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Re: Draft Resource Management Plan/Draft Environmental Impact Statement documents (DRMP/DEIS documents) for U.S. Bureau of Land Management (BLM) Kremmling and Colorado River Valley Field Offices.

American Whitewater appreciates having the opportunity to provide comment on the BLM's Colorado River Valley and Kremmling Field Office's (CRVFO, KFO) draft Resource Management Plans (dRMPs). American Whitewater is a stakeholder in the Upper Colorado River Wild and Scenic Stakeholder Group that developed and submitted to the BLM a proposed Management Plan (SG Plan or Plan) with respect to Wild and Scenic Rivers management. The Plan has been identified as the Preferred Alternative for Segments 4 through 7 of the Upper Colorado River in the DRMP/DEIS documents. The Stakeholder Group has endorsed the Plan and requested its adoption by BLM per the terms contained in a joint letter dated January 10, 2012 from the Stakeholder Group participants to the BLM (Joint Letter).

American Whitewater reaffirms its support for the positions set forth in the Joint Letter and as a result, we are not providing additional comments with respect to the subjects addressed in the Plan or with respect to the subjects addressed in the Joint Letter. We are submitting our own joint comments in support of management actions that are most protective of riparian values and river recreation throughout the CRVFO and KFO regions, which in our opinion involves a combination of actions outlined in Alternatives B and C.

American Whitewater's comments are broken into two categories; 1) those related to Colorado River Valley Field Office actions and 2) those related to Kremmling Field Office actions.

About American Whitewater

American Whitewater is a national 501(c)(3) non-profit organization that works to conserve and restore our nation's whitewater resources and enhance opportunities to enjoy them safely. With over 5,000 members and 100 affiliate clubs, we represent the interests of tens of thousands of whitewater enthusiasts nationwide. As conservation-minded whitewater recreationists, we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and potential to provide clean and safe drinking water. Our membership and the general public highly value our nation's river systems and associated riparian zones, and we have a direct interest in maintaining healthy rivers for everyone to enjoy. The Upper Colorado and other rivers in the CRVFO region attract our members from across the region and the country, and we support management actions that protect and preserve healthy riparian systems.

Flow Management in the Colorado River

The Upper Colorado River is a key recreation resource in the KFO and CRVFO regions, bringing critical economic support to the local area each year. In 2010, commercial rafting in the Upper Colorado (including segments 4 and 5) had an economic impact of over \$12 Million in the local economy, while Glenwood Canyon generated over \$18 million for local communities. Non-commercial rafting, kayaking, and river-based recreation in the Colorado River basin also contribute significantly to the unique character of the region. At its heart, the river is also home to numerous species, including the sensitive Colorado cutthroat trout. The Upper Colorado River is also the largest supplemental source of water for the cities of Denver, Aurora, Colorado Springs, and eastern Colorado towns and farms. As these demands increase, so does the threat to these flow-dependant resources.

Iconic western rivers, as the Colorado River, deserve additional and permanent protection of their Outstandingly Remarkable Values, which includes whitewater boating. While a Wild and Scenic designation may do much towards this goal, it unfortunately can do very little to protect the streamflows needed to support recreation and the health of the river. The Stakeholder Plan that would be implemented under Alternative B2 provides a much stronger framework for protection of streamflows into the future, while also balancing the needs for future water supplies.

The Upper Colorado River Stakeholders, including environmental groups, water users, recreational users, and local governments, have worked together and in consultation with State government since 2008 to develop the proposed Upper Colorado River Wild and Scenic Stakeholder Group Management Plan (SG Plan or Plan) to protect the flow-dependant outstandingly remarkable values (ORVs) identified in the BLM and USFS Eligibility Reports for Segments 4 through 7 of the Upper Colorado River. The Plan has been endorsed by the members of the SG and has been identified as the federal agencies' Preferred Alternative B2 in the DRMP/DEIS documents.

The Stakeholder Group has invested substantial effort to date in the development of this collaborative SG Plan and believes it is the best approach for balancing permanent protection of the flow-dependant ORVs, certainty for the stakeholders, water project yield, and flexibility for water users. We request that the federal agencies approve the proposed SG Plan as the means to address Wild and Scenic River values in the above-referenced segments of the Colorado River.

1. Comments on River-Recreation Aspects of CRVFO draft RMP

American Whitewater submits the following additional comments on recreation-relevant aspects of the Colorado River Valley Field Office RMP:

- We encourage BLM to maintain the current level of remoteness between State Bridge and Glenwood Canyon. Whitewater Boating is a targeted recreation activity here, and the remote nature of Colorado River segment 6 provides opportunities for family-oriented recreation unique to the region.

- We support BLM's continued presence at developed recreation sites, and hope to work closely with BLM managers to improve exchange of river-related information and recreation monitoring programs.

- American Whitewater supports the proposal to not allow new SRP's under both Alternatives B and C.

- American Whitewater agrees that current recreation facilities are meeting demand. Alternatives B and C indicate some expansion of facilities (restrooms, boat ramps) may be warranted, but overall this will be rare. We encourage BLM to evaluate the costs and benefits of developing additional recreation sites, including evaluating increased costs of maintenance in light of decreasing budgets and proposed recreation fee structures to offset existing budget shortfalls.

- American Whitewater supports the decision by BLM to *not* institute a permit system for CRVFO Rivers at this time.

- American Whitewater requests that if BLM implements recreation fees, under all alternatives, that fees be restricted to maintaining visitor services and facilities. If budgets decline and/or recreation demand increases, we encourage BLM to implement recreation fees as provided by the guidelines in the Federal Lands Recreation Enhancement Act.

Other Rivers in the CRVFO Region

While the Colorado River attracts the most attention, American Whitewater supports the permanent protection of ORV's, recreation value, and riparian habitat on rivers throughout the CRVFO region. While Alternative B2 is the most protective of flows in the Colorado, and designates Deep Creek as Suitable for inclusion in the NWSRS, Alternative C continues to protect the remaining 22 segments that are currently eligible for Wild and Scenic designation. The dRMP states that other BLM management actions will protect the ORV's of these segments, however these protections can be withdrawn in the future through a dRMP revision process. A Wild and Scenic suitability determination will help to provide the permanent protection that these rivers deserve. Of particular importance to our membership are the Eagle River and Rock Creek segments. As a tributary to the Colorado River, the Eagle River is valued for its river access, and for both commercial and non-commercial rafting and floatboating activities. Rock Creek is valued for its high-quality and high-challenge whitewater kayaking opportunities, and historic significance. We feel that a suitability determination for both segments is critical to preserving the flow-dependant needs of the Eagle River and Rock Creek segments, as well as of downstream segments of the Colorado River.

American Whitewater understands that there are certain segments where there is only one ORV, where there is only a small segment that is eligible on BLM lands, or where BLM believes that other management actions will protect the ORV's. American Whitewater supports a determination that these rivers are Suitable for inclusion in the NWSRS not only because the protections afforded by the WSRA are permanent, but also because they would be more protective of flows in downstream segments and overall riparian functioning. These segments include Abrams Creek, Battlement Creek, Egeria Creek, Hack Creek, Mitchell Creek, No Name Creek, Rock Creek, Thompson Creek, and segments in the East Middle Fork and East Fork Parachute Complexes.

Other Special Designations (CRVFO)

American Whitewater also supports protecting important values of rivers throughout the CRVFO through other means. In particular, we support the designation of proposed Areas of Critical Environmental Concern (ACEC's) that are near river corridors that are proposed under Alternative C. The proposed Abrams Creek ACEC would protect the genetically pure population of native, wild and naturally reproducing Colorado River cutthroat trout. The proposed Colorado River Seeps ACEC would protect critical plant communities along the Colorado River. The Grand Hogback ACEC would provide additional protection to parts of Elk, Rifle and Government Creeks. While these latter river segments are not currently eligible for inclusion in the NWSRS, they are important as tributaries of the iconic Upper Colorado River and should be afforded protection.

American Whitewater also supports the designation of the New Castle ERMA, which maintains the undeveloped Garfield Creek access to the Colorado River. We support this proposal as outlined in Alternatives B and C.

Finally, American Whitewater supports the continuation of whitewater boating within the Bull Gulch Wilderness Study Area, and ongoing maintenance of river access sites on the Eagle River during the whitewater season, and the Roaring Fork River.

2. Comments on River-Recreation Aspects of KFO draft RMP

- American Whitewater encourages BLM actions that emphasize and protect the remote nature of river-based recreational experiences in the region.
- American Whitewater supports BLM's decision to not limit Group size for non-commercial river trips, and asks that it be consulted if and when limits would be explored under Alternative C.
- American Whitewater supports BLM's decision to permit non-commercial river users within the SRMA, and asks that information collected on non-commercial use in the region be made available for future monitoring and evaluation of the SG Plan under Alternative B2. We request that private permits for river trips do not come at a cost to the user.
- American Whitewater supports BLM's proposal to restrict camping in the River corridor to a 14-day limit from September 1 to March 31 and 7-day limit from April 1 to August 31.

Other Rivers in the KFO Field region

While the Colorado River attracts the most attention for river-based recreation, American Whitewater supports the ongoing maintenance of river access sites on the Fraser River, Blue River and at Muddy Creek. While not all sites are predominantly used for whitewater-boating, each site provides the general public safe access to rivers in the region, and we feel is critical to maintain into the future. We also request that BLM explore opportunities to improve access facilities along these segments in an effort to minimize impacts to the surrounding landscape.

Additionally, American Whitewater supports protecting the riparian habitat of all of the rivers throughout the KFO region. While Alternative B2 is the most protective of flows in the Colorado, Alternative C continues to protect the remaining 13 segments that are currently eligible for Wild and Scenic designation. The dRMP states that other BLM management actions will protect the ORV's of these segments, including those that have just one ORV (Piney River, Spruce Creek, and Sulphur Gulch) and those that are likely part of a Wilderness Study area (Rabbits Ear Creek, the North Platte River, and Troublesome Creek). Management protections outside of the NWSRS can be withdrawn in the future through a dRMP revision process. A Wild and Scenic suitability determination will help to provide the permanent protection that these rivers deserve, while complimenting the flow-management efforts contemplated by the SG Plan.

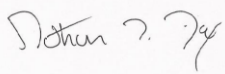
Other Special Designations (KFO)

American Whitewater supports efforts to protect important values of rivers throughout the KFO region through additional means. In particular, AW supports the designation of proposed Areas of Critical Environmental Concern (ACEC's) that are near river corridors that are proposed under Alternative C only. For example, the proposed Kinney Creek ACEC would protect the genetically pure population of native, wild and naturally reproducing Colorado River cutthroat trout. We also support the designation of the Troublesome Creek, Laramie River and North Park Natural Area ACEC's as outlined under Alternative C; and the use restrictions outlined in Alternative C for the Troublesome Creek and Platte River WSA's, as both areas have an impact on important rivers and creeks that warrant protection.

Additionally, the Headwaters ERMA proposed under Alternative B and SRMA under Alternative D contains Kinney Creek, and the Strawberry ERMA proposed under Alternative B and SRMA under Alternative C and D contains a major tributary to the Fraser River. We support the level of use restrictions necessary to protect the riparian values of these rivers.

Again, thank you for your consideration of our comments. American Whitewater looks forward to working with both the Colorado River Valley and Kremmling Field Offices as a partner in river stewardship, and as a stakeholder in the Upper Colorado River Management Plan.

Sincerely,



Nathan Fey
Colorado Stewardship Director
American Whitewater