3. 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. Under Alternatives B, C, and D it would be designated as its own ERMA. Current river-related use is moderate during the 6-8 week whitewater season (p. 3-147), and would be continued under all alternatives. Certain recreation activities may be subject to finding Eagle River eligible for inclusion into the NWSRS under Alternative C (Chapter 4).

Key Management Proposals:

- SRP's
 - o Alternative A: continue a moratorium on commercial river-related Special Recreation Permits (SRP's).
 - o Alternatives B and C: No new river-related SRPs will be issued; new activities will have to comply with the SRP Handbook and undergo an approval process.
 - o Alternative D: river-related SRPs would be issued if monitoring shows land health standards are met and use conflicts are minimal.
- Land use protections
 - o 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).
- Camping:
 - o Alternatives B and C: overnight camping would be prohibited.
 - o Alternative D: only allowed in designated campgrounds.
- Boating Group Size: Commercial and private groups will be limited to 25 people per group (including guides) under Alternative C only (Appendix K).

IV. Other Special Designations

The BLM has other Special Designations to protect certain values. These include Wilderness Study Areas, which are areas that are being considered for inclusion in the National Wilderness Preservation System, and Areas of Critical Environmental Concern, which are areas within BLM lands where special management actions are taken to protect areas of environmental significance. These designations may provide additional protection to rivers and specific ORV's within the CRVFO region whether or not certain segments eventually are designated for inclusion in the NWSRS. Note, however, that BLM specific protections (ACECs in this instance) are not necessarily permanent protections. Despite this, these protections are important to support in your comments.

Wilderness and Wilderness Study Areas:

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 overlaps with Bull Gulch ACEC), which is located 10 miles northwest of Eagle (p. 3-188). 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. The current conditions of the WSA's is

described on pages 3-186 through 3-190, and the environmental consequences of each alternative are outlined in Chapter 4, section 4.4.2 on pages 4-688 through 4-693.

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

Areas of Critical Environmental Concern (ACEC's) are BLM lands that receive special management attention in order to protect and prevent irreparable damage to important historical, cultural, or scenic values, fish and wildlife resources or other natural systems or processes. They also protect life and safety from natural hazards (p. 3-183). BLM designates ACEC's where there are 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). General information about ACEC's can be found [from the BLM here](#). Management actions vary from one ACEC to the next, and depend on the "relevant and important values" identified for each one (p. 4-609).

As you consider your comments for ACEC's, we suggest you look at Table 4.4.1-1 "Existing and Potential Areas of Critical Environmental Concern" in Chapter 4 on page 4-608, which compares values and number of acres designated. Additionally, Figures [2-59](#), [2-60](#), [2-61](#) and [2-62](#) are maps of ACEC designations for each alternative.

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 their associated values).

- Under Alternative A, these 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).
- 3 ACEC's would be designated under Alternative D (p. 2-18).

For a comparative summary of the ACEC's under each alternative, see pages 12 to 15 in "[CRVFO RMP Summary](#)". See also Table 2.2 in Chapter 2 on pages 2-96 through 2-109. While some ACEC's would only be designated under certain alternatives, we suggest you consider supporting all ACEC's that protect riparian values.