

ATTACHMENT #5

March 27, 2019

U.S. Bureau of Land Management
Kremmling Field Office
Attn: Shane Dittlinger
P.O. Box 68
Kremmling, CO 80459

RE: Upper Colorado River Wild & Scenic Stakeholders Group Comments on draft Recreation Area Management Plan EA

Sent via email: BLM_CO_KR_WEBMAIL@BLM.GOV

Dear Mr. Dittlinger,

The Upper Colorado River Wild & Scenic Stakeholders Group (W&S SG) appreciates the opportunity to comment on the Kremmling Field Office's (KFO) draft Environmental Assessment (draft EA) for the Upper Colorado River Recreation Area Management Plan (RAMP).

The SG was formed as an independent, collaborative group in 2007, to develop a local management alternative to Wild and Scenic River designation of the Upper Colorado River that balances permanent protection of the W&S Outstandingly Remarkable Values (ORVs), certainty for the stakeholders, water project yield, and flexibility for water users along the Upper Colorado River. Various state agencies, local governments, environmental and recreational interests, landowners, anglers, and water providers participate in the stakeholder group with the intention of protecting and perhaps enhancing the ORVs on this part of the Colorado River in ways that coordinate with federal agency management. The Special Recreation Management Area (SRMA) includes segments of the Colorado River that overlap with the W&S SG Plan, including Recreation Management Zones 2 (Gore Canyon) & 3 (Pumphouse to State Bridge).

We offer four specific comments on the draft EA:

1. The draft EA's Alternative C Proposed Action includes unlimited, self-issued, no-cost Day Use Permits for all uses in the Zones 2 and 3, and for overnight river camping. This will be of particular benefit to the W&S SG, as the EA acknowledges. Utilizing a permit system would provide improved visitor data for the BLM and the W&S SG. This will aid in better decision-making and better management of the ORVs for these river sections.
2. The Alternative C Proposed Action identifies 25 campsites along the river in Zone 3 and limits camping to only those designated campsites. Camping could be reserved through recreation.gov. This approach will support the floatboating and fishing ORVs,

first by ensuring campsites reservations are reserved in a predictable and orderly fashion, thereby avoiding crowding issues and dispersed camping impacts along the river corridor, and second by preventing degradation of the scenic qualities of the river corridor through better waste and garbage management.

3. The permit system identified in the Alternative C Proposed Action creates an educational opportunity to further protect the floatboating and fishing ORVs. We encourage the BLM to include educational information about Leave No Trace camping techniques and river safety. The EA should specify if portable toilet systems and firepans will be required under the proposed permit system. This helps maintain the scenic ORVs that bring recreationalists to this river segment.

4. The EA does not explicitly state if the permits for designated river campsites and/or the Day Use Permits will require a fee. Section 5 of the EA, the analysis of the affected environment, environmental consequences, and cumulative effects, mentions that the Day Use Permits would be provided at no cost, but Section 2, the summary of alternatives, is not explicit. Likewise, the February 22, 2019 News Release about the draft EA says the campsites would be permitted for a fee, but the EA is silent on whether a fee would be charged or the amount. It would be helpful for those reviewing the EA to understand if these will have an associated cost or not.

We look forward to continuing to partner with the BLM to protect the fishing and recreational floatboating ORVs. Thank you for considering our comments on this draft EA.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rob R. Buirgy". The signature is stylized with a large, sweeping flourish at the end.

Rob R. Buirgy, Coordinator
Upper CO River Wild and Scenic Stakeholder Group

CC:

Bill Mills, Kremmling Field Manager, Bureau of Land Management
Roy Smith, Water Rights Specialist, Bureau of Land Management