



U.S. Department of the Interior
Bureau of Land Management
Royal Gorge Field Office
Cañon City, Colorado



U.S. Department of Agriculture
U.S. Forest Service
Pike and San Isabel NFs & Cimarron and Comanche National Grasslands
Salida, Colorado

Scoping Report

Browns Canyon National Monument Resource Management Plan /
Environmental Impact Statement

July 2019



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Browns Canyon National Monument Resource Management Plan and Environmental Impact Statement

Final Scoping Report

Prepared by

**U.S. Department of the Interior
Bureau of Land Management
Royal Gorge Field Office
Cañon City, Colorado**

and

**U.S. Department of Agriculture
U.S. Forest Service
Pike and San Isabel National Forests and
Cimarron and Comanche National Grasslands
Salida, Colorado**

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ACRONYMS AND ABBREVIATIONS

ACEC	Areas of Critical Environmental Concern
AHRA	Arkansas Headwaters Recreation Area
BCNM	Browns Canyon National Monument
BLM	Bureau of Land Management
CARMMS	Colorado Air Resource Management Modeling Study
CFR	Code of Federal Regulations
CMA	Cooperative Management Agreement
CPW	Colorado Parks and Wildlife
CR	County Road
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
FSR	Forest System Road
FST	Forest System Trail
LWC	Lands with Wilderness Characteristics
NEPA	National Environmental Policy Act
NOI	Notice of Intent
OHV	Off-Highway Vehicle
R&PP	Recreation and Public Purpose
RMP	Resource Management Plan
RMZ	Recreation Management Zone
ROV	Resources, Objects, and Values
SRP	Special Recreation Permit
UAS	Unmanned Aircraft System
USFS	U.S. Forest Service
VRM	Visual Resource Management System
WSA	Wilderness Study Area

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1.0 INTRODUCTION AND PLANNING AREA

The Bureau of Land Management (BLM) and U.S. Forest Service (USFS) are preparing a Resource Management Plan/Environmental Impact Statement (RMP/EIS) to provide comprehensive management direction for the Browns Canyon National Monument (BCNM or monument). BCNM was established under Presidential Proclamation 9232 (February 19, 2015) as an area of 21,604 acres (Figure 1).

BCNM encompasses BLM and USFS lands and includes the Browns Canyon Wilderness Study Area (WSA) and USFS Aspen Ridge Roadless Area. In addition, a portion of the Arkansas Headwaters Recreation Area (AHRA), a cooperative management area along the Arkansas River administered by the USFS, the BLM, and Colorado Parks and Wildlife (CPW), is included within the monument. The Planning Area is the BCNM boundary and is described in detail in the BCNM *Planning Assessment* (Section 1.3, pp 7-9). The BLM refers to BCNM's unique *resources, objects, and values*, including resource use such as livestock grazing and recreation, as ROVs. Proclamation 9232 requires that monument ROVs be protected for the benefit of all Americans.

This scoping report describes the various notifications and outreach efforts that were used to solicit public involvement; overviews the commenters and categories of comments; and summarizes the public comments reviewed.

1.1 Purpose and Need for the Plan

Presidential Proclamation 9232 defines the need for joint federal agency action to manage BCNM's ROVs:

“The Secretary of the Interior and the Secretary of Agriculture (Secretaries) shall manage the monument through the Bureau of Land Management (BLM) and USFS, pursuant to their respective applicable legal authorities, to implement the purposes of this proclamation.

The USFS shall manage that portion of the monument within the boundaries of the National Forest System, and the BLM shall manage the remainder of the monument. The lands administered by the BLM shall be managed as a unit of the National Landscape Conservation System, pursuant to applicable legal authorities, including, as applicable, the provisions of section 603 of the Federal Land Policy and Management Act (43 U.S. Code 1782) governing the management of wilderness study areas.”

The purpose of the RMP/EIS is to provide strategic direction and guidance for the BLM and the USFS's allocation of resources and management of the public lands within the BCNM pursuant to the multiple-use and sustained yield mandates of the Federal Land Policy and Management Act (FLPMA) of 1976, the National Forest Management Act of 1976, and Multiple Use Sustained Yield Act of 1960: *“For purposes of protecting and restoring the objects identified above, the Secretaries shall jointly prepare a management plan for the monument and shall promulgate such regulations for its management as deemed appropriate”*.

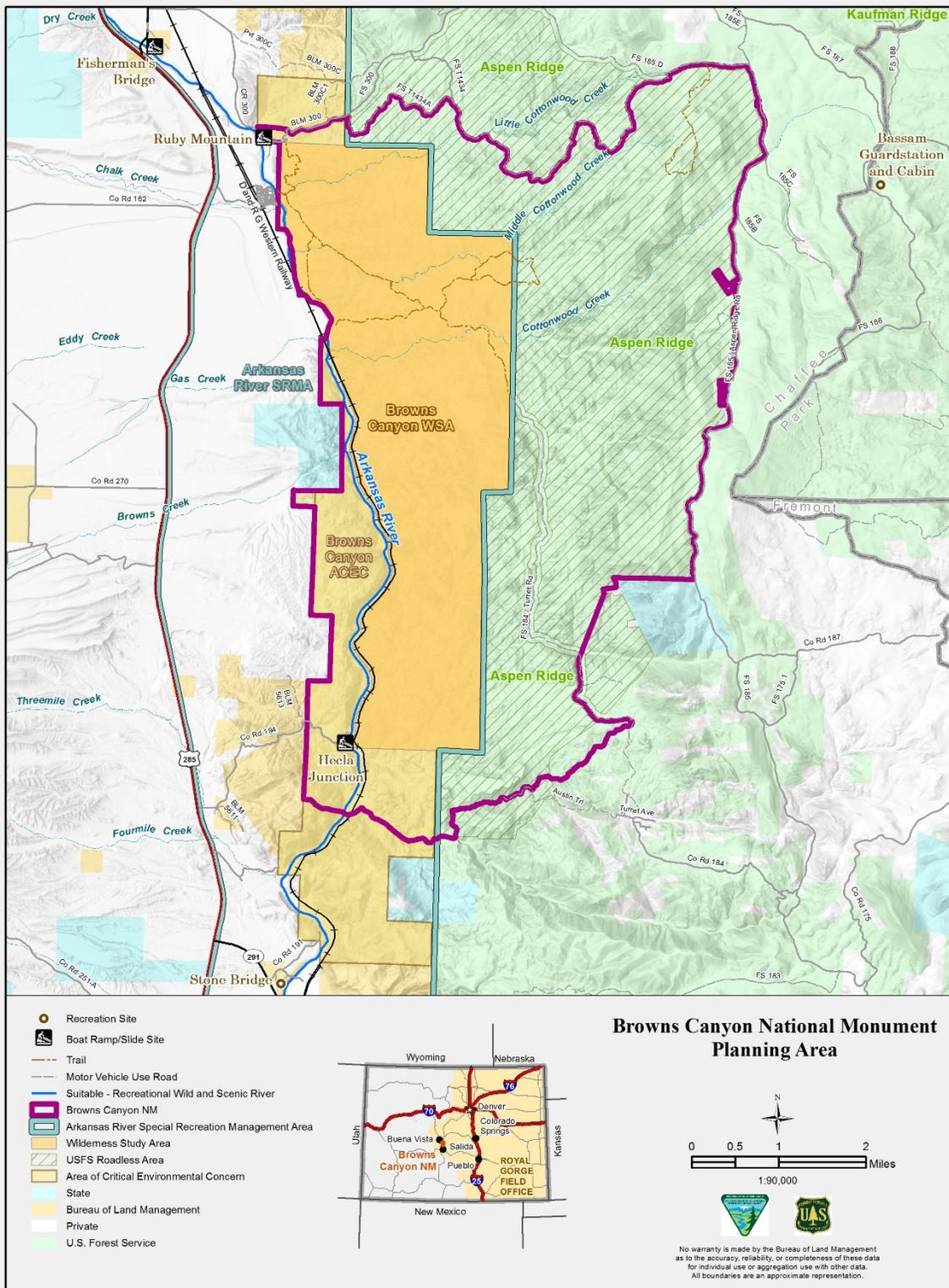


Figure 1 Browns Canyon National Monument Planning Area

BCNM's growing popularity, visitation, and economic contribution to Colorado, require that the BLM and USFS develop a joint BCNM management framework to:

- Ensure the protection and interpretation of the BCNM ROVs.
- Guide shared conservation and stewardship of BCNM.
- Provide sustainable and quality river-based and upland recreation and livestock grazing resource use in the Monument.

BCNM ROVs that require strategic management include prehistoric antiquities, tribal values, geologic, scientific and historic objects, wilderness qualities, wildlife habitat, plant communities, recreational, and other intrinsic values such as BCNM scenery and viewsheds.

2.0 PUBLIC INVOLVEMENT PROCESS

Scoping is a National Environmental Policy Act (NEPA) requirement (40 Code of Federal Regulations [CFR] 1501.7, 43 CFR 46.235) and, for land use planning, signifies the start of the environmental analysis that will accompany development of the RMP. The following sections outline how the public, stakeholders, and cooperators were invited to participate in and engaged in the planning process. Appendix A includes copies of the Notice of Intent (NOI) and other notification methods.

2.1 Notice of Intent

The formal public scoping process began on May 14, 2019, with publication of the NOI in the *Federal Register* informing the public of the intent to develop a RMP and associated EIS (*Federal Register* Vol. 84, No, 93, 2019). The NOI defined the end date of the scoping period as June 13, 2019, or 15 days after the last public meeting, whichever was later.

The last public meeting was held on June 5, and the public period closed on June 20, 2019, for a total scoping period of 38 days.

2.2 Notifications

Other methods of notification included the following:

- BLM's ePlanning website updates at <https://go.usa.gov/xn2eC>.
- Postcard mailing to the project mailing list.
- E-Newsletter distribution to the project mailing list and posted on ePlanning.
- News Release distribution which resulted in a media interview and article in the Mountain Mail.
- Social Media Posts.

2.3 Scoping Meetings

The Council on Environmental Quality implementation regulations (40 CFR 1500 et seq.) require scoping meetings to be conducted as part of the RMP/EIS. Information at the public meetings included an overview of the project and public process, highlights of the preliminary

range of alternatives, and introduction to the public comment tools. During the public meeting, a PowerPoint presentation by Keith Berger, Royal Gorge Field Office Manager; Joseph Vieira, BCNM Project Manager; and Kristina Kachur, consulting team planner was given to welcome members of the public and provide an overview of the planning and public scoping processes. Public meeting materials were provided in PDF format on BLM’s ePlanning page.

Additionally, two identical online webinars were held to provide a detailed description of how to provide comments via the ePlanning and Mapping Comment Tools. The first of the public webinars was posted on the BLM’s ePlanning website. Table 1 shows all scoping meeting dates, locations, and attendees.

Table 1 Public Scoping Meeting Dates, Locations, and Attendees

Venue	Address	Date	Approx. No. of Attendees
SteamPlant Event Center	220 West Sackett Avenue Salida, CO 81201	Monday, June 3, 2019, 5:30 – 7:30 pm	27
Buena Vista Community Center	715 E Main St Buena Vista, CO 81211	Tuesday, June 4, 2019, 5:30 – 7:30 pm	43
Marriott Denver West – Beaver Creek & Vail Rooms	1717 Denver West Blvd., Golden, CO 80401	Wednesday, June 5, 2019, 5:30 – 7:30 pm	25
Online Webinar	Via GoToWebinar	Wednesday, May 29, 2019, 12:00 – 1:00 pm	5
Online Webinar	Via GoToWebinar	Tuesday, June 04, 2019, 1:00 – 2:00 pm	7

2.4 Opportunities for Public Comment

Members of the public and agencies had several methods for providing comments during the scoping period. Comment could be submitted via:

- The BLM’s ePlanning website at <https://go.usa.gov/xn2eC>.
- U.S. mail at 5575 Cleora Road, Salida, CO 81201.
- A Comment Mapping Tool developed for this planning process at <http://arcg.is/1yuDDD>.
- Handwritten comment forms at the scoping meetings. Comment forms were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting.

Although the formal comment period has ended, the BLM will continue to consider all comments received in RMP project planning to the best of the agency’s ability. However, any future scoping comments received may not be formally published in a scoping report or other document.

2.5 Consultation and Coordination

During public scoping, the BLM solicited comments on the planning issues from federal, state, and local agencies; Native American tribes; the public; stakeholders; and other interested parties.

The following agencies were invited to be cooperators:

- Chaffee County
- City of Salida
- Colorado Parks and Wildlife (CPW) – AHRA
- Colorado Parks and Wildlife (CPW) – District Wildlife
- Town of Buena Vista

The following tribes were invited to participate:

- Apache Tribe of Oklahoma
- Cheyenne and Arapaho Tribes of Oklahoma
- Cheyenne River Sioux Tribe
- Comanche Nation of Oklahoma
- Crow Creek Sioux
- Eastern Shoshone Tribe
- Jicarilla Apache Nation
- Kiowa Tribe of Oklahoma
- Northern Arapaho Tribe
- Northern Cheyenne Tribe
- Oglala Lakota Tribe
- Pawnee Nation of Oklahoma
- Rosebud Sioux Tribe
- Southern Ute Tribe
- Standing Rock Sioux Tribe
- Ute Mountain Ute Tribe
- Northern Ute Tribe

3.0 COMMENT SUMMARY

All written submissions postmarked or received on or before June 20, 2019 are documented in this Scoping Report. The BLM's ePlanning page included separate comment submission forms for the NOI and the Planning Criteria Report – Preliminary Alternatives and Basis for Analysis. However, for the purposes of this scoping summary all comments were combined and the same methodology used to analyze the comments.

3.1 Comment Analysis Methodology

Each submission was entered into BLM's Comment Analysis Response Application (CARA) system, an online processing database, and then numbered and labeled with a commenter code indicating the entity from which it was received (i.e., individual, government agency, non-governmental organization or special interest, business, or Tribe). Comments were also marked as unique letter, form letter, or form letter plus additional comments.

3.2 Summary of Comment Submittals

A total of 125 unique comment letters were submitted. Table 2 shows the number of letters by submission type.

Table 2 Number of Letters by Submission Type

Submission Type	Number of Letters
Hardcopy Mail or Personally Delivered	11
Email	2
ePlanning	70
Online Mapping Tool	42

3.2.1 Comments by Affiliation/Organization

The following list shows names of the affiliation or organization that submitted comment letters. A complete list of all commenters, including a list of additional signatories to organization letters, is included in Appendix B.

- American Whitewater
- Audubon Colorado Council
- Bowling Green State University, Geology
- Chaffee County Cattlemen
- Chaffee County, CO
- Colorado Off-Highway Vehicle Coalition (COHVCO)
- Colorado Cattlemen's Association
- Colorado Department of Agriculture
- Colorado Department of Natural Resources, Water Conservation Board
- Colorado Department of Public Health and Environment
- Colorado Parks and Wildlife (CPW)
- Conservation Lands Foundation
- Colorado Off Road Enterprise (CORE)
- Denver Audubon
- Friends of Browns Canyon
- History Colorado
- Western Colorado University, Master of Environmental Management Program
- Northern Cheyenne Tribe
- Private Boaters of the Arkansas Valley
- Quiet Use Coalition
- Salida, City of
- The Wilderness Society
- Trails Preservation Alliance
- Tri Lazy W Ranch
- Trout Unlimited
- Trout Unlimited, Colorado
- U.S. EPA Region 8
- Upper Arkansas Water Conservancy District
- Well Sorted Automotive
- Wild Connections

3.2.2 Comments by Category

Once the submissions received during the public scoping process were entered into an online database, the letters were reviewed and parsed into individual comments to be coded according to issue categories. For example, if a letter brought up four different issues, the text was parsed into four separate comments. This parsing process resulted in approximately 472 individual comments, which were then coded according to planning issue categories. The vast majority of these comments were related to topics that will be addressed in the RMP and EIS.

Table 3 shows the number and relative percentage of comment by issue category.

Table 3 Number and Percent of Coded Comments by Planning Issue

Category	Number	Percent
Recreation	147	31.1%
Travel and Transportation Management	93	19.7%
Special Designations	50	10.6%
NEPA, Planning Criteria, and Process	36	7.6%
Wildlife and Fish	24	5.1%
Range and Livestock Grazing	21	4.4%
Cultural Heritage, Tribal Values and Uses	19	4.0%
Lands and Realty	16	3.4%
Lands with Wilderness Characteristics	15	3.2%
Geology, Minerals and Paleontology	13	2.8%
Watersheds, Soils and Water Resources	11	2.3%
Vegetation, Wildland Fire Ecology and Fuels	10	2.1%
Socio and Economic Conditions	10	2.1%
Visual Resources and Scenery Integrity, Night Skies, and Natural Soundscapes	4	0.8%
Air Quality	3	0.6%

3.3 Summary of Comments by Issue

This section summarizes the scoping issues that were raised through public scoping. The issue summaries were identified based on public comments. The public comment summaries in this section do not include all individual public comments; rather, they focus on providing an overview of the overarching themes presented in the public comments. Full text of each of the comment letters is provided in Appendix C.

3.3.1 NEPA, Planning Criteria, and Process

Commenters provided recommendations on consultation and coordination, the public NEPA process, valid existing rights, and federal policies as it relates to planning criteria.

Commenters requested that meaningful public input, particularly the local perspective, is accounted for in the alternatives development as the creation of the BCNM was a grassroots effort by local stakeholders and is an efficient and necessary part of NEPA. Collaboration of users, scientists, environmentalists, local governments, and citizens should be utilized in

studying resources, surveying user experiences, documenting impacts, and resolving public land disputes. It was also requested that data, specifically on Recreation Management Zones (RMZs), be provided to the public for review prior to the draft RMP.

Commenters questioned:

- Utilizing the USFS Forest Plan from 1984, which was not developed under the USFS 2012 planning regulation; suggesting it might cause confusion and potential disagreements over guiding direction.
- Utilizing BLM's regulations on USFS lands for the purposes of consistency.
- Secretary Order No. 3355's focus on streamlining NEPA process leading to a lack of due diligence to assess, document, and disclose necessary information and reduced ability for the public to fully engage and participate in the process.
- Proclamation 9232's level of focus on recreation versus other resources.

Commenters requested coordination with Colorado Department of Health and Environment, U.S. EPA, federal, state, and local partners. Further, commenters recommended coordination with the interagency air quality technical workgroup and the Arkansas River Voluntary Flow Management Program. It was also stated that tribal nations, History Colorado, and the State Historic Preservation Office should be engaged in a cooperative effort to manage, inventory, monitor, educate, and interpret cultural resources, landscapes, and traditional cultural properties.

Commenters also stated that the valid existing rights for livestock grazing permittee maintain, management, and improvements be maintained.

Commenters requested the planning criteria be revised:

- To identify water rights as an explicit valid existing right.
- To remove direction that the BCNM is managed under the multiple-use mandate of the Federal Land Policy Management Act; instead highlighting the National Conservation Lands and the Proclamation 9232 preserving the Monument for the protection and preservation of its natural, cultural, historic and scientific values. Alternatively, commenters suggested the BLM/USFS failed to consider the multiple-use policy of section 102(a)(7) of the Federal Land Policy and Management Act (43 U.S. Code 1701(a)(7)).
- To highlight the Omnibus Public Lands Act standards to ensure that lands within the system are managed consistently for conservation and safeguarded for future generations.

Commenters recommended the following be analyzed in cumulative effects:

- Management changes between the existing Royal Gorge RMP and the updated Eastern Colorado RMP, such as:
 - oil and gas development and the associated environmental impacts, and
 - impacts to air and water resources within the Monument that could occur from future energy development, particularly within the South Park area.
- Cumulative results from BLM's Colorado Air Resource Management Modeling Study (CARMMS).
- Motorized use beyond the boundaries of the Monument.

Additionally, commenters expressed concerns of induced growth effects from increased visitation, including:

- Effects on the available uses of Federal lands beyond the Monument's eastern boundaries (i.e., the Aspen Ridge area and other adjoining areas of the Pike and San Isabel National Forest).
- Greater traffic in the Bassam Park area leading to increased dispersed, unregulated camping in Four Mile/Buena Vista and associated effects to livestock grazing, private property, and wildlife.
- Increased usage on County and Forest System Roads (FSRs) and associated effects on maintenance and safety.

3.3.2 Special Designations

Commenters state that the entire monument, with particular emphasis on the Roadless Areas and the Lands with Wilderness Characteristics (LWCs), must continue to be protected for its rural and remote character. Further, the commenters would like to preserve the quiet, natural sounds and would like to prohibit disturbances from vehicles with motors; requesting that the RMP focuses on keeping the wilderness character of the Monument.

Commenters state that the biggest problem BCNM faces in managing and protecting resource values is population growth, demands for commercial exploitation, and the unknown effects of a changing climate.

Commenter states that there is no need for federal action to manage the river in a considerably different way than it is currently managed. The commenter is opposed to revoking existing waterpower/reservoir withdrawals in order to protect the wild and scenic values of the entire Arkansas River from Leadville to Pueblo Reservoir.

Commenters suggest that recommendations to congress on the Arkansas River Segment 2 wild and scenic designation would jeopardize an existing voluntary agreement and endanger the recreation, scenery, wildlife, botany, and fish outstandingly remarkable values. Further, the Arkansas River is heavily used, is mostly next to a highway, and the water conveyed within the channel is part of the Monument. The Arkansas River should be classified as recreation due to the decades of past recreational use.

The commenter states that there is no beneficial reason to designate this reach of the Arkansas River as a Wild and Scenic River due to the fact that the Proclamation states that the water conveyed within the channel is not a part of the Monument.

Consider a determination of suitability for Segment 2 of the Arkansas River would apply additional protection that would extend well beyond the Monument boundary, since Segment 2 includes sections of the river both upstream and downstream of the Monument.

Commenter states that high use recreation poses threats to the undeveloped and outstanding opportunities for solitude and primitive and unconfined recreation characteristics in the WSA and Areas of Critical Environmental Concern (ACEC).

Commenters request that the entirety of the Browns Canyon ACEC (11,697 acres) be maintained as well as all other existing special designations within the Monument. The obligations of the

BLM with regard to ACECs under FLPMA must remain in place in conjunction with the duties under the Proclamation.

Commenters suggested the following goals, objectives, and management actions:

- Consider proactive management to preserve the wilderness character of the lands within the Aspen Ridge Roadless Area.
- Utilize current planning process as an opportunity to recommend wilderness for the entirety of Aspen Ridge Roadless Area within the monument.
- The USFS should include language in the RMP, providing commitment to manage the Aspen Ridge Roadless Area under the same protections even if the roadless area designation were to be removed.
- Under the Analysis Issues and Methods section, clarify that this section applies to both WSAs and USFS Roadless Areas, and potentially other areas if designated.
- Revise the description for “Adverse Impacts on Roadless Areas” (page 54) to adequately include all nine characteristics identified in the 2001 Roadless Area Conservation Rule.
- Maps should clearly distinguish between designated system roads and motorized routes open to the public and undesignated, unauthorized, and/or permitted/administrative roads not open to public use.
- Apply additional management actions within the WSA in order to protect its wilderness values, such as limit group sizes to 12 individuals.
- Provide direction to manage the WSA as if it were designated as Wilderness, even if the WSA designation is released by Congress.
- Maintain the Browns Canyon ACEC and manage to the same standard defined in the Royal Gorge RMP.
- Analyze impacts from recreational activities (i.e. camping, camp fires, recreation) on areas with special designations, including impacts from dogs and horses.

3.3.3 Air Quality

Commenters stated that air quality, including high visibility, is an important resource value. However, air quality and visibility are influenced by regional weather patterns and activities outside of BCNM.

Commenter stated that the BLM’s CARMMS is a useful tool for determining air quality effects on BCNM that result from regional activities. CARMMS can also be used to help in determining if any changes in management direction may be warranted, including impacts to valued resources at BCNM that could result from activities anticipated under the Eastern Colorado RMP.

Commenters suggested the following goals, objectives, and management actions:

- Focus on nearby and on-site activities that produce dust and particulates, particularly vehicle travel on unpaved roads.
- Implement speed limits on gravel roads to reduce particulate matter pollutants that reduce visibility.
- Conduct air quality resource monitoring within the BCNM boundary to obtain local data.

3.3.4 Cultural Heritage, Tribal Values and Uses

Commenters stated the importance of cultural landscapes and tribal values and coordinating with tribal interests to manage cultural resources and culturally significant sites appropriately. Commenters also provided support for education, signage, and interpretive programing. The USFS and BLM should develop signage to be placed at viewpoint(s) and should include interpretive information as well as guidelines related to ethics and impacts of off-trail use on Native American sites and artifacts. Signage in the area should only be in places deemed appropriate by the tribes. Additional information on consultation and coordination is provided in Section 3.3.1.

Commenters suggested the following goals, objectives, and management actions:

- Develop a cultural RMP, including a schedule for inventories, identifying sites with high-visitor traffic, and incorporating the appropriate management actions based on those inventories; involve tribal participation.
- Develop a Programmatic Agreement among the relevant agencies in order to clearly lay out the responsibilities and delegations of authority for preservation and identification of cultural resources as well as compliance with Section 106 in advance of implementation.
- Develop an area of potential effect that reflects the potential visual, auditory, and physical effects to the setting of historic resources that may extend beyond the Monument boundaries.
- Development of appropriate educational and science-based programs related to cultural resources within the national monument. Further, commenters requested the historic railroad be interpreted.
- Implement educational programs and materials related to geology, minerals, paleontology, and cultural-historical resources important to American Indian tribes.
- Allow for cross-country travel access by Native Americans by foot or horse for gathering Monument resources.

3.3.5 Geology, Minerals, and Paleontology

Commenters expressed concerns that rock hounding and other activities have led to informal trail proliferation, increased erosion, and other resource damage. It was also stated that rocks, minerals, petrified wood, fossils, etc. are important resources within the Monument and must be protected.

Commenters suggested the following goals, objectives, and management actions:

- Mitigation and restoration of surface impacts from prior exploratory or active claims to natural conditions; water, waste, and hazards resulting from prior mining activities should be monitored.
- Prohibit casual collection of rocks, minerals, petrified wood, artifact, fossils, etc. resources at all locations within BCNM except Ruby Canyon. Prohibit all commercial use.
- Allow for limited, non-commercial mineral collection at Ruby Mountain. Consider additional regulations to manage this activity, including:

- establishing a permit requirement,
 - designating and signing specific locations,
 - clarifying specifications around "reasonable use" for rock collection,
 - limiting collection to hand tools and picks, and
 - limiting quantity to no more than 25 pounds per day per person, and no more than 100 pounds by any individual in 1 year (individuals may not pool daily nor annual limitations).
- If necessary, purchase any existing claims that have the potential to result in adverse effects on the Monument.

3.3.6 Lands with Wilderness Characteristics

Commenters stated that the long-term conservation of and restoration of important and at-risk cultural resources can best be provided by managing to protect the wilderness characteristics and values of lands within BCNM and by limiting motorized use to existing roads.

Commenters expressed concern regarding the Browns Canyon WSA's potential release from wilderness consideration change in management practices. The commenter further states that BCNM was designated for its remote and wilderness values and changing the management practices based on routinely changing priorities from one Congress to the next may damage the long-term resources that were originally designated to be protected.

Commenters suggested the following goals, objectives, and management actions:

- Manage and maintain the naturalness of these areas in accordance with the Wilderness Act of 1964, Section 2(c)(4) in order to preserve the ecological, geological, scientific, education, scenic, and historic values.
- Design trails to create minimal impact to LWCs, avoid fragmentation of wildlife habitat, and limit or remove all motorized vehicle use.
- BLM should not significantly modify the current and proposed uses of the LWCs.
- Under Alternative B, Railroad Gulch (537 acres) and Browns Canyon North-Ruby Mountain (88 acres) should be managed to protect wilderness characteristics.
- In order to maintain wilderness values, locate range developments away from riparian areas, design facilities to fit in with the natural landscape by using native materials for fencing. Also, encourage ranchers to use traditional transportation (i.e. horses) to access the more primitive areas.
- BLM should recognize the wide range of values associated with lands with wilderness characteristics that supplement and benefit other resources. These include scenic values, recreation, cultural resources, wildlife habitat, connectivity, and riparian areas.
- Analyze impacts on cultural resources from motorized use within LWCs.

3.3.7 Vegetation, Wildland Fire Ecology, and Fuels

Commenters expressed concerns about vegetation management, specifically invasive vegetation and treatments, sensitive plant species, and riparian and wetland area management. Commenters described the that an indication needs to be made on a site-specific scale with strong consideration for site potential (e.g., determinations of stubble height, composition, etc. may not be standardized due to differing soil, moisture, etc. conditions).

Commenters suggested the following goals, objectives, and management actions:

- Explore and implement requirements around the use of local firewood, weed-free hay for horses, and other specific measures as necessary to prevent the introduction and spread of invasive species.
- Do not allow spraying of herbicides or pesticides via aircraft. Use of all-terrain vehicles to apply herbicides and pesticides should be limited to designated routes and subject to seasonal closures.
- Allow for aerial treatment and/or Unmanned Aircraft Systems (UASs) in limited circumstances for fire, vegetation, wildlife management.
- Protect riparian values to support the boating community, which depends on healthy riparian habitats and river flows.
- Restrict development of any new trail or other development within a 100-foot buffer of sensitive plant locations.
- Limit the use of non-native species, including non-native sterile and non-persistent species, for restoration projects.
- Allow weed control by mechanical methods to maintain biodiversity and health of the ecosystem.
- Maintain natural process that enhance and preserve vegetation biodiversity.
- Allow natural fires to burn, when feasible, to promote vegetation biodiversity and allow for natural fire regimes to occur.
- Restrict prescribed burns in the WSA and allow natural fires to preserve its natural character.
- Prescribed burns should be addressed and allowed under Alternative B as well as Alternative C. Prescribed burns are generally beneficial to wildlife habitat, and therefore are appropriate within the established sideboards of Alternative B.
- Implement adaptive management to manage recreation, wildlife, and grazing management during critical times, such as dry, low water.
- Analyze the impact of motorized recreation on sensitive plant species.

3.3.8 Visual Resources and Scenery Integrity, Night Skies, and Natural Soundscapes

Commenters requested that visual resources and natural soundscapes be both preserved and enhanced within the boundary. It was also requested that efforts be made to ensure that the skies within the boundary are unimpeded by excessive lights. Commenters also stated that

anthropogenic noise is a significant stressor to many wildlife species and can impact behavior, physiology, and important life cycle events.

Commenters suggested the following goals, objectives, and management actions:

- It should be clarified that habitat work could be accomplished under all alternatives regardless of Visual Resource Management (VRM), Scenery Management Systems, and Scenic Integrity Objectives standards.
- Include language to proactively manage for natural night skies and natural soundscapes; working with local communities.
- Utilize existing National Park Service management practices for measuring and administering soundscapes and noise pollution to serve as a starting point for developing a sound management practice within the Monument.
- Inventory visual resources following the process outlined in BLM Manual H-8410-1.
- Designate lands with pre-existing management requirements (Special Designations) as VRM Class I.
- Align visual resource classes with the corresponding management area designations.
- Maintain a low contrast for all visitor infrastructure regardless of the VRM classification.

Commenters requested that the BLM/USFS analyze night skies and soundscapes impacts to nocturnal wildlife, ecological processes, and desired visitor experiences.

3.3.9 Watersheds, Soils, and Water Resources

Commenters expressed support for an education program to encourage proper disposal of human and pet waste. Concerns over new in-channel infrastructure to control flows and sediment were also identified, noting that such projects can adversely impact environmental and riparian conditions and result in an overly managed river system.

Commenters suggested the following goals, objectives, and management actions:

- Installing primitive restroom facilities would not be effective, would require substantial resources and is not in character with the wilderness setting of BCNM.
- Establish minimum stream flows or water rights to protect flow-related Outstandingly Remarkable Values.
- Preserve and restore “proper functioning condition” of riparian habitat and soils.
- Implement Best Management Practices and proper mitigation and restoration to any improvement projects or management activities to keep surface disturbance to a minimum.
- Water quality should be monitored in areas where trails cross streams or creeks.
- Concern that the Preliminary Planning Criteria do not explicitly recognize existing or reserved water rights.

3.3.10 Wildlife and Fish

Commenters stated concerns related to sensitive species and habitat, threatened and endangered species, and ecosystem and habitat health.

Commenters suggested the following goals, objectives, and management actions:

- Seasonal closures of roads and trails to protect wildlife. These restrictions should apply to all human activity and not just recreation. Seasonal closures should apply to a variety of important habitats. In addition to raptor nesting sites, other important habitats include elk and bighorn sheep production areas, big game winter concentration areas, bald eagle roost sites, and others. Apply adaptive management techniques to extend the avoidance seasons and locations as needed.
- New locations with seasonal avoidance requirements, including a section of the Turret trail, the Catkin Gulch trail, and FSRs 184, 185, 185.D, and Forest System Trail (FST) 1434.
- Consider rerouting existing trail segments out of areas where they result in adverse resource impacts.
- Concerns about a new public road and parking area west of Turret. This project would impact riparian areas, bighorn sheep winter range and production areas, other wildlife, and falcon nests.
- Support for increased public education efforts to protect the long-term health of the Gold Medal fishery. Recommend a partnership between BLM and CPW to initiate a Creel Census to determine fishing pressure within BCNM, angling methods, catch rates, angler satisfaction, etc.
- Recommendation to formalize a monitoring and management program to maintain healthy wildlife populations.

3.3.11 Recreation

Commenters provided input on a variety of issues and management actions related to recreation including access, permits, dispersed camping, user conflicts, land activities (camping, climbing, bicycling, hiking, equestrian, hunting, shooting, and Off-Highway Vehicles [OHVs]), and water activities (canoeing, kayaking, rafting, and fishing). Commenters expressed concerns over the budget to maintain existing and fund potential new recreation improvements. The RMP should provide clarification on funding and an implementation strategy, including triggers for adaptive management. Commenters provided a range of desired recreational experiences and settings, which ranged from allowing additional motorized access consistent with historic use prior to the Monument or WSA establishment to a solitude-based experience highlighting only non-motorized and non-mechanized activities.

Commenters suggested the following goals, objectives, and management actions:

- Provide opportunities for a range of overnight camping experiences, from developed campgrounds to dispersed primitive camping. Camping should be managed in a sustainable manner and well maintained, which requires providing necessary resources and educational activities that promote appropriate visitor behavior. Monitor specific locations that see high visitation and continue to build a database of baseline information

to help define triggers that identify if overuse is becoming an issue. Examples of triggers for overuse: proliferation of new campsites, loss of vegetation cover, clearing land for firewood, increase in bare ground, soil compaction, erosion, decreased wildlife counts and viewing, etc. Additional recommendations on designated dispersed camping along spur routes is provided in Section 3.3.12.

- Allow camping only in developed campgrounds or designated dispersed camping areas. Dispersed camping would be prohibited at all other locations.
- Allow/do not allow backpacking in the Monument; consider a permit or sign in system for backpackers.
- Employ adaptive management strategies to manage dispersed camping and user conflicts. This would include a 7-day camping limit, use of reservation system, and designated campsites. Fire pans and use of a portable toilet device would be required at all dispersed sites.
- Maintain existing motorized access and dispersed camping along travel routes consistent with current travel plans.
- Require that campfires be contained within a structure. Provide agency-constructed fire rings, fire bowls, or pits at all designated (dispersed and campground) campsites. In the WSA adopt wilderness campfire/stove policies and implement triggers to close impacted areas in primitive areas.
- Connect/do not connect the River Access Trail and the River Bench Trail and social-trails in the area. Examine tradeoffs and associated impacts from social-trails to visitor experience, wildlife, vegetation, soils, wilderness characteristics, etc.
- Evaluate strategies for reducing the impacts of camping along the Arkansas River including:
 - Implementing a free or minimal fee camping permit system and/or sign up system for hikers and boaters.
 - Designate boat-in and hike-in campsites in the River Bench area.
 - Restore or designate/formalize social trails from campsites, as appropriate.
 - Provide hardened campsites.
 - Require specific gear such as fire pans and sealed toilet systems.
 - Develop additional campsites; designating some for commercial use and others for non-commercial use.
- Construct a backcountry, single track hiking and/or mountain bike trail linking Salida and Buena Vista through the east side of the Monument. A remote, long distance trail connecting to existing systems in these communities would benefit the local economy. Preference would be a route that does not use existing motorized roads.
- Restrict new trail development in sensitive habitat including; within 0.5 mile of raptor nests; elk and bighorn sheep production areas; elk or deer winter concentration areas; riparian areas; bighorn sheep winter range; or priority habitats of threatened or endangered species.
- Designate historic horseback trails from Elk Mountain Ranch and allow hiking along these trails.

- Develop a trail along the Arkansas River such as along the railroad tracks.
- Allow for fixed anchors (including bolts) to establish climbing routes.
- Prohibit all recreational target shooting.
- Do not allow electric bicycles.
- Consider closing, restoring, or decommissioning non-system trails.
- Prohibit camping at trailheads and day use facilities and within 0.25 mile of all trail intersections with a road.
- Allow new roads, parking areas, or trails designated for motorized vehicle use in areas west of the Arkansas River and at the Ruby Mountain Recreation Site. These would be allowed only as necessary to provide reasonable river, parking area, and/or campground expansion and access.
- Consider requiring permits to avoid overuse by all types of recreation.
- Develop clear special recreation permit (SRP) guidelines. Classify SRPs into distinct classes, ranging from least intensive to most intensive, based on specific factors such as the size of equipment, size of area used, number of participants, frequency of use, compatibility with other uses, etc. SRPs should only be issued if the permitted activities would not negatively impact monument objects and values.
- Continue AHRA recreation management of all AHRA Recreation and Public Purpose (R&PP) Recreation Sites within the BCNM and within all AHRA Cooperative Management Lands.
- Develop a monitoring plan that is meaningful, repeatable and focuses on landscape level changes. Allocate adequate resources and incentives to achieve the desired level of monitoring. Livestock grazing permittees should be engaged in the monitoring.
- Develop additional interpretive materials, brochures, maps, and kiosk signage to manage for expected increases in visitation. Education should be included on waste, including pet waste.
- Manage access to Ruby Mountain rockhounding. See Section 3.3.5 Geology, Minerals and Paleontology for more detail.
- Work closely with AHRA and CPW to monitor the impacts of increased use on the quality of fishing, riparian condition, remoteness, and overall experience.
- Require human and pet waste removal along the Arkansas River shore and within the Arkansas River RMZ, excluding Ruby Mountain and Hecla Junction where facilities exist.
- Support for the decisions to coordinate commercial permits for fishing with CPW and issue such permits in a manner that will reduce conflicts among users.
- Avoid, minimize, and mitigate the adverse impacts of recreational use on wildlife, natural, ecological, geologic, cultural, and other resources.
- Utilize management zones to provide guidance for travel and transportation management decisions and for the management of other resources and management prescriptions, such as visual resource management classifications.

- Analyze impacts of recreation, including unauthorized travel and use, on soils, land, vegetation, hydrology, wilderness character, and visitor experience.
- Analyze impacts from garnet collection; collection areas should be reviewed for sacred properties by local and native groups.
- Analyze impacts of recreation on the biophysical impacts to the river corridor.
- Analyze impacts of increased visitation on wilderness character and visitor experience.

Commenters suggested the following goals, objectives, and actions for management zones:

- Manage the majority of the Monument for primitive recreation.
- Do not divide the entire Monument into recreation management zones. Recreation should not be a primary resource use in priority wildlife habitat areas such as birthing and nesting areas, the Browns Canyon WSA, and Forest Plan management areas emphasizing big game winter range, grazing, and aspen production.
- Designate management zones emphasizing certain types of settings and experiences:
 - Front Country Zone (e.g. Ruby Mountain, Hecla Junction). Provide infrastructure and visitor support services in popular day-use areas. Active management will be more necessary in this zone than in other zones. Access is easy and convenient, and the encounter rate is very high. High maintenance and intervention will be required to accommodate concentrated visitor use. Opportunities for challenge and adventure are less important compared to other zones. Education and interpretation will focus on the monument objects of interest and resources or for public safety.
 - Passage Zone. Provide travel routes which receive use as throughways to allow access to other zones and trailheads or for administrative purposes. The Passage Zone can also provide recreational opportunities, particularly the Arkansas River Passage Zone. Rudimentary facilities should be provided as necessary to protect resources, educate visitors about monument features and enhance public safety. This may include parking, trailheads, primitive campsites, and information kiosks or signs (e.g., the area near the Arkansas River corridor, FSR 184, County Road (CR) 194, CR 300).
 - Backcountry Zone. Provide a less developed, self-directed visitor experience while accommodating motorized and non-motorized access on designated routes. Management is generally passive. Facilities are rare and provided only where essential for monument object and resource protection. Administrative control and the need for maintenance should remain moderate, with trail and route markers as well as designated parking and staging areas. The density of routes may be low to medium in select areas. Other non-motorized routes may exist in these zones at low densities. There will be a low to moderate chance for encounters with other people (e.g., trailheads in the northwest corner of the monument and the Aspen Ridge area).
 - Primitive Zone. Provide undeveloped, self-directed areas that serve quiet-use and non-motorized recreation in a primitive setting. Management should generally be passive and consistent with the management of wilderness quality lands. These areas generally have sensitive monument objects and resources; therefore, should

have a low density of low-standard, multi-use, non-motorized trails. There will be a low chance for encounters with other people (e.g., the area east of the Arkansas River that is outside of backcountry and passage zones, including the WSA, the area west of the Arkansas River and the area near Stafford and Railroad gulches).

Commenters suggested the following goals, objectives, and management actions for the preliminary recreation management zones presented in the *Planning Criteria – Preliminary Alternatives and Basis for Analysis Report*:

3.3.11.1 Arkansas River Shore and Bench

- Do not manage lands that are part of a WSA in a manner similar to other BLM lands not part of the WSA. Reduce the extent of this RMZ to not include the Turret and Bench trails and the WSA; RMZ focus should be on intensive river use and day hiking and not include Turret and River Access trails which are more backcountry in nature.
- Include lands adjacent to the Arkansas River that are cooperatively managed with AHRA within this RMZ, due to the high volume of use in this area.
- Refine or create a new RMZ for lands cooperatively managed with AHRA along the Arkansas River, including land 200 feet from the river in the Monument, except those lands that are part of the Hecla Junction and Ruby Mountain leased areas.
- Do not include any land within the railroad right of way and east of that right of way where the railroad passes through the Monument.

3.3.11.2 Aspen Ridge

- Consider pack-in, pack-out for human waste as a management tool in highly used designated dispersed site.
- Consider a develop campsite to accommodate increased use, possibly somewhere near Bassam Park.
- Designate campsites with permanent fire rings where campers can park in the 100-foot buffer zone and carry gear by foot to the campsite.
- Include signage and mapping of the trail system appropriate for visitation and camping, including the differences between camping on the east side of FSR 185 versus the west side of FSR 185 within the Monument.
- Provide signage to keep people from parking/trespassing in Turret/Austin Trail Area. Consider creating a parking/turn-around area with a composting toilet 0.5 mile beyond Turret on Austin Trail to provide access to the Railroad Gulch/Stafford Gulch/ Hecla Tower area, and to keep people from stopping in Turret.
- Establish an overlook of the canyon and river.
- Do not include the area around FST 1435 as part of this RMZ; manage this area as primitive backcountry zone.
- Do not allow new trails.
- Accommodate dispersed motorized camping within 100 feet of the road along the Aspen Ridge Road outside the Monument boundary.

- Consider adding/defining spur routes as scenic overlook(s), subject to the NEPA process, providing accessing for visitors with varying capabilities.

3.3.11.3 Ruby Mountain – Hecla Junction

- Consider separate parking designation for vehicles with OHV trailers.
- Do not allow OHV parking due to impacts on user experiences, crowding, noise, dust, fumes, and the pre and post wilderness experience of users.
- Explore an increase of parking within the AHRA R&PP lease as multiple users (rafters, fishermen, hikers, campers) are exceeding the space on holidays and weekends.
- Develop a pedestrian bridge at Hecla Junction or vicinity.
- Develop concept plans to harden specific locations for dense visitor access.
- Manage Hecla Junction and Ruby Mountain as separate management zones.
- Clarify AHRA user fee area at Ruby Mountain as it relates to crossing through the AHRA managed area to Monument facilities and trails.
- Clarify Recreation Appendix reference to garnet collection in this zone; Ruby Mountain is not included as part of this zone. Ruby Mountain itself is part of the WSA and not included in the AHRA leased area.

3.3.11.4 Railroad Gulch

- Manage area to maintain natural and wild qualities while providing necessary information and amenities, namely parking in the proposed location along the Austin Trail outside of the monument's boundary.
- Examine designating a 0.5-mile system route for motorized public access down the existing Austin Trail for hikers, hunters and equestrians. Provide parking.
- Designate a non-motorized route down the historic Austin Trail Railroad Gulch and the Reef.
- Do not designate this area as an RMZ as there are no designated recreational facilities, western access is across a no-trespassing railway corridor, and eastern access across private land.
- Manage area for wildlife habitats (falcon nest, Red-tailed hawk nest, bighorn sheep lambing area). Do not develop new trails.
- Manage area in upper Stafford Gulch for primitive backcountry

3.3.11.5 Monument Backcountry River East

- Manage the WSA as part of this RMZ.
- Develop a trail from the east side of the Monument into the interior, such as a spur trail off of FST 1435.
- Manage area for primitive characteristics and settings, including no new trailheads or other facilities. Trail management should focus upon resource protection rather than development.

- Minimize signage in backcountry and primitive zones; any signage should primarily be for visitor safety and resource protection.
- Include FST 1435, a non-motorized system trail, as part of this RMZ. Manage issues at the current FST 1435 trailhead, including barriers and/or signage as needed to limit motorized access. Implement seasonal trail closures.
- Incorporate almost all of the Aspen Ridge and Arkansas River Bench and Shore proposed zones, and all of the Railroad Gulch proposed zone areas into this RMZ.
- Delineate RMZ boundary based on current and past Wilderness Area boundaries; extending all the way to the current Monument boundary in most areas. This zone would extend within 100 feet of CR 300, FSRs 185.D, 185, and 184. It would extend to within 100 feet of FSTs 1434 and 1435. It would extend up to the edge of the Monument Boundary in all other areas except along the river, where this zone would be 200 feet east of the river or to the railroad tracks (whichever is furthest east at that point) for areas east of the river.
- Do not manage area as semi-primitive motorized or roaded natural. Management Prescription area 2B on pages III-116-124 of the current Forest Plan emphasizes rural and roaded-natural recreation opportunities. Many of the standards and guidelines, and general direction for 2B areas in that Plan would not be compatible with the Proclamation, the Colorado Roadless Rule, or protection of objects of scientific and historic interest.

3.3.11.6 Monument Backcountry River West

- Protect the significant elk production area in this zone.
- Manage the northern 811 acres of Monument lands west of the river as a primitive zone to retain their wild and primitive character.
- Monument Backcountry – River West RMZ. The western boundary of BCNM should be surveyed and adjusted, as needed, using cadastral mapping. The area should also be surveyed to better understand its resources and evaluate potential future usage. (See Planning Criteria Report, p. 40, and Appendix B, pp. 4-5.)

3.3.11.7 Turret Road

- Do not state that a desired future condition for this zone is to provide OHV driving. The proclamation does not specifically include or mention anything about OHV driving being provided for along FSR 184.
- Provide signage to keep people from parking/trespassing in Turret/Austin Trail Area. Consider creating a parking/turn-around area with a composting toilet 0.5 mile beyond Turret on Austin Trail to provide access to the Railroad Gulch/Stafford Gulch/ Hecla Tower area, and to keep people from stopping in Turret.

3.3.12 Travel and Transportation Management

Commenters provided numerous suggestions related to travel and transportation management, including a variety of specific recommendations on trailheads, trail/road improvements and

additions, signage, parking areas, and dispersed camping. Commenters provided both support and opposition to increased motorized vehicle access within the Monument. Commenters requested that historic opportunities for motorized use access be allowed to continue.

Commenters expressed concerns with depicting unauthorized and undesignated routes on public maps. Commenters stated that travel and transportation management should ensure the protection of the characteristics of special designations, including the Aspen Ridge Roadless Area, the Browns Canyon WSA, and the Browns Canyon ACEC.

Commenters requested that the approved system-route network should protect and preserve BCNM values while also providing for recreational use. Travel management should provide the minimum route network necessary to support enjoyment of the monument. The route network should also be sustainable in terms of agency resources for monitoring and management. The plan should focus on places at which there will likely be an increase in visitation.

Commenters suggested the following goals, objectives, and management actions:

- Develop a travel management plan to inventory, evaluate, and analyze routes to reduce redundant routes, re-route or close existing routes where they are harming monument objects and/or sensitive resources. Prepare and implement a closure and rehabilitation plan for unnecessary routes.
- Monitor OHV use areas. If impacts to natural and cultural resources are occurring, develop implementation-level use limitations including route closures, vehicle size and weight limitations, or other mitigation measures as necessary.
- Continue to manage the following system trails as non-motorized, non-mechanized: T6045 (Turret Trail), T6045A (River Bench Trail), T6046 (Calkin Gulch Loop), and T6045B (River Access Trail). Using USFS guidelines, manage T6045 (Turret Trail) as Trail Class 2 (moderately developed) to sustainably manage access use in the WSA and T6045A (River Bench Trail), T6046 (Calkin Gulch Loop), and T6045B (River Access Trail) as Trail Class 1.
- Restrict all motorized and mechanized use to designated routes, including but not limited to routes along the Aspen Ridge Road and a 0.25 mile route extending off FSR 185.D. Utilize a combination of signage and structures to deter further use.
- As appropriate, designate non-system routes as system routes along Aspen Ridge as scenic overlooks or dispersed campsites (with parking located in the 100-foot buffer between Aspen Ridge Road and the monument boundary).
- Seasonally close roads and trails to all human use where determined necessary and install signs and gates.
- Close the northernmost 0.38 miles of FSR 184 to all motor vehicle use at 38°42'21.95"N 106°0'44.75"W and convert to a designated trail open to hiking and horse riding use.
- Improve Austin Trail to accommodate private vehicles, including pickup trucks with horse trailers.
- Allow motorized travel for maintaining and establishing range improvements.
- Allow/do not allow over snow vehicle use off designated routes.
- Install signage where designated routes enter the Monument.

- Provide parking facilities at Austin Trail and north of Turret on FSR 184 near the Monument boundary; relocate the existing gate at the edge of Turret to a point on Austin Trail.
- Limit mechanized travel (e.g., bicycles) to routes open to OHVs and create trails specifically designated for bicycle use.
- Allow active rehabilitation and reclamation of undesignated routes and passive revegetation, with minimal additional site-specific analysis.
- Allow/do not allow the realignment and repair of the historic footprint of FSR 184 between FSR 184 and the Arkansas River to restore historical multiple use access to the area.
- Explore other environmentally responsible means to transport people into the Monument, such as shuttle bus system from parking locations outside of the Monument.
- Recognize all pre-existing spurs and associated campsites off of FSR 185.
- Designate pre-existing campsites with evidence of use (including existing fire rings) that are fully located within the 100-foot buffer between the monument boundary and Aspen Ridge Road (FSR 185).
- Establish designated, dispersed camping along the east side of FSR 185.
- Develop up to two scenic overlooks in the Aspen Ridge area with parking allowed only within the 100-foot buffer zone along Aspen Ridge Road. Provide interpretive information along the route, restroom facilities, and an accessible picnic table. Do not allow camping.
- Allow/do not allow ad hoc/user-created additional designated dispersed sites or spur roads.
- Enforce policies of travel management and recreation sites with seasonal rangers.
- Stabilize and properly maintain existing designated trails before approving new trails.
- Establish a long-term agreement with a local volunteer user group to assist with the management and maintenance of the existing trails.
- Consider entering into future cooperative agreements for financial and advisory assistance, including one with Chafee County, to address road issues on adjacent private lands that lead into the Monument (e.g. CR 300).
- Consider compensatory mitigation for new trails in the Monument. For example, a proposal to add a new trail in the Monument might be conditionally approved if an existing trail such as FST 1435, which receives little use, is closed.
- Analyze impacts associated with the Fourmile TMP and Arkansas River TMP and other relevant actions that have superseded and replaced those plans.

3.3.13 Range and Livestock Grazing

Commenters stated concerns over noxious weeds related to healthy biodiversity; sheep and cattle trailing permissions; and the historical uses and management of all grazing allotments.

Commenters also pointed out the need for ranchers to access, maintain, enhance, and utilize their water rights on any proposed wilderness areas within the Monument. All historic uses related to

permittee maintenance, management, and improvements be document as pre-existing and are rights for continued management and use by the current and all subsequent permittees.

Also, access via motorized routes must be maintained in order to maintain range improvements. Commenters stated that properly managed livestock grazing has beneficial effects on BCNM lands.

Commenters suggested the following goals, objectives, and management actions:

- Weeds and weed control issues must be addressed, particularly in headwater areas. Weed control by mechanical methods must be allowed.
- Add language to explicitly ensure that livestock grazing permits will be transferrable to new permittee/owners in the exact same manner as was the case prior to the designation of the Wilderness Areas.
- Need for adding language to make it explicit that motorized access for the purposes of managing livestock grazing permits be allowed to continue in the same manner as is currently allowed.
- Ensure that grazing continues to be an economic contributor in the Arkansas Valley. Grazing leases within BCNM help to preserve the valley's ranching heritage.
- Minimize impacts to livestock grazing through public education and adaptive management with the goal of minimizing conflicts between recreationists and cattle. Education efforts should inform the public on BLMs and USFSs multiple-use mandates.
- Ensure that all presently accepted language, such as the right to change authorized grazing numbers, times of use, the transfer of grazing permits to other parties, motorized access for permit maintenance and administration, and range improvements be preserved.
- Grazing operations and improvements i.e., water developments, fences, gates, salting, and rotation, should be managed so as not to conflict with recreation where possible. Consider relocating structures to optimize both cattle and recreation opportunities.
- Consider fencing the area of land west of the river that is not allocated for grazing to control grazing use in this area.
- Analyze impacts to cultural resources from grazing activity.
- Analyze impacts to grazing allotments from recreational activities.

3.3.14 Lands and Realty

Commenters stated that UAS operators are a legitimate user group of the Monument and deserve fair consideration when assessing user access within the Monument. Commenters also stated that user conflicts can be avoided and any impacts are temporary in nature. Ranchers, forest managers, and wildlife managers can use UASs in ways that result in less disturbance than current land based methods. Conversely, some commenters expressed concern for the use of UASs within the Monument due to the potential to disturb wildlife, wilderness values, and recreational experiences. Commenters express concern that the Preliminary Planning Criteria do not explicitly recognize existing or reserved water rights.

Commenters suggested the following goals, objectives, and management actions:

- Authorize commercial filming via the appropriate agency throughout the BCNM without requiring site-specific NEPA analysis (e.g., Environmental Assessment) if the project is limited to the river surface; existing highways and pullouts; designated routes, roads, and trails; and previously disturbed or cleared areas.
- Consider acquiring the property on the east side of U.S. Highway 285 just south of CR 194/Hecla Junction Road for a visitor center.
- Consider providing the greatest degree of access for UAS operators so long as their activities are not significantly detrimental to Monument values or the experience of other users. All areas within the boundary of the Monument should be open to casual non-commercial use.
- Consider a new alternative that either imposes no new restrictions on UAS use within the Monument and allows casual non-commercial use.
- Consider location-specific rules and restrictions so that the use of UASs would not cause impacts or other disturbances in specific, sensitive areas such as nesting habitats.
- Consider making an exception for UAS use for emergency response purposes including firefighting and search and rescue operations.
- Consider creating appropriate restrictions on UAS use for events via a special use permit.
- Ensure the protection of resources in BCNM, compliance with Proclamation 9232, as well as safety and visitor experience when considering management prescriptions for UASs.
- Respect for private property rights must be honored.
- The analysis should consider impacts of UAS use on wilderness values, wildlife, and recreational experience.
- Consider potential fire risks from UAS use.

3.3.15 Social and Economic Conditions

Commenters suggested that developing a mountain biking/hiking trail connecting Buena Vista and Salida through the Monument would provide substantial recreation tourism opportunities and support local businesses. Additionally, commenters noted that livestock grazing on public lands contributes to the local economy. Commenters requested that the socioeconomic analysis evaluate the effects of management actions on socioeconomic conditions, recognizing that some actions may be beneficial to some groups and detrimental to others.

3.3.16 Issues Raised That Will Not be Addressed as Part of This Planning Process

The following comments were received and will not be addressed as part of this planning process for the following reasons:

- Issues that can be resolved through policy or administrative action.
- Issues beyond the scope of this plan.

- Issues that have already been addressed but should be better communicated to the issue holder.

Specific issues that fall into these categories include:

- Support for or opposition to Proclamation 9232.
- General Legal Concerns.
- Monument boundaries.

An example of this type of comment:

- Commenter feels the Browns Canyon Monument area covers too much area to the east of the actual scenic canyon and waterway it seeks to protect. This encroachment hinders the multiple use of our National Forest lands.
- Acquire private land edge holdings adjacent to the Monument boundary (specifically along the eastern boundary), should opportunities arise in the future. Certain types of allowed development of and activity on these private land parcels could potentially result in significant adverse impacts to the objects of historic and scientific interest on nearby Monument lands.

Further, general support for or against one of the preliminary alternatives or desire for the need to developing a general type of alternative without giving specifics were not considered.

3.3.16.1 Other Out of Scope Issues

Wilderness Areas – The designation of Wilderness Areas is by act of Congress; therefore the following comments will not be addressed in this plan:

- Designate all major riparian areas within the boundary as Wilderness to protect both the high desert environments and the wildlife that depend on these areas.
- Designated the entire Monument as a Wilderness Area in order to return the land to its original state. The commenter believes that all livestock grazing, recreational activities, invasive vegetation treatments, and existing leaseholders are causing harm to the lands within the boundary.
- Establish Wilderness boundaries based on visible, on-the-ground features such as human linear disturbances and/or geographic features.
- Designate most lands east of the Arkansas River as Wilderness.

Wilderness Study Areas – The BLM has established Planning Criteria stating the WSA will continued to be managed as is; therefore the following comments will not be addressed in this plan:

- Manage all LWCs managed as WSA. Furthermore, if the WSA is removed by congress, the commenter recommends that the BLM continue to manage the area as a WSA.
- Release the Browns Canyon WSA from wilderness consideration due to the restrictive nature of the designation. The commenter believes that the associated restrictions would prohibit the desirable recreational activities that take place in the vicinity of the proposed WSA.
- Commenter requests that all identified Roadless Areas be designated as WSAs.

- Commenter requests that all areas with wilderness characteristics outside of the WSA be managed in a similar manner.

Rafters, commercial and private boating permits – Boating use, both commercial and private, is managed through BCNM under the terms of a Cooperative Management Agreement (CMA) between BLM, USFS, and CPW. The management plan developed under the CMA defines boating carrying capacities and other terms and conditions for boating use (See <https://cpw.state.co.us/ahra-plan> for additional information); therefore the following comments will not be addressed in this plan:

- Consideration should be given to capping not only the number of commercial permits issued, but the number of boats per day allowed by any one company.
- The number of private trips should not be restricted in any way.
- No lottery or other restrictive permit system should ever be established for Browns Canyon.

4.0 NEXT STAGES IN THE PLANNING PROCESS

It is the goal of the RMP to develop objectives, administrative designations, allocations for allowable resource uses, and management actions. These are planning decisions that identify what types of uses or actions the BLM must allow or restrict in the various portions of the planning area at the comprehensive, program-level scale. Allocations identify whether or not BLM-administered lands would be available for various uses or potential uses. Management actions identify what and where future actions may or may not be allowed and what restrictions or requirements may be placed on those future actions to achieve the objectives.

BLM and USFS land use and forest planning follows a “tiered” approach, in which RMPs serve as the top level programmatic guidance that are focused on landscape-level goals and objectives and land use allocations. Specific implementation actions usually require additional information and a more detailed impact analysis before they can be approved. As such, the RMP will present a vision or desired condition for the area and provide a blueprint for protecting the resources and objects of value managed by the BLM and USFS.

Many of the comments received address implementation-level activities or actions that do not need RMP decisions to implement, such as inventorying, monitoring, agreements, and standards. For the purposes of summarizing public feedback received during scoping, the following comment summaries include many of these types of statements. While specific recommendations on implementation decisions may not be addressed directly in the draft RMP/EIS, comments will be utilized to inform the RMP’s allocation and management decisions, as well as future implementation decisions.

Any changes made to the purpose and need, planning issues, preliminary alternatives, analysis issues or analytic framework, or baseline data after scoping will be reflected in the Draft RMP/EIS anticipated to be published by the end of 2019.

Appendix A – Scoping Materials

Information provided during the public scoping period included a variety of notifications and materials. A copy of each of the following documents are provided in this Appendix.

1. *Federal Register* Notice of Intent
2. News Release
3. Newsletter
4. Newsletter Revised
5. Postcard
6. Social Media Posts
7. Meeting Display Boards
8. In-Person Presentation
9. Comment Form

ADDRESSES: The Saturday meeting will take place at the Ramada Inn, 1511 East Main Street, Barstow, California 92311. The location and agenda for the Friday field trip will be posted on the BLM web page at: <https://www.blm.gov/get-involved/rac/california/california-desert-district>, when finalized.

Written comments may be filed in advance of the public meeting, c/o Bureau of Land Management, Public Affairs, 22835 Calle San Juan de Los Lagos, Moreno Valley, CA 92553. Written comments will also be accepted at the time of the Saturday public meeting and will be incorporated into the meeting minutes and made available on the Council's website.

FOR FURTHER INFORMATION CONTACT:

Sarah K. Webster, BLM California State Office, telephone: 916-978-4622, email: swebster@blm.gov. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1-800-877-8339 to contact Ms. Webster during normal business hours. The FRS is available 24 hours a day, 7 days a week, to leave a message or question. You will receive a reply during normal hours.

SUPPLEMENTARY INFORMATION: The 15-member Council provides recommendations to the Secretary of the Interior concerning the planning and management of the public land resources located within the BLM's California Desert District and offers advice on the implementation of the comprehensive, long-range plan for management, use, development, and protection of the public lands within the California Desert Conservation Area.

All Council meetings and field trips are open to the public, but the public must provide their own transportation, meals, and beverages.

The field trip will include visits to the Cronese Lake, the Razor Off-Highway Vehicle Recreation Area, and the Avawatz Mountains. The Saturday public meeting will include a discussion of implementation of the John D. Dingell, Jr. Conservation, Management, and Recreation Act (Dingell Act), the West Mojave Route Network Project, and off-highway vehicle recreation as they relate to the previous day's field trip.

The Saturday meeting will also include discussions on implementation of the Dingell Act in the California Desert District, updates from Council members and the BLM California Desert District Manager, and time for public comment at the beginning and end of the meeting as well as during various presentations.

While the Saturday meeting is tentatively scheduled from 9:00 a.m. to 4:00 p.m., the meeting could conclude prior to 4:00 p.m. should the Council conclude its presentations and discussions. Therefore, members of the public interested in a particular agenda item or discussion should schedule their arrival accordingly. The final agenda will be posted to the Council's website at <https://www.blm.gov/get-involved/rac/california/california-desert-district>.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

(Authority: 43 CFR 1784.4-2)

Benjamin E. Gruber,

Acting California Desert District Manager.

[FR Doc. 2019-09930 Filed 5-13-19; 8:45 am]

BILLING CODE 4310-40-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCOF02400.L16100000.
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Notice of Intent To Prepare a Resource Management Plan and Associated Environmental Impact Statement for the Browns Canyon National Monument, Colorado

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: In compliance with the National Environmental Policy Act of 1969, as amended (NEPA); the Federal Land Policy and Management Act of 1976, as amended (FLPMA); and the National Forest Management Act of 1976, as amended (NFMA); the Bureau of Land Management (BLM) Royal Gorge Field Office (RGFO), Cañon City, Colorado and U.S. Forest Service (USFS), Pike-San Isabel National Forests and Comanche-Cimarron National Grasslands (PSICC), Pueblo, Colorado, intend to prepare a joint Resource Management Plan (RMP) and Forest Plan (FP) amendment, supported by an Environmental Impact Statement (EIS), for the Browns Canyon National Monument (BCNM). This notice announces the public scoping process to solicit comments and identify issues for

BLM and USFS consideration in the EIS. The management plan will revise a portion of the existing Royal Gorge RMP and amend the Pike-San Isabel National Forests and Comanche-Cimarron National Grasslands FP.

DATES: This notice initiates the public scoping process for the RMP-FP and EIS. Comments on issues may be submitted in writing until June 13, 2019. The date(s) and location(s) of any scoping meetings will be announced at least 15 days in advance through local media, newspapers and the BLM website at: <https://go.usa.gov/xn2eC>. In order to be considered in the Draft EIS, all comments must be received prior to the close of the 30-day scoping period or 15 days after the last public meeting, whichever is later. The BLM and USFS will provide additional opportunities for public participation upon publication of the Draft EIS.

ADDRESSES: You may submit comments on issues and planning criteria related to the BCNM RMP-FP and EIS by the following methods:

- *Electronically via the BLM ePlanning website:* <https://go.usa.gov/xn2eC>
- *Hard copy via mail to:* BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201

Documents pertinent to this proposal may be examined at the RGFO, 3028 E. Main St., Cañon City, Colorado 81212, at the PSICC Salida Ranger District, 5575 Cleora Road, Salida, CO 81201, or on the BLM ePlanning website at <https://go.usa.gov/xn2eC>.

FOR FURTHER INFORMATION CONTACT:

Joseph Vieira, Project Manager, telephone 719-246-9966; address 5575 Cleora Road, Salida, Colorado 81201; email blm_co_browns canyon@blm.gov. Contact Mr. Vieira at blm_co_browns canyon@blm.gov to add your name to our mailing list. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FRS is available 24 hours a day, seven days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: This document provides notice that the BLM RGFO and USFS PSICC intend to prepare a joint RMP/FP and EIS for the BCNM, announces and initiates the public scoping process, and seeks public input on issues and planning criteria. The USFS published a Notice of Intent to begin the Plan Assessment Phase of its planning process on April

17, 2017, consistent with 36 CFR 219 Subpart B. The planning area is located in Chaffee County, Colorado and encompasses approximately 21,600 acres (9,790 acres on BLM and 11,810 acres on USFS) of public land and national forest. The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, develop alternatives and guide the planning process. Preliminary issues for the planning area have been identified by the BLM and USFS personnel; Federal, State, and local agencies; and other stakeholders. The issues include: Managing for sustainable outdoor recreation, visitor growth and visitor enjoyment; conserving and protecting monument resources and objects or values including bighorn sheep, peregrine falcon, terrestrial and avian wildlife habitat, cultural and historical resources, geological features and riparian values; understanding and addressing tribal values; and addressing existing uses such as livestock grazing. Preliminary planning criteria include: Compliance with FLPMA, NFMA, NEPA, and other applicable laws and regulations; consultation and coordination with Native American Tribes with due consideration to Tribal concerns; incorporate the BLM Colorado Standards for Public Land Health and USFS planning criteria; management decision consistency across agency boundaries within the BGNM and with other contiguous public lands; continue managing Wilderness Study Areas under the Interim Management Policy for Lands under Wilderness Review until Congress acts on a designation or releases lands from consideration; recognize valid existing land-use and ownership rights; include adaptive management criteria to explore alternative ways to meet future management objectives; comply with existing plans and policies of adjacent local, State, Federal agencies and local Native American Tribes to the extent practicable; and use the best available scientific information and research where practicable for the planning effort.

The BLM and USFS will evaluate identified issues to be addressed in the plan, and will place them into one of three categories:

1. Issues to be resolved in the plan;
2. Issues to be resolved through policy or administrative action; or
3. Issues beyond the scope of this plan.

The BLM and USFS will provide an explanation in the Draft RMP-FP and Draft EIS as to why an issue was placed in category two or three. The public is

encouraged to help identify any management questions and concerns that should be addressed in the plan. The BLM and USFS will work collaboratively with interested parties to identify management decisions best suited to local, regional, and national needs and concerns. The BLM and USFS use and coordinate the NEPA scoping process to help fulfill the public involvement process under the National Historic Preservation Act (54 U.S.C. 306108) as provided in 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed action will assist the BLM and USFS in identifying and evaluating impacts to such resources.

The BLM and USFS will consult with Native American Tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal concerns, including impacts on Native American trust assets and potential impacts to cultural resources, will be given due consideration. Federal, State, and local agencies, along with Tribes and other stakeholders that may be interested in or affected by the proposed action that the BLM and USFS are evaluating, are invited to participate in the scoping process and, if eligible, may request or may be requested by the BLM and USFS to participate in the development of the environmental analysis as a cooperating agency. The BLM and USFS will use a joint interdisciplinary approach to develop the plan in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Outdoor recreation, wildlife and fisheries, threatened and endangered species; vegetation; invasive and noxious weeds; rangeland management; forestry; soils; hydrology; riparian systems; cultural resources and Native American interests; minerals and geology; fire ecology and management; paleontology; lands and realty; sociology and economics; visual resource management; law enforcement; and geographic information systems.

You may submit comments on issues and planning criteria in writing to the BLM at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the **ADDRESSES** section above. To be most helpful, you should submit comments by the close of the 30-day scoping period or within 15 days after the last public meeting, whichever is later.

Before including your address, phone number, email address, or other personal identifying information in your

comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Authority: 40 CFR 1501.7, 43 CFR 1610.2.

Jamie E. Connell,

BLM Colorado State Director.

[FR Doc. 2019-09837 Filed 5-13-19; 8:45 am]

BILLING CODE 4310-JB-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[19X.LLAKA02000.L16100000.DS0000.LXSS0L3I0000.241A]

Notice of Availability of the Supplemental Draft Environmental Impact Statement for the Haines Amendment to the Ring of Fire Resource Management Plan; Notice of Public Meeting

AGENCY: Bureau of Land Management, Interior

ACTION: Notice.

SUMMARY: The Bureau of Land Management (BLM), Glennallen Field Office is issuing for public comment the Supplemental Draft Environmental Impact Statement (EIS) for the Haines Amendment to the Ring of Fire Resource Management Plan. BLM Alaska will hold a public meeting in Haines to receive comments on the Haines Amendment Supplemental Draft EIS. The Supplemental Draft EIS will supplement the December 2012 Draft Resource Management Plan Amendment/Draft Environmental Impact Statement for the Haines Planning Area that originally analyzed which, if any, designations and associated management practices best fulfill the resource needs and multiple use demands within the Haines Planning Area.

DATES: To ensure that the BLM will consider your comments on the Haines Amendment Supplemental Draft EIS, BLM Alaska must receive your comments no later than August 1, 2019, which is 90 days after the Environmental Protection Agency published its notice of availability of the Haines Amendment Supplemental Draft EIS in the **Federal Register**. BLM Alaska will announce the date, time, and location of the public meeting in Haines on its website, through public notices, media news releases, and/or mailings.



U.S. Department of the Interior
Bureau of Land Management

News Release

Royal Gorge Field Office, Colorado

For Immediate Release: May 14, 2019

Contact: Brant Porter, Public Affairs Specialist, 719-269-8553

BLM and USFS Begin Public Scoping for Browns Canyon National Monument Resource Management Plan

CANON CITY, Colo. – Today, the Bureau of Land Management Royal Gorge Field Office, in coordination with the U.S. Forest Service, announced a 30-day public scoping period to help guide efforts for a combined Resource Management Plan for the 21,600-acre Browns Canyon National Monument.

“Public involvement is essential in developing the plan and managing Browns Canyon for current and future generations,” said Royal Gorge Field Manager Keith Berger. “We look forward to building on the strong community engagement established in the initial planning stages.”

By working with the public, the State of Colorado and key stakeholders, development of this RMP will further a number of Department of the Interior initiatives, including those exploring enhanced recreational opportunities for the public and building a meaningful conservation stewardship legacy.

The BLM and USFS are seeking input on resource management issues that members of the public would like the agencies to address in the plan. Three public meetings will be held during the scoping period to answer questions and accept written comments:

- June 3, in Salida, from 5:30 p.m. to 7:30 p.m. at the SteamPlant Event Center, 220 West Sackett Avenue
- June 4, in Buena Vista, from 5:30 p.m. to 7:30 p.m. at the Community Center, 715 E Main Street
- June 5, in Golden, from 5:30 p.m. to 7:30 p.m. at the Marriott Denver West, 1717 Denver West Boulevard

The BLM and USFS will also host two Public Scoping Webinars online on Wednesday May 29 from noon to 1 p.m. MDT and another on June 4 from 1 p.m. to 2 p.m. MDT. More information on the webinar is available at the ePlanning site.

Public comments will be most helpful if received by June 13 and must be submitted through the BLM ePlanning site at <https://go.usa.gov/xn2eC> or mailed to BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201.

Before including your address, phone number, e-mail address, or any other personal identifying information in your comments, be advised that your entire comment, including personal identifying information, may be

made publicly available at any time. While individuals may request the BLM to withhold personal identifying information from public view, the BLM cannot guarantee it will be able to do so.

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The BLM manages more than 245 million acres of public land located primarily in 12 Western states, including Alaska. The BLM also administers 700 million acres of sub-surface mineral estate throughout the nation. The agency's mission is to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations. Diverse activities authorized on these lands generated \$96 billion in sales of goods and services throughout the American economy in fiscal year 2017. These activities supported more than 468,000 jobs.



The Browns Canyon Chronicle

The Newsletter of the Browns Canyon National Monument Resource Management Plan
Volume 1 Issue 1 - May 2019
<https://go.usa.gov/xn2eC>



Kayaker and stand-up paddle boarder on the Arkansas River in Browns Canyon National Monument. Photo by Logan Myers.

Public Scoping for BCNM Plan Underway

On May 14, 2019, the BLM and the U.S. Forest Service (USFS) published in the **Federal Register** a notice of intent (NOI) to prepare a resource management plan / environmental impact statement (RMP/EIS) for Browns Canyon National Monument (BCNM). This began a 30-day scoping period during which the BLM is soliciting comments from the public on the preliminary alternatives (see page 4) and issues to be addressed in the Browns Canyon RMP/EIS.

BCNM was created by presidential proclamation on February 19, 2015, and it consists of about 21,600 acres of public land in the upper Arkansas river valley in Chaffee County, Colorado, of which, the BLM manages about 9,790 acres, and the U.S. Forest Service (USFS) manages about 11,810 acres. Colorado Parks and Wildlife (CPW), through the Arkansas Headwaters

Recreation Area (AHRA) manages river-based recreation on the Arkansas River, which runs through Browns Canyon. The BLM and the USFS are developing the Browns Canyon RMP/EIS jointly with cooperation from CPW, the towns of Buena Vista and Salida, and Native American tribes. The BLM is the lead agency in the planning process.

BLM and USFS will also host several public meetings to provide a forum for the exchange of ideas about monument management issues, goals and objectives (see page 2).

Comments can be submitted on the BCNM ePlanning website: <https://go.usa.gov/xn2eC> or by U.S. Mail to BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201. Please do not email comments. The scoping period ends on June 13, 2019.

In This Issue

- Public Scoping for BCNM Plan Underway.....1*
- Field Manager's Message.....2*
- Schedule of Public Scoping Meetings for BCNM Resource Management Plan.....2*
- Public Comments Sought on BCNM Wild & Scenic River Values.....3*
- Key Reports Help Agencies Develop BCNM Resource Management Plan.....4*
- A River Runs Through It.....4*

Field Manager's Message

Public scoping is an exciting and valuable part of developing a resource management plan for Browns Canyon National Monument, which is a unit in the BLM's [National Conservation Lands](#) system. Comments submitted by the public during scoping help determine the issues, goals, and objectives that the RMP/EIS will analyze and help ensure that management of BCNM is responsive to the public's needs and desires. Public involvement is absolutely essential in developing the plan, which will guide management of the monument for current and future generations. The BLM,

USFS, and CPW/AHRA greatly appreciate the strong community support provided in the initial planning stages for the RMP and look forward to building on that support. The BCNM RMP/EIS will replace the 1996 BLM **Royal Gorge Resource Area RMP** and amend the 1984 USFS Pike and San Isabel National Forest **Land and Resource Management Plan**, which currently guide management of the monument. We look forward to reading your comments or meeting you at one of our public meetings!

—Keith Berger, Field Manager
Royal Gorge Field Office

PLEASE NOTE

Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.



Photo by Logan Myers

SCHEDULE OF PUBLIC SCOPING MEETINGS FOR BCNM RESOURCE MANAGEMENT PLAN

Venue	Address	Date	Time
SteamPlant Event Center	220 West Sackett Avenue, Salida, CO 81201	Monday, June 3, 2019	5:30–7:30 p.m.
Buena Vista Community Center	715 E Main St, Buena Vista, CO 81211	Tuesday, June 4, 2019	5:30–7:30 p.m.
Marriott Denver West	1717 Denver West Boulevard, Golden, CO	Wednesday, June 5, 2019	5:30–7:30 p.m.

There will also be two public scoping webinars online on Wednesday, May 29, 2019, 12:00–1:00 pm, and Tuesday, June 04, 2019, 1:00–2:00 pm, MDT. For webinar call-in information or updates regarding public meetings, visit the BCNM ePlanning website at <https://go.usa.gov/xn2eC> or call 719-269-8500, Monday–Friday, 8 a.m. to 4:30 p.m., MDT. All open houses will start with a short presentation on the BCNP RMP/EIS and the planning process.

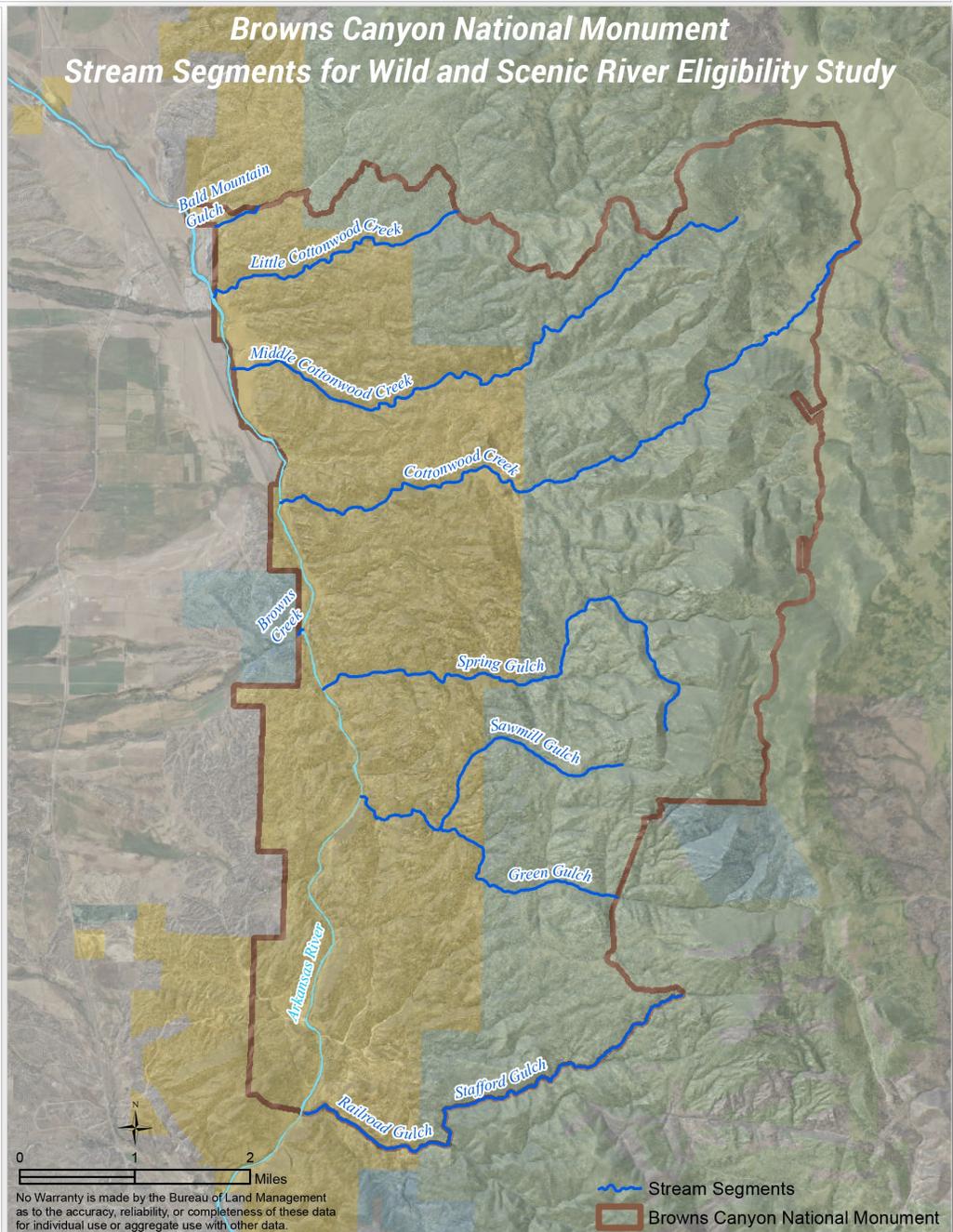
Public Comments Sought on BCNM Wild & Scenic River Values

As part of public scoping for the BCNM RMP/EIS, the BLM and USFS are requesting public and stakeholder comments about the eligibility and outstandingly remarkable values (ORVs) of waterways in the monument, in accordance with the Wild and Scenic River Act of 1968 (WSR Act). The BLM recently completed an eligibility study of the Arkansas River for the Eastern Colorado RMP, so the streams under agency study are tributary to but do not include the Arkansas River (see map).

A unique or rare river-related value (i.e., ORV), is one that is a conspicuous example from among a number of similar examples that are themselves uncommon or extraordinary. The BLM and USFS are seeking public comments on values listed in Section 1(b) of the WSR Act, specifically "scenic, recreational, geological, fish and wildlife, historical, cultural, or other similar values."

Other values that the agencies may consider include ecological, biological, botanical, paleontological, hydrological, traditional cultural uses, water quality, and scientific values. ORVs must be located in the river segment (or stream area) or on its immediate shores, within 1/4 mile, and contribute substantially to the functioning of the river ecosystem, and/or owe their location or existence to the presence of the river.

Following scoping, agency resource specialists will complete a draft WSR eligibility report, which will be released for public review.

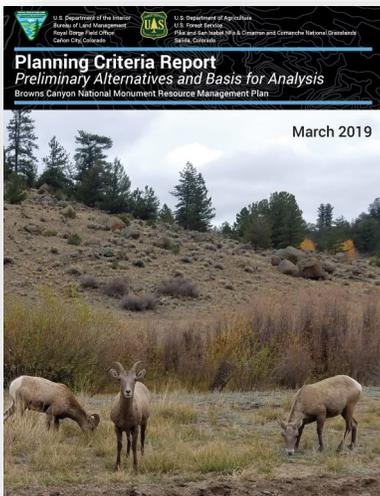


For a complete discussion of the wild and scenic river study process, please see **BLM Manual 6400—Wild and Scenic Rivers—Policy and Program Direction for Identification, Evaluation, Planning, and Management**, available online here: https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmmanual6400.pdf.

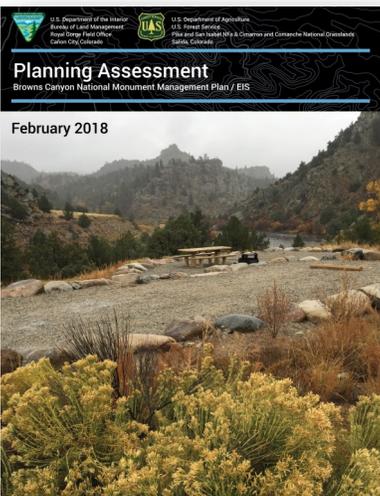


Key Reports Help Agencies Develop BCNM Resource Management Plan

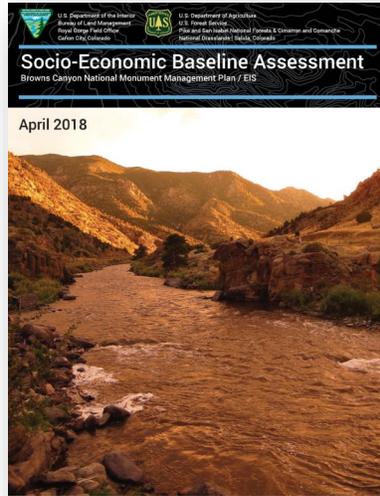
The BLM and USFS conducted a number of studies and subsequently published several reports in 2017–2019 to help answer questions related to developing a resource management plan for Browns Canyon National Monument. The BLM and USFS are soliciting comments on the **Planning Criteria Report** during public scoping for the RMP/EIS. All of these reports are available on the BLM’s land use planning (ePlanning) website: <https://go.usa.gov/xn2eC>.



Planning Criteria Report: Preliminary Alternatives and Basis for Analysis describes how the preliminary alternatives were developed and the methods that will be used to analyze potential impacts of the management alternatives in the BCNM RMP/EIS.



Planning Assessment Report evaluates best available scientific and other information about conditions, trends, and management questions relevant to monument resources, objects, values and uses.



Baseline Socioeconomic Report profiles population trends, demographics, and other social and cultural characteristics relevant to the BCMN and discusses employment, wages, earnings, sources of income, public finance, and economic indicators.



Social Landscape Assessment of Browns Canyon National Monument analyzes the results of stakeholder interviews, listening sessions, and participatory human ecology mapping to help understand the public’s values, interests, and concerns related to BCNM.

A RIVER RUNS THROUGH IT



You don’t have to tell the more than 373,000 annual visitors who raft or otherwise recreate in the segment of the Arkansas River that passes through Browns Canyon National Monument how spectacular it is, because they already know that. The Arkansas River is one of the most commercially rafted rivers in the United States, and the broader Arkansas Headwaters Recreation Area supports about 46.6 million dollars in local economic activity from fishing and boating each year. That’s roughly 7.5 percent of the 618.5 million dollars generated by BLM-managed recreation in Colorado in fiscal year 2017. AHRA is managed by Colorado Parks and Wildlife. For more information, go to the CPW website at <https://cpw.state.co.us/placestogo/parks/ArkansasHeadwatersRecreationArea> or visit or call the AHRA office at 307 West Sackett Ave, Salida, CO 81201, (719) 539-7289. The office is open 7 days a week. Photo by Logan Myers.



EFFECTIVE COMMENTS

- ⇒ Focus on issues such as wild and scenic river values (see page 3) or those in the preliminary alternatives and basis for analysis (see **Planning Criteria Report** above).
- ⇒ Provide constructive solutions, specific examples, and supporting documentation.
- ⇒ Are clear, concise, and relevant.
- ⇒ Avoid simply stating an opinion.



The Browns Canyon Chronicle

The Newsletter of the Browns Canyon National Monument Resource Management Plan
Volume 1 Issue 1 - May 2019
<https://go.usa.gov/xn2eC>



Kayaker and stand-up paddle boarder on the Arkansas River in Browns Canyon National Monument. Photo by Logan Myers.

Public Scoping for BCNM Plan Underway

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based recreation on the Arkansas River, which runs through Browns Canyon. The BLM and the USFS are developing the Browns Canyon RMP/EIS jointly with cooperation from CPW, the towns of Buena Vista and Salida, and Native American tribes. The BLM is the lead agency in the planning process.

BLM and USFS will also host several public meetings to provide a forum for the exchange of ideas about monument management issues, goals and objectives (see page 2).

Comments can be submitted on the BCNM ePlanning website: <https://go.usa.gov/xn2eC> or by U.S. Mail to BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201. Please do not email comments. The scoping period ends 15 days after the last public meeting, which is scheduled for June 5 (see page 2).

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Field Manager's Message

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Photo by Logan Myers

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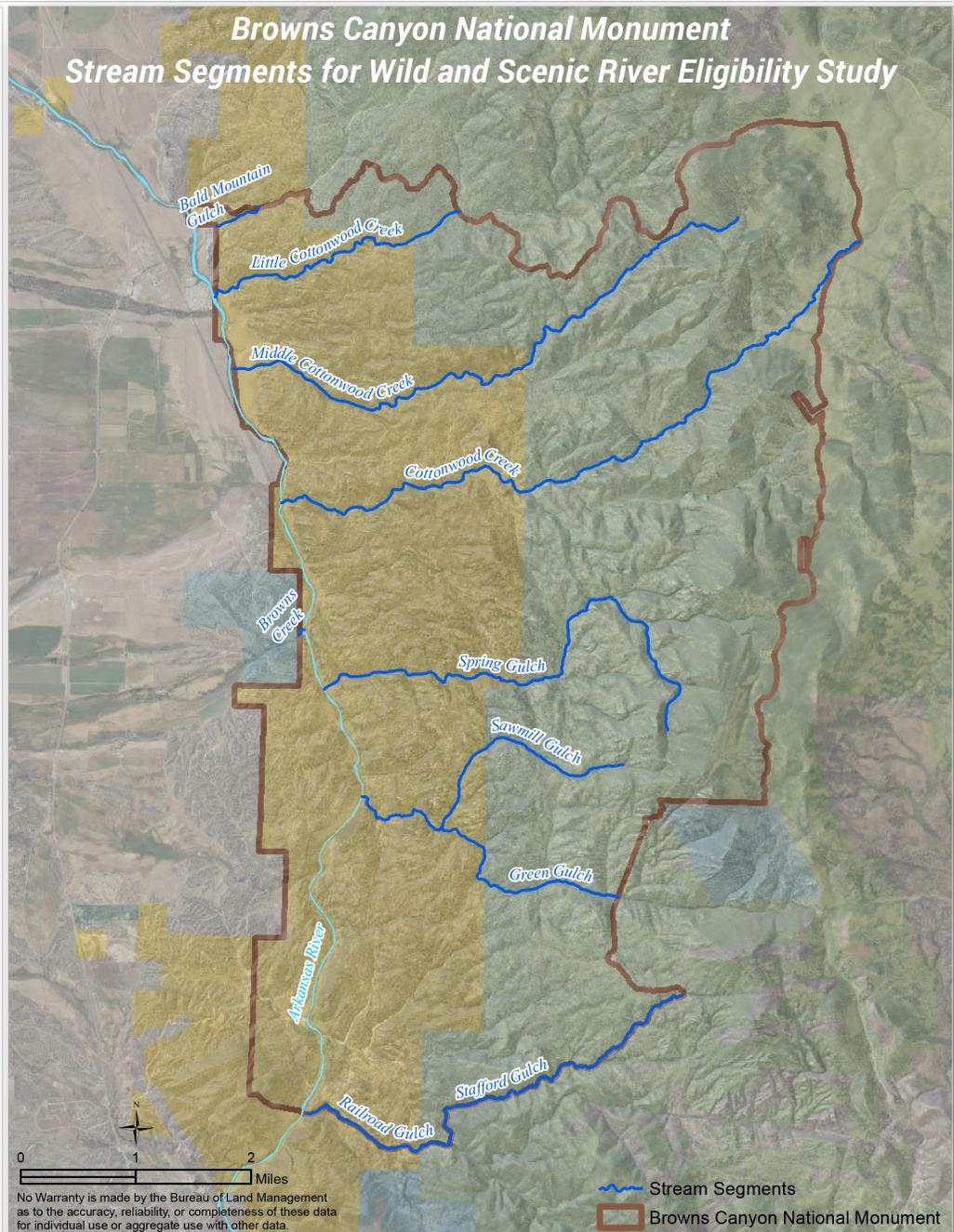
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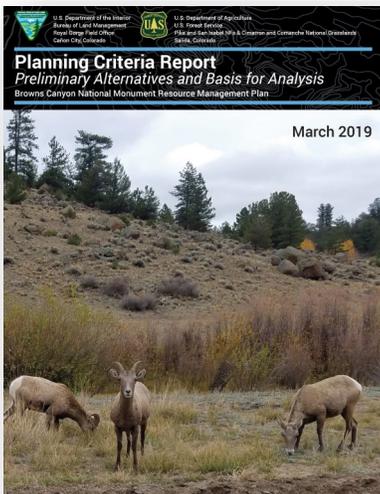


For a complete discussion of the wild and scenic river study process, please see **BLM Manual 6400—Wild and Scenic Rivers—Policy and Program Direction for Identification, Evaluation, Planning, and Management**, available online here: https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmmanual6400.pdf.

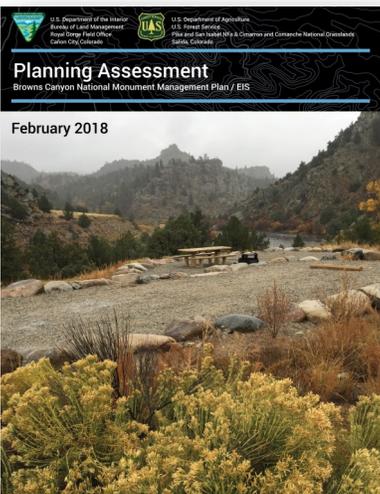


Key Reports Help Agencies Develop BCNM Resource Management Plan

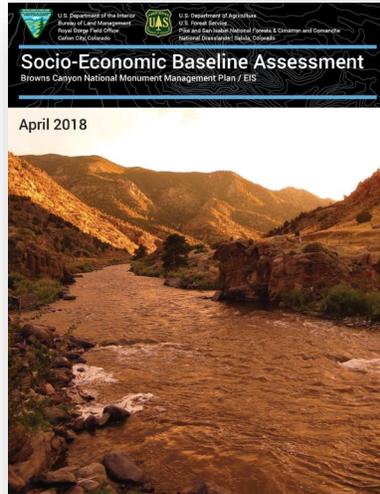
The BLM and USFS conducted a number of studies and subsequently published several reports in 2017–2019 to help answer questions related to developing a resource management plan for Browns Canyon National Monument. The BLM and USFS are soliciting comments on the **Planning Criteria Report** during public scoping for the RMP/EIS. All of these reports are available on the BLM’s land use planning (ePlanning) website: <https://go.usa.gov/xn2eC>.



Planning Criteria Report: Preliminary Alternatives and Basis for Analysis describes how the preliminary alternatives were developed and the methods that will be used to analyze potential impacts of the management alternatives in the BCNM RMP/EIS.



Planning Assessment Report evaluates best available scientific and other information about conditions, trends, and management questions relevant to monument resources, objects, values and uses.



Baseline Socioeconomic Report profiles population trends, demographics, and other social and cultural characteristics relevant to the BCMN and discusses employment, wages, earnings, sources of income, public finance, and economic indicators.



Social Landscape Assessment of Browns Canyon National Monument analyzes the results of stakeholder interviews, listening sessions, and participatory human ecology mapping to help understand the public’s values, interests, and concerns related to BCNM.

A RIVER RUNS THROUGH IT



You don’t have to tell the more than 373,000 annual visitors who raft or otherwise recreate in the segment of the Arkansas River that passes through Browns Canyon National Monument how spectacular it is, because they already know that. The Arkansas River is one of the most commercially rafted rivers in the United States, and the broader Arkansas Headwaters Recreation Area supports about 46.6 million dollars in local economic activity from fishing and boating each year. That’s roughly 7.5 percent of the 618.5 million dollars generated by BLM-managed recreation in Colorado in fiscal year 2017. AHRA is managed by Colorado Parks and Wildlife. For more information, go to the CPW website at <https://cpw.state.co.us/placestogo/parks/ArkansasHeadwatersRecreationArea> or visit or call the AHRA office at 307 West Sackett Ave, Salida, CO 81201, (719) 539-7289. The office is open 7 days a week. Photo by Logan Myers.



EFFECTIVE COMMENTS

- ⇒ Focus on issues such as wild and scenic river values (see page 3) or those in the preliminary alternatives and basis for analysis (see **Planning Criteria Report** above).
- ⇒ Provide constructive solutions, specific examples, and supporting documentation.
- ⇒ Are clear, concise, and relevant.
- ⇒ Avoid simply stating an opinion.



Browns Canyon National Monument Public Scoping Period and Meetings



The Bureau of Land Management and US Forest Service invite you to provide input on concerns to be addressed in the Resource Management Plan and Environmental Impact Statement for Browns Canyon National Monument .

Written comments can be submitted on the BLM's ePlanning site at <https://go.usa.gov/xn2eC>, or by U.S. Mail to BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201. Please do not email comments. **Comments should be provided by June 13, 2019, to be included in the public scoping report.**

Public Scoping Meeting Schedule: Open houses will start with a short presentation. All in-person meetings will be held from 5:30 - 7:30 pm.

Monday, June 3

SteamPlant Event Center

220 West Sackett Avenue, Salida, CO 81201

Tuesday, June 4

Buena Vista Community Center

715 E Main Street, Buena Vista, CO 81211

Wednesday, June 5

Marriott Denver West

1717 Denver West Boulevard, Golden, CO 80401

Online Webinar Presentations

The BLM and USFS will provide an overview of the project status and a tutorial for using the Comment Mapping Tool.

Wednesday, May 29,

12 - 1:00 pm MDT

Tuesday, June 4,

1 - 2:00 pm MDT

For updates and webinar registration information, visit: <https://go.usa.gov/xn2eC>

BLM Royal Gorge Field Office
RE: BCNM RMP/EIS
5575 Cleora Road
Salida, CO 81201



Bureau of Land Management - Colorado

May 14 at 6:25 PM · 🌐

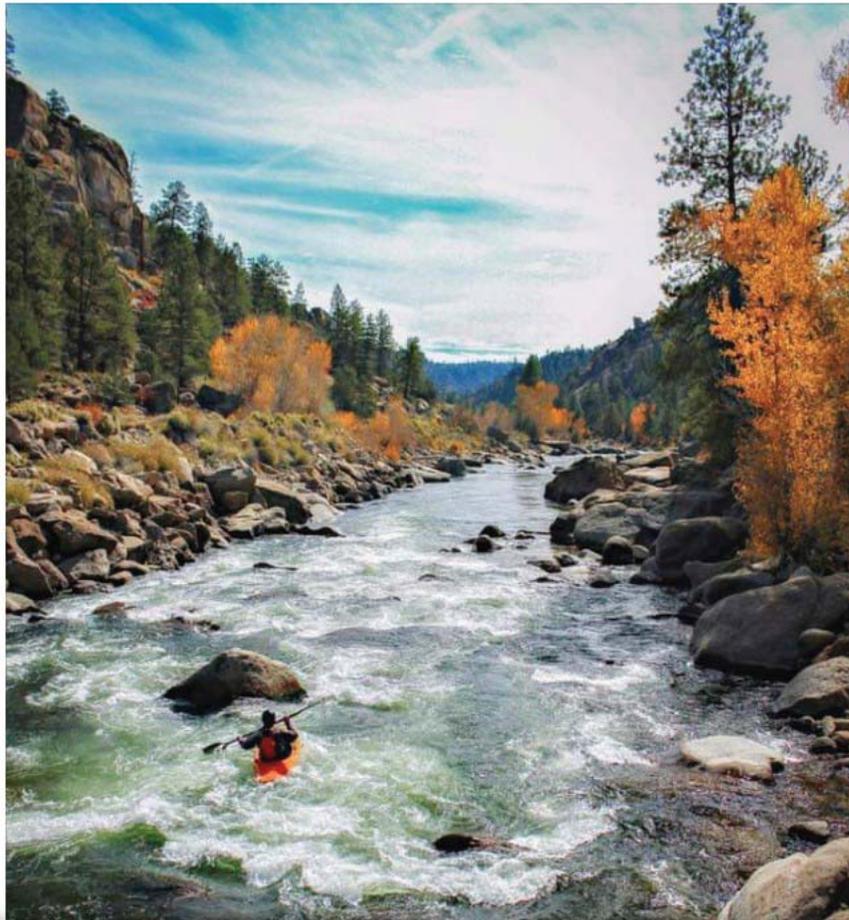
The BLM-Royal Gorge Field Office and U.S. Forest Service - PSICC National Forest want to hear your thoughts about Browns Canyon National Monument.

The agencies announced a 30-day public scoping period to help guide efforts for the Browns Canyon National Monument Resource Management Plan.

For more information on the plan, public meeting dates, and to submit comments, please visit the Browns Canyon e-Planning site:

<https://go.usa.gov/xn2eC>.

Photo by Logan Myers





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U.S. Forest Service - PSICC National Forest
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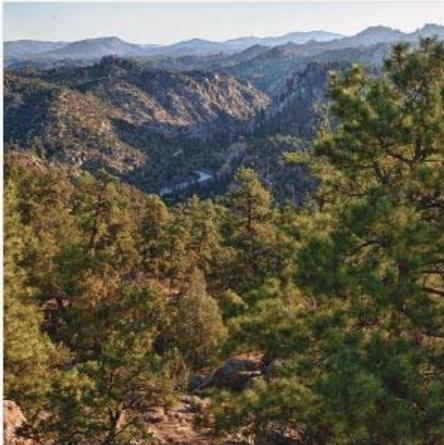
U.S. Forest Service - PSICC National Forest

May 14 at 12:15 PM · 🌐

The BLM-Royal Gorge Field Office and U.S. Forest Service want to hear your thoughts about Browns Canyon National Monument. The agencies announced a 30-day public scoping period to help guide efforts for the Browns Canyon National Monument Resource Management Plan. For more information on the plan, public meeting dates, and to submit comments, please visit the Browns Canyon e-Planning site: <https://go.usa.gov/xn2eC>.



Browns Canyon



Colorado - Royal Gorge FO - Browns Canyon National Monument RMP

2

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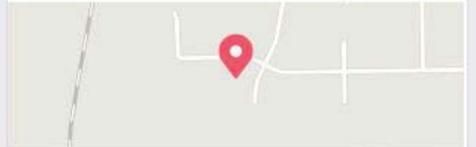
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- 17 check-ins

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USFS_Pike&San Isabel
@PSICC_NF

Welcome. This is the official site of the Pike & San Isabel National Forests and Cimarron & Comanche National Grasslands (PSICC) in Colorado and Kansas.

Rocky Mountain Region
fs.fed.us/r2/psicc/
Joined May 2009

Tweet to USFS_Pike&San Isabel

1,243 Photos and videos



USFS_Pike&San Isabel
@PSICC_NF

Follow

The 30-day public scoping period for the Browns Canyon National Monument Resource Management Plan starts today. For more information on the plan, public meeting dates, and to submit comments, please visit the Browns Canyon e-Planning site: go.usa.gov/xn2eC.



11:17 AM · 14 May 2019

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Overview

Browns Canyon National Monument (BCNM)

- Established under Presidential Proclamation 9232 (February 19, 2015).
- Encompasses 21,604 acres of BLM and USFS lands.
- Includes a portion of the Arkansas Headwaters Recreation Area (AHRA), a cooperative management area administered by the USFS, the BLM, and Colorado Parks and Wildlife (CPW)
- Presidential Proclamation 9232 defines the need for joint federal agency action to manage BCNM's resources, objects, and values.



What is a Resource Management Plan (RMP)?

- A land use plan as prescribed by the Federal Land Policy and Management Act (FLPMA) that establishes land-use allocations, coordination guidelines for multiple-use, objectives, and actions for a given area.
- This RMP will replace the 1996 BLM Royal Gorge Resource Area Resource Management Plan (RGRMP) and amend the 1984 USFS Pike and San Isabel National Forest Plan.

What is an Environmental Impact Statement (EIS)?

- A detailed statement prepared by the responsible official in which a major federal action that significantly affects the quality of the human environment is described, alternatives to the proposed action are provided, and effects are analyzed.

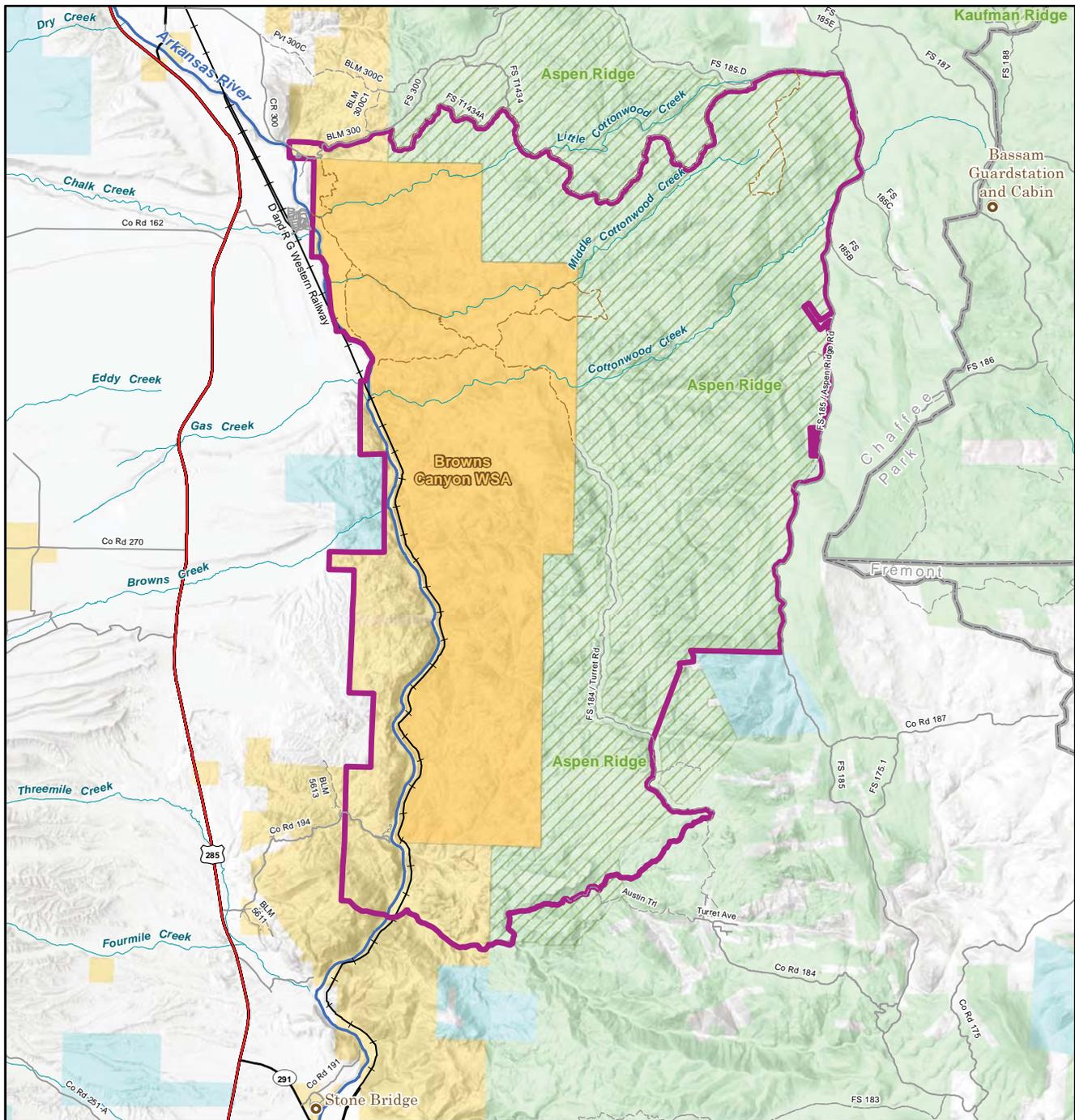
Relationship to Eastern Colorado RMP

- The Eastern Colorado RMP is being developed to provide comprehensive management direction for all the resources and uses within the Royal Gorge Field Office in eastern Colorado. It replaces the Royal Gorge Resource Area RMP and the Northeast RMP.
- BCNM is not included as part of this update



BROWNS CANYON NATIONAL MONUMENT

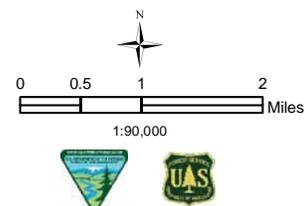
Resource Management Plan/Environmental Impact Statement



- Recreation Site
- Trail
- Motor Vehicle Use Road
- Browns Canyon NM
- Wilderness Study Area
- USFS Roadless Area
- State
- Bureau of Land Management
- Private
- U.S. Forest Service



Browns Canyon National Monument Planning Area



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregation use with other data. All boundaries are an approximate representation.

Schedule

 Opportunities for public input

Pre-Scoping



Scoping & Draft Plan



Proposed Plan



Available Reference Documents:

Social Landscape Assessment of Browns Canyon National Monument
 Browns Canyon National Monument
 AUGUST 2017 FINAL REPORT

Prepared by:
 Chris Barber, Senior Manager
 Geospatial Building Institute, Inc.
 San Francisco, CA

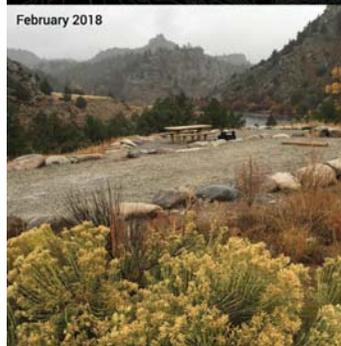
Lee Corwin, PhD, Research Social Scientist
 US Forest Service Pacific Northwest Research Station
 Seattle, WA

John Galamb, Associate Facilities
 Geospatial Building Institute, Inc.
 San Francisco, CA

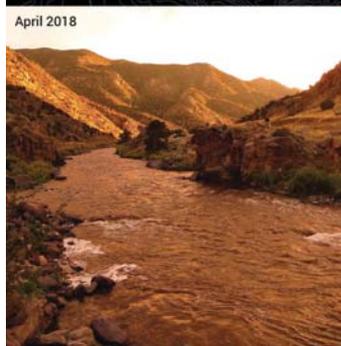
John Harner, PhD, and Rebecca Grosswald
 Department of Geography and Environmental Studies
 University of Colorado, Colorado Springs
 Colorado Springs, CO



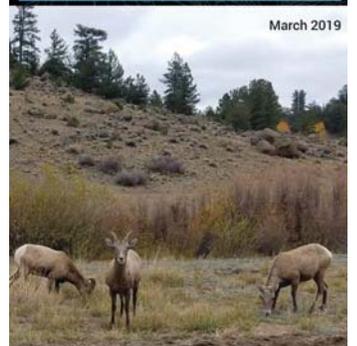
Planning Assessment
 Browns Canyon National Monument Management Plan / EIS
 February 2018



Socio-Economic Baseline Assessment
 Browns Canyon National Monument Management Plan / EIS
 April 2018



Planning Criteria Report
 Preliminary Alternatives and Basis for Analysis
 Browns Canyon National Monument Resource Management Plan
 March 2019



Meeting Purpose

What is scoping?

- Required for federal resource management planning processes.
- Signifies the start of the environmental analysis that will accompany the RMP.
- Scoping comment period solicits feedback on the purpose and need, planning issues, methodologies for analyzing those issues, and preliminary alternatives which are presented in the Planning Criteria Report.

What is a Planning Criteria Report?

It describes the formulation of preliminary alternatives and the analytical methodologies that will be used to analyze issues. It introduces the purpose and need of the RMP; laws and regulations shaping the planning effort; and planning sideboards guiding the alternatives development.

Preliminary Alternatives Tables

- **Planning issues:** concerns, guidance, conflicts and trade-offs between resource use, protections, and development.
- **Goals (BLM)/desired conditions (USFS) common to all alternatives:** a broad statement of desired outcomes addressing resource, environmental, social, or economic characteristics within a planning area, or a portion of the planning area, toward which management of resources should be directed.
- **Objectives common to all alternatives:** concise statement of desired resource conditions within the planning area, or a portion of the planning area.
- **Allowable uses and management actions (BLM)/standards (USFS) by alternative:** allocated areas for specific types of use and/or measures that will be applied to planning activities to achieve management objectives for resources.

Measure #	OBJ	BLM	USFS	Alternative A (Current Management)	Alternative B	Alternative C
NA	NA	X	X	Goal Desired Condition CR1 Apply proper care and maintenance of B/C/NM cultural resources, ensuring that they are available for appropriate use by present and future generations through identification, preservation, and protection. Objectives: CR1.1 Partnership - Cooperate and identify opportunities with Tribes, university, support programs, or other partners for protection, maintenance, identification, educational use or experiential use of appropriate cultural resources that may lead to better protection and conservation. CR1.2 Research Program - Allow for and seek opportunities that provide for scientific research related to cultural resources, incorporating site documentation, monitoring and stabilization, and enhancement. CR1.3 Public Education Effort - Provide opportunities for public education and interpretation of cultural resources.		
NA	NA	X	X	Goal Desired Condition CR2 Reduce unwanted levels and resolve potential conflicts from surface or below-ground development, or potential conflicts with other resource uses. Objectives: CR2.1 Proactive Stewardship - Perform proactive activities, such as identifying and signing, significant sites and areas. CR2.2 Avoidance - Work to avoid significant cultural resources, and protect, stabilize, enhance, and restore resources and in-kind cultural resources. CR2.3 Long-term conservation - Provide for the long-term conservation of significant cultural resources.		
NA	NA	X	X	Goal Desired Condition CR3 Engage Tribal interests in B/C/NM and work with Tribes to support Tribal uses of public lands, as appropriate. Objectives: CR3.1 Tribal Relationships - Develop and maintain working relationships with Tribes that have an interest in the area. CR3.2 Tribal Char - Provide opportunities for traditional (Native American) uses of cultural resources, sacred sites, landscapes, native plants, and other natural resources.		
MANAGEMENT ACTIONS/STANDARDS COMMON TO ALL ALTERNATIVES						
101 (Public Education and Outreach)	CR1.1 CR1.2	X	X	In collaboration with Tribes, develop interpretive, educational, and outreach programs, as appropriate and desired by Tribes, to foster understanding of cultural heritage and archaeological resources, and provide insight through education and interpretation, make archaeological site etiquette information readily available to visitors.		
102 (Research)	CR1.1 CR1.2 CR1.3 CR1.4	X	X	Facilitate appropriate research with partners to improve understanding of cultural resources by allowing for scientific, study, collection, excavation, and monitoring of scientific information.		
103 (Traditional Use)	CR1.1 CR1.2	X	X	Allow Native American non-commercial collection and use of natural resources necessary for traditional, religious, or ceremonial purposes.		
MANAGEMENT ACTIONS/STANDARDS COMMON TO ALL ALTERNATIVES						
100 (Comprehensive Site)	CR 1.1 CR 1.2 CR 1.3 CR 1.4	X	X	No similar action.	Conduct interpretive site in line with the recreation management plans (RMPs) (see Section 3.3.3 Recreation) to attract visitors and satisfy their desire to experience the history and geology of the area. Allow educational programs within designated trail systems.	No similar action.
MANAGEMENT ACTIONS/STANDARDS AND ADMINISTRATION FOR ALLOWABLE RESOURCE USE MANAGEMENT AREA BY ALTERNATIVE						
100 (Program)	CR1.1 CR1.2 CR1.3 CR1.4 CR1.5	X	X	No similar action.	Establish collaborative programs with Native American communities, State Resource Preservation Office, academic institutions, and qualified organizations to identify, inventory, document, stabilize, and develop and implement best management practices (BMPs) for the protection, stabilization, preservation, and interpretation of historic and prehistoric resources.	No similar action.

Basis for Analysis

This section presents the analytical framework, which guides the effects analysis that forms the basis for decisions in the RMP. The framework outlines the study area, assumptions, and methods to be used to ensure that the analysis is objective, quantified, and based on best available information.



Basis for Planning

Purpose and Need

Proclamation Number 9232 defines the need for joint federal agency action to manage BCNM's Resource, Objectives, and Values:

"The Secretary of the Interior and the Secretary of Agriculture (Secretaries) shall manage the monument through the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS), pursuant to their respective applicable legal authorities, to implement the purposes of this proclamation."

The purpose is to provide strategic direction and guidance for the BLM's and the USFS's allocation of resources and management of the public lands within the BCNM pursuant to the multiple-use and sustained yield mandates.

Summary of Preliminary Planning Criteria

Development of the RMP is guided by the BLM and USFS's decision space (or the "sideboards") which consists of:

- management "under the principles of multiple use and sustained yield" (FLPMA)
- "appropriated and withdrawn from all forms of entry, location, selection, sale, leasing, or other disposition" (Proclamation 9232)
- management for consistency across agency boundaries and with other adjoining public lands and decisions made applying only to Federal lands
- honoring valid existing rights (e.g., mineral rights, rights-of-way, grazing)
- continuing existing Wilderness Study Area management to prevent impairment and ensure continued suitability for designation as wilderness
- development of activity and project level decisions later referencing RMP goals, objectives, RMP record of decision, after additional detailed analysis and further public involvement

The RMP complies with both agencies' planning and management mandates. The USFS is utilizing the BLM's administrative review processes.

Public Scoping Comments

There are multiple ways to provide written comments. Visit the ePlanning website for more information and to submit comments: <https://go.usa.gov/xn2eC>

1. Online Comments via ePlanning
2. Interactive Mapping Comment Tool
3. U.S. Mail: BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201.

How to provide effective comments

Comments that provide relevant information with sufficient detail are most useful.

Consider the following questions:

- Are the goals, objectives, or desired conditions described in the Planning Criteria Report adequate? If not, how should they change?
- Do the alternatives adequately address the planning issues? If not, what additional issues or management alternatives should the BLM and USFS consider?
- Has the BLM developed an adequate range of alternatives? If not, why not and what would make the range adequate?
- Is the basis for analysis in the Planning Criteria Report adequate for understanding the potential impacts of the different management alternatives? If not, why not, and how can the analytical methods be improved?

Comments that are not substantive include:

- Comments in favor of or against an action without any reasoning (such as “I don’t like ____” without providing any rationale)
- Comments that only agree or disagree with BLM or USFS policy or Proclamation 9232
- Comments without justification or supporting data
- Comments that do not pertain to the planning area (such as “the government should eliminate all dams throughout the west”)
- Comments that take the form of vague, open-ended questions

Public comments will be most helpful if received before June 13, 2019 but comments will be accepted up to 15 days after the date of the last public meeting, which is scheduled for June 5.



Overview of the Preliminary Alternatives

The BLM and USFS, with Cooperating Agencies, developed a preliminary range of alternatives. Allowable uses and management action decisions are grouped into three preliminary alternatives. A preferred alternative has not been developed.

- **Alternative A (Current Management/No Action):**
 - Continues existing management in the Planning Area
 - Reflects decisions in the Royal Gorge Resource Area Record of Decision and Approved Resource Management Plan (BLM 1996) and Pike and San Isabel National Forests; Cimarron and Comanche National Grasslands Land and Resource Management Plan (USFS 1984), as amended.
 - Reflects management direction in Proclamation 9232, which imposes restrictions to resource uses and protections for ROVs.
- **Alternative B:**
 - Focuses on protecting monument resources (e.g., cultural resources, wildlife, vegetation, soil/water), objects, and values (river adventure, wilderness hiking, Tribal use, grazing use, quiet-solitude-naturalness use, etc.) while providing for hiking, boating and non-motorized recreation activities in a predominantly primitive and back-country setting.
 - Limits future recreational infrastructure development while still allowing varied river-based and upland outdoor recreation experiences and outcomes.
- **Alternative C:**
 - Focuses on a wider variety of river and upland recreation opportunities in middle and front country settings to enhance the local economy and quality of life for residents and visitors.
 - Similar to Alternative B, Alternative C includes protections for monument resources, objects, and values, though emphasizes recreation and access more than resource management under Alternative B.



Wilderness/ACEC/Lands with Wilderness Characteristics

Browns Canyon Wilderness Study Area

- Alternative A: Conform to wilderness management policies (BLM Manual 6330) until a Congressional decision is made regarding designation.
- Alternatives B and C: Should the Browns Canyon WSA, in whole or in part, be released from wilderness consideration, manage such released lands consistent with this RMP-EIS.

Aspen Ridge Roadless Area

- All Alternatives: Manage the Aspen Ridge Roadless Area per the 2012 Colorado Roadless Rule.

Browns Canyon Area of Critical Environmental Concern

Planning Issue: Is special management under the Browns Canyon Area of Critical Environmental Concern (ACEC) designation warranted for the recognized relevant and important values of the ACEC designation (1996) or does monument establishment (2018) under Proclamation 9232 provide sufficient protection for relevant and important values? Are there any additional lands that should be considered for ACEC status in the BCNM?

- Alternative A: Designate Browns Canyon as an ACEC.
- Alternatives B and C: No ACECs are designated in BCNM because monument protections are substantially equivalent to ACEC designation.

Wild and Scenic River

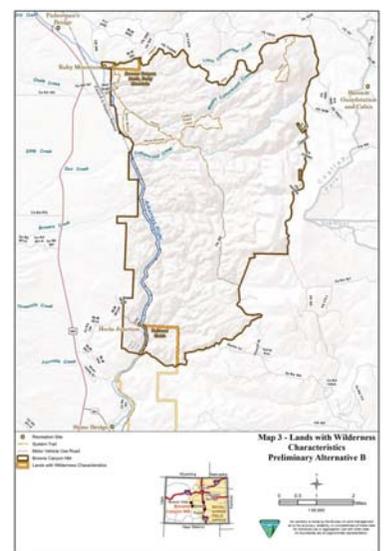
Planning Issue: What management is needed to protect eligible and suitable river segments as candidate Wild and Scenic Rivers under the National Wild and Scenic Rivers System (NWSRS), and which tentative classification of wild, scenic, or recreational should be applied?

- Alternative A: The Arkansas River Segment 2 is suitable for inclusion into the NWSRS.
- Alternative B: Determine the Arkansas River Segment 2 within the BCNM (7.1 miles) as suitable for designation, and apply interim protective management.
- Alternative C: Determine the Arkansas River Segment 2 within the BCNM (7.1 miles) as not suitable for designation, and release them from interim protective management afforded eligible segments. Proclamation 9232 is adequate to protect outstandingly remarkable values.
- WSR eligibility and suitability determinations studies are underway. Public comments are requested.

Lands with Wilderness Characteristics

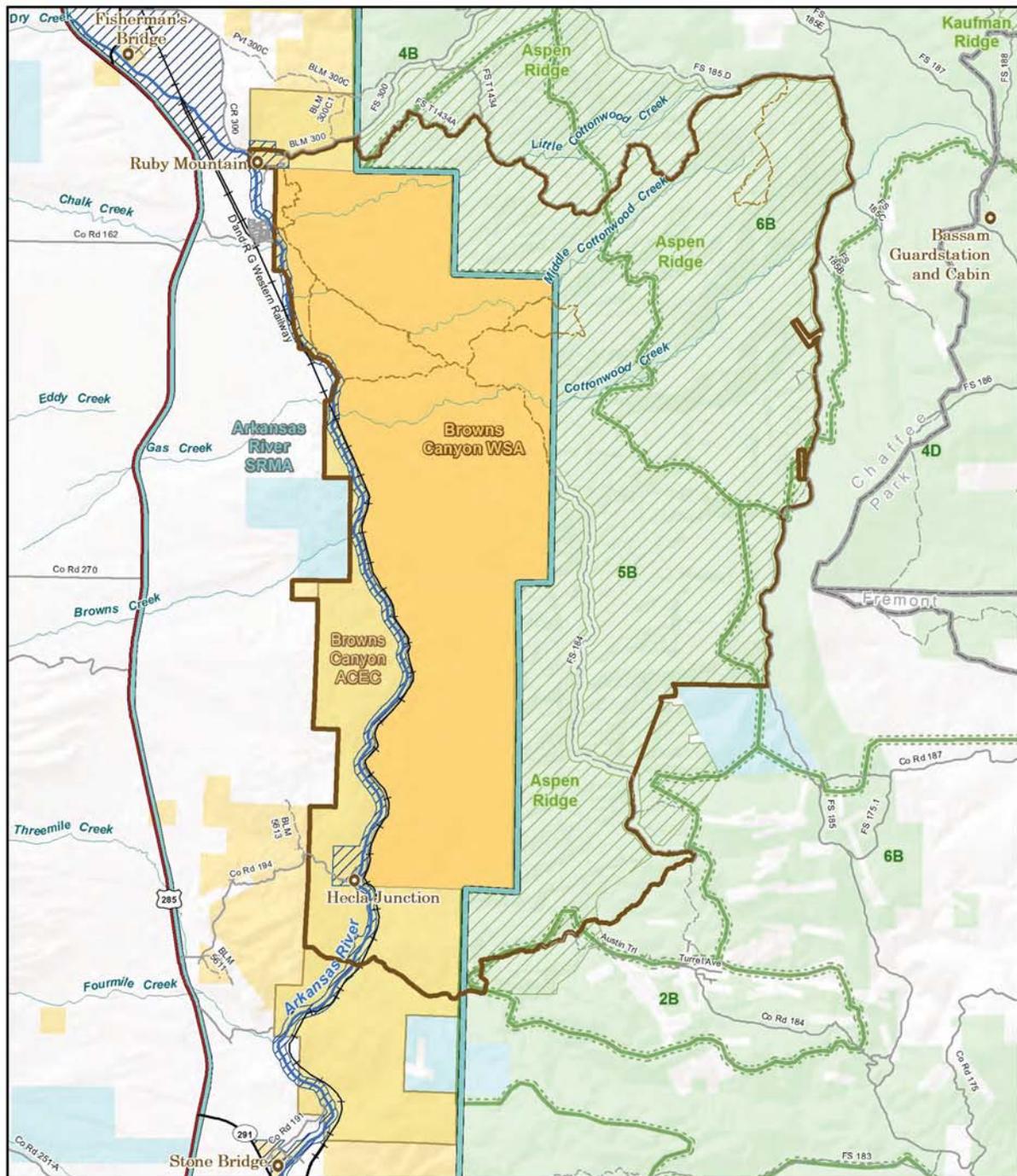
Planning Issue: How will the two units within BCNM lands that were inventoried and found to contain wilderness characteristics, COF-020-044 Ruby Mountain and COF-020-005 Railroad Gulch, be managed?

- Alternative A: No similar action.
- Alternative B: Manage to protect wilderness characteristics in areas inventoried and found to possess wilderness characteristics: Railroad Gulch (537 acres) and Browns Canyon North-Ruby Mountain (88 acres).
- Alternative C: Do not manage lands that were inventoried and found to contain wilderness characteristics separately from other Monument management.



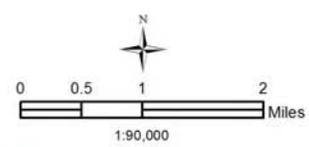
BROWNS CANYON NATIONAL MONUMENT

Resource Management Plan/Environmental Impact Statement



- Recreation Site
- Trail
- Motor Vehicle Use Road
- Suitable - Recreational Wild and Scenic River
- Browns Canyon NM
- Arkansas Headwaters Recreation Area
- Cooperative Management Area
- Arkansas River Special Recreation Management Area
- USFS Management Area
- Wilderness Study Area
- USFS Roadless Area
- Area of Critical Environmental Concern
- State
- Bureau of Land Management
- Private
- U.S. Forest Service

Map 2 - Planning Area and Existing Management



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregation use with other data. All boundaries are an approximate representation.

Geology/Minerals/Paleontological/Cultural Resources and Tribal Concerns

Collection

Planning Issue: How do BLM and USFS balance protection of unique geological and geomorphologic features with increasing public visitation and collection?

- Alternative A: Collection of monument resources is prohibited except on a case-by-case basis consistent with current laws, regulations, and guidance.
- Alternatives B and C: Prohibit collection of monument resources and objects: rocks and minerals; petrified wood and fossils of plants, animals, fish, insects, invertebrate animals; bones, waste, other products from animals; or other naturally occurring items at all other locations beyond Ruby Mountain.

Garnet Collection - Ruby Mountain

Planning Issue: How do BLM and USFS manage historic recreational mineral collection at Ruby Mountain?

- Alternative A: Garnet collection and mineral collection at Ruby Mountain is allowed in limited quantities and for non-commercial purposes.
- Alternative B: Allow garnet collection and mineral collection at Ruby Mountain only for educational, experiential, or scientific purposes via SUP/SRP.
- Alternative C: Allow garnet collection and rock hounding at posted locations at Ruby Mountain.

Cultural and Tribal Values

Planning Issue: How do BLM and USFS proactively identify cultural resources while promoting scientific, conservation, traditional, and educational values during future management activities?

- Alternative A: No similar action.
- Alternatives B and C: Develop interpretative sites in line with the recreation management zones (RMZs) (see Section 2.3.9 Recreation) to attract visitors and satisfy their desire to experience the history and prehistory of the area. Allow educational programs within designated trail systems.
- Alternative A and C: No similar action.
- Alternative B: Establish collaborative programs with Native American communities, State Historic Preservation Office, academic institutions, and qualified organizations to identify, inventory, document, monitor, and develop and implement best management practices (BMPs) for the restoration, stabilization, protection, and/or interpretation of historic and prehistoric resources.



Soils/Watersheds/Water Resources

Planning Issue: What BLM and USFS land use allocation decisions are necessary to protect BCNM river corridor, spring, seep, and intermittent stream health from effects of higher temperatures, long-term drought, or concentrated recreational use?

Planning Issue: What areas of especially fragile soils influencing riparian, spring, and riverine systems will need special attention?

Surface Disturbing Activities

- Alternatives A and C: No similar action.
- Alternative B: Avoid surface-disturbing activities within the following: public water reserves, active floodplains, 100-year floodplain of the Arkansas River, and 250 feet of intermittent and perennial streams, rivers, riparian areas, wetlands, and springs. Vegetation treatments and recreational infrastructure will be allowed if they would benefit the watershed.

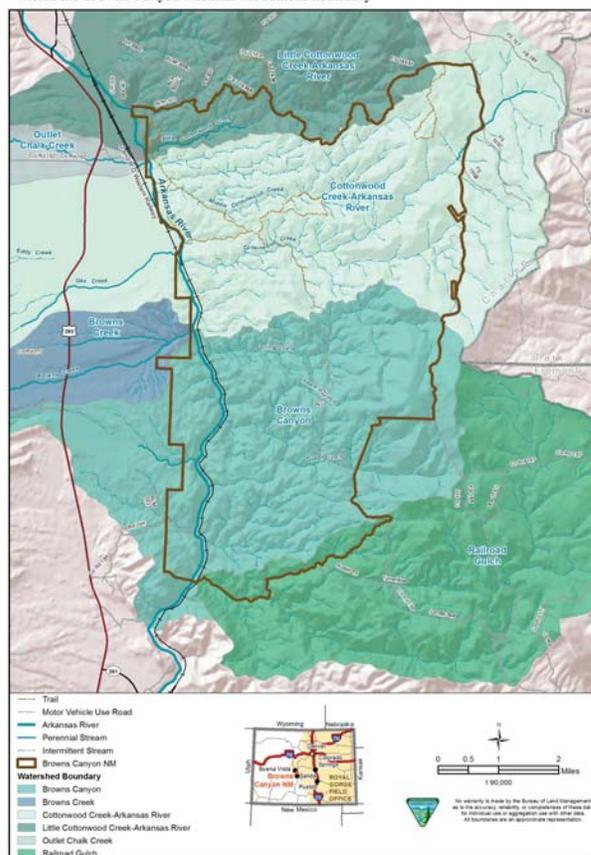
Waste Disposal

- Alternative A: No similar action.
- Alternative B: Develop an education program to encourage proper human and pet waste disposal along the Arkansas River.
- Alternative C: Same as Alternative B, except allow installation of primitive restroom facilities or waste stations along the Arkansas River where monitoring shows waste is resulting in violations of State or Federal water quality standards.

Planning Area Waters within the National Monument Boundary
Browns Canyon National Monument



Watershed Boundaries and Streams
within the Browns Canyon National Monument Boundary



Grazing/Vegetation/Special Status Plants/Wildland Fire

Grazing Allotments/Range Improvements

Planning Issue: What management strategies are needed to balance livestock use and wildlife (including special status species) habitat needs?

Planning Issue: Given increases in recreation on public lands in Chaffee County, how will potential conflicts between recreation and livestock be addressed?

- Alternative A: No similar action.
- Alternatives B and C: Allow for the ability to adjust BLM Range allotment management categories to Maintain and Improve categories in order to meet monument objectives.
- Alternative A: No similar action.
- Alternatives B and C: Inventory and assess existing range improvements. Abandon and remove structural improvements that are no longer needed. Improvements that are designated for retention should be improved and upgraded to meet current standards.

Restoration

Planning Issue: Where is special management needed to restore, maintain, or enhance priority vegetation species (including special status species)?

- Alternative A: No similar action.
- Alternative B: Prohibit use of non-native plants and seeds for restoration and nonstructural range improvements and require seed purity testing. Select seeds and plants based on Natural Resources Conservation Service ecological site descriptions or other USFS current accepted standard.
- Alternative C: Allow non-native sterile and non-persistent species to be used for certain restoration objectives.
- Alternative A: No similar action.
- Alternatives B and C: Colorado List A and B weeds, and other invasives, will be controlled, as appropriate, using integrated pest management techniques including the use of chemical, mechanical, biological, fire, and cultural control as needed.

Wildland Fire

Planning Issue: How does BLM and USFS respond to BCNM wildland fire behavior and changed wildfire event risk resulting from current forest die off, insects, disease, and long-term trends in temperature and precipitation?

Planning Issue: How does BLM and USFS respond to increasing recreational use in BCNM and higher probability for human-caused ignitions?

- Alternative A: No similar action.
- Alternatives B and C: Monitor fire influenced vegetation condition class natural range of variability post-burn at 1-year, 2-year, 5-year, 10-year, 15-year, and 20-year intervals.



Wildlife and Fish

Seasonal Use/Access

Planning Issue: How should uses, including recreational use, grazing, motorized, and mechanized vehicle use, etc., be managed to provide for wildlife (including special status species) habitat needs?

Planning Issue: How do BLM and USFS adaptively manage for increased BCNM backcountry recreation, increases in habitat disturbance, people-wildlife encounters with bighorn, raptor, or other wildlife during lambing, nesting, winter, or other crucial periods?

Alternative A	Alternative B	Alternative C
<p>No similar action.</p> <p>Other use restrictions are determined case by case based on potential impacts to wildlife and habitat.</p>	<p>Implement seasonal use restrictions on SRP and large group events within the following areas (centered on a raptor nest site) to maintain the integrity of inventoried and known nest sites and surrounding habitat:</p> <ul style="list-style-type: none"> • 0.5 mile - prairie or peregrine falcon from March 15 to July 31. • All other non-special status raptors (accipiters, falcons [except kestrel], buteos, and owls): 0.25 mile during specified nesting date. 	<p>No similar action.</p>
<p>No similar action.</p> <p>Trail development is allowed on a case-by-case basis.</p>	<p>Allow new trail development in big game winter range with seasonal use prohibitions on key areas during sensitive seasons.</p>	<p>No similar action.</p>
<p>No similar action.</p> <p>Climbing area and route closures are determined on a case-by-case basis.</p>	<p>Allow for seasonal area restrictions for climbing, camping, and other incompatible recreational uses in the following areas (Map 9):</p> <ul style="list-style-type: none"> • 0.5 miles of falcon nesting sites in Railroad Gulch and other sites as determined through inventory (March 1 to July 31). 	<p>Identify areas where climbing routes would be restricted based on raptor nesting on an annual basis.</p>
<p>No similar action.</p> <p>Climbing area and route closures are determined on a case-by-case basis.</p>	<p>Allow for seasonal area restrictions to climbing in the following areas (Map 8):</p> <ul style="list-style-type: none"> • Bighorn sheep summer use area along the river (May 1 to July 31). 	<p>No similar action.</p>



Recreation

Recreation Management Areas

Planning Issue: How does the monument accommodate a variety of recreation opportunities from intense river recreation to backcountry settings, taking into consideration quality demand, visitor growth, service level, and recreation setting preferences trade-offs associated with low versus more developed sites?

- Alternative A: Continue to intensively manage recreation (Special Recreation Management Area) on the lands along the Arkansas River and the Gold Belt Tour Area.
- Alternatives B and C: Manage for the recreation objectives defined for each of the following RMZs (Map 10):
 - Arkansas River Bench and Shore (1,718 acres)
 - Monument Backcountry - River East (15,852 acres)
 - Monument Backcountry - River West (1,293 acres)
 - Aspen Ridge (1,717 acres)
 - Railroad Gulch (636 acres)
 - Turret Road (292 acres)
 - Ruby Mountain-Hecla Junction Access (95 acres)

See Planning Criteria Report, pages 37-44 and Appendix B, for a complete comparison of Recreation Management Zones.

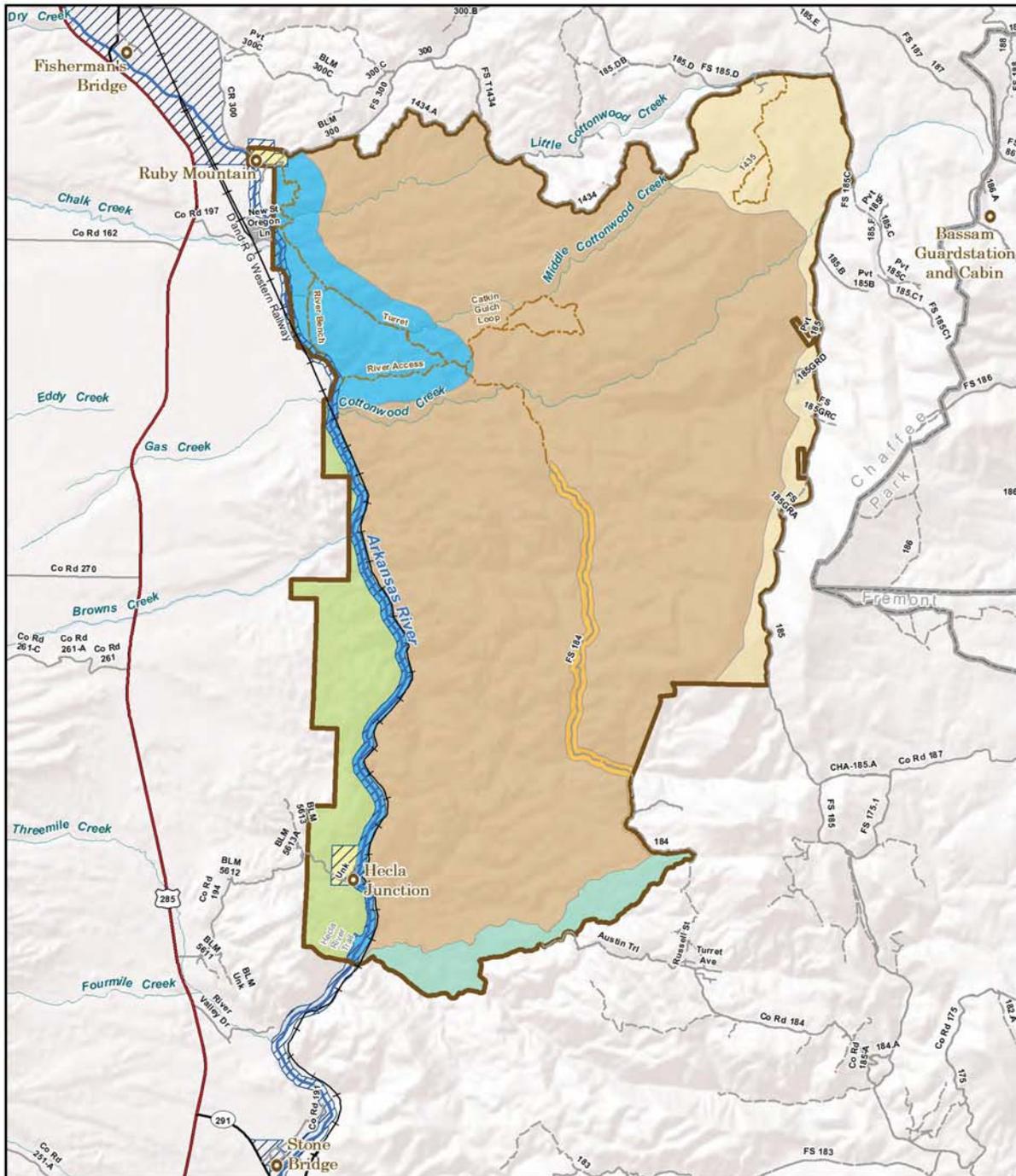
Alternative A	Alternative B	Alternative C
No similar action.	Prohibit camping/overnight use in trailheads or other facilities intended for day-use only except where allowed in RMZs.	
No similar action.	Prohibit recreational target shooting in the following areas: <ul style="list-style-type: none"> • Within the Arkansas River RMZ (1,718 acres) • Within 50 feet of CR 300/ BLM 300 • Within 50 feet of CR 194 • Within 50 feet of Aspen Ridge Road (USFS 185) Within 50 feet of USFS 185D 	No similar action.
No similar action. SRPs and SUPs are issued on a case-by-case basis consistent with current laws, regulations, and guidance.	Allow SRPs and SUPs that support recreation objectives. Utilize SRPs and SUPs as a tool to mitigate impacts to other ROVs within the monument (i.e., guided day hiking to inform visitors of ROVs, user ethics, management issues, etc.).	
Apply the existing statewide 14 day camping limit, unless modified by a cooperative management agreement, to camping and overnight use on BLM administered lands within the RGFO.*	Based on monitoring of impacts to monument ROVs, employ adaptive management strategies to manage overnight camping and user conflicts.* Allow strategies including but not limited to: <ul style="list-style-type: none"> • 7 days camping limit* • Reservation and/or quota systems* • Designated campsites* • Fire pans would be required* • Use of a portable toilet device required* 	

*Implementation Decisions.



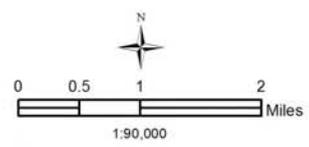
BROWNS CANYON NATIONAL MONUMENT

Resource Management Plan/Environmental Impact Statement



- Recreation Site
 - System Trail
 - Motor Vehicle Use Road
 - Browns Canyon NM
 - Arkansas Headwaters Recreation Area
 - Cooperative Management Area
- Recreation Management Zones**
- Arkansas River Shore & Bench
 - Aspen Ridge
 - Hecla Junction & Ruby Mountain
 - Monument Backcountry - River East
 - Monument Backcountry - River West
 - Railroad Gulch
 - Turret Road

Map 10 - Recreation
Preliminary Alternatives B & C



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregation use with other data. All boundaries are an approximate representation.

BROWNS CANYON NATIONAL MONUMENT

Resource Management Plan/Environmental Impact Statement

Visual Resources

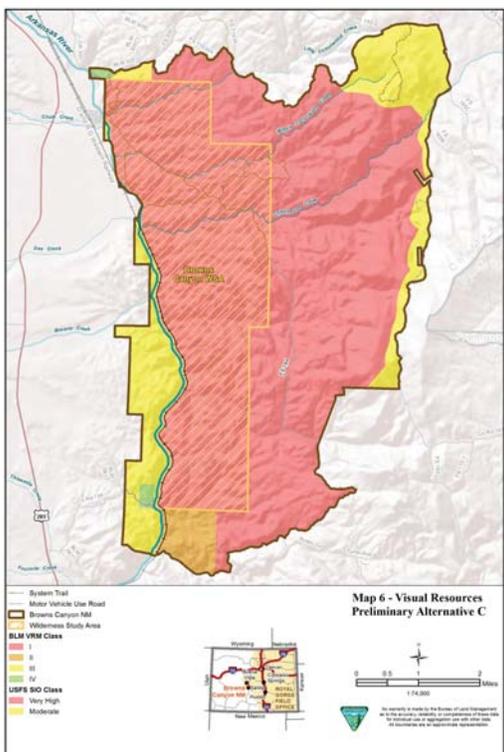
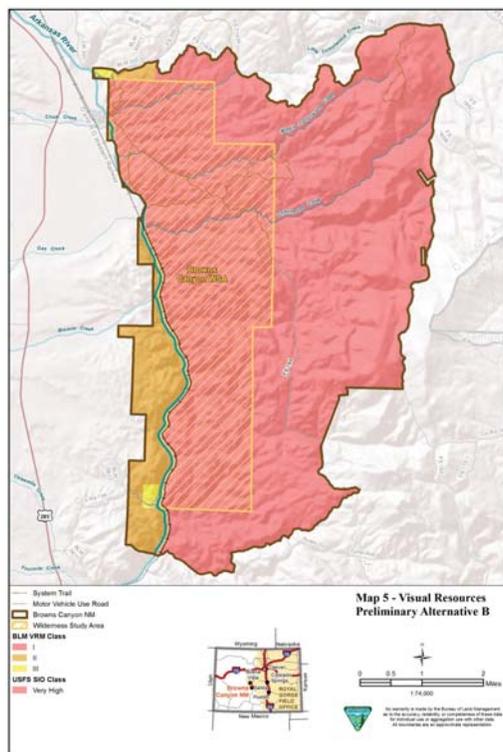
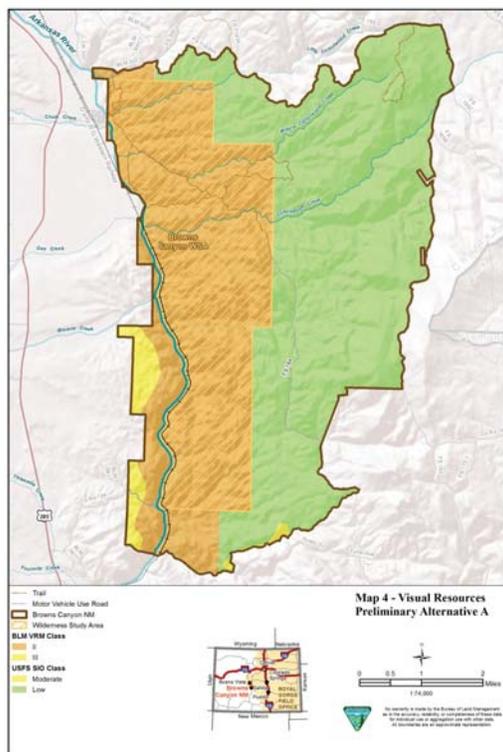
Planning Issue: How can monument visibility, visual resources (contrast, color, foreground, background), scenery, night skies, quiet, solitude, and soundscape degradation risk be mitigated to address social landscape and amenity value for BCNM use and enjoyment by the public?

Within BCNM, manage for VRM Class and SIO designations on BLM and USFS-administered surface lands (respectively)+:

	Alternative A (Map 4)	Alternative B (Map 5)	Alternative C (Map 6)
VRM Class I/ SIO Very High:	0/0 acres*	7,970/11,812 acres	7,457/10,095 acres
VRM Class II/ SIO High	9,271/0 acres*	1,728/0 acres	529/0 acres
VRM Class III/ SIO Moderate	521/61 acres	95/0 acres	1,712/1,717 acres
VRM Class IV/ SIO Low	0/11,769 acres	0/0 acres	95/0 acres

*Total acreage discrepancies in this table are due to rounding.

*Per the 1996 Royal Gorge Resource Area RMP, WSAs are managed by the Instructional Memorandum later replaced by BLM Manual 6330 as VRM Class I.



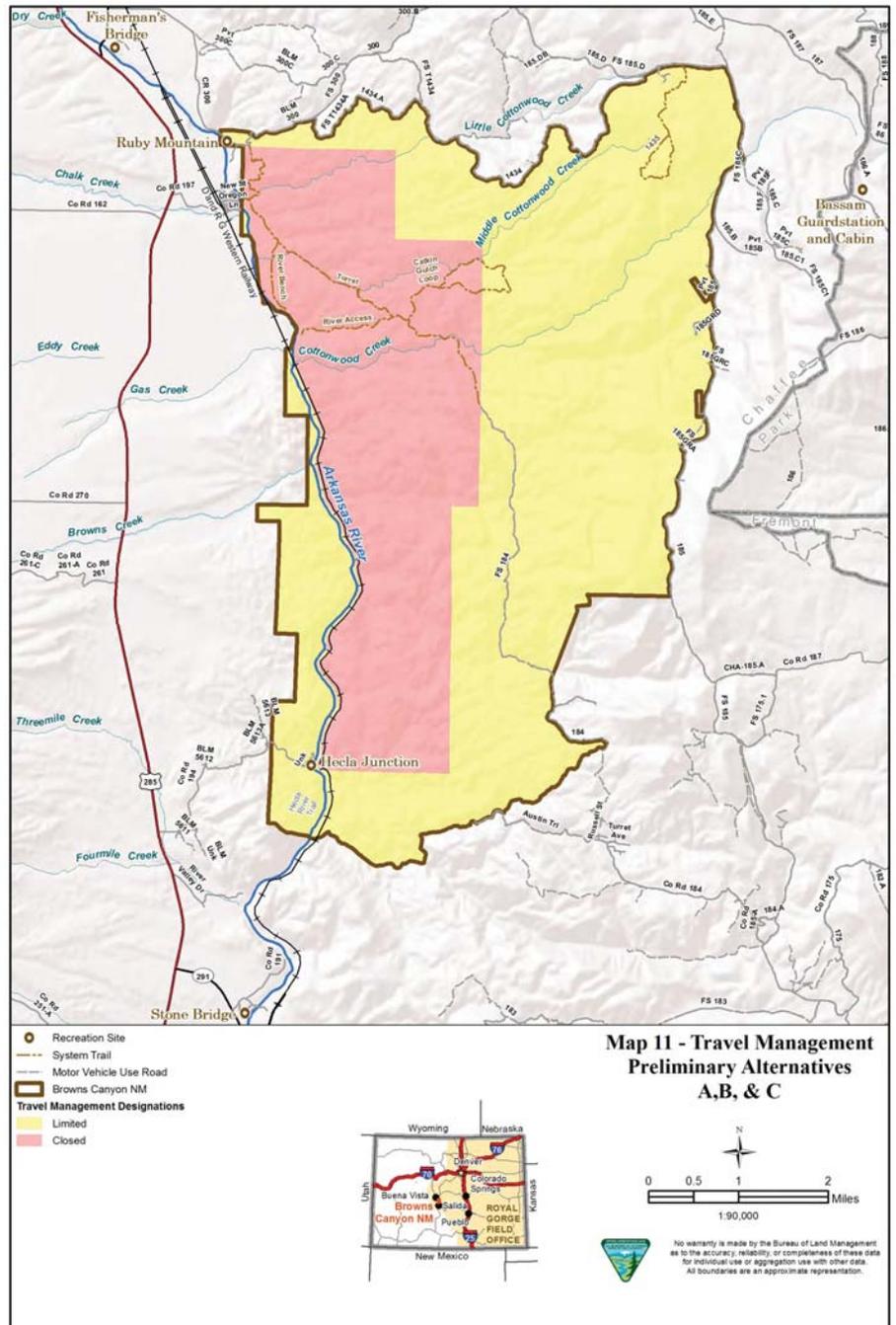
Travel and Transportation Management

Planning Issue: What areas should be designated as open, closed, or limited for all travel modes (from motorized to non-motorized), based on opportunities provided and/or the need to protect resources?

- Alternatives A, B and C: Maintain existing motorized and mechanized travel consistent with existing travel management decisions (Map 11).
 - Open: 0 acres
 - Limited to designated: 14,141 acres
 - Closed: 7,463 acres

Planning Issue: What are the principal travel priorities in this area for the public, as well as for administrative and resource management activities (e.g., research and monitoring, grazing management, recreational use, or emergency or fire access)?

- Alternative A: No similar action.
- Alternatives B and C: Rehabilitate and reclaim routes within the monument stemming from the Aspen Ridge Road to prevent motorized vehicle use.
 - These routes could be designated as non-motorized routes if compatible with the physical, social and operation settings identified in the Aspen Ridge RMZ.
 - Designated parking, camping and motorized routes along the Aspen Ridge Road outside of the monument will be addressed by the Salida Ranger District through forest and district travel management planning processes.



Online Mapping and Comments

Introduction

The purpose of this comment tool is to collect location-specific comments. To provide non location-specific comments, visit BLM's ePlanning site at <https://go.usa.gov/xn2eC>

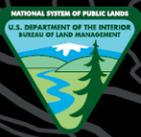
The BLM and USFS are seeking site-specific comments related to resources and uses. To use the tool, visit <http://arcg.is/1yuDDD> and:

- Place a point comment where specific plants or wildlife should be considered.
- Draw an area comment to suggest an alternative to the recreation management areas.

How to Use This Map

- To submit a comment, click the "Add Comment" tab at the top right. Further instructions are provided on how to create a point or area comment. Comments will not be shown to other commenters once saved.
- To view and turn on/off layers click the "Layer List" tab at the top right. The layer list has wildlife, recreation, visual, travel, and base map layers that can be toggled on and off. You can also turn all layers on or off.
- To view the map legend, click on the "Legend" tab at the top right. The legend identifies the various symbols and colors that are shown on the map.

TRY IT OUT TONIGHT!



U.S. Department of the Interior
Bureau of Land Management

Browns Canyon National Monument

Public Scoping & Planning Criteria Meeting





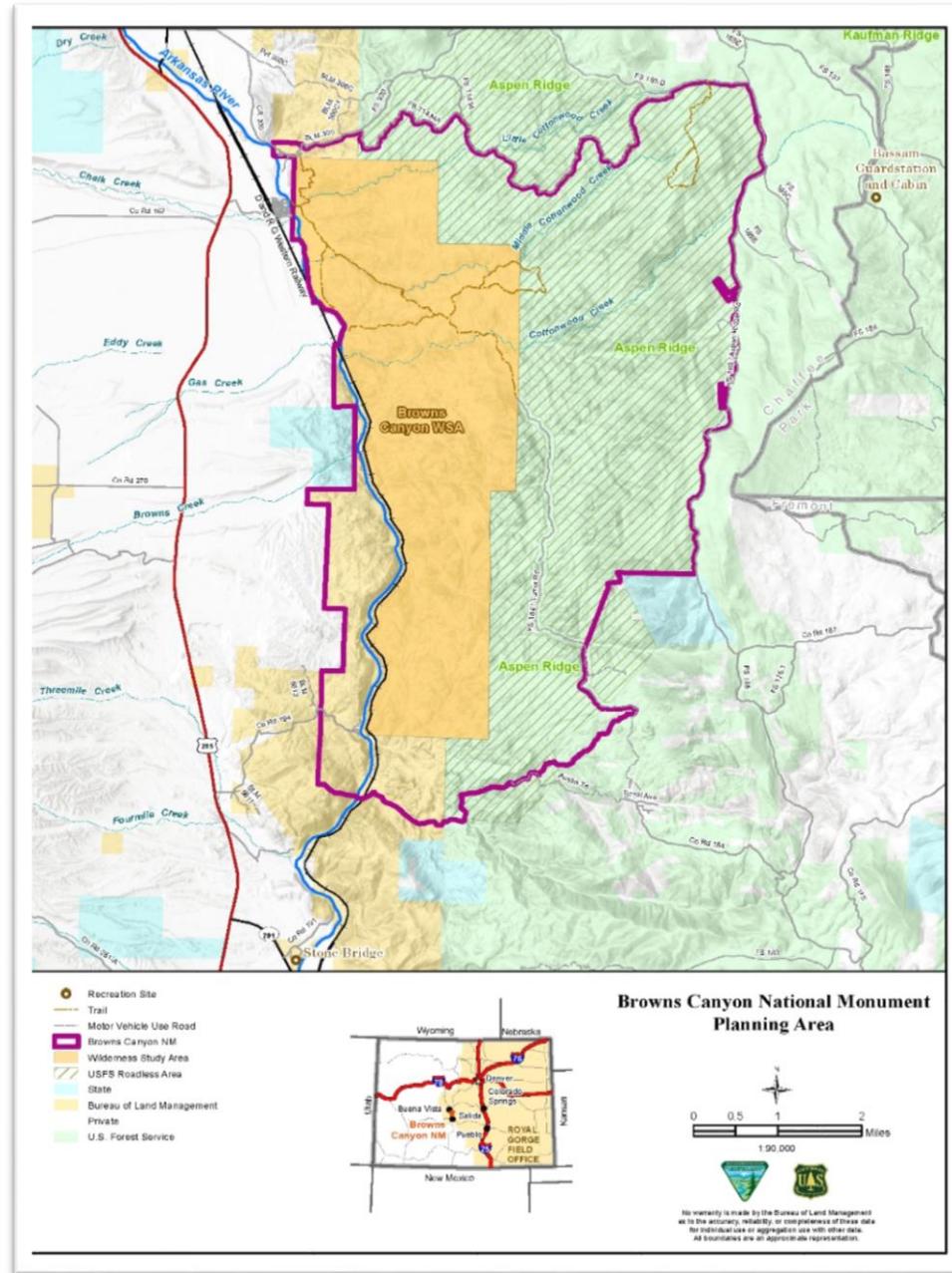
Agenda

- Browns Canyon Planning Area Introduction
- Overview of the Planning Process
- Preliminary Alternatives Highlights
- Public Comment Methods



BCNM Planning Area

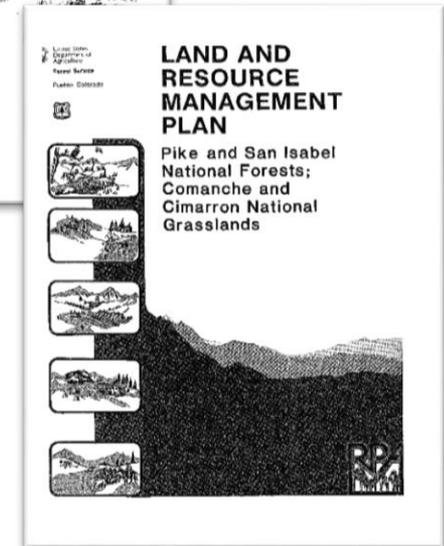
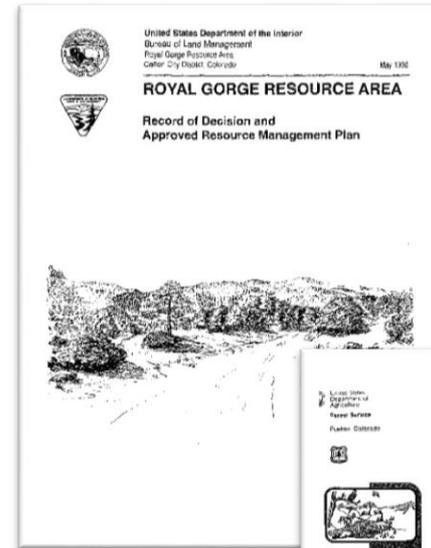
- Established under Presidential Proclamation 9232 in 2015
- Encompasses 21,604 acres of BLM and USFS lands
- Includes a portion of the Arkansas Headwaters Recreation Area, a cooperative management area by the USFS, the BLM, and Colorado Parks and Wildlife
- BCNM is not included as part the Eastern Colorado RMP update





Why a Resource Management Plan/ Environmental Impact Statement?

- Guide BLM and USFS management activities
- Establish goals and objectives for resource management
- Identify lands that are open and available for certain uses
- Develop and analyze alternatives





Purpose and Need

Proclamation Number 9232 defines the need for joint federal agency action to manage BCNM's Resource, Objectives, and Values:

- *“The Secretary of the Interior and the Secretary of Agriculture (Secretaries) shall manage the monument through the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS), pursuant to their respective applicable legal authorities, to implement the purposes of this proclamation.”*

The purpose is to provide strategic direction and guidance for the BLM's and the USFS's allocation of resources and management of the public lands within the BCNM pursuant to the multiple-use and sustained yield mandates.



Schedule



Opportunities for public input

Pre-Scoping

Social Landscape Assessment
October 2016 - May 2017

Planning & Socio-Economic Baseline Assessments
October 2017 - March 2018

Planning Criteria Report
July 2018 - March 2019

Scoping & Draft Plan

Notice of Intent
May 14, 2019

Scoping Period and Meetings (30 days)
May 14 - June 13, 2019

Develop Draft RMP/EIS
June 2018 - October 2019

Draft Comment Period & Meetings (90 days)
October 2019 - January 2020



We are here

Proposed Plan

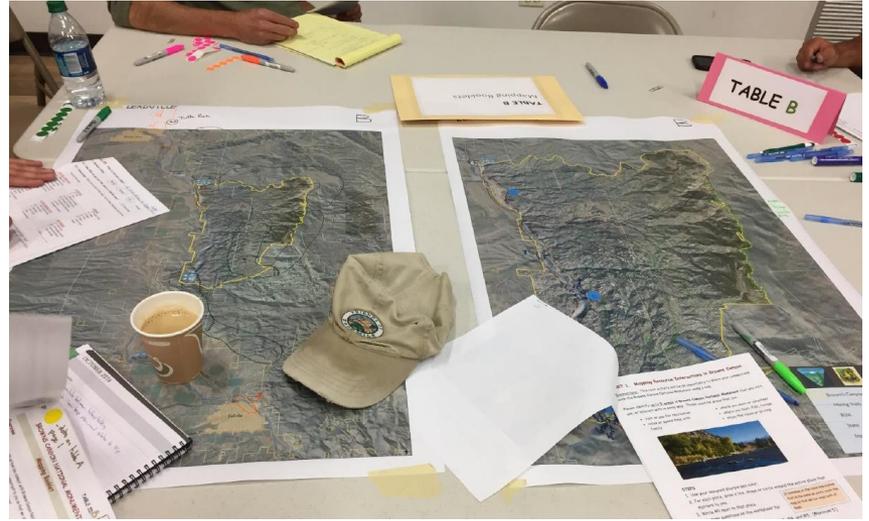
Develop Proposed RMP/ Final EIS
January 2020 - April 2020

Public Review/ Protest Period
April 2020 - May 2020

Protest Resolution (30 days)
May 2020 - June 2020

Approved RMP and Record of Decision
June 2020

Public Involvement To Date



Social Landscape Assessment of Browns Canyon National Monument
Browns Canyon National Monument
AUGUST 2017 FINAL REPORT

Prepared by:
Chris Smith, Service Initiator
Conansco Building Institute, Inc.
San Francisco, CA

Lee Conway, PhD, Research Social Scientist
ESD Rural Service Field Research Station
Seattle, WA

John O'Connell, Associate Facilities
Conansco Building Institute, Inc.
San Francisco, CA

John Heman PhD, and Rebecca Coonrod
Department of Geography and Environmental Studies
University of Colorado, Colorado Springs
Colorado Springs, CO



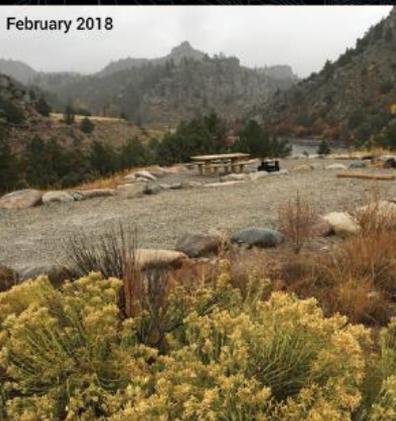
1

U.S. Department of the Interior
Bureau of Land Management
Front Range Field Office
Golden, Colorado

U.S. Department of Agriculture
U.S. Forest Service
Front Range Field Office
National Crossroads | Delta, Colorado

Planning Assessment
Browns Canyon National Monument Management Plan / EIS

February 2018

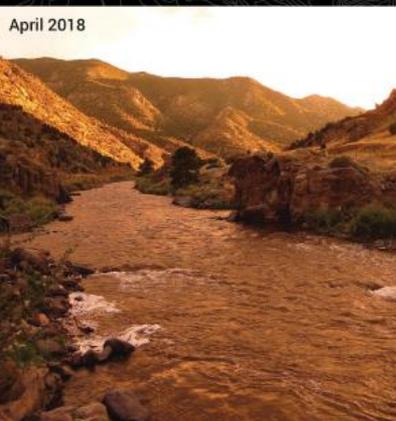


U.S. Department of the Interior
Bureau of Land Management
Front Range Field Office
Golden, Colorado

U.S. Department of Agriculture
U.S. Forest Service
Front Range Field Office
National Crossroads | Delta, Colorado

Socio-Economic Baseline Assessment
Browns Canyon National Monument Management Plan / EIS

April 2018



U.S. Department of the Interior
Bureau of Land Management
Front Range Field Office
Golden, Colorado

U.S. Department of Agriculture
U.S. Forest Service
Front Range Field Office
National Crossroads | Delta, Colorado

**Planning Criteria Report
Preliminary Alternatives and Basis for Analysis**
Browns Canyon National Monument Resource Management Plan

March 2019





Summary of Preliminary Planning Criteria

Development of the RMP is guided by Proclamation 9232, FLPMA, and the BLM and USFS's decision space (or the "sideboards") which consists of:

- Management "under the principles of multiple use and sustained yield" (FLPMA)
- "Appropriated and withdrawn from all forms of entry, location, selection, sale, leasing, or other disposition" (Proclamation 9232)
- Continuing existing Wilderness Study Area management to prevent impairment and ensure continued suitability for designation as wilderness
- Management for consistency across agency boundaries and with other adjoining public lands and decisions made applying only to Federal lands
- Honoring valid existing rights (ROW's, livestock grazing, railroad)
- Development of activity and project level decisions will follow



Overview of the Preliminary Alternatives

Alternative A (Current Management/No Action):

- Continues existing management in the Planning Area
- Reflects decisions in the Royal Gorge Resource Area Record of Decision and Approved Resource Management Plan (BLM 1996) and Pike and San Isabel National Forests; Cimarron and Comanche National Grasslands Land and Resource Management Plan (USFS 1984), as amended.
- Reflects management direction in Proclamation 9232, which imposes restrictions to resource uses and protections for ROVs.



Overview of the Preliminary Alternatives

Alternative B:

- Focuses on protecting monument resources (e.g., cultural resources, wildlife, vegetation, soil/water), objects, and values (river adventure, wilderness hiking, Tribal use, grazing use, quiet-solitude-naturalness use, etc.) while providing for hiking, boating and non-motorized recreation activities in a predominantly primitive and back-country setting.
- Limits future recreational infrastructure development while still allowing varied river-based and upland outdoor recreation experiences and outcomes.



Overview of the Preliminary Alternatives

Alternative C:

- Focuses on a wider variety of river and upland recreation opportunities in middle and front country settings to enhance the local economy and quality of life for residents and visitors.
- Similar to Alternative B, Alternative C includes protections for monument resources, objects, and values, though emphasizes recreation and access more than resource management under Alternative B.



How to Comment

There are multiple ways to provide written comments.

- Online Comments via ePlanning: <https://go.usa.gov/xn2eC>
- Interactive Mapping Comment Tool: <http://arcg.is/1yuDDD>
- U.S. Mail: BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201.

**Public comments will be most helpful if received before June 13, 2019.
Comments will be accepted up to 15 days after the date of the last public
meeting (June 5).**



Tips to Provide Effective and Substantive Comments

- Are the goals, objectives, or desired conditions adequate? If not, how should they change?
- Do the alternatives adequately address the planning issues? If not, what additional issues or management alternatives should the BLM and USFS consider?
- Has the BLM developed an adequate range of alternatives? If not, why not and what would make the range adequate?
- Is the basis for analysis in the Planning Criteria Report adequate for understanding the potential impacts of the different management alternatives? If not, why not, and how can the analytical methods be improved?



For example

Substantive

- The RMP should consider the impacts of whitewater rafters on wildlife. Impacts such as ... are incurring in x, y, and z locations.
- Recreation Record # 1005
Alternative C should include ... because...
- The BLM/USFS should consider seasonal use restrictions on Aspen Ridge Road.

Not Substantive

- I don't like motorcycles on the Monument.
- The BLM's motorized use practices across the west are irresponsible.
- Allow/Do not allow more ATVs/UTVs.
- I prefer Alternative B.
- Why does the Monument allow horse back riding?



ePlanning Comment Tutorial

ePlanning

Browns Canyon National Monument RMP

> [Land Use Planning Register](#) > [Browns Canyon National Monument RMP](#) > [Home](#)

Project Search:

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NEW!



PUBLIC SCOPING BEGINS FOR BROWNS CANYON NATIONAL MONUMENT RESOURCE MANAGEMENT PLAN

On May 14, 2019, the BLM and the U.S. Forest Service (USFS) published in the *Federal Register* a notice of intent (NOI) to prepare a Resource Management Plan/Environmental Impact Statement (RMP/EIS) for Browns Canyon National Monument (BCNM).

The BLM and USFS are soliciting comments from the public about issues to be addressed in the BCNM RMP/EIS, such as wild and scenic river values (see **Issues** in the navigation list on the left) and those described in the *Planning Criteria Report* (see **Documents & Reports** in the navigation list).

Comments can be submitted online through the interactive mapping tool here: <http://arcg.is/1yuDDD>, through the **Documents & Reports** page, or by U.S. Mail to BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201. Please do not email comments.

Written comments must be received by June 13, 2019, in order to receive a formal response in a scoping

comment report, which will be released at a later date.

For a schedule of public scoping meetings, see "Meetings" under the **How to get Involved** link at left.

HOW TO COMMENT:

The most useful comments are specific comments about BCNM management issues, goals, and objectives. The BLM and USFS are especially interested in comments on the preliminary alternatives and basis for analysis found in the *Planning Criteria Report* (see **Documents & Reports** page) and comments on wild and scenic river values (see the **Issues** page).

Effective comments provide constructive solutions, specific examples, and supporting documentation; are clear, concise, and relevant; and avoid simply stating an opinion.

The BLM and USFS will review comments submitted during the scoping period and respond to them in a scoping comment report to be published at a later date. Comments submitted outside of this period will be considered but won't be in the scoping report.

Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Browns Canyon National Monument RMP

Project Search:

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- Documents & Reports**
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 - Meetings
- Maps
 - Data
- Links
- FAQs

Documents & Reports

NEW!

The BLM and USFS are soliciting comments on the *Planning Criteria Report* during public scoping for the RMP/EIS. The BLM and USFS conducted a number of studies and subsequently published several crucial reports in 2017–2019 to help answer questions related to developing a resource management plan for Browns Canyon National Monument. All of these reports are available below to view or download.

Click on the buttons next to the *Notice of Intent* or *Planning Criteria Report* document links in the section below to submit comments. Click on the document links to view or download the documents (requires [Adobe Reader](#)). Comments can also be submitted by U.S. Mail to BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201 or through the online mapping tool: <http://arcg.is/1yuDDD>. Please do not email comments.



Planning Criteria Report: Preliminary Alternatives and Basis for Analysis describes how the preliminary alternatives were developed and the methods that will be used to analyze potential impacts of the management alternatives in the BCNM RMP/EIS.



Planning Assessment Report evaluates best available scientific and other information about conditions, trends, and management questions relevant to monument resources, objects, values, and uses.



Baseline Socioeconomic Report profiles population trends, demographics, and other social and cultural characteristics relevant to the BCNM and discusses employment, wages, earnings, sources of income, public finance, and economic indicators.



Social Landscape Assessment of Browns Canyon National Monument analyzes the results of stakeholder interviews, listening sessions, and participatory human ecology mapping to help understand the public's values, interests, and concerns related to BCNM.

Scoping

Last Updated:
05/16/2019 11:05:38 MDT

Document Name	Release Date	Available Formats	Public Participation	
Notice of Intent to Prepare a Resource Management Plan and Associated Environmental Impact Statement for the Browns Canyon National Monument, Colorado	05/14/2019	(275 KB)	Open (05/14/2019 - 06/13/2019)	<input type="button" value="Comment on Document >>"/>
Planning Criteria Report - Preliminary Alternatives & Basis for Analysis (March 2019)	04/01/2019	(10803 KB)	Open (05/14/2019 - 06/13/2019)	<input type="button" value="Comment on Document >>"/>

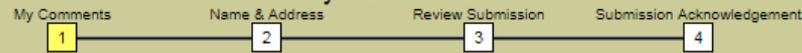
Pre-Planning

Document Name	Release Date	Available Formats	Public Participation	
Planning Assessment Report - Browns Canyon National Monument (February 2018)	05/25/2018	(9547 KB)		

Planning Criteria Report - Preliminary Alternatives & Basis for Analysis (March 2019)

Comment Submission Form

My Comments



Comment Title: Chapter Reference: Section Reference:

Character Count Max of 10,000

Attachment: No file chosen

(Note - the total size of all attachments must be less than 20mb)

Note: Due to BLM security settings, the comment form currently re-sets after 60 minutes. This means your comments need to be complete within 60 minutes or the comment form will be deleted.

Planning Criteria Report - Preliminary Alternatives & Basis for Analysis (March 2019)

Comment Submission Form

My Comments



Comments:

Select	Comment Id	Comment Title	File Attachment	Chapter Reference	Section Reference
<input type="checkbox"/>	1	OHV Designations	BCNM_Preliminary Alternative Comments_Kachur.docx	Preliminary Alternatives	2.3.10

Comment Title:
 Chapter Reference:
 Section Reference:

Character Count Max of 10,000

Attachment: No file chosen

(Note - the total size of all attachments must be less than 20mb)

Note: Due to BLM security settings, the comment form currently re-sets after 60 minutes. This means your comments need to be complete within 60 minutes or the comment form will be deleted.

Planning Criteria Report - Preliminary Alternatives & Basis for Analysis (March 2019)

Comment Submission Form

Name & Address

My Comments **1** Name & Address **2** Review Submission **3** Submission Acknowledgement **4**

Name

First Name: *
 Middle Name/Initial:
 Title:
 Is Primary Submitter? Yes No

Last Name: *
 Suffix:

Mailing Address

Address 1: Country/Territory:
 Address 2:
 Address 3:
 City/Municipality: *
 State/Province: *
 ZIP/Postal Code: *

Contact Information (Please use the following format for all specified phone numbers: XXX-XXX-XXXX)

Email Address: Fax Number:
 Day Phone: Other Phone:
 Evening Phone:

Organization

Do you represent a Group or Organization? Yes No *

Note: Due to BLM security settings, the comment form currently re-sets after 60 minutes. This means your comments need to be complete within 60 minutes or the comment form will be deleted.

Planning Criteria Report - Preliminary Alternatives & Basis for Analysis (March 2019)

Comment Submission Form

Review Submission



Submission

Names and Addresses

test test
tes, Alabama test United States

Comments

Comment Number: 1

Comment Title: OHV Designations

Comment: Record 1004: More acres should be closed to all motorized travel including Cottonwood Creek in Alternative C.

Attachment: BCNM_Preliminary Alternatives_Comments_Kachur.docx

Download Print

Disclaimers and Agreements:

Withhold personally identifying information from future publications on this project?

Yes No *

Note: Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Please include me on the mailing list for this project?

Yes No *

You will be included on any future mailings related to this project.

Note: Due to BLM security settings, the comment form currently re-sets after 60 minutes. This means your comments need to be complete within 60 minutes or the comment form will be deleted.



Online Comment Tool

A method to submit location-specific comments: <http://arcg.is/1yuDDD>

To provide non location-specific comments, visit BLM's ePlanning site.

The BLM and USFS are seeking site-specific comments related to resources and uses of the BCNM.

For example:

- Place a point comment where specific plants or wildlife should be considered.
- Draw an area comment to suggest an alternative to the recreation management areas.

Browns Canyon National Monument Interactive Mapping Comment Tool

The purpose of this comment tool is to collect location-specific comments. To provide non location-specific comments, visit BLM's ePlanning site at <https://go.usa.gov/xn2eC>.

The BLM and USFS will host two online webinar presentations to provide an overview of the project status and provide a tutorial for using the Comment Mapping Tool. Visit ePlanning for more info and to register for the events at <https://go.usa.gov/xn2eC>.

HOW TO USE THIS MAP

- To submit a comment, click the "Add Comment"  tab at the top right.

Further instructions are provided on how to create a point or area comment. Personal information (name and e-mail) will not be shown to other commenters once saved. However, other commenters will be able to view your comments.

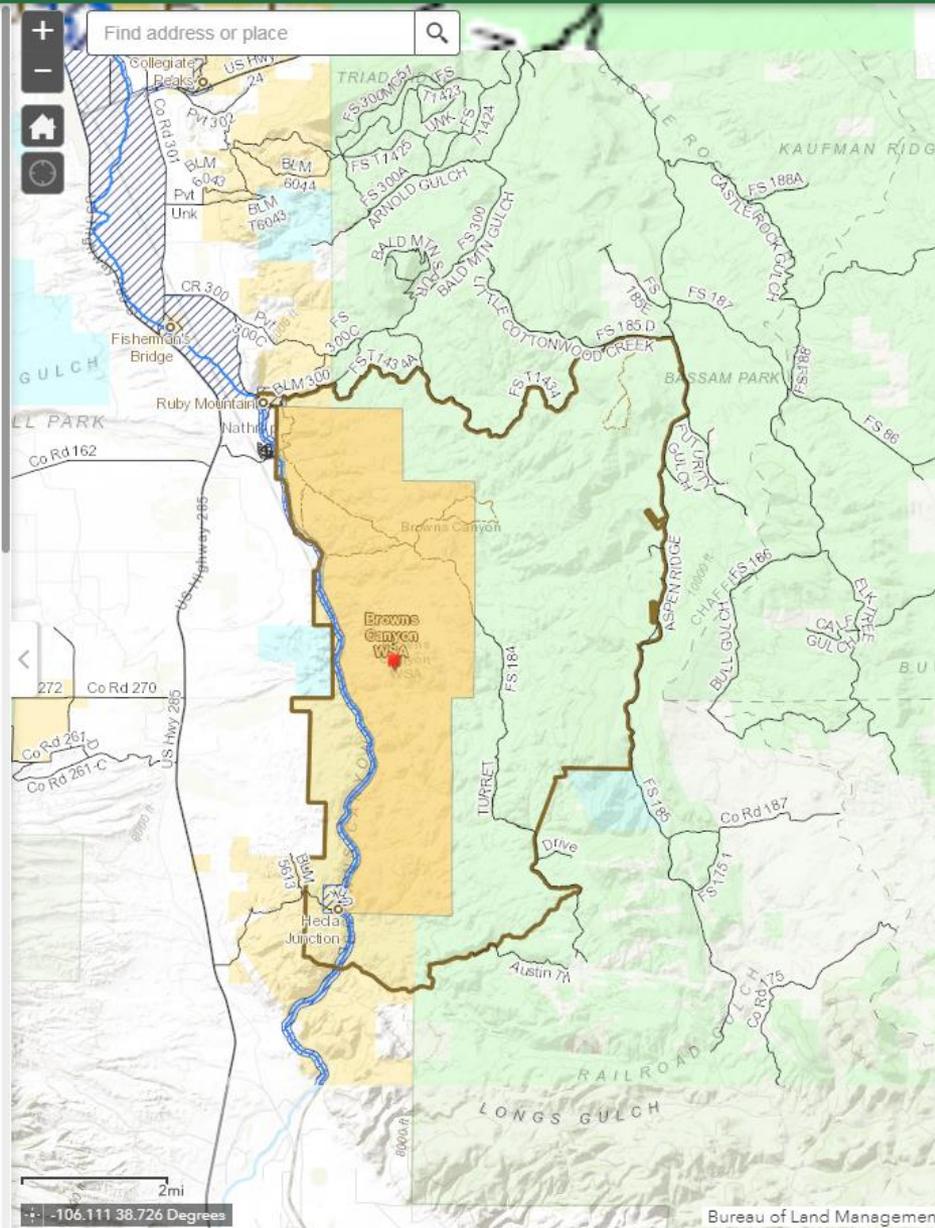
- To view and turn on/off layers click the

"Layer List"  tab at the top right. The layer list has wildlife, recreation, visual, travel, and base map layers that can be toggled on and off. You can also turn all layers on or off.

- To view an aerial or topographic background, click the "Basemap

Gallery"  tab at the top right.

- To view the map legend, click on the



Add Comment

- Please select one of the comment types below
- Click on the map to place the location-specific comment

Comment Point

Comment Area



Browns Canyon National Monument Interactive Mapping Comment Tool

TIPS FOR PROVIDING EFFECTIVE COMMENTS

The BLM and USFS are seeking site-specific comments related to resources and uses of the BCNM. For example:

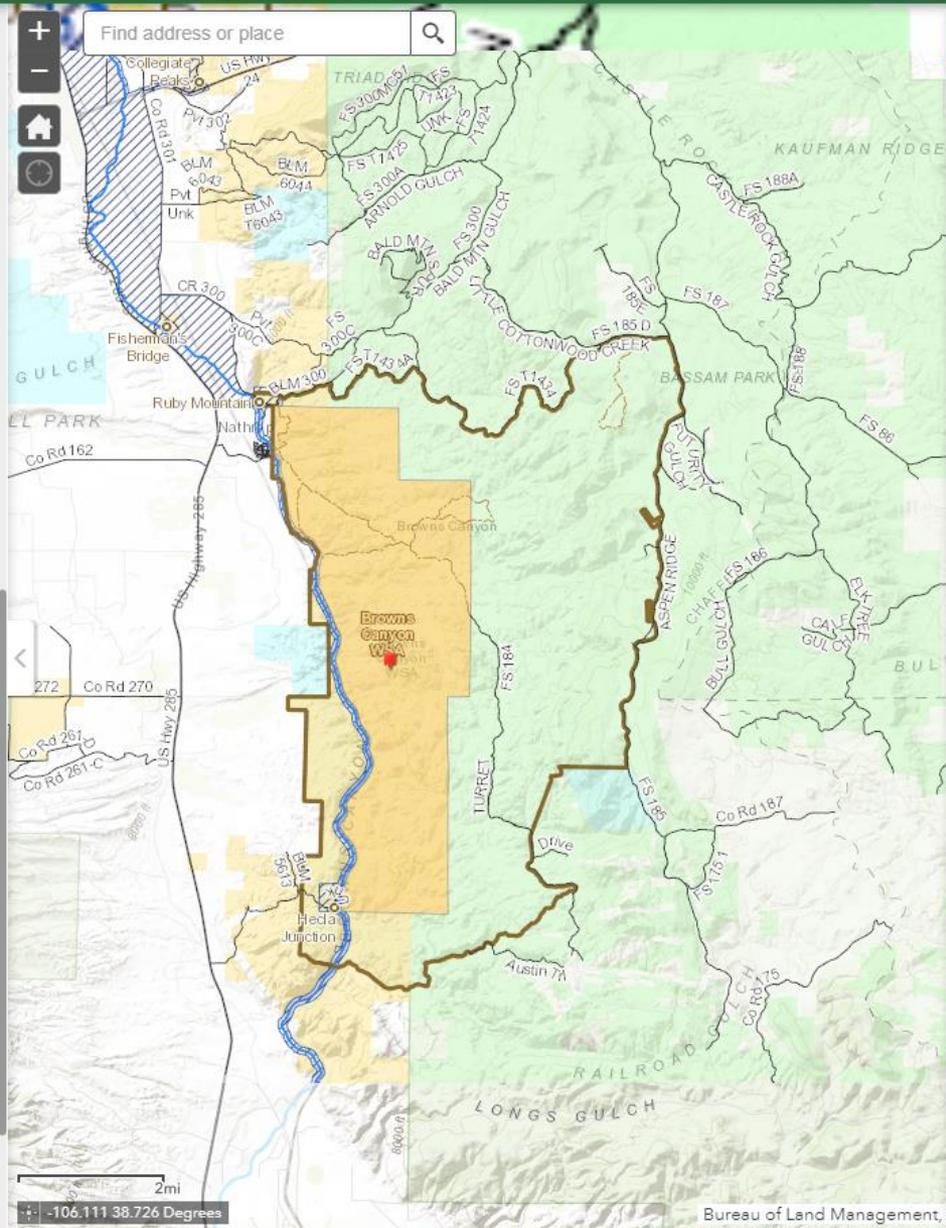
- Place a point comment where specific plants or wildlife should be considered.
- Draw an area comment to suggest an alternative to the recreation management areas.

Effective comments are detailed enough to adequately inform the development of the draft alternatives for the BCNM RMP/EIS. Substantive comments do one or more of the following:

- Raise issues or concerns the BLM has not considered or provide additional arguments relevant to issues the BLM has already identified.
- Identify additional planning criteria.
- Present information that can be used when refining a reasonable range of management alternatives and considering the impacts of alternatives.

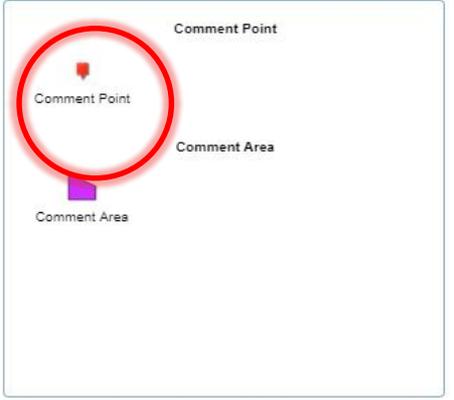
Please consider the following questions:

- Are the goals, objectives, or desired conditions described in the *Planning Criteria Report* (available on the BCNM website: <https://go.usa.gov/xn2eC>) adequate? If not, how should they change?
- Do the alternatives adequately address the planning issues? If not, what additional issues or management alternatives should the BLM and USFS consider?
- Is the basis for analysis in the *Planning Criteria Report* adequate for understanding the potential impacts of the different management



Add Comment

- Please select one of the comment types below
- Click on the map to place the location-specific comment



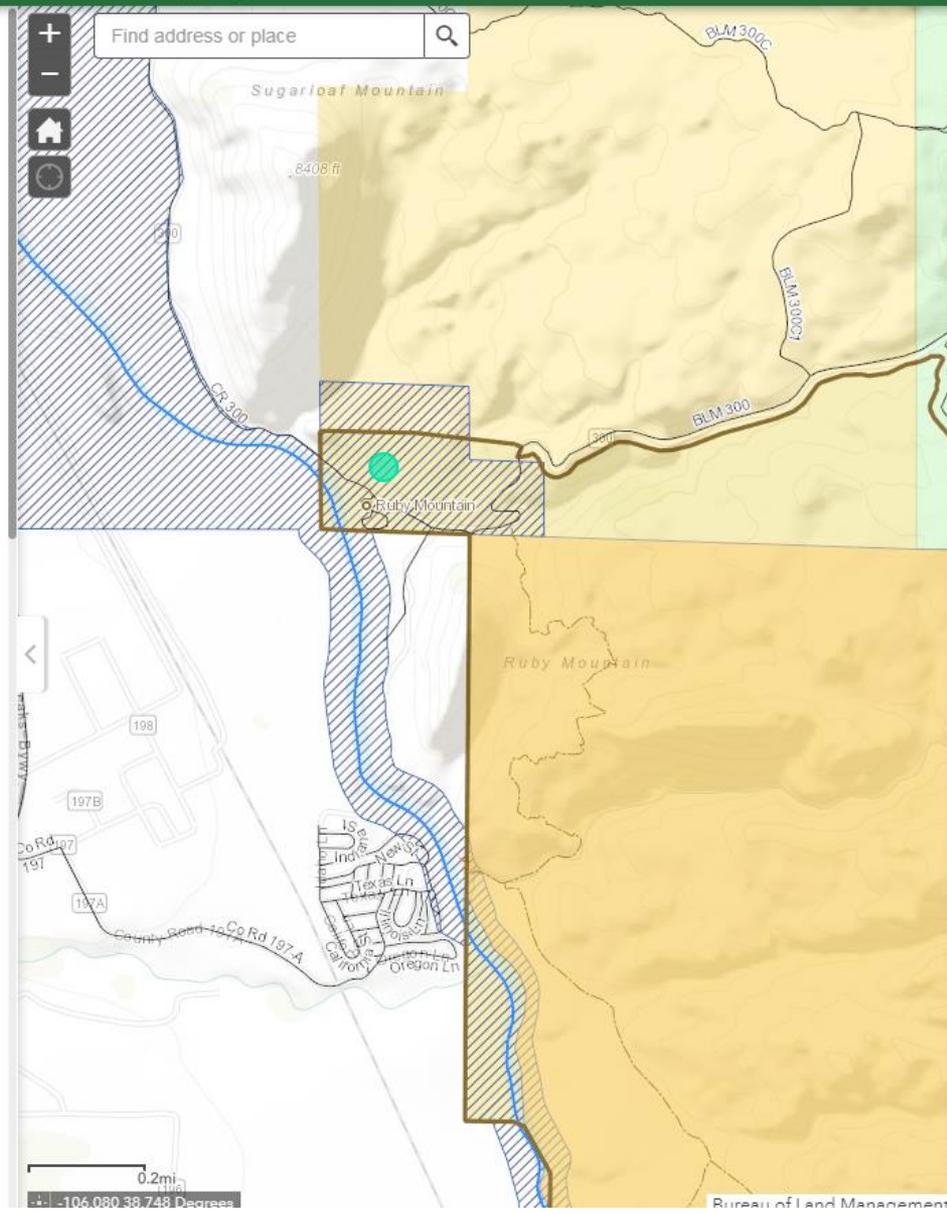


The purpose of this comment tool is to collect location-specific comments. To provide non location-specific comments, visit BLM's ePlanning site at <https://go.usa.gov/xn2eC>.

The BLM and USFS will host two online webinar presentations to provide an overview of the project status and provide a tutorial for using the Comment Mapping Tool. Visit ePlanning for more info and to register for the events at <https://go.usa.gov/xn2eC>.

HOW TO USE THIS MAP

- To submit a comment, click the "Add Comment"  tab at the top right. Further instructions are provided on how to create a point or area comment. Personal information (name and e-mail) will not be shown to other commenters once saved. However, other commenters will be able to view your comments.
- To view and turn on/off layers click the "Layer List"  tab at the top right. The layer list has wildlife, recreation, visual, travel, and base map layers that can be toggled on and off. You can also turn all layers on or off.
- To view an aerial or topographic background, click the "Basemap Gallery"  tab at the top right.
- To view the map legend, click on the



Add Comment

Comment Point

Important - Please Read: Once you save your comment, you will not be able to edit or delete your comment. Your comment will be visible to other users.

Be sure to hide your personal information by selecting "Yes" when asked, "Hide your personal information?" Otherwise, your personal information will be visible to others.

Name

Comment

Comment Category *

E-mail Address

Do you want to be on the mailing list?

City/Municipality *

State/Province *

ZIP/Postal Code *



U.S. Department of the Interior
Bureau of Land Management

Browns Canyon National Monument

Public Scoping & Planning Criteria – Online Webinar Tutorial

A wide-angle landscape photograph of Browns Canyon National Monument. The foreground is a rocky riverbank covered in grey and white stones. A river flows through the center, bordered by green and yellowish-brown shrubs and trees. In the background, there are rugged mountains under a blue sky with scattered white clouds.

Thank you for attending!



How to Comment

There are multiple ways to provide written comments.

- Online Comments via ePlanning: <https://go.usa.gov/xn2eC>
- Interactive Mapping Comment Tool: <http://arcg.is/1yuDDD>
- U.S. Mail: BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201.

**Public comments will be most helpful if received before June 13, 2019.
Comments will be accepted up to 15 days after the date of the last public
meeting (June 5).**



BROWNS CANYON NATIONAL MONUMENT

Resource Management Plan/Environmental Impact Statement

Public Scoping Comment Form



Comments related to the Browns Canyon National Monument Resource Management Plan/Environmental Impact Statement may be submitted on the **BLM's ePlanning website** at <https://go.usa.gov/xn2eC>. Comments can also be submitted by **U.S. Mail to BCNM RMP/EIS, 5575 Cleora Road, Salida, CO 81201**, or through the **online mapping tool**: [http:// arcg.is/1yuDDD](http://arcg.is/1yuDDD). Comments will be most helpful if submitted by June 13, 2019, but will be accepted up to 15 days after the last public meeting, which is scheduled for June 5.

Public comments submitted for this planning review, including names and street addresses of respondents, will be available for public review at the USFS PSICCC Salida Ranger District, 5575 Cleora Road, Salida, CO 81201, representing the BLM Royal Gorge Field Office, during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except federal holidays.

Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your written comments. Such requests will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations, businesses, or from individuals identifying themselves as representatives or officials of organizations or businesses.

Contact Information (Please Print):

Name: _____ Affiliation: _____
 Street address: _____ City: _____ State: _____ Zip: _____
 E-mail address: _____

Effective Comments

- Focus on issues such as those in the preliminary alternatives and basis for analysis (see *Planning Criteria Report* under **Documents & Reports** on the BLM ePlanning website: <https://go.usa.gov/xn2eC>).
- Provide constructive solutions, specific examples, and supporting and documentation.
- Are clear, concise, and relevant.
- Avoid simply stating an opinion and general comments agreeing or disagreeing with existing policy.

BCNM Public Scoping Comments:

Date:

BCNM Public Scoping Comments (cont'd):

Appendix B – List of Commenters

The comments analyzed in this report were provided by the following commenters.

- Brett Ackerman, Colorado Parks and Wildlife
- Eric Aslakson
- Lauren Atkinson
- Jesse R. Bowers
- Christopher Boyer
- Leonard Chamberlain
- Chris Clark
- Bruce Cogan, Chaffee County Cattlemen
- Douglas DeLong
- Douglas DeLong, Well Sorted Automotive
- Karen Dils
- Frank Doyle
- Emma Dunn
- Bill Dyer
- Caleb Efta
- T. R. Evans
- Terry Fankhauser, Colorado Cattlemen's Association
- Raymond Ferbrache
- Linda Gibas
- Jay Gingrich
- Andrew Ginzal
- Bruce Goforth
- Gary Gruenisen
- Sean Hackett, Colorado Department of Public Health and Environment
- Dr. JoAnn T. Hackos
- JoAnn Hackos, Audubon Colorado Council
- Sacha Halenda
- Jonathan Halpern
- Philip Hartger, The Wilderness Society
- Rachel Holder
- Rick Hum
- Thomas Jacobson
- William Jacoby
- Hank Jenkins
- Susan Jenkins
- Hattie Johnson, American Whitewater
- Scott Jones, COHVCO
- Jeff Keidel
- B. Ker
- John Kreski
- Robert Lamond
- Brett Landin
- Jane Lewis
- Teanna Limpy, Northern Cheyenne Tribe
- James Lockhart, Wild Connections
- Jim McGannon
- Patrick McKay
- Mark Merklein
- Michael Meyer
- Amy Moyer, Colorado Department of Natural Resources
- Danielle Murray, Conservation Lands Foundation
- Logan Myers, Private Boaters of the Arkansas Valley
- Ray Nagashima
- Hally K. Norton, History Colorado
- John O'Brian
- Dan Omasta, Colorado Trout Unlimited

- Ron Rak
- Pauline P. Reetz, Denver Audubon
- Adrian Reif
- Don E. Riggle, Trails Preservation Alliance
- Alan Robinson
- Rebecca Rupp
- Michael Smith
- Mike Smith
- Shannon Snyder, U.S. EPA Region 8
- Tom Sobal, Quiet Use Coalition
- Ann Stevens
- Joe Stone, Friends of Browns Canyon
- Mike Sugaski
- Julia Taylor
- John Toepfer
- Steve Turner, History Colorado
- Kristie VanVoorst
- Jessica Walton
- Yolanda Walton
- Brenda Wiard
- Brandon Wilkins
- Andrea Wilson
- Jay R. Wilson, Tri Lazy W Ranch
- Richard Wolkowitz, MD
- P. T. Wood, City of Salida
- Greg Wright

Additionally, the letter submitted by the Friends of Browns Canyon included the following supporters:

- 146 Taphouse
- 350 Central Colorado
- 350 Colorado
- A Church
- Absolute Bikes
- Adobe Park Productions
- American Whitewater
- Arkansas River Outfitters Association, representing 29 outfitters
- Arkansas Valley Digital Imaging
- Backcountry Hunters and Anglers
- Badfish SUP
- Bald Mountain Electrical
- Benson's Tavern
- Blue Collar Projects
- Boathouse Cantina
- Braveheart Properties
- Café Dawn
- Central Colorado Conservancy
- Circle R Hotel
- City of Salida
- CO Creative LLC
- Collegiate Peaks Chapter of Trout Unlimited
- Colorado Committee of 3 Million
- Colorado Headwaters
- Colorado Mountain Club
- Colorado Trout Unlimited
- Conservation Colorado
- Conservation Lands Foundation
- Defenders of Wildlife
- Dolores River Boating Advocates
- Ecoflight
- Elements Composting
- Elevation Beer Co.
- Evergreen Café
- Eye Candy
- Fat Tees
- First Street Flooring
- Friends of Browns Canyon

- Friends of Fourmile, a chapter of the Greater Arkansas River Nature Association (GARNA)
- Fritz Restaurant
- Geosphere International
- Great Western Storage
- Grit and Thistle Film Co.
- High Country Conservation Advocates
- Hittle Landscape Architects
- Huddle 4 the Environment
- Hunnicutt Properties
- Hunt to Eat
- Itty Bitty Lakes Gallery
- jalaBlu Yoga
- Kaleidoscope Toys
- Katie Maher Fine Art
- Lifestream Water Systems
- Little Cambodia
- McCoy & McCoy, Inc.
- Moonlight Pizza
- Natural Habitats Design
- Oak Construction
- On Time Builders
- Palace Hotel
- Phreckles Photography
- Pinon Vacation Rentals
- Poncha Mini Storage
- Pure Greens
- Riverboat Works
- Rocky Mountain Live
- Rocky Mountain Wild
- Rok Skool
- Roxy's Bottle Shop
- Salida Business Alliance, representing 57 local businesses
- Salida Chamber of Commerce
- Salida Dental Hygiene
- Salida Dermatology
- Salida Fly
- Salida River Adventures
- Salida Mountain Sports
- Salida School of Stringed Instruments
- Salida Walking Tours
- Sierra Club Colorado Chapter
- Simple Foods
- Soulcraft Brewing
- State Farm
- Stone Media
- SubCulture Cyclery
- Sunshine Apothecary
- Susan Mayfield Art
- Suttly's Records and Art
- Tanda CAD Drafting
- Taylor, Julie, Turret resident
- The Firefly Restaurant
- The Hodgepodge
- The Iron Shop
- The Lettucehead Company
- The Link School
- The Mixing Bowl
- The Trailhead
- The Wilderness Society
- Tim Brown Photography
- Vely Agency
- Veterans Expeditions
- Wenham Design
- Western Resource Advocates
- Western Slope Conservation Center
- Wild Connections
- Wilderness Workshop
- Wood's Distillery

Appendix C – Full Text Comments

Name: B Ker

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/13/2019 8:00

Comments:

this is national land and not state land. state land can go by state rules. this is national land for 328 million americans not colorado state residents. this land should be declared wilderness as the best idea. peace for trees and animals are so badly needed and that is what this land should be. ban all livestock grazing on this land. they have been getting away with murder paying cheap rates and destroying the land, meanwhile killing all the wildlife and trees that they can kill. they are bad leaseholders and deserve to be kicked off national land. ban all hunting and trapping. ban new roads. ban chemical applications. ban burning up the site. The assault of the federal agencies on land is extensive and massive and the land is destroyed by the venal vicious actions of these federal agencies, which regard their policy as raping the land. with money the only object. they are horrible stewards of the land. they kill it. we see endless reports in the federal register of lands that have been destroyed by these federal agencies and now need restoration. this comment is for the public record please receipt. please make sure i am continually kept on the list for comment. b ker bk1492@aol.com

Name: Jay R. Wilson

Organization Name: Tri Lazy W Ranch

Secondary Author:

Secondary Organization:

Date Submitted: 6/5/2019 8:00

Comments:

Joe Vieira National Monument Project Manager Planning and Environmental Coordinator BLM Colorado Rocky Mountain District Salida, Colorado Dear Joe, I have attended several of the planning meetings. I wanted to get my written comments on the record as I will be unable to attend the public meetings on June 3rd or June 4th, 2019. I am a rancher in Chaffee County. I hold a BLM permit which is located within the boundaries of the Browns Canyon Management Area. As a steward of the land it is my obligation and charge to protect this resource from damage while retaining the historical heritage of this property. My comments will pertain to the historical use of cattle grazing and resource protection of this land. I met with Senator Udall, Senator Bennett, Forest Service, and BLM officials from Washington DC. at special meeting of stakeholders to discuss the formation of the monument project. During this meeting I was assured the historical use of this land would be preserved. To this end I have several key points to share with you which were agreed upon. Cattle grazing in the proposed National Monument Area would be protected and its historical use would continue. This included all presently accepted language such as the right to change authorized grazing numbers, times of use, the transfer of grazing permits to other parties, motorized access for permit maintenance and administration, and range improvements. We were also assured ALL cattle operations within the Monument Area would be protected and continue as historically managed. I have additional concerns regarding the protection of this area. As I observe today, there is increased usage of our Forest and BLM lands for recreational purposes. While I recognize the right of the public to enjoy this resource, I am opposed to the increased destruction of the lands due to their ignorance and miss-use. As there are controls within our grazing protocols, so should there be controls and adequate monitoring of the public use to protect this land. In my opinion, if we have protected this land with Monument status, now it is our obligation to see this resource is not destroyed by others that want to benefit from it. As our grazing permits provide a schedule for rotational grazing and other rules we must adhere to, consideration must be given to have adequate law enforcement to ensure the public abides by the rules established for this Monument area. Most importantly, respect for private property rights must be honored. Respectfully Submitted, Jay R. Wilson, President Tri Lazy W Ranch Nathrop, CO.

Name: Teanna Limpy

Organization Name: Northern Cheyenne Tribe

Secondary Author:

Secondary Organization:

Date Submitted: 6/10/2019 0:00

Comments:

The preparation of the RMP and EIS for the Browns Canyon National Monument should adequately address tribal interests, such as the protection and/or mitigation of religious and culturally significant sites previously identified. Additionally, it is essential that tribes are provided an opportunity to participate in Class III Pedestrian Survey work for projects proposed with areas associated with the forthcoming RMP and EIS. If sites are identified, a proper mitigation and/or avoidance process should be included in the draft RMP and EIS. An unanticipated discovery plan and Colorado Burial Law should be included in the case of a UD.

Comment period for 'Notice of Intent'

Letter #: 4

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/5/2019 0:00

Comments:

I am writing to request that in preparing your EIS and Management Plan for Brown's Canyon you keep the wilderness character of this area at the top of your priorities. With the Arkansas River running through it, it provides important, hard to match, wilderness for rafters and back country hikers alike. The Browns Canyon area also provides crucial habitat for wildlife such Bighorn sheep and peregrine falcons.

Name: Jonathan Halpern

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/9/2019 0:00

Comments:

The Preliminary Alternatives Document is impressive in scope and detail and provides a wealth of background and resource information which are critical to meaningful planning. It is well organized and works logically through all natural resources, cultural resources, and land use issues for each of the three preliminary alternatives. My basic comment at this stage is as follows: There are untold millions of acres of lands protected by BLM, FS, NPS, BR and other federal land managing agencies. However, once a natural area such as Brown's Canyon is designated as a "national monument", it becomes a destination for many Americans and foreign nationals. This phenomena will inevitably be magnified by the dramatically growing interest in, and visitation to new destinations in the Colorado Mountains. This is particularly true for those within weekend "striking distance" from the huge population centers on the Front Range. These lands are national interest lands and should be managed as such. The words of the Friends of Brown's Canyon which were quoted in a piece last year in the Chaffee County Times attest to the beginnings of the interest in Brown's Canyon and say: "Brown's Canyon National Monument is in danger of experiencing overuse in some areas, misuse by some user groups, and creating negative impacts to the surrounding private and county properties." This is only the beginning of an escalating use of the monument. Planning is essential and decisions makers should be bold and "get ahead of the growth curve". The Alternative C which focuses on a wider variety of river and upland recreation opportunities in middle and front country settings to enhance the local economy and quality of life for residents and visitors, should be the preferred alternative and is the one which will inevitably protect many of the monument's resources. Furthermore, the objectives of both Alternatives B and C are not mutually exclusive. By enabling visitor access in some locations, the solitude and resource protection some seek in other areas can be assured/enhanced. Development concept planning should be a part of the RMP/EIS and should design facilities which "harden" specific chosen locations for dense visitor access. For example, this past weekend saw the current primary access point at Ruby Mountain already reaching its carrying capacity for staging of visitors to the monument's trails (and OHV users who roam the roads and FS trails on the north side of the monument). A development concept should involve architects, interpretive specialists, resource management specialists, transportation planners, and others, to forecast use patterns, and design facilities to enable use of the trail system from that side of the monument, while protecting resources. A number of other issues of resource protection, access, and desired forms of use need to be resolved or considered in the RMP. These include enhanced opportunity to access the monument from the south through Turret. Another is the consideration of access from across the Arkansas River from the west at a location like Hecla Junction. Other issues may include limiting the use of drone or other technology, and the need for on site visitor contact facilities (ranger contact facility, etc.) at specific locations (for purposes of visitor information, interpretation, and emergency response during peak use periods). Turret access. The county road 184 which goes through the town of Turret and into the monument is rough with rock outcrops in several locations. Only experienced drivers in high clearance 4WD vehicles should be encourage to attempt it. The road (CR 184) is closed to off highway vehicles until it crosses into the monument, whereupon OHVs are allowed. There will be increasing pressure from ATV (OHV) users to access the monument from

the south in addition to high clearance 4WD vehicles. There is currently no good way to stage an OHV on the south side of the monument. The resident community in Turret has erected many signs prohibiting parking in most locations, and beyond Turret there is no good location to stage a vehicle and trailer, in order to drive beyond on an OHV. The planning team needs to consider this allowed use and enable it with proper staging areas and route controls (or else change the map and disallow it altogether). Without such deliberate planning, the resource will see negative impacts (social roads and trails, trash, off road motorized use, etc), from the south as well as other impacts. Access from the west. An access such as access across a bridge at Hecla and a developed area there should be considered for substantial visitor contact and access, as an alternative to Ruby Mountain development area. Wilderness. The potential for wilderness designation has been an important issue for years. The RMP should evaluate wilderness potential and designate an area if it has the character of wilderness as described in "The Act", or should set the issue aside permanently. Fire. Activities prescribed in the RMP/EIS should be evaluated in the context of the potential for causing human induced wildland fire. A large portion of the rugged monument could be burned unless activities are evaluated in planning and contingencies for fire are developed and understood. Thank you for the opportunity to comment on the preliminary alternatives planning document.

Name: Douglas DeLong

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/5/2019 0:00

Comments:

I would like to submit comments regarding the Resource Plan for Brown's Canyon National Monument. My business supports the OHV community in this area and I believe it is important to "Maintain and enhance existing motorized and mechanized travel consistent with existing travel management decisions." Accordingly, I support Alternative A with regards to reference 1004 in section 2.3.10 regarding Travel and Transportation Management. Aspen Ridge (FS 185) should maintain open access and ideally Turret Road (FS184) would be restored and open to access.

Name: Terry Fankhauser

Organization Name: Colorado Cattlemen's Association

Secondary Author:

Secondary Organization:

Date Submitted: 5/20/2019 0:00

Comments:

On behalf of the Colorado Cattlemen's Association and the Colorado Public Lands Council (CCA/PLC), we are providing comments on the Browns Canyon National Monument, preparation of a Resource Management Plan and Associated Environmental Impact Statement. Changes in Authorized Numbers. Language must be included to ensure that changes in the numbers of authorized livestock be based on facts and not the whim of individual land managers. We believe that while guidelines are generally helpful and point management in the right direction, they also support the possibility of decisions being made based on individual caprice. Fact-based land management decision making is needed everywhere with public lands. It is particularly needed in a Wilderness Area where it is all too easy to eliminate historic uses in favor of what is currently more popular. As an industry, we accept and will live with fact-based decisions. Water Rights. Ranchers shall have access through motorized and otherwise in order to maintain, enhance, and utilize their water rights on any proposed wilderness. Permit Transfers. Language must be added to explicitly ensure that permits will be transferrable to new permittee/owners in the exact same manner as was the case prior to the designation of the wilderness areas. Motorized Access for Permit Administration. Language must be added to the bill to make explicit that motorized access must be allowed to the subject areas to continue administering grazing permits in the same manner as is currently allowed. Absent explicit direction, permit administration could all too easily be denied by a manager. Range Improvements. Ranchers shall have access through motorized and otherwise in order to maintain and enhance range improvements they deem necessary for operation of their business. Livestock trailing areas. A number of sheep and cattle producers currently use areas proposed for wilderness designation to trail their sheep and cattle to and from federal grazing allotments. Explicit language is needed to protect the activity. Without the language, sheep and cattle trailing will be easy to deny and operations will disappear. Weed control. The problem of weeds and weed control must be addressed, particularly in headwater areas. Weed control by mechanical methods must be specifically allowed. Funds for weed control have to be provided. Weeds cannot be allowed to go unchecked. As noxious weeds gain control of the landscape, the biodiversity and health of the ecosystem will plummet. Without proper management, weeds will dramatically change the face of the landscape. Weed management cannot be hampered by lack of statutory authority to do the needed job. Monitoring Plan. We support the need to consider recreational implications in the Plan. Recreation must be managed, as other uses are, as they impact the functionality and health of the ecosystem. A key element of management is monitoring recreational impacts. As opposed to the Plan's statements of Grazing have adverse or negative implications to the resources. This is presumptive and pre-decisional. We support the need for development of a monitoring plan that is meaningful, repeatable and focuses on landscape level changes. A key element of this plan should be the allocation of adequate resources and incentives to achieve the desired level of monitoring. Livestock grazing permittees should be engaged in the monitoring and site-specific capabilities and analysis should be implemented. Historic Uses. We request that all historically uses of related to permittee maintenance, management, improvements along with those associated with roads, water systems and storage, fencing, etc be documented in great detail as pre-existing and are

rights for continued management and use by the current and all subsequent permittees. All Other Comments

The planning process should consider carefully implications from one use to another. Such as implications to livestock grazing or resource impacts from activities such as recreation, etc. Livestock grazers have long since managed resources, through timing, duration and stocking rates to deliver high quality habitat that supports diverse ecosystems. Ranchers who graze on public lands also serve as stewards for that land. Ranchers' commitment to effective stewardship includes ongoing efforts to preserve clean waterways, control invasive plants and non-native grasses, and protect endangered species. They also maintain feeding areas used by native species and serve as first responders during disasters like forest fires. According to the Department of the Interior, grazing on public lands contributes a minimum of \$1.5 billion annually to the economy. Ranchers pay the federal government approximately \$12 million for grazing permit fees. Ranchers pay taxes on the public lands permits they hold. Brown's Canyon Monument must be a good neighbor to adjacent landowners. Where impacts drift onto private and state grounds, the Forest Service has a responsibility to address and remediate these impacts. In describing desired plant communities, indication needs to be made on a site-specific scale with strong consideration for site potential. For example, determinations of stubble height, composition, etc may not be standardized due to differing soil, moisture, etc. conditions.

Name: Shannon Snyder
Organization Name: U.S. EPA Region 8
Secondary Author:
Secondary Organization:

Date Submitted: 6/11/2019 8:00

Comments:

Attached are EPA's comments on the BCNM notice of intent to prepare a joint RMP/FP and associated EIS. A hard copy will also be sent in the mail. If you have any questions, or would like to discuss, please contact Shannon Snyder at 303-312-6335. Ref: 8ORA-N Jun 11 2019 Joseph Vieira, BLM Project Manager U.S. Forest Service Salida Ranger Station 5575 Cleora Road Salida, CO 81201 Dear Mr. Vieira: The U.S. Environmental Protection Agency Region 8 has reviewed the Bureau of Land Management's May 14, 2019, notice of intent to prepare a joint Resource Management Plan (RMP) and U.S. Forest Service (USFS) Forest Plan (FP) and associated Environmental Impact Statement (EIS) for the Browns Canyon National Monument. In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), we are providing scoping comments. Due to limited resources these comments focus on considerations for the air quality analysis. The Browns Canyon National Monument (BCNM) is located in Chaffee County, Colorado, and comprises approximately 21,600 acres of public land (9,790 acres on BLM and 11,810 acres on USFS). The Monument includes public land administered by the BLM Royal Gorge Field Office and the USFS Pike-San Isabel National Forests and Comanche-Cimarron National Grasslands (PSICC). The EIS will support a joint RMP and Forest Plan amendment for the National Monument, which was established on February 19, 2015, The management plan will revise a portion of the existing Royal Gorge RMP and PSICC FP. The RMP/FP will focus on managing for sustainable outdoor recreation, while conserving and protecting monument resources and objects or values, and addressing existing uses such as livestock grazing. The plans will establish goals, objectives, and management direction to guide resource management in the planning area over the next 20 years. The Eastern Colorado RMP is in the process of being revised and the revision will now include the Royal Gorge RMP area, The Eastern Colorado RMP is evaluating mineral extraction and oil and gas development and the associated environmental impacts. It is important for the scope of the BCNM analysis to assess the environmental effects of management changes between the existing Royal Gorge RMP and the updated Eastern Colorado RMP. Specifically, we recommend assessing any potential cumulative impacts to air and water resources within the Monument that could occur from future energy development, particularly within the South Park area. In assessing current and future air quality conditions, the cumulative results from BLM's Colorado Air Resource Management Modeling Study (CARMMS) low, medium and high scenarios for grid cells that fall within and around the Monument will be useful. CAARMS can assist in determining whether activities in other planning areas are adversely affecting air quality related values in the BCNM, or could have potential future impacts. This information would help inform whether any changes in management direction may be warranted to protect valued resources at BCNM that could result from activities anticipated under the Eastern Colorado RMP planning effort. This assessment is also helpful in determining whether considerations are necessary in the Eastern Colorado RMP and EIS for the lands surrounding the Monument to ensure planning objectives and goals are met to sustain resources and uses. We thank BLM and USFS for their coordination efforts to date and hope that those efforts continue with EPA and other federal and state partners. We recommend early coordination with the interagency air quality technical workgroup to inform them of decisions made for the air quality analysis. This will ensure that air

quality impacts will be adequately disclosed in the EIS, and avoid unnecessary delay as the project progresses. Thank you for the opportunity to participate in the scoping process for Browns Canyon National Monument. The EPA hopes to assist the BLM in the development of an analysis that will assess potential environmental impacts and identify potential mitigation measures. If you have any questions or comments, please feel free to contact me at (303) 312-6335 or snyder.shannon@epa.gov. Sincerely, Shannon Snyder NEPA Branch Office of the Regional Administrator

Name: thomas jacobson

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/11/2019 8:00

Comments:

please see attached PDF I would like to see the Monument's management plan provide for a non motorized but hiker and mountain biker friendly trail running north-south and ultimately connecting to trails outside the Monument linking Salida and Buena Vista. A trail linking the two communities would create economic benefits to both. Salida and BV have worked diligently over the last decade to create substantial trail infrastructure. With that both have seen an increase in recreation tourism. Salida supports three bike shops and an outdoor store as well as numerous restaurants and bars that benefit from the influx of bikers, hikers, and trail runners. Recently, bike packing has grown in popularity. A trail traversing a small portion of the Monument and connecting Salida and BV would draw many cyclists and long distance hikers from outside our communities and add to the growing recreation based economy that is so critical to Chaffee county. This trail would provide the east side compliment to the Colorado trail running north-south in the Collegiate foothills. While cyclist currently make this loop using the Aspen Ridge road, hikers and bikers generally prefer the opportunity to access more remote country under their own power while avoiding the noise, dust and danger of motorized trails or roads. Both hiking and mountain biking are low impact and quiet uses that are compatible with the Monument's management goals while allowing for expanded recreation and backcountry access. Several developed campsites along the trail could be created to keep users from damaging resources through dispersed camping. Cyclists and hikers, unlike motorized users seldom leave trash and rarely require camp fires which I believe should be banned to preserve resources. As both a hiker and biker, I would also like to see additional hiking only trails within the monument with commensurate parking and signage. Thank you for your consideration.

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/12/2019 0:00

Comments:

I am in favor of creating multi-use trails in the Browns Canon Monument for the future. I prefer non-motorized trails but also understand it is only fair to work with motorized trail users also to create a plan that will meet the needs of all user groups. A trail that connects Salida and Buena Vista would be an incredible asset to the Monument. Thank you. Diana

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/14/2019 0:00

Comments:

As a backpacker and hiker, I would like to see more trails added to the monument. Currently, the few trails available in the monument don't offer multi day opportunities. I feel that while many visitors will be satisfied with short day hikes, some of us want more back country travel with more solitude and access to portions of the monument that will otherwise be generally inaccessible.

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/14/2019 0:00

Comments:

I would like to see hiking and mountain bike trails especially one linking Salida and BV. This would be an amazing human powered way to experience this fascinating area. This connection would benefit both communities economically by bringing outside visitors to recreate and help support local businesses. These trails would also provide a unique user experience that can not be obtained by walking or riding on motorized roads. Quiet, non-motorized uses like hiking and biking would be compatible with the Monument's natural beauty that took so many years of hard work to protect.

Name: Raymond Ferbrache

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/15/2019 0:00

Comments:

We would like to see Brown's Canyon open for the public, not just hiking, but also for the other quiet non-destructive activity of mountain bicycling. Personally, with my tender (78 year old) sensitive feet I can only hike short distances. However, on my bicycle I can cover miles of scenic trails, maybe as far as from BV to Salida. We would enjoy the scenic beauty of access through Brown's Canyon. This is important for us now and future generations to not be cut off from using this public land as is the situation in so many wilderness areas.

Name: Andrew Ginzel

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/15/2019 0:00

Comments:

I would love to have a hike and bike trail in the canyon so that the stunning resource can be enjoyed by those not on the river. This could be fun for pack rafting too. I think this could become a great tourist draw too – especially for young children and older adults who are not comfortable on the river.

Name: William Jacoby

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/15/2019 0:00

Comments:

Please build a trail from Salida to BV for hikers and mountain bikers. I think this trail could be build and managed in such a way that it would have minimal environmental impact. Hikers and mountain bikers are good trail stewards. Diving around Salida and BV, one sees scores of mountain bikes and their riders. The area has become a Mecca for the sport. Stop by one of our bike shops to see what these bikes cost (>\$4,000), these riders have money and they spend it while they are here. The economic impact of mountain biking rivals that of skiing, This unique trail from Salida to BV will immediately make the bucket list for many hikers and mountain bikers. Next up, rails to trails from Canon City to Leadville. Thank you for your consideration, Bill Jacoby

Name: Adrian Reif

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/15/2019 0:00

Comments:

I've been wanting for years to get more into and inside of Brown's Canyon National Monument. It is a special place that deserves protected exploring. The area has seen tremendous success with a focus on adding trails, both for locals and visitors. As a local, I think a trail connecting BCNM with Salida and Buena Vista would create an amazing out and back car-free journey / day-trip into the land that's something to write home about. The number of locals who get out and explore trails is vast and I know many would appreciate the opportunity to dive deeper into this amazing area. And just imagine, if more people appreciated these national treasures, they would be less willing to strip them of protections and sell them. Adrian Reif

Name: michael smith

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/17/2019 0:00

Comments:

I would like to see hiking and/or mountain bike trails- especially one linking Salida and BV. This type of epic long distance trail would be a huge economic draw to the area. It would benefit both communities economically, and help support local businesses. In addition, a trail of this scale would offer amazing human powered access to parts of the monument that cannot be easily seen or experienced unless you pay to raft the river or have the skills and equipment to navigate the river on your own. Quiet uses like hiking and biking are totally compatible with the Monument's natural beauty.

Name: Withheld Withheld
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/17/2019 0:00

Comments:

I would like to see non-motorized trails, such as for hiking and bicycling and horseback, included for future plans for Browns Canyon Monument. This would greatly enhance visitor experiences to the area. Non-motorized use of wild areas is the very best way to access and enjoy nature. I have been looking for ways to personally better experience this area so close to where I live, and have been disappointed at so few trail options available to me. I know that I am not alone, as I see increased use of the new trails for hiking and biking being built near my town, Salida. There is a demand for such amenities, as more people seek to enjoy wilderness areas self-propelled. There's no better way to see the natural beauty of Browns Canyon! I've heard discussions about linking the two communities of Salida and Buena Vista via a trail in the Monument - this would be an incredible resource for local users, for visitors, and also for the local businesses in both communities. When the Monument was approved, there was a lot of talk about how it would add to the financial support for the county. A connecting trail would certainly support this, as visitors would come and spend tourist dollars all through Chaffee County. Trails would greatly expand ways to enjoy the Monument and increase options for supporting our local business. If you build it, they will come!

Name: Danielle Murray
Organization Name: Conservation Lands Foundation
Secondary Author:
Secondary Organization:

Date Submitted: 6/17/2019 8:00

Comments:

On behalf of the Conservation Lands Foundation, please accept the following Scoping Comments for the Browns Canyon National Monument Resource Management Plan. June 18, 2019 Joseph Viera BLM Planner-Project Manager Browns Canyon National Monument c/o USFS PSICC Salida Ranger District 5575 Cleore Road Salida, CO 81201 Submitted electronically at: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPagelId=102756> Re: Scoping Comments on Browns Canyon National Monument Resource Management Plan Dear BLM Planner-Project Manager Viera, The Conservation Lands Foundation (CLF) submits the following scoping comments for the Browns Canyon National Monument Resource Management Plan. CLF is a non-profit organization that promotes environmental conservancy through support of the National Landscape Conservation System (National Conservation Lands) and preservation of the outstanding historic, cultural, and natural resources of those public lands. CLF works to protect, restore, and expand the National Conservation Lands through education, advocacy, and partnerships. Our comments focus on the portion of the Browns Canyon National Monument ("Monument") managed by the Bureau of Land Management ("BLM") as a protected part of the National Conservation Lands- 36 million acres of National Monuments, National Conservation Areas, Wilderness Areas, Wilderness Study Areas, Wild and Scenic Rivers and National Historic Trails. Through congressional and presidential directives these lands must be managed to protect their extraordinary ecological, scientific and historic resources, allowing all American's to discover and explore these spectacular places. CLF is the only organization whose sole mission is to protect, expand and restore the National Conservation Lands. CLF achieves its mission by working with and supporting the Friends Grassroots Network (FGN). The FGN consists of over 60 organizations located in 13 states, to foster and implement a national strategy to promote the protection of the National Conservation Lands. Organizations within the FGN and their members organize and conduct a wide range of conservation-related activities, including clean-up projects, trail maintenance and rebuilding, riverbank and stream restoration, removal of invasive species, closure of illegal roads, water quality monitoring, enhancement of wildlife habitat, and improvement of recreational access. The National Environmental Policy Act On August 31, 2017, the Department of Interior issued Secretary Order No. 3355 focused on streamlining the National Environmental Policy Act (NEPA) process. CLF is concerned that the agency intends to fast-track this process, thereby not doing their due diligence to assess, document, and disclose necessary information. BLM must adhere to their own guidance and NEPA in developing an RMP, which includes analysis and inventory of objects and values and "rigorously explor[ing] and objectively evaluat[ing]" a range of alternatives. In addition, the agency must allow for the public to fully engage and participate in the process. Browns Canyon National Monument Presidential Proclamation Browns Canyon National Monument was established on February 19, 2015, in order to, "preserve its prehistoric and historic legacy and maintain its diverse array of scientific resources, ensuring that the prehistoric, historic, and scientific values remain for the benefit of all Americans." The proclamation also highlighted the recreational values in the region. "The area also provides world class river rafting and outdoor recreation opportunities, including hunting, fishing, hiking, camping, mountain biking, and horseback riding." The proclamation directs

the Secretaries to jointly prepare a management plan for the monument “for the purposes of Protecting and restoring the objects” identified within the proclamation. In development of the RMP BLM should: Include measures for management at the landscape level. BLM must include management standards in RMPs for the National Conservation Lands that protect not only individual objects and values, but also the surrounding landscape and natural ecosystem (16 U.S.C. § 7202(a)). Protecting large, intact and healthy landscapes is the principal focus of many of the presidential proclamations and organic acts for National Conservation Land units, which frequently include natural and/or cultural landscapes in the recitation of protected objects and values. Only include management alternatives that protect the National Monuments Objects and Values. BLM is required under NEPA to develop and evaluate a “reasonable range” of management alternatives for National Conservation Land RMPs. However, this range of management alternatives is constrained by the requirement that any alternative ultimately selected by BLM must protect the unit’s objects and values. For this reason, BLM should only develop and evaluate management alternatives that ultimately provide protection for the National Conservation Land’s objects and values. In addition to the legal mandate outlined through the proclamation, BLM should consider that the Browns Canyon is now a part of a system of protected lands, the National Conservation Lands. As part of the system, there are additional policy and management standards for consideration in drafting an RMP.

Management Standards for the National Conservation Lands

a) **The Omnibus Public Lands Act** The 2009 Omnibus Bill (Omnibus) established the National Conservation Lands as a permanent system of protected lands, “...to conserve, protect and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.”⁴ The National Conservation Lands include all BLM managed National Monuments. To ensure that the permanently protected National Conservation Lands are managed in order to “conserve, protect and restore nationally significant landscapes,” all units within the system have several basic conservation standards, including:

- 1) Prescriptive language that requires the area to be managed for the conservation, protection and enhancement of resources over other uses;
- 2) A prohibition on discretionary uses that are not consistent with conservation and protection of these resources;
- 3) A mineral withdrawal; and
- 4) Restrictions on off-road vehicles and a travel management plan with restrictions necessary to protect the area.

These standards ensure that lands within the system are managed consistently for conservation and safeguarded for future generations. The Omnibus makes clear that units of the system must be managed to a higher conservation standard.

b) **Department of the Interior and BLM Policy** Conservation primacy and standards for the system have also been outlined in Department of the Interior guidance and BLM policies. In 2010, Secretarial Order 3308 established a unified conservation vision for managing the National Conservation Lands ‘as required by the Omnibus Act of 2009’ to “conserve, protect, and restore nationally significant landscapes.” Further stating that “the BLM shall ensure that the components of the [system] are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values.” In 2011, BLM released the 15-Year Strategic Plan, setting specific goals for how to manage the National Conservation Lands focused on conservation, protection and restoration. The Strategic Plan further expanded that “there is an overarching and explicit commitment to conservation and resource protection as the primary objective” and that the BLM shall “not authorize discretionary uses that cannot be managed in a manner compatible with the designation proclamation or legislation.” In 2012, BLM released two relevant Policy Manuals: 6100-National Landscape Conservation System Management; and 6220-National Monuments, Conservation areas, and Similar Designations. In accordance with the policy outlined in the Omnibus Legislation and Secretarial Order 3308, these two manuals provided guidance to BLM employees on the drafting of management plans and land use plan decisions as related to the National Conservation Lands. The Secretarial Order, 15-Year Strategy and Policy Manuals make clear that agency policy prioritizes conservation over other uses within the National Conservation Lands. In addition, BLM Policy

Manual 6220 establishes conservation standards for National Monuments. In development of Monument Management plans, Manual 6220 states that BLM must:

- Clearly identify Monument and NCA objects and values as described in the designating proclamation or legislation; where objects and values are described in the designation legislation or proclamation only in broad categories (e.g., scenic, ecological, etc.), identify the specific resources within the designating area that fall into those categories;
- Identify specific and measurable goals and objectives for each object and value, as well as generally for the Monument;
- Identify management actions, allowable uses, restrictions, management actions regarding any valid existing rights, and mitigation measures to ensure that the objects and values are protected;
- Provide, to the extent possible, a thorough quantitative analysis of the effects of all plan alternatives on the objects and values;
- Where a thorough quantitative analysis is not possible, provide a detailed qualitative analysis of the effects of all plan alternatives on the objects and values;
- Include a monitoring strategy that identifies indicators of change, methodologies, protocols, and time frames for determining whether desired outcomes are being achieved.

c) Exception to the “multiple use” mandate of the Federal Land Policy Management Act

Lastly, it should be clear, that National monuments are managed as part of the National Conservation Lands, and no longer managed under multiple-use standards as outlined in the Federal Land Policy Management Act. BLM has clearly stated that units of the National Conservation Lands are an exception to FLPMA, however at times there remains confusion about the management of National Monuments and Conservation Areas. “The authors of FLPMA included an astute exception: Management activities must abide by [multiple-use] principles, except ‘...where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.’ That means in some places, conservation may be elevated over development or production if a law identifies conservation as the primary use for which the land is designated.” No longer under the guise of the multiple-use mandate, these lands must be managed in order to “conserve, protect and restore nationally significant landscapes.” Due to the unique features, historic and cultural significance and essential habitat found in the Browns Canyon National Monument, BLM must develop a RMP that ensures protection of the resources, objects and values. This is of paramount importance. It is essential for BLM, as steward of National Monuments, to safeguard our treasured landscapes. Thank you for the full consideration of our scoping comments. Please contact the Conservation Lands Foundation with any questions.

Sincerely,
Danielle E. Murray Senior Legal and Policy Director
Conservation Lands Foundation danielle@conservationlands.org 970-247-0807 x102

Name: sacha halenda

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 0:00

Comments:

Browns Canyon is a spectacular place. The terrain is rugged and remote which is appropriately limiting in terms of traffic. I would like to see a trail system that would allow for non-motorized access along the river corridor. This would allow people to experience the canyon without having to have a raft or kayak.

Comment period for 'Notice of Intent'

Letter #: 21

Name: Withheld Withheld

Organization Name: Master of Environmental Management Program

Secondary Author:

Secondary Organization:

Date Submitted: 6/17/2019 8:00

Comments:

SEE ATTACHED

**Browns Canyon National Monument Management Plan
Environmental Impact Statement Planning Assessment Comments**

Submitted by Western Colorado University, Gunnison, CO

Master of Environmental Management Program

Lauren Atkinson, Peter Horgan, and Tyler Lee

June 10, 2019

Introduction

The purpose of this report is to propose an alternative as a National Environmental Policy Act (NEPA) Interdisciplinary Team (ID Team) for the Browns Canyon National Monument (BCNM) Resource Management Plan (RMP). Our ID Team started our assessment with the goal of answering the research question, “How are consideration of social landscape, baseline issues and concerns, and stakeholder interests conceptualized in a proposed alternative?”

To answer our research question and develop a Monument RMP alternative our ID Team synthesized a combination of interviews, similar National Monument resource management plans, documents describing NEPA Process, and the BCNM Planning assessment, Socio-Economic Baseline Assessment, and Social Landscape Assessment. This analysis highlights specific aspects of the resources, resource uses and special designations of BCNM that should be considered as the preferred alternative in the creation of a management plan that considers Resources, Objects, and Values (ROV’s).

Our team focused on the specific section of the Planning Assessment in Chapter 2 *Ecosystems, Resources, Conditions, and Trends* (See Table Below). This comment may be articulated as a preferred alternatives for each ROV for the Draft Environmental Impact Statement of the BCNM RMP.

ID Team	
Lauren Atkinson	<ul style="list-style-type: none"> ● Master of Environmental Management ● Recreation Planning, Aspen Sopris Ranger District, White River National Forest ● 2018 National Wilderness Workshop Steering Committee ● Active Member, Society of Outdoor Recreation Professionals
Peter Horgan	<ul style="list-style-type: none"> ● Master of Environmental Management ● Stewardship Coordinator, Crested Butte (CO) Land Trust ● Founder/Host/Facilitator, “The Climbing Advocate” Podcast ● Founder, Gunnison (CO) Valley Climbers
Tyler Lee	<ul style="list-style-type: none"> ● Master of Environmental Management ● Lead Wilderness Ranger, Aspen-Sopris Ranger District, White River National Forest ● 2018 National Wilderness Workshop Steering Committee

Preferred Alternative

The preferred planning alternative for BCNM allows for the continuation of multiple use through the duration of the special use authorizations, increase recreation infrastructure and policy, while protecting monument wilderness values. The alternative provides management flexibility through monitoring of changing conditions following monument designation. This adaptive approach allows opportunity for internal and public review of additional policy to ensure consistency and compliance with resources, objects and values.

Table of Resource, Objects and Values Goals and Objectives for BCNM Preferred Planning Alternative.

Resource (ROV)	Preferred Alternative (Goals and Objectives)
Scenic Resources	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Maintain pristine character of air resources through monitoring visibility of iconic landscape. Design parameters for clear and clean air quality monitoring. ● Preserve landscape through limiting surface impacts (GSENM RMP-EIS) <p>Actions:</p> <ul style="list-style-type: none"> ● Implement speed limits on gravel roads to reduce particulate matter pollutants that reduce visibility. ● Conduct air quality resource monitoring within the BCNM boundary to obtain local data to reflects larger particulates locally ● Seek additional special management area designation to preserve scenic quality of landscape.
Cultural Resources	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Identify and evaluate cultural resources, especially within areas of increased visitation and visibility. ● Manage cultural resources to ensure that the region’s historical features and irreplaceable components are adequately protected consistent with the protection, preservation, and enhancement of Monument objects and values. ● Educate recreational users on methods to avoid and reduce impacts to sensitive cultural resources. <p>Actions:</p> <ul style="list-style-type: none"> ● Manage cultural resources with local tribes and local cities. ● Protective measures would be established and implemented for sites, structures, objects, and traditional use areas that are important to Tribes with historical and cultural connections to the land to maintain the viewsheds and intrinsic values, as well as the auditory, visual, and aesthetic settings of the resources. ● Provide cultural interpretation to recreational users though signage and kiosks.
Native and Modern Peoples	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Ensure that grazing continues to be an economic contributor in the Arkansas Valley and helps preserve the ranching heritage (modern peoples). ● Minimize impacts to livestock through public education and adaptive management to provide the ranchers (modern peoples) with assurance that conflict between recreationists and cattle will be minimal. ● Identify and evaluate cultural resources, especially within areas of increased

	<p>visitation and visibility.</p> <ul style="list-style-type: none"> ● Identify ways to improve access and use of culturally sensitive locations and ecological landscapes ● Account for all traditional cultural properties, sacred sites, cultural uses, and cultural landscapes <p>Actions:</p> <ul style="list-style-type: none"> ● Educate public on the BLM’s and USFS’s multiple-use mandate to minimize impacts on rancher’s cattle ● Improve retention barriers between recreation zone and grazing allotments ● Protective measures would be established and implemented for sites, structures, objects, and traditional use areas that are important to Tribes with historical and cultural connections to the land to maintain the viewsheds and intrinsic values
Scientific Resources	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Manage riparian resources for desired future conditions, ensuring ecological diversity, stability, and sustainability, including the desired mix of vegetation types, structural stages, and landscape/riparian/watershed function and provide for native and special status plant, fish, and wildlife habitats. ● Avoid or minimize the destruction, loss, or degradation of riparian areas, wetlands and associated floodplains; preserve and enhance natural and beneficial values. <p>Actions:</p> <ul style="list-style-type: none"> ● Minimize surface-disturbing activities in riparian areas that alter vegetative cover, result in stream channel instability or loss of channel cross sectional area, or reduce water quality (cattle grazing) ● No camping allowed within 200 feet of isolated springs or water sources to allow wildlife and livestock access to water.
Geology	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Ensure that collection and respect to special geological features remain undisturbed ● Identify, evaluate, study, interpret, and protect geological resources in the Planning Area. <p>Actions:</p> <ul style="list-style-type: none"> ● Implement regulations on what activities are permissible as it pertains the collection or use of geological resources
Paleontology	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Ensure that areas that contain or are likely to contain vertebrate or noteworthy invertebrate or plant fossils are identified and evaluated prior to authorizing surface-disturbing activities. ● Promote scientific, educational, and interpretive uses of fossils consistent with applicable laws, policies, and regulations. ● Identify, evaluate, study, interpret, and protect paleontological resources in the Planning Area. <p>Actions:</p> <ul style="list-style-type: none"> ● The Planning Area would be managed to provide for the protection of paleontological resources consistent with Monument objects and values. ● All research, inventories, and monitoring of paleontological resources would be

	conducted in accordance with applicable laws, regulations, and policy.
Vegetation	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Identify the desired composition and range of conditions for vegetation communities throughout the Planning Area. ● Manage vegetation and native plant communities relative to their associated landform(s) to optimize plant community health and resilience to landscape-wide impacts. ● Manage vegetation to support fish and wildlife habitat and healthy watersheds. <p>Actions:</p> <ul style="list-style-type: none"> ● Promote out of season grazing when cattle are more apt to roam in open fields rather than near riparian areas ● Collaborate with commercial river companies to educate river users at heavily congested river corridors
Vegetation Biodiversity	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Identify the vegetation diversity throughout the planning area. ● Maintain natural process that enhance and preserve vegetation biodiversity. <p>Actions:</p> <ul style="list-style-type: none"> ● Monitor vegetation biodiversity. ● Wildland fire would be utilized to protect, maintain, and enhance resources, and, when possible, would be allowed to function in its natural ecological role.
Terrestrial Wildlife	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Protect critical and crucial habitat for big game. ● Engage local, State, and Federal partners in program and project design to address management issues and minimize or avoid impacts to wildlife species and their habitats across jurisdictional boundaries. ● Protect and maintain wildlife connectivity. <p>Actions:</p> <ul style="list-style-type: none"> ● Seasonal closures for big game winter range on FS 184 and 1434 through Dec 1 - April 15. ● Continue seasonal closure for Bighorn sheep around river from May 15 - July 14 (2001 Arkansas River Recreation Management Plan).
Raptors Other Avian Wildlife	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Manage species diversity and habitat of avian species within BCNM. ● Engage local, State, and Federal partners in program and project design to address management issues and minimize or avoid impacts to avian species and their habitats across jurisdictional boundaries. <p>Actions:</p> <ul style="list-style-type: none"> ● Specific closure for Peregrine falcon at the Stafford/Railroad Gulch confluence.
Aquatic and Riparian Wildlife	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Promote and restore healthy riparian habitat throughout the Planning Area. ● Engage local, State, and Federal partners in program and project design to address management issues and minimize or avoid impacts to aquatic and riparian wildlife species and their habitats across jurisdictional boundaries.

	<p>Actions:</p> <ul style="list-style-type: none"> ● Give preferential consideration to riparian area–dependent resources in cases of unresolvable resource conflicts. ● Dispersed recreation management: Limit use where the riparian area is being unacceptably damaged. ● Reclaim disturbed soils where erosion could cause adverse impacts to Monument objects and values, including riparian areas and aquatic ecosystems. ● Minimize surface-disturbing activities in riparian areas that alter vegetative cover, result in stream channel instability or loss of channel cross sectional area, or reduce water quality
Recreation	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Manage, promote, and develop recreation resources while maintaining areas for other resources and minimizing user conflicts. ● Provide basic visitor services, including interpretation, information, and education in the context of the desired recreation setting. ● As appropriate, consider allowable uses consistent with the goals and objectives for managing lands for wilderness characteristics. ● Manage areas with special designations to provide special management as required to protect and prevent irreparable damage to important resources. ● Maintain the long-term sustainability of the values for which special designations are managed. <p>Actions:</p> <ul style="list-style-type: none"> ● Develop established dispersed campsites in the monument. ● If WSAs within the Planning Area are released by Congress, the agencies would conduct a land use plan amendment of the RMP with accompanying NEPA analysis to determine how those lands would be managed. ● WSAs would continue to be managed as for wilderness values, closed to OHV use. ● Develop recreational zoning between high recreation areas and cattle allotments
Research	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Manage and maintain the naturalness of the area to the standard of the Wilderness Act of 1964, Section 2(c)(4) for the purpose of preserving the ecological, geological, or other features of scientific, educational, scenic or historical value.. ● <p>Actions:</p> <ul style="list-style-type: none"> ● All research, inventories, and monitoring of resource uses would be conducted in accordance with applicable laws, regulations, and policy.
Travel and Transportation	<p>Goals & Objectives:</p> <ul style="list-style-type: none"> ● Manage trails within the WSA and ASEC for future wilderness designation and to reduce impacts on other resources. ● Protect Monument objects and values while maintaining similar recreational management levels to allow the public to enjoy those objects and values. ● Manage the transportation system so it provides safe reasonable access for public travel, recreation uses, traditional and cultural uses, and land management and resource protection activities, and contributes to the social

	<p>economic sustainability of local communities.</p> <ul style="list-style-type: none"> ● Support a culture of surface travel user stewardship and conservation of the landscape during user travel <p>Actions:</p> <ul style="list-style-type: none"> ● Develop trail management objectives for all trails within BCNM. ● As part of implementation-level travel planning, monitor OHV use areas and, if impacts to natural and cultural resources are occurring, develop implementation-level limitations including route designation, route closure, motorized vehicle size and weight limitations, or other mitigation measures as necessary to address those impacts ● Mechanized travel (e.g., bicycles) is limited to routes open to OHVs and trails specifically designated for bicycle use.
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Appendix

Research on Ecosystems, Resources, Conditions, and Trends (2.1.1-2.3.6)

The following three sections are the synthesized research notes on Resources, Resource Uses, and Special Designations that formulated our Preferred Alternative above.

1. Resources

The BCNM Final Planning Assessment affords land protection on the basis of prehistoric legacy, diverse scientific resources and world class recreation opportunities (BLM, USFS, 2018). The comments and resource concerns in Appendix E and F of the BCNM Social Landscape Assessment include resource interactions tied to wilderness values and biophysical impacts from recreation. Public interactions with BCNM lands suggest that there is strong public concern related to management changes that will impact public access to engagement in outdoor experiences (Table 1). The naturalness of resources is important as is the ability to access the heart of BCNM through motorless recreation corridors. Thus, this section addresses the resources, objects and values (ROV) of keen public interest and proposes alternatives that promote natural landscape characteristics.

The top 10 resource activities identified by the public within the boundary of BCNM:

- 1) View nature (458 responses, 74% of all places drawn that list this interaction)
- 2) Hike/walk (406, 65%)
- 3) Watch wildlife (302, 48%)
- 4) Photography/art (270, 43%)
- 5) Relax (250, 40%)
- 6) Camp (218, 35%)
- 7) Raft/kayak/canoe (202, 32%)
- 8) Bird watching (200, 32%)
- 9) Picnic (183, 29%)
- 10) Family (171, 27%)

Table 1. *List of Resource Interactions*; 623 respondents and 4,825 interactions. (Truncated, Bartlett et. al., 2017).

Resource Topics to Carry Forward

The IDT recommends strongly considering ROVs related to visual, geological and paleontological, and biophysical recreation impacts (Table 2). In addition to consideration of the findings from the BCNM Social Landscape Assessment, the Socioeconomic Baseline Assessment conducted by the USFS and the BLM revealed that the region relies on the non-market goods and services provided by the BCNM protected area. Recreation provides the visiting public an experience of high economic value. In addition, the economic value of the ecosystem services provided by the perpetual naturalness of BCNM is noteworthy to the public.

Visual Resources: There are multiple resources that comprise the world class quality of the visual resources of BCNM. Air quality is impacted by anthropogenic activity from nearby and distant sources. High visibility air quality conditions reveal the unique geological and the diverse vegetated mosaic of the BCNM (see Fire Management section of this analysis).

Geological and Paleontological Resources: Characterized by scientific value and giving way to one of the most significantly biodiverse ecosystems in Colorado (BLM, USFS, 2018), geology influences the stark visual contrast at BCNM. The unique geological features of BCNM have made lands within the monument boundary famous for mineral collection. Surface rock strata reveal ancient natural history of scientific and cultural value.

Biophysical Resource Impacts from Recreation: The BCNM MP-EIS Planning Assessment noted that monument designation will likely increase recreational use. Recreational use has significantly altered the biophysical environment in other recreation hot spots in Colorado with similar feature attributes as BCNM. Biophysical resources include wildlife, vegetation, soil impacts from human interaction, proliferation of unofficial trails and campsites. Impacts to these resources have caused the most significant level of degradation of natural conditions (USFS, 2017).

Visual Resources	Geological and Paleontological Resources	Biophysical Resource Impacts from Recreation
<ul style="list-style-type: none"> ● Local visibility impacts from PM_{2.5} and PM₁₀. 	<ul style="list-style-type: none"> ● Rock strata ● Minerals ● Paleo resources 	<ul style="list-style-type: none"> ● Proliferation of recreation impacts in high use areas (Arkansas River Corridor and Ruby Mountain.)

Table 2. Resource Topics to Carry Forward.

Visual Resources

Clear air and high visibility are valued by wilderness visitors (Hill et. al., 2000). The challenge of managing clear airsheds is the fluid movement of air across land designation boundaries. Visibility range and air quality at BCNM is impacted by localized sources as well as by large-scale events such as wildfire and urban smog influenced by wind direction. Given that BCNM managers are unable to control regional weather patterns, these recommendations are geared towards local sources of impaired visibility.

- **Visibility: Dust Mitigation**
 Particulate matter (PM) of 2.5 to 10 microns in diameter, about the width of a human hair, obstructs visibility on local and regional scales (Airnow.gov, 2017). These dust particles are large enough to cause

noticeable human health issues. PM_{10} ends up in the air from dust stirred up by vehicles traveling over dirt roads. In particular, silt particles in road dust can be harmful (EPA, 1998). $PM_{2.5}$ is produced by activities such as engine combustion, fires and agricultural processes.

Recommendations for Visual Resources

- Work within the existing Travel Management framework to determine appropriate road surface treatments for dust mitigation on roads surrounding the BCNM boundary.
- Determine appropriate speed limits for dirt roads within the monument boundary to reduce the travel distance of $PM_{2.5}$ and 10.

Geological Resources

Research on mitigation measures from prior extraction projects, recreational mineral collection, and preservation of scientifically valuable paleontological resources was conducted for the purpose of address the planning concerns identified in Section 2.1.3 of the BCNM MP-EIS.

- **Extractive Project Mitigation**
The new monument designation eliminates lands within BCNM from being explored for future extraction. Surface impacts from prior exploratory or active claims should be mitigated to restore natural conditions. Monitoring of water, waste and natural hazards from prior mining activities should be conducted as an assessment of public safety risk. The draft environmental impact statement (DEIS) for the newly designated Bears Ears National Monument (BENM) contains potential Abandoned Mine Lands that are inventoried, stabilized and reclaimed by the BLM as funding allows.
- **Mineral Collection**
Mineral collection in BCNM has longstanding public history. Current BLM guidelines on rockhounding describe “reasonable amounts” of mineral specimens, rocks, semi-precious gems, petrified wood, and invertebrate fossils for personal collection as acceptable. Despite the physical removal of monument resources, the associated impacts from rockhounding degrade natural resource conditions. Unofficial trail proliferation in prospecting areas harms vegetation and creates erosion. Unsuccessful excavating in an area leads to disturbance of soil. Rock and gemstone collection is prohibited in other protected areas to preserve the heritage of tribes (KKTRNM, BLM , 2018)
- **Paleontology**
The presence of certain rock strata makes it likely that many paleontological resources within in BCNM are unknown at this time. The Final Planning Assessment notes that surface disturbing activities may lead to the discovery of these unknown resources and that an increase in recreation activities may increase removal of fossils. The National Park Service manages several parks with an objective of preserving paleontological resources as a means of accessing natural history. The use of visitor information services, public education and closure areas are systems in place to preserve the natural condition of these resources and mitigate impacts to sensitive resources. Monitoring of known sites of value has been prescribed within adaptive land management plans to enable managers to adapt policy to meet desired conditions (Paleo Solutions, 2017).

Recommendations Geological Resources

- With a predicted increase in visitation, it is in the best interest of the agency to thoroughly assess abandoned mines for environmental and public hazards. The wilderness characteristics of the monument should be achieved in these areas, if possible, through remediation. Potential for action should be assessed and feasibility determined.

- The public should be provided opportunities to become more education on the BLM’s rockhounding guidelines through increased education on ethics of mineral collection.
- As recommended in the BENM DEIS, collection of and access to known sensitive areas containing paleontological resources should be controlled. Engineering and educational avenues, such as elevated walkways and interpretive signage, should be sought prior to limiting access.

Biophysical Resource Impacts from Recreation

Recreation impacts at BCNM are currently concentrated in a few areas, but proliferation of impacts to the environment was a public concern identified during the social landscape assessment questionnaire. (See the Resource Uses section for an assessment of recreation activities themselves.) Resource impacts from garnet collection

- **Proliferation of Recreation Impacts**
 There is public concern that a monument designation may increase visitation. Comments received during the social landscape survey indicated that current monument visitors are concerned that an increase in visitation may lead to access restrictions to areas of the monument, a justified concern on public lands in Colorado under current use trends. For example, the nearby Maroon Bells-Snowmass Wilderness Area has adopted a visitor use management plan that aims to reduce biophysical impacts from recreation through changing visitation patterns through permit system (USFS, 2017). The Arkansas River Corridor and Ruby Mountain areas see frequent public interactions. Biophysical impacts to the river corridor, such as camping and associated impacts and bank erosion, risk inhibiting the wilderness character and visitor experience. Rockhounding activities at Ruby Mountain may also increase and visitation to the monument increases, which includes removal of unique rocks and garnets. Removal of resources from BCNM for recreational collecting should be reviewed for sacred properties by local and native groups.

Recommendations for Recreation Impacts

- Provide a visitor service infrastructure where impacts to resources are of highest concern. Create a short video for independent and commercial groups to view prior to departure that highlights the most prominent impacts from camping, such as human waste disposal, cross country travel and fire impacts.
- An adaptive management approach for determining precise extent of biophysical impacts. Monitoring official and unofficial trails for changes in width, tread wear paired with use numbers coupled with a detailed campsite impact assessment is required for future management decisions that may include zone-based capacities in the future.
- Utilize a special designation for Ruby Mountain to harness biophysical impacts from cross country travel and “digging” for minerals. Implement some control over the volume of mineral resources removed from the monument for personal purposes through public education provided though the BCNM and third-party websites, social media, and community retail outfitters.

2. Resource Uses

Recreation is arguably the resource use that is of the utmost importance at BCNM. The dramatic population increases in Colorado, particularly across the Front Range, has driven people to seek solitude and find secluded spots away from crowds. The social landscape that is desired from the public will require BCNM staff to manage for varying recreational uses and experiences. Table 3 outlines the resource use topics recommended for consideration in the final BCNM MP-EIS.

Recreational Use Monitoring	Conflict Mitigation Between User Groups	Maintenance of Wilderness Values
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Table 3. *Resource use topics to carry forward.*

Recreational Use Monitoring

An adaptive management approach to recreational use management is becoming more common in protected area management where visitation is increasing (USFS, 2017). An adaptive plan is an effective way to plan for unknown visitation trends and when changes to current use trends may shift (Personal communication, J. Vieira, March 12, 2019). Currently, minimal data is available on user numbers. The collection of user data between the developed areas and the primitive areas is integral to determine future management needs. This information may then be used to determine plans to potentially expand or improve the network of trail systems in BCNM according land management prescriptions. Two different types of recreational experiences are desired.

Recommendations for Recreational Use Monitoring

- The creation of buffer zones and zoning areas that are considered more primitive, away from the motorized areas and river use corridors should be considered.
- Since the Arkansas River is the most heavily used area in the monument, fostering partnerships between the Monument staff and the river outfitters will be important to steward the heavy congestion and erosion issues seen at the river put-ins. These partnerships could include collaborative stewardship days and efforts to educate the public on proper river etiquette.
- Utilize directive to provide educational activities. The monument to boast its educational opportunities and be utilized as an “educational laboratory.” Collaboration with organizations such as the Greater Arkansas River Nature Association or the Colorado Mountain Club could help to provide these opportunities.
- The Monument is managed for multiple-use, more than just recreation as a resource use needs to be taken into consideration simultaneously.

Conflict Mitigation Between User Groups

The conflict that currently exists between recreationists and traditional grazing uses appears to be of major concern to the BLM and USFS. However, there are tools that would be prudent for the agencies to utilize in order to minimize these conflicts and properly balance the use between recreational activities and grazing in the Monument.

- **Education for Recreational Visitors**
Education has the potential to be the most useful tool for the BLM and USFS to collaborate on. Providing the public with the information they need to know before they go will minimize negative experiences among the recreators and will give the ranchers the peace of mind that the public is well-versed in multiple-use management. Informing the public visiting the Monument that this is an area that manages for multiple-use will be imperative.
- **Grazing Use**
A number of range management practices should be taken into consideration. The proclamation that designated BCNM identified grazing as an important and historic use of the land. With the Monument providing ample recreational opportunities primarily during the summer season, it would be prudent for the agencies to consider out of season grazing. This would provide an opportunity to minimize the effects recreation has on grazing.

Recommendations for Conflict Mitigation Between User Groups

- Provide public education opportunities through interpretive signage and kiosks in busy central locations, in camping areas, literature such as brochures, and through face-to-face conversations between visitors and interpretative rangers.
- Devise clear messaging for public compliance for pets on leash, being mindful of pet waste, and keeping gates closed behind them when entering or exiting an area where grazing is permitted.
- Provide waste bags for the pets and overnight visitors and add language regarding these courtesy practices on the interpretative signage.
- Consider whether new trail development is in a key forage area or when implementing new grazing tools, is the area prone to high recreational use?
- Create recreational zones to keep impacts from increased traffic and interactions between recreationists and livestock to a minimum. Grazing allotments will have to be separated from the high use recreational areas and promoted more in the area primitive areas where less people tend to be present.
- Plan for grazing during the colder seasons when recreation visits are low.
- Enhance current grazing management practices and keep negative effects to riparian areas to a minimum. Cattle are known to stay out in the fields during the colder months resulting in better distribution patterns and not negatively affecting riparian areas.

Uphold Wilderness Values

The Browns Canyon Wilderness Study Area (WSA) management objectives will be carried forward into the new BCNM MP-EIS. WSAs are “lands in limbo” that require re-training of user groups when prescribed a new land designation.

Recommendations to Uphold Wilderness Values

- Distance water developments such as springs and ponds and strategically placing animal supplements such as protein and salt blocks away from riparian areas will also prove to be beneficial.
- Distinguish the water developments to fit in with the nature landscape.
- Use native material for fencing required to keep the cattle in their respective areas.
- Encourage the ranchers and staff to use traditional transportation such as horses to access the more primitive areas.

3. Special Designations

Browns Canyon Wilderness Study Area and Area of Critical Environmental Concern (ACEC)

- *Goals and Objectives:*
 - Manage areas with special designations to provide special management as required to protect and prevent irreparable damage to important historic, cultural, or scenic values; fish and wildlife resources; or other natural systems or processes (BENM DEIS).
 - Maintain the long-term sustainability of the values for which special designations are managed (BENM DEIS).
- *Actions:*
 - All 22,000 acres of the Browns Canyon Wilderness Study Area (WSA) should be managed indefinitely to protect wilderness characteristics and to be eligible for future Wilderness designation.
 - Continue to manage the ACEC to the same standard defined in the Royal Gorge Resource Management Plan to manage values for Wilderness designations.
 - High use recreation posits threats to the undeveloped and outstanding opportunities for solitude and primitive and unconfined recreation characteristics in the WSA and ACEC.
 - The most direct method to manage high use recreation would be through access points and corridors into the WSA.

- The following system trails should be managed as non-motorized, non-mechanized, and Trail Management Objectives (TMOs) should be established for each trail; T6045 (Turret Trail), T6045A (River Bench Tr), T6046 (Calkin Gulch Loop), T6045B (River Access Trail).
- To meet the recreation and scenic resources ROV's, Trail Management Objectives should focus on sustainable use and minimal development.
- The main access trail to the WSA is T6045 (Turret Trail), using USFS guidelines this segment should be managed as Trail Class 2 to be moderately developed to sustainably manage access use in the WSA.
- T6045A (River Bench Tr), T6046 (Calkin Gulch Loop), T6045B (River Access Trail) should be managed as Trail Class 1 to preserve wilderness character and consolidate impacts.
- *Other Lands with Wilderness Characteristics:*
 - The inventoried Roadless Areas provide the most significant opportunity to meet the following Monument ROV's; Scenic Resources, Cultural Resources, Scientific Resources, Vegetation Biodiversity, Vegetation, Terrestrial Wildlife, Raptors Other Avian Wildlife, Recreation, and Research. These lands provide social and ecological benefits, furthermore due to their roadless status they are ideal candidates to be managed for future Wilderness designation.
 - These lands should be managed identically to the existing WSA.
 - Roadless areas that have existing motorized and mechanized uses should not be considered for management for wilderness character.

Fire Management (Vegetation Biodiversity)

- *Goals and Objectives:*
 - Identify the vegetation diversity throughout the planning area.
 - Maintain natural process that enhance and preserve vegetation biodiversity.
- *Actions:*
 - Browns Canyon National Monument is predominantly covered by pinyon and juniper forests. Natural fires within the National Monument should be allowed to burn with reason to promote vegetation biodiversity and allow for natural fire regimes to occur.
 - If not already existing, management pods, zones, or areas could be created through the resource management plan to develop specific fire objectives and procedures.
 - These fire management zones should address fires within the WSA, prescribed burns, and other fuels treatments.
 - To protect the untrammeled characteristic in the WSA, prescribed burns should only be allowed in the Monument outside of the WSA.
 - Natural fires within the WSA should be allowed to burn, with reasonable consideration to other resources and safety, to preserve the natural character of the WSA.
 - In the Bears Ears National Monument EIS wildland fire is used to protect, maintain, and enhance resources, and, when possible, would be allowed to function in its natural ecological role.

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Wilderness Workshop comment on Notice of Proposed Action for Vail Mountain Snowmaking Project. November 9, 2018.

Williams, Jeff. Personal Interview. 6 Mar. 2019.

Name: Michael Meyer

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

I would like to see hiking and mountain bike trails, especially one linking Salida and Buena Vista included in the plan because there currently is no offroad trail connecting the two towns. This connection would benefit both communities economically by bringing outside recreators which would help support local businesses. The trails would provide a unique user experience that can not be obtained by walking or riding on motorized roads. The types of quiet uses like hiking and biking are very compatible with the Monument's natural beauty.

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

Vamping up or trail system to include a trail connecting Salida and Buena Vista would greatly benefit the area. This is a highly active community so adding outdoor amenities, such as trails, would draw more people, hence increased economic benefits. Also, adding trails would help alleviate many now congested, popular trails. It would also keep pedestrian and bike traffic away from roadways. Please consider adding trails as an enhancement to our beautiful towns! Just like National Parks, if anticipated planning doesn't accommodate these future attributes, we will have far less to enjoy in the future!

Name: Brenda Wiard
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

Our comment is general encouragement to emphasize quiet use trails for both hiking and mountain biking in Browns Canyon National Monument. They would be an excellent way to encourage use of the area without worrying about degradation of the natural beauty of the area or the enjoyment of nature by others. We especially encourage an easy and somewhat wide trail along the river through the canyon itself, perhaps on the bed of the railroad tracks if the line is closed or next to it in the right of way. It would be a huge positive to have a way to pass through the canyon to enjoy the canyon itself as well as the river, the river traffic, and the wildlife in the area. We get visitors from out-of-state who simply can't do much hiking because of the altitude - they would LOVE a flat trail through the canyon and we would love to have a place like that to take them. We would actually be happy to pay to enter the monument if something like that was available. Likewise, it would really be a benefit for both of the communities of Buena Vista and Salida if there was a bike path connecting the two towns. Laying in the most important section of that via Browns Canyon would be a big step forward. As for the rest of the monument, the more trails the better. If you can get a professional trail builder, they can build sustainable trails that will also highlight the very interesting and unusual geology of the area. And, please sign the trails well ... all those gulches can be confusing. Please also make allowances for hiking with dogs ... practically everyone here has a dog and they would all be happier with the plan if dogs were allowed on at least some of the trails. We would discourage motorized use except for a parking lot at one edge of the monument. We would also discourage eBikes which would go faster and could tear up that loose sandy soil there. ?These comments are all for two people, who are both hikers and bikers and who have lived in the area for almost 30 years.

Name: James Lockhart

Organization Name: Wild Connections

Secondary Author:

Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

June 20, 2019 BCNM RMP/EIS 5575 Cleora Road Salida, CO 81201 via electronic web submission <https://go.usa.gov/xn2eC> The following comments are submitted on behalf of Wild Connections. Wild Connections is a regional conservation organization that focuses on protecting and restoring public lands in the upper reaches of the Arkansas and South Platte watersheds to ensure survival of native species and maintain ecological richness by protecting key natural areas and the landscape corridors that connect them. We are a supporter and signatory to the Browns Canyon National Monument Sustainable Alternative scoping comments submitted by Friends of Browns Canyon and other organizations and the comments submitted by Quiet Use Coalition and others. We agree with these groups that in the scoping process, the Bureau and Forest Service must prepare and analyze a conservation alternative in addition to the three alternatives identified in the Planning Criteria Report. These are intended as supplemental comments. The Browns Canyon Wilderness Study Area must continue to be managed as wilderness, as stated in the Presidential Proclamation and as required by law. Adjoining areas with the same wilderness qualities, including the BLM LWCs and the Aspen Ridge roadless area, should be managed to promote these same values. These areas, which were included in the 2005 Browns Canyon Wilderness Bill, have been long recognized to possess these same wilderness qualities. Protection of wilderness values, including wildlife corridors and the general visitor experience, requires that the Monument be managed as an integrated unit without undue regard for artificial boundaries or areas of different agency management. Thus, areas with wilderness characteristics outside the BLM WSA must be managed in a similar manner. We note, for example, that the Wildlife Corridors Map in the Planning Criteria Report (Map 8) shows that key wildlife areas extend across these administrative boundaries and illustrate a similar importance for wildlife purposes to the WSA, LWCs, and roadless areas. The existing Area of Critical Environmental Concern (ACEC) within the Monument should be retained as an ACEC. The Planning Criteria Report makes almost no mention of funding considerations or financial constraints, yet these are likely to be significant factors in determining the success of a management plan. Joint management of the Monument by BLM and Forest Service, two separately funded agencies, could produce unusual difficulties with regard to securing adequate funding. Planning must ensure that funding is both adequate and coordinated. This is a factor of particular concern regarding areas proposed for intensive visitor use in the more remote portions of the Monument (in other words, other than Ruby Mountain and Hecla Junction). The BLM and Forest Service should consider whether likely funding and staffing resources would permit proper patrolling and management of the Aspen Ridge Road, Turret Road, Austin Trail, particularly if additional trailheads, dispersed camping, or other visitor facilities are added to these routes. Roads and access along southern portion of Monument (Turret and Austin trails). Concerns regarding private land along the Austin road and trespassing on these properties by road users should also be taken into account in analyzing the need to manage and patrol that area. It is also particularly important to establish viewpoints along road, limit trailheads, with no intrusion into the roadless area beyond 100 feet setback from roadway since spur routes are particularly difficult to manage and patrol to prevent users from going beyond designated endpoints. The agencies must also carefully consider whether funding and staffing resources exist to prevent dispersed camping along the Aspen Ridge

Road from adversely impacting the monument due to improper disposal of trash and human waste. Rockhounding, to the extent that it is allowed, should be limited to collection of garnets in the Ruby Mountain area. (We note that the Geology, Minerals, and Paleontology section of the Preliminary Alternatives report, garnet collection at Ruby Mountain is the only listed rockhounding activity.) Because this is an activity typically not permitted in a National Monument, rockhounding not be listed as a potential recreational activity in the Arkansas River Shore and Bench RMZ. The agencies should consider whether rockhounding is such a significant additional use that the slopes of Ruby Mountain where minerals collection presently occurs should not be included in the River Shore and Bench RMZ, but should be treated either as part of the Ruby/Hecla RMZ or separately as its own RMZ. We agree with the Sustainable Alternative and Quiet Use comments that the River Shore and Bench RMZ is too large and should not extend beyond the junction of the Turret and Bench Trails. It seems that the primary purpose for having this RMZ is to permit more intensive recreation, which appears primarily to consist of river use and day hiking. From a day hiking standpoint, there is little point to including the rest of the Turret and River Access Trails in this zone, since this creates a 9-mile out-and-back route unlikely to be interesting to most dayhikers and more consistent with the "wilderness" or "backcountry" hiking recognized as the hiking use in Backcountry zones. We note in this regard that "dayhiking" by river users should be analyzed separately from dayhiking from established parking areas and trailheads. We are particularly concerned that large numbers of recreational boaters, dayhiking into the backcountry zones from river access points, may have significant impacts on trails and wildlife in what is otherwise a remote wilderness setting within a designated Wilderness Study Area. In this regard, we also note that the Planning Criteria Report does not distinguish between day hiking and backpacking (apparently subsumed within "backcountry" or "wilderness" hiking) except to note a need for overnight parking areas in conjunction with backpacking. Since backpacking involves an overnight stay in the Monument, these are significantly different recreational activities, generally appealing to different groups of recreational users and often managed differently, as for example by limiting backpackers through a permit system while allowing dayhikers in unlimited numbers. Backpacking and various levels of hiking therefore need to be analyzed separately. We are somewhat concerned that the Lands with Wilderness Characteristics Map in the Planning Criteria Report (Map 3) appears to identify only small areas in the northern and southern portions of the Monument as having these characteristics. During the LWC process, the Browns Canyon WSA, being already protected as wilderness, was not analyzed for these characteristics, although it clearly possesses them. To avoid confusion as to which areas within the Monument have the character of wilderness, any similar maps published in any later planning documents should include the outline of the WSA. Maps in any further planning documents should also clearly distinguish between designated system roads and motorized routes open to the public and undesignated, unauthorized and/or permitted/administrative roads not open to public use. James E. Lockhart, President Wild Connections 2168 Pheasant Pl., Colorado Springs, CO 80909 jlock@datawest.net

Comment period for 'Notice of Intent'

Letter #: 26

Name: Sean Hackett

Organization Name: Colorado Department of Public Health and Environment

Secondary Author:

Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

Please add CDPHE as a cooperating agency to the email list for this proposal.

Name: Logan Myers

Organization Name: Private Boaters of the Arkansas Valley

Secondary Author:

Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

I have been a board member of FOBC for 9 years and did significant campaigning for the Monument designation including traveling to Washington to lobby Congress. I was not an overwhelming supporter of the campaign for Wilderness protection, but I did fully support Monument designation through the Antiquities Act. Many members of our community echo my sentiments that they did not support Wilderness designation but did Monument status because of a belief that the community would have more input into the potential management of a Monument. From the information I have gathered that is because they want to maintain or even improve public access to the resource so it can be more fully enjoyed by everyone. The "sustainable alternative" put forth by the Friends of Browns Canyon in conjunction with multiple other conservation groups does an excellent job of addressing environmental and wildlife related concerns, but is seriously lacking in a necessary balance with outdoor recreation. Any attempts to limit the public's access to these resources needs to be thoroughly evaluated from multiple perspectives, and all options explored for mitigating these negative impacts before a reduction in public access is even considered. All areas of heavy use should be documented and fully studied by state scientists and environmentalists as well as a locally based citizens group to fully understand the consequences of these impacts. Additionally surveys should be conducted of users in heavy use areas to see if the increased use diminishes the quality of their experience before additional regulations are mandated.

Comment period for 'Notice of Intent'

Letter #: 28

Name: Philip Hartger

Organization Name: The Wilderness Society

Secondary Author:

Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

Linked below are shapefiles submitted in conjunction with the Sustainable Alternative, submitted 6/20/19. <https://www.dropbox.com/sh/r7edytc7rod5k38/AAANx0Cf-Lp5KAACclovGSI-a?dl=0>

Name: Rebecca Rupp

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

Please include trails for mountain biking and hiking in Browns Canyon National Monument area. These trails will allow more people to enjoy more parts of the Monument with minimal impact to the surrounding natural resources and wildlife. Hiking and cycling trails provide opportunities for more Americans get exercise outdoors, which improves their physical and mental health. Thank you.

Name: Patrick McKay

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/14/2019 0:00

Comments:

I strongly oppose any new restrictions on unmanned aerial vehicles (UAVs or drones) in the Browns Canyon National Monument. Unless there is specific evidence otherwise, it is extremely likely that drone use in the monument is already fairly low and has no impact on monument values that requires additional restrictions. Because drones operate in the air, they have no impact on the ground beyond noise. Any impact they do have is extremely ephemeral and limited to the few minutes the drone is in the air. They thus do not have any lasting impact on wilderness characteristics or any other monument values. I urge the BLM to remember that wilderness study areas are not the same as wildernesses, and should not be managed as de facto wilderness without congressional designation. One of the few current differences between the two is that drones may be operated in WSAs whereas they are not allowed in wildernesses. I urge you to maintain this distinction unless you have actual evidence that drones are causing specific harm in specific areas. I ask for the creation of a new alternative that does not impose any additional restrictions on drones and allows them to continue to be flown in all areas of the national monument.

Name: Withheld Withheld

Organization Name: Upper Arkansas Water Conservancy District

Secondary Author:

Secondary Organization:

Date Submitted: 5/20/2019 8:00

Comments:

Please see attachment May 20, 2019 VIA ELECTRONIC MAIL Joseph Vieira BLM Planner-Project Manager Browns Canyon National Monument c/o USFS PSICC Salida Ranger District 5575 Cleore Road Salida, CO 81201 blm_co_browncanyon@blm.gov Re: Browns Canyon National Monument Resource Management Plan-comments on draft Planning Criteria Report (March 2019) Dear Mr. Vieira: I am writing on behalf of the Upper Arkansas Water Conservancy District (UAWCD) to provide comments on the draft Planning Criteria Report (Report) relating to the development of a Resource Management Plan for Browns Canyon National Monument (BCNM). UAWCD is a political subdivision of the State of Colorado whose mission is to acquire and preserve, for present and future use, all water rights available for use within the Upper Arkansas Valley, and to seek every possible means to increase the water supply available within the Upper Arkansas Valley. The BCNM is within the boundaries of UAWCD. UAWCD believes that the Report should more explicitly recognize that Presidential Proclamation 9232 expressly disclaimed any reservation of water rights in conjunction with the reservation of the BCNM. The Proclamation states: "This proclamation does not alter or affect the valid existing water rights of any party, including the United States. This proclamation does not reserve water as a matter of Federal law, and the inclusion of the land underlying the Arkansas River in the monument shall not be construed to reserve such a right. This proclamation does not alter or affect agreements governing the management and administration of Arkansas River flows, including the Voluntary Flow Management Program." (Emphasis added.) The Report notes that "Preliminary Planning Criteria help guide development of the plan by defining the BLM and USFS's decision space (or the "sideboards") for the RMP alternatives and land use planning process. Preliminary Planning Criteria are generally based on applicable laws, agency guidance, and the results of public and governmental participation..." The Report goes on to identify specific Preliminary Planning Criteria. Some of the criteria reiterate significant aspects of the Proclamation. For example, "In accordance with Presidential Proclamation 9232, 'All Federal lands and interests in lands within the boundaries described in the [Planning Area] are hereby appropriated and withdrawn from all forms of entry..." The disclaimer of reserved water rights in the Proclamation is not entirely unique, but it does make this national monument reservation different than many others where water rights were reserved either expressly or implicitly. Therefore, the disclaimer of reserved water rights in the Proclamation is a significant attribute that should be acknowledged as a Preliminary Planning Criteria. Additionally, UAWCD believes that the Preliminary Planning Criteria should explicitly recognize existing water rights. The criteria currently state, "The BLM and USFS will honor valid existing rights (e.g., mineral rights, rights-of-way [ROWs], grazing)." There is no mention of water rights in this criterion or any of the other criteria, even though the Proclamation states that "does not alter or affect the valid existing water rights of any party." If the Report is going to recognize any valid existing rights (which it does), then water rights should be among those rights listed. Such recognition is important, in light of the Plan's stated intent of analyzing, inter alia, how management decisions will impact riparian and spring systems. See Report 3.8.1.3. In addition to water rights associated with diversion infrastructure located in and adjacent to the river and side tributaries, there are also numerous water rights (decreed and undeclared) associated with springs throughout the BCNM. All such rights should not be diminished as a result of the

proposed management plan. Thank you for your consideration of these issues. We look forward to providing additional comments as you progress through the planning process. Sincerely, Kendall K. Burgemeister LAW OF THE ROCKIES

Name: Brandon Wilkins
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 5/24/2019 0:00

Comments:

I have just read the Planning document regarding Browns Canyon National Monument. I can tell you from first hand as I regularly recreate in the area to include hunting and hiking, the existing "leave it as is" which is alternative A is my recommendation. I usually access the area through the forest service road through Turret and very rarely see many people at all. The existing road allows for good access to many points that allow a variance of hiking to both the west towards the Arkansas River and to the east towards Aspen Ridge. Also, based upon the use which seems predominantly from the Arkansas River corridor especially via the rafting industry, management should be more based on that location due to the number of visitors and the precious water resource that it is. The water is necessary for the wildlife and aquatic resources as well as the recreation aspect that draws so many visitors to the Arkansas River Valley. As I mentioned earlier, the other existing entrance into the Monument via Turret should be managed "AS IS" and continued for motorized recreation on the marked Forest Service Road. I think most of us who actually use the area are more apt to see disruptive use of the area and take appropriate actions. The remoteness limits managers and field personnel to little time actually being in the Monument. So, based upon my take. I would like the Planning Alternative A to be strongly considered. The area has been used for hundreds of years and is still in a rather primitive state. So, a hands-off approach makes sense. While I am not as familiar with the Arkansas River corridor, that seems to be the area that would need the most hands-on approach.

Comment period for 'Planning Criteria Report'

Letter #: 4

Name: Don E. Riggle

Organization Name: Trails Preservation Alliance

Secondary Author:

Secondary Organization:

Date Submitted: 6/5/2019 8:00

Comments:

DUPLICATE

Comment period for 'Planning Criteria Report'

Letter #: 4

Name: Scott Jones

Organization Name: COHVCO

Secondary Author:

Secondary Organization:

Date Submitted: 6/5/2019 8:00

Comments:

DUPLICATE

Name: Jeff Keidel
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/10/2019 8:00

Comments:

I went to the Browns Canyon Mapping Comment tool, but was VERY FRUSTRATED that the comment bar allowed me to only write one or two sentences before being cut off! The space on the bar was very limited! This tool does not allow the public to adequately communicate their concerns/ input to this comment period. Was this a design flaw or a deliberate effort to reduce public comment!?? Here are the comments I would have written, had the website provided adequate space: 1) I am concerned that traffic in the Bassam Park area will increase especially if signage at the intersection of Hwy 24/287 and CR307 encourage visitors to BCNM to access the monument there. The impacts to CR307 and 187, 185 could be very significant. Currently there is little traffic in the Bassam Park area, but if visitors are invited to access the BCNM through Bassam Park to get to the eastern border of the monument (Aspen Ridge Road) that entire area could have significant negative impacts. 2) Also, with greater traffic in the Bassam Park area, I think there would be increased dispersed, unregulated camping, similar to what is happening in the Fourmile Area, near Buena Vista. This will cause significant environmental damage, and cause conflicts with open-range cattle grazing in the area... and private landowners... and wildlife. In general, I think there should be very limited development of monument facilities along the eastern boundary (Aspen Ridge) and that primary access points should be on the north, south and western boundaries of the monument.

Comment period for 'Planning Criteria Report'

Letter #: 6

Name: Ron Rak

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/23/2019 8:00

Comments:

DUPLICATE

Name: Karen Dils
 Organization Name:
 Secondary Author:
 Secondary Organization:

Date Submitted: 5/29/2019 8:00

Comments:

5/26/19 Re Comments on Browns Canyon National Monument First, I am VERY familiar with this plan and am VERY frustrated at the process to make comments. I spent an hour reading the document and making notes on the preferred alternatives. I tried using the interactive map, but it only allows for VERY specific items. couldn't find out if I needed to put in my personal info for EACH comment, so I didn't continue. It appeared I could highlight the preferred alternative, but then I had to join adobe to sign it - I didn't want to do that. Perhaps in the final one, you should allow folks to highlight their preferred alternative, save & send to you - or something WAY easier. So now I have to spend another hour typing my notes in hopes you'll understand them. I know this isn't the end-all, but wanted my voice to be heard. I am out of the country for the "in-person" events. So going from top to bottom, pg# and Record# with preferred alternative and any comments: If all records on the same page have the same alternative I will reference just the page#.

Page	Record #	Preference	Comments	11	B 12	Adequate protection. No designation into NWCRS. Unnecessary bureaucracy and landowners and anti-government people wouldn't like it.
16	1001-1003	B	Traditionally allowed	17	1004 A	17 1005 C
18		B	24	25	26	27
28	1005 B	B	28	1006 C	33	1007 C Birds could abandon current nests
33	1008 A		38	1007 B	37	B
38	B		38	1007 B	39	C

Develop campsite for WALK-INS on the benches a bit away from the river to avoid conflicts with FLOAT_IN campers. Perhaps have an online registration system for dispersed campsites - as a floater, I always prefer to know where I can camp. Limit commercial outfitters by camp size and number perhaps so one company doesn't dominate. Would be a bummer to backpack to the current River Bench campsite and find it occupied.

40	1010 C	40	1011 B	41	1012 B
41	1013 B	42	1014 C	42	1015 B
42	1014 C	43	1016 C	43	1017-18 B

Backpackers can't carry fire pan; allow wag bags Use current historic horseback trails from Elk Mt. Ranch for hiking and sign them. (OVER) Except allow designated motorized camping for 2 days only in places that have historically accommodated them. Definitely need access from Turret and decent parking for cars and horse trailers I don't have a feeling for the rest. However, I STRONGLY support a pedestrian/horse bridge across the Arkansas, preferably just before Seidel's rapid. There are old cement bridge abutments that could be used (The Chama River bridge at their put-in below El Vado has such a bridge. At such time as the railroad resumes, perhaps it could be removed. However, there is a gulch going under the railroad there I believe. There may be additional places for a bridge. Perhaps negotiate with Chateau Chaparral for additional parking (for a fee) and use of their pedestrian bridge.

Thank you for your work! Nothing is perfect. I look forward to additional alternative proposals.
 Sincerely, ... Karen Dils Buena Vista, CO

Name: Patrick McKay

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/2/2019 0:00

Comments:

I would like to request that the BLM consider an alternative focused on expanding opportunities for motorized and mechanized recreation in Browns Canyon. This alternative should include the following:

1. Restore motorized access to the full length of FS 184 Turret Road from its current eastern endpoint, across the wilderness study area, to the junction with County Road 300 near the Arkansas River. This route has historically been open to motorized access and should be re-opened to restore greater connectivity to the area.
2. Maintain all existing motorized access along FS 184 Turret Road and FS 185 Aspen Ridge. There should be no new restrictions on motorized access on either of these roads, nor any new restrictions on motorized dispersed camping. No existing campsite spurs should be closed or rehabilitated.
3. The entirety of Browns Canyon National monument should remain open to casual non-commercial use of unmanned aerial vehicles (UAVs or drones). The National Park Service's blanket ban on all use of drones in all national parks has been a terrible policy that has barred people from using drones to photograph many remote areas of national parks where drone use is completely appropriate and where they would not cause any harm or disturbance. Browns Canyon is just such a place, and there is no justification for banning drones in any part of it. If the BLM feels that restrictions on drones are necessary, those restrictions should be limited to specific areas where drones have actually caused specific harm, and the BLM should avoid imposing any blanket prohibition on drones in the entire Monument. Doing so would set an extremely bad precedent for drone use, as it would make Browns Canyon the first BLM managed national monument to follow the NPS policy of banning drones. Please consider carefully whether such restrictions are really necessary.

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/5/2019 0:00

Comments:

Dear Bureau of Land Management: Attached is my my Browns Canyon National Monument Visitor Use Management Strategy, which is a comprehensive planning document that was developed after lengthy surveying and stakeholder engagement in 2015, for purposes related to pursuit of my Master of Urban and Regional Planning degree from the University of Colorado. Contained within are what I find to be the most relevant and appropriate steps for improving the visitor experience at Browns Canyon National Monument concurrent with preserving the elements that the National Monument is intended to protect.

Comment period for 'Planning Criteria Report'

Letter #: 10

Name: Robert Lamond

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/3/2019 0:00

Comments:

I strongly request BLM consider a new alternative which either imposes no new restrictions on UAS use in the monument or only restricts them in specific areas where they have actually been problematic in the past. Thank you.

Name: Withheld Withheld
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/10/2019 0:00

Comments:

I was not able to get the interactive mapping tool to take my input. The Save feature grayed out and I could not save my comments, so I am submitting my comments here.

1-Arkansas River Bench (northwest corner of the monument): River use is well managed by the AHRA and should remain so, without infringement from the BCNM management plan. AHRA manages river use and riverside camping for outfitters and private boaters. But BCNM will manage land-based use. Conflicts between river-based and land-based camping may require a system for resolving user conflicts. I recommend designating river-based (blue post) and land-based (green post) campsites in the River Bench area. In addition, designating seasons for when campsites may be used by river-based or land-based users may be helpful.

2-Monument land west of the Arkansas River: This area is not well understood. I recommend a thorough survey of this area, including defining its boundaries and inventorying its assets to help determine its best management.

3-Ruby Mountain trailhead parking area: The parking area is already too small because it is used for motorized access to the Four Mile area as well as for hiking access to the Ruby Mountain trail. I recommend enlarging the parking lot or providing a different parking lot for motorized Four Mile users.

4-Aspen Ridge Road area: Designate the already existing vehicle accessible dispersed campsites along the west side of Aspen Ridge road. Provide permanent campfire structures in those sites, to discourage excessive fire ring creation and new campsite creation by users.

5-Turret/Austin Trail area. Provide signage to keep people from parking/trespassing in Turret. Consider creating a parking/turn-around area with a composting toilet .5 mile beyond Turret on Austin Trail to provide access to the Railroad Gulch/ Stafford Gulch/ Hecla Tower area, and to keep people from stopping in Turret

6-General:

a-Provide signage and explanation of Leave No Trace rules at trailheads for the backcountry and primitive areas of the monument and at frontcountry campsites.

b-Provide seasonal closures for critical wildlife areas.

Name: Withheld Withheld
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/7/2019 8:00

Comments:

Please see attached document. Comment Regarding Drones / UAVs for Browns Canyon National Monument Plan This is a follow - up comment to my earlier comments regarding drones in Browns Canyon National Monument. The draft alternatives include three alternatives regarding drones / unmanned aerial vehicles: (A) continue existing management which allows drones in the entire monument subject only to FAA rules; (B) prohibit drones throughout the entire monument; or (C) prohibit drones only in the wilderness study area and developed camp grounds. While I believe alternative A represents the best approach, there are several additional alternatives I wish to suggest, depending on what actual concerns with drones in the monument managers wish to address. I will address several potential concerns with drones below and propose alternatives to mitigate them. Before doing so, I ask that the monument managers keep in mind the drone operators are legitimate user - group of the national monument whose interests deserve fair consideration. The vast majority of recreational drone enthusiasts are amateur photographers who view drones as simply flying cameras and would use them as cameras to capture unique perspectives of the beautiful natural scenery in the monument. Commercial drone operators are also an important user - group, with potential use - cases in the monument including filmmakers or rafting tour companies using drones to promote their tours or film clients shooting rapids in Browns Canyon. If the monument were to impose a blanket ban on drones like the rule the National Park Service adopted for all its managed lands in 2014, drone users would suffer greatly and would lose out on many valuable opportunities both for business and enjoyment of the monument. It would also set a dangerous precedent that would lead to blanket drone bans on many other BLM and Forest Service managed lands where drones are currently allowed. Wherever possible, managers should strive to maintain the greatest degree of access for these user - groups, so long as their activities are not significantly detrimental to monument values or the experience of other users. Where drones could have detrimental impacts, the least restrictive means should be used to mitigate potential harms.

1. Noise and Intrusion Upon Solitude After discussing this issue with some of the managers at the Denver public meeting, it sounds like the main concern managers have with drones is their potential to intrude on the natural solitude of other visitors to the monument. While this is a legitimate concern, I believe this concern is overblown. While certain types of drones can be noisy, the kind of small quadcopters (ie. DJI Mavic Pro) that would most likely be flown by visitors to the monument are actually very quiet, and often use noise - reducing propellers. Even close - by, the noise produced by these drones is only slightly louder than an average conversation and quieter than someone playing music on a portable speaker. Once a drone is a couple hundred feet in the air and a few hundred feet away laterally, it is almost inaudible, with at most a faint hum. When flown in an already noisy environment like near a river or busy road, most drones will not be audible at all, as they will be drowned out by the louder ambient noise. While it is inevitable that drones may disturb some visitors who do not like to hear any artificial noise in a natural setting, managers should keep in mind that it is impossible to guarantee that be free from unwanted noise. Noise - sensitive users could just as easily be disturbed by other visitors having a loud conversation or playing music on a portable speaker. Not every possible noise disturbance needs to be regulated in the monument's rules, nor should it be. Rather, to the extent

that user - conflicts occur, monument users should be expected to work out such conflicts themselves while exercising common courtesy. A simple request to a drone operator to not fly near another visitor would resolve most conflicts without further incident. Should managers nevertheless find it necessary to regulate drones over concerns of noise and user - conflict, I urge you to consider less restrictive alternatives than the ones already in the draft alternatives. Instead of banning drones across the entire monument, or even the entire WSA, consider location - specific rules prohibiting drones in specific places where there are likely to be large numbers of people who would be disturbed by drones being flown there. As FAA rules prohibit flying drones over people, it may be appropriate to ban drones in developed areas where there are likely to be large numbers of people present, while drones would be fine in more remote areas. Banning drones during certain times of day would also be a possibility, such as to prevent drones from being flown near campsites when people are trying to sleep. Above all, I urge that any location - specific drone bans be based on facts rather than hypothetical speculation. Rather than proactively banning drones where they have never been a problem, wait until drones prove to be a significant problem that users are complaining about. If few or no monument visitors have actually complained about drones in the monument, there is no justification for preemptively curtailing the freedom of drone users. 2. Privacy While a common concern with drones is invasion of privacy, this concern is likewise overblown. The overwhelming majority of drone users are only interested in filming scenery and have no interest in spying on people. To the extent that other people are captured by a drone, it is purely incidental and is no different than other forms of photography in a public place where the photographer may incidentally capture other people. There is no reason why such incidental capture must lead to user - conflict. Where it does, it is most often due to paranoia cultivated by sensationalized media reports than genuine privacy concerns. This is another form of user - conflict that would be best addressed by concerned parties simply talking to the drone operator and asking not to be filmed. Most drone enthusiasts would be happy to comply and would take the opportunity to educate the other person about drones and how they are not a threat to privacy. This once again is a situation that is best handled by individual monument visitors, rather than monument rules and rangers. 3. Wilderness Characteristics One potential reason that managers may wish to ban drones in the wilderness study area is because they must manage the WSA to preserve wilderness characteristics in case the WSA is eventually designated a full wilderness by Congress. Here it is important to note that unlike actual wilderness areas which are governed by the Wilderness Act, land managers have full discretion as to the extent they wish to manage a WSA as a wilderness. The BLM has many WSAs under its jurisdiction across the west, and to my knowledge drones are not currently banned in any of them. This is for good reason, as drones do not cause any lasting impacts on the ground that could impair wilderness values or harm the ability of the WSA to become a designated wilderness. Drone flights are inherently ephemeral, lasting only 15 - 20 minutes on average. Because they occur in the sky, there is no impact to the environment on the ground. The only impact they have is noise, and that is only temporary. Thus, there is no conflict between drones and managing for wilderness characteristics. If the Browns Canyon WSA is ever designated as a full wilderness by Congress, drones can easily be prohibited at that time. Allowing drones in the present will have no impact on future wilderness status. 4. Wildlife Managers may also be concerned with drones disturbing wildlife. This is again related to noise, as I have addressed above. The effects of drones on wildlife has not been widely studied, and the results are inconclusive. While some studies have suggested that drones can disturb wildlife and alter their behavior, at least in the short run, others have suggested that animals exposed to drones more frequently quickly become acclimated to them and learn to ignore them. Should managers wish to avoid any potential disturbances to wildlife caused by drones, there is no need to ban drones across entire landscapes. A simple rule prohibiting people from flying drones near wildlife would suffice, along with specific area closures for such things as nesting raptors. Park managers across America already have plenty of

experience closing specific places to rock climbing, hiking, etc. during raptor nesting season. It would be trivial to adopt similar rules for drones, along with erecting appropriate signage to ensure users are notified of the closure. For other wildlife, a broad rule prohibiting people from flying near or disturbing wildlife with drones would give rangers the necessary tools to cite anyone who is seen causing an actual disturbance (ie. buzzing a herd of deer).

5. Fire Danger Drones are typically powered by lithium batteries. While most drone batteries are fairly tough and designed with built-in protections against overload, there is always some risk that if a drone were to crash, the battery could ignite and spark a wildfire. While the chances of this occurring are remote, I have heard of one incident in recent years of a crashed drone causing a small wildfire in Arizona in 2018, which was quickly extinguished by local firefighters. While the risk of fire presented by drones is extremely small, if this were a concern to managers, the best solution would be to simply treat drones the same as other activities on public lands which entail potential fire risk. They could be prohibited during times of elevated fire danger when other restrictions are in place and allowed at all other times.

6. Drone Events At the Denver public meeting, one manager expressed concerns over large drone events or that another event like a bike race could involve large numbers of drones being flown in the monument at one time. I do not believe this is likely to be a significant issue. The most likely scenario where drones will be flown in the monument is individual visitors flying drones for short periods to document a scenic location. While there are organized drone gatherings such as mini-quad races, Browns Canyon National Monument would be an extremely unlikely place for such an event to be held. Such events are more likely to be held in urban parks or on more remote BLM or Forest Service lands outside of a national monument. If someone did want to host a drone-focused event in the monument, or if an event like a bike race were to happen where numerous competitors would be using drones to film themselves, these events would already need to acquire special use permits in order to happen in the first place. Managers could then impose any necessary restrictions on using drones during the event in the special use permit. As I am aware, the BLM already does this with large permitted events such as the Hardrock 100 foot race in Silverton, where participants are prohibited from using drones during the event. This solution has worked well there, and there is no reason it would not work at Browns Canyon.

Conclusion In conclusion, I have attempted to address several potential concerns monument managers may have regarding drones in the monument and have suggested several additional alternatives to consider. These include:

1. Impose location-specific restrictions on drones in high-traffic areas where drones have actually caused problems and are likely to present a continuing disturbance to other users.
2. Restrict drones near campsites to prevent people from being disturbed while trying to sleep.
3. Prohibit drones from being flown in such a manner as to disturb wildlife and impose temporary closures in specific locations for nesting raptors and such.
4. Restrict drones during times of high fire danger to mitigate risk of a damaged battery igniting a wildfire.
5. Restrict drones in special use permits for large events.

There are many other possible ways to regulate drones in a manner that still allows recreational and commercial drone flights within the monument while minimizing impacts to other users and the environment. I urge managers to consider a full range of alternatives in the management planning process, while avoiding knee-jerk prohibitions that could unjustly restrict the actions of legitimate monument users. Any rules regarding drones should be narrowly tailored to address specific concerns, and outright bans on drones across large landscapes should be avoided. This is a complex issue, and it may be more appropriate to consider this in a separate, more specific rulemaking process rather than the general monument plan. Should the monument planners wish to discuss this issue further, I would be happy to do so.

Thank you for your consideration. Patrick McKay Highlands Ranch, CO

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/10/2019 0:00

Comments:

Currently BCNM has very limited access to its most scenic areas. We feel the most important reason for establishing a national monument is to enable visitors to enjoy the natural beauty and recreational resources. Most visitors don't expect to or are unable to do lengthy hikes to reach the more exciting areas of the Monument. While rafting/boating offers one way to travel through the Monument, the Monument should be accessible to other user groups and throughout the year. Hecla Junction would benefit from a pedestrian bridge and a network of trails on the east side of the river. This allows access to a huge amount of terrain that currently requires a difficult river crossing. The Turret Road should be improved to provide non-4WD access from the southeast to the center of the Monument. A trail network could be developed from along the road and from a parking area at the end of the road where outhouse facilities should be provided. There should be access at a point along the western boundary of the BCNM as this would put visitors close to interesting terrain. A location about as far north as Centerville might be ideal. Possibly, access could be negotiated through the Centerville Ranch as part of the Central Colorado Conservancy efforts. Or maybe a road could be extended north from Hecla Junction to a new parking area with a pedestrian bridge. The railroad provides an obvious trail opportunity. We would love to see an arrangement made with the railroad company to allow use of the land along the tracks.

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/10/2019 0:00

Comments:

We are concerned about the impacts of dispersed car camping. Areas just west of the Hecla Junction fee area are already overused. We would like to see established and clearly marked dispersed sites wherever car camping would be allowed in BCNM. Campers would be required to camp only in established/marked dispersed sites and not create new sites. Rangers should patrol these sites to educate campers and ensure proper safety and protection of the sites. Hikers on overnight trips would not need these restrictions at this time.

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/10/2019 0:00

Comments:

There is potential for considerable rock climbing in BCNM. Very little development has been done to date because of the inconvenient access to the best cliffs. Hopefully access will improve as the Monument is developed. We don't foresee a significant number of climber visits in the near future, however growth is likely. Fixed anchors (including bolts) are a traditional and accepted part of establishing climbing routes. They have minimal impact on the rock resource, provide considerable safety benefits, and often make the climbing routes more enjoyable for a greater number of people. If and when rock climbing becomes more popular in BCNM, attention will need to be given to developing trails.

Name: Rick Hum

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/4/2019 0:00

Comments:

Under 2.3.9 of the draft planning criteria report page 38 # 1006* states that in alternative B or C that management will be determined by degradation but there is virtually no water quality monitoring activities in the immediate area that would be able to determine if there is degradation or damage to the water quality.

Name: Rick Hum

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/4/2019 0:00

Comments:

On Page 39 record #109. For all camping area include these limits: Based on monitoring of impacts to monument ROVs, employ adaptive management strategies to manage overnight camping and user conflicts. * Allow strategies including but not limited to: Based on monitoring of impacts to monument ROVs, employ adaptive management strategies to manage overnight camping and user conflicts. •7 days camping limit* •Reservation systems* •Designated campsites*•Fire pans would be required*•Use of a portable toilet device required •7 days camping limit* • •Fire pans would be required* •Use of a portable toilet device required

Name: thomas jacobson

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/12/2019 0:00

Comments:

I would like to see the Monument's management plan provide for a non motorized but hiker and mountain biker friendly trail running north-south and ultimately connecting to trails outside the Monument linking Salida and Buena Vista. A trail linking the two communities would create economic benefits to both. Salida and BV have worked diligently over the last decade to create substantial trail infrastructure. With that both have seen an increase in recreation tourism. Salida supports three bike shops and an outdoor store as well as numerous restaurants and bars that benefit from the influx of bikers, hikers, and trail runners. Recently, bike packing has grown in popularity. A trail traversing a small portion of the Monument and connecting Salida and BV would draw many cyclists and long distance hikers from outside our communities and add to the growing recreation based economy that is so critical to Chaffee county. This trail would provide the east side compliment to the Colorado trail running north-south in the Collegiate foothills. While cyclist currently make this loop using the Aspen Ridge road, hikers and bikers generally prefer the opportunity to access more remote country under their own power while avoiding the noise, dust and danger of motorized trails or roads. Both hiking and mountain biking are low impact and quiet uses that are compatible with the Monument's management goals while allowing for expanded recreation and backcountry access. Several developed campsites along the trail could be created to keep users from damaging resources through dispersed camping. Cyclists and hikers, unlike motorized users seldom leave trash and rarely require camp fires which I believe should be banned to preserve resources. As both a hiker and biker, I would also like to see additional hiking only trails within the monument with commensurate parking and signage. Thank you for your consideration.

Name: Hally K Norton
Organization Name: History Colorado
Secondary Author: Steve Turner
Secondary Organization: History Colorado

Date Submitted: 6/2/2019 8:00

Comments:

Royal Gorge Field Office Bureau of Land Management RE: BCNM RMP/EIS 5575 Cleora Road Salida, Colorado 81201 JUN 03 2019 Re: Consultation Regarding the Planning Criteria Report for the Browns Canyon National Monument Resource Management Plan and the Environmental Assessment, Chaffee County, Colorado (I IC#744 74) Thank you for your correspondence dated 14 May 2019 and received by our office on 16 May 2019 regarding comment and review of the Planning Criteria Report: Preliminary Alternatives and Basis for Analysis, Browns Canyon National Monument Resource Management Plan (RMP) under Section 106 of the National Historic Preservation Act (NHPA). We suggest that for RMPs, particularly those involving multiple federal and/or state agencies, it is often appropriate to develop a Programmatic Agreement (PA) among the relevant agencies in order to clearly lay out the responsibilities and delegations of authority for preservation and identification of cultural resources as well as compliance with Section 106 in advance of implementation. We request that if the Royal Gorge Field Office (RGFO) and Pike and San Isabel National Forests, Cimarron and Comanche National Grasslands (PSICC) feel a PA is appropriate, they jointly initiate consultation with our office as the RMP moves forward. We note that the Area of Potential Effects (APE) for the undertaking encompasses 9,792 acres of BLM administered lands within the RGFO and 11,811 acres of USFS-administered lands within the PSICC Salida Ranger District, for a total of 21,604 acres within which the RMP will apply. We suggest that it may be more appropriate to define that APE more broadly. It is our office's position that the APE is defined as the geographic area or areas within which an undertaking or project may cause changes in the character or use of historic properties, if such properties exist. As such, the APE should reflect the potential visual, auditory, and physical effects to the setting of historic resources and may extend beyond the National Monument boundaries. Effects of management decisions at the Browns Canyon National Monument and effect downstream resources and those located in other areas of BLM and USFS land outside of the Monument (indirect effects) which should also be considered as part of the federal undertaking. The Preliminary RMP details three alternatives: Alternative A (No Action Alternative), Alternative B and Alternative C. Any federal undertakings, including those as a result of the No Action Alternative, are subject to review under Section 106 of the NHPA. We note that Alternative B focuses on protecting monument resources, including cultural resources. This alternative will develop more interpretive and educational sites within recreation management zones than the current management actions, and will establish more collaborative programs to identify, inventory, document, monitor, protect, and interpret cultural resources than either Alternative A or C. The Preliminary RMP suggests that only 3.5 percent of the Monument has been surveyed to date and that potential impacts to cultural resources as a result of the Preliminary RMP Alternatives is not well understood. This project has the potential to affect historic properties, as defined by 36 CFR 800.16(1)(1). As a result of the fact that the APE has not been recently surveyed, it is our recommendation that a cultural resources survey be completed by an archaeologist who meets the Secretary of the Interior's Standards for Archaeology to determine the presence of cultural resources within the APE and the potential effect(s) to these resources as a result of the proposed project. We look forward to the results of the additional analysis concerning the potential effect(s) of the various Alternatives to cultural resources. We request being involved in the consultation

process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties. Thank you for the opportunity to comment. We look forward to continued consultation as a preferred alternative within the RMP is selected. If we may be of further assistance, please contact Lindsay Johansson, Section 106 Compliance Manager, at (303) 866-4678 or lindsay.johansson@state.co.us. Sincerely, Steve Turner, AIA State Historic Preservation Officer

Name: Withheld Withheld

Organization Name: Colorado Department of Agriculture

Secondary Author:

Secondary Organization:

Date Submitted: 6/13/2019 8:00

Comments:

Thank you for the opportunity to comment and CDA would like to work as a cooperating agency on future projects. Adam Ortega Federal Land Management Specialist Conservation Services Division P 303.869.9049 | F 303.466.2860 | C 720.610.2537 305 Interlocken Parkway, Broomfield, CO 80021, U.S.A adam.ortega@state.co.us | www.colorado.gov/AG June 7, 2019 Attn: Joseph Viera Bureau of Land Management USFS PSICC Salida Ranger District 5575 Cleore Road Salida, CO 81201 Dear Mr. Viera, The Colorado Department of Agriculture (CDA) submits the following comments regarding the Bureau of Land Management (BLM) Browns Canyon National Monument Resource Management Plan: Planning Criteria Report, Preliminary Alternatives and Basis for Analysis. CDA's mission is to strengthen and advance Colorado agriculture; promote a safe and high quality food supply; protect consumers; and foster responsible stewardship of the environment and natural resources. It is with this mission in mind that CDA supports the Alternatives described. CDA prefers Alternatives B or C as they provide the necessary flexibility to adapt livestock grazing management strategies. The ability to adapt livestock grazing will contribute to the beneficial effects of properly managed grazing on the landscape. CDA supports sustainably managed livestock grazing as a congressionally mandated use of federal lands that is vital to the ranching industry and beneficial to wildlife and associated natural resources. In conclusion, CDA would like to show support for development of the Browns Canyon National Monument RMP. The final plan will give the needed protections for the valuable resources as well as provide for a quality recreational experience. These actions are necessary to achieve program goals and for BLM to meet statutory and regulatory obligations regarding land management. Contact Mr. Adam Ortega at 303-869-9049 or adam.ortega@state.co.us for questions about these comments.

Name: JoAnn Hackos

Organization Name: Audubon Colorado Council

Secondary Author:

Secondary Organization:

Date Submitted: 6/12/2019 8:00

Comments:

See the attached file. Browns Canyon National Monument Resource Management Plan/ Environment Impact Statement Public Scoping Comment On behalf of the Audubon Colorado Council, Evergreen Colorado Audubon, and Conservation Colorado, I am happy to provide a comment on the Resource Management Plan/Environment Impact Statement for the Browns Canyon National Monument. I attended the public scoping meeting in Golden, CO on June 5, and was pleased with the thorough information provided by the BLM and the USFS. This spectacular canyon is fully deserving of the best possible protection of its resources. At the same time, we must ensure that the public has an opportunity to visit the National Monument and experience its wild and scenic values. We fully support the visitors who raft the Arkansas River, hike the trails, observe wildlife, and fish the waters. We support Alternative B, which we believe will preserve wilderness values at the Monument, including protecting big game species from human disturbance, avoiding disturbance of nesting birds, protecting nesting raptors from disturbance from climbing and similar activities, and protecting shorebird and waterfowl habitat. Visitors to the National Monument, including members of our Audubon chapters, want, we believe, a pristine natural area, which includes areas that have wilderness values. Their visits support the towns and rural areas along the Arkansas Valley. Consequently, we urge the BLM and the USFS to maintain the wilderness and roadless values of the Monument. We want the quiet natural sounds to be maintained, and not disturbed by vehicles with motors. We want to ensure that visitors are informed about leaving "no trace" in managing waste. We want the skies to be bright and clear, unimpeded by excessive lights, and we want to ensure that nonnative species are not introduced into the Monument inadvertently. We know that the Monument hosts nesting Peregrine Falcons and other raptors. Their nesting areas need to continue to be protected. We are especially interested in the possible presence of the Mexican Spotted Owl, which is under study as we understand it. As dedicated birdwatchers, we want the Monument to preserve its wildlife, which means prohibiting threats like drones, off-road vehicles including snow mobiles, target shooting, and collecting rocks and minerals. We understand, of course, that Ruby Mountain will be set aside for mineral collection. We hope that you will restrict camping to camp sites that are carefully maintained, have adequate protection from destructive fires, and are not located near environmentally sensitive areas. At the same time, we want BLM and the USFS to help the Monument increase visitation with good signs, maps, kiosks at entry points, and adequate parking. Some area may require permits to avoid overuse. We also know that visits should take into account the interests of the local Tribal councils so that culturally sensitive sites are not disturbed. Our members prefer that Browns Canyon remain open only to hikers and horseback riders, in addition to rafters and anglers. We urge you to reject off-road vehicles and mountain biking as intrusive. We want to protect the scenic values, the silence, and the wildlife. We hope that BLM and USFS feel the same. JoAnn T Hackos, PhD Conservation Board Member Evergreen Colorado Audubon Chapter Audubon Colorado Council Member Conservation Colorado Member

Comment period for 'Planning Criteria Report'

Letter #: 22

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/13/2019 0:00

Comments:

Please consider that there should be no need for special management and ACEC designation. Monument designation provides sufficient protection of ROVs.

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/13/2019 0:00

Comments:

The Arkansas river should be classified as recreational, not wild or scenic. Decades of recreational use support this designation, and it should continue.

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/13/2019 0:00

Comments:

{record # 1001} Please release Browns Canyon WSA in whole from wilderness consideration. Designation as wilderness would be too restrictive on the finest recreational activities found here.

Name: Withheld Withheld
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/13/2019 0:00

Comments:

From the perspective of a private boater who has enjoyed running this river with family and friends for decades, and also as one who formerly worked on the river as a CWP photographer at Zoom Flume, and then as a guide for PT. Please consider these points: * Commercial use should of course continue, but consideration should be given to capping not only the number of commercial permits issued, but the number of boats per day allowed by any one company. Some companies run dozens of boats in one long line, and various companies launch at similar times for the half day trips. In my opinion, the river has already reached a congestion point, and already reflects the absolute maximum number of boats that should be allowed by commercial outfitters. * The number of private trips should not be restricted in any way. * No lottery or other restrictive permit system should ever be established for Brown's Canyon. That practice always favors commercial use. * If increased overnight use is observed, consider adding more camps. There are several benches and other locations that can be developed with minimal impact to the natural resources. * Consider designating some of the larger camps for only commercial use. * Consider designating some camps for only private use (e.g. Browns creek) * If conflict arises, perhaps a camp sign-up board could be established at Ruby Mountain. Private boats launching upstream could use a new "5 minute eddy" to sign up for a camp. * The Ruby Mountain launch site is only for private use, this should continue.

Name: Withheld Withheld
Organization Name: CORE
Secondary Author:
Secondary Organization:

Date Submitted: 6/13/2019 0:00

Comments:

Please accept these comments relative to the scoping phase of the Resource Management Plan and Associated Environmental Impact Statement for the Browns Canyon National Monument, Colorado on behalf of Colorado Off Road Enterprise (CORE). Prior to our comments, a summary of our organization will be helpful. CORE was formed in 2016 in Buena Vista as a grassroots motorized advocacy/trail adoption group. We work with the BLM Royal George Field Office, the Salida Ranger District and the Leadville Ranger District concerning trail adoption, volunteer trail projects and area cleanups. Currently, we have 12 adopted trails, 8 in Chaffee County and 4 in Lake County. Over the past 3 years CORE has developed a positive relationship with land managers, private property owners and our motorized user group. CORE is a 100% volunteer organization funded solely by member dues, donations and grants. CORE is very familiar with the recreation opportunities the Browns Canyon National Monument and the surrounding area affords. We attended the public meeting in Buena Vista on June 4th and were disappointed to learn there were no new motorized options being considered for the management plan. This is concerning, as our local community has longed for the day a management plan restored the historical use that was lost through the Wilderness Study Area Designation. CORE would advise/request that this project include a review and possible realignment to restore the through route of FSR – 184 to include multi-use access allowing all users to enjoy the Monument. This would provide all recreators, not just boaters and hikers, the opportunity to enjoy the scenic aspects of the Monument and the Arkansas River Corridor within the Monument. Without addressing the restrictive nature of the current options, this would render the majority of users to the Monument as paying customers of guide companies, both paddling and fishing. CORE members/volunteers have hiked the current 'closed' section of FSR – 184 and the roadbed remains almost entirely intact. It would take minimal effort to reopen this section and CORE is willing to help secure the grant funds needed to repair and restore the unusable sections. Please consider adding the realignment and use of FSR – 184 to one of the current Alternatives. Thank you, Marcus Trusty CORE Founder

Name: Withheld Withheld
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/14/2019 0:00

Comments:

First, Thanks for the opportunity to comment and be a part of the public process in managing our pulic lands, I have lived within easy acces to now BCNM for over 40 years, and have come to treasure thei resource. . This document is rather complicated ! Many people will just give up or make some broad general comment. Comments below are tied to sections of the Document: BCNM Wild & Scenic River Values: The Arkansas River has scenic qualities related to the granite geology, water quality, and the restored fishery. I have paddled the Middle Fork of the Salmon and many other western rivers. The Arkansas in BCNM compares very favorably to other western rivers. It exceeds the inventory criteria : the river must be free flowing and, with its adjacent land area, possess one or more outstandingly remarkable values. Recreation values are a matter of record. A big problem in the future will be managing and protecting these values in the face of population growth, demands for commercial exploitation, and the unknown effects of a changing climate. Geology, Minerals, and Paleontology : Garnet collection and mineral collection Alt B is a reasonable approach looking at future needs and population growth. The resource is limited, and must be managed for future generatons.: At Ruby Mountain only for educational, experiential, or scientific purposes via SUP/SRP. Lands with Wilderness Characteristics: Per Alt B Railroad Gulch (537 acres within BCNM). and Browns Canyon North-Ruby Mountain (88 acres). Should be managed to protect wilderness characteristics. Railroad Gulch has been affected by the "hand of man" but that effort failed and nature came back- which has a teachable benefit for those who see it. Railroad Gulch should be managed as a WSA. The actual WSA has shrank by compromise over the years and is now a very minimal part of what deserves protection. When hiking in the area it is hard to tell when you have left the actual WSA, as there is little change in the surroundings- after getting well outside the WSA boundary line. Visual Resources and Scenery Integrity, Night Skies, and Natural Soundscapes: Alt B strikes a reasonable balance with "Prohibit projects that depart from Visual Resource Management (VRM) class objectives or Scenery Management System (SMS) Scenic Integrity Objectives (SIO) standards." Watersheds, Soils, and Water Resources: Climate change will require flexible management options to protect resources first. Grazing and recreational use will have to adapt to protections needed. Seasonal wildlife closures will be needed to protect wildlife from stress during critical times. The wildlife were here before recreationists . For example, there may not be enough water in the drainages to supply wildlife and a full grazing lease. Low, warm water may stress fish and require a closure of fishing to protect the survival of the fishery. Wildlife and Fish: There are numerous water sources from alluvial seeps over bedrock in the arroyos of the wilderness study area that can be use by wildlife. Motor vehicle use can increase siltation in upstream areas, which is detrimental to fish survival. Protect the area for winter range for deer, elk and bighorn sheep. Areas to the east of WSA should be considered a buffer area for wildlife, especially low altitude winter range. No new roads should be allowed between Aspen Ridge road and the WSA. Alt B proposals for wildlife closures are reasonable and could be extended as appropriate. As much as we may treasure the river or rock climbing experience, wildlife were here first and deserve protection. Perigrine falcons are known to nest in Stafford and Railroad gulches. Nest sites can vary from year to year. Therefore a broader protection area is justifiable. Wildlife, ctd. The area northwest of of Hecla is remote and it gets little visitor use compared to other

areas of the monument. This is an elk calving area for a herd that spends a lot of time on public and private lands around Centerville. Given external development pressures, this area NW of Hecla deserves protection.

Recreation: Alt B makes sense to protect public safety. "Prohibit recreational target shooting in the following areas: • Within the Arkansas River RMZ (1,718 acres) • Within 50 feet of CR 300/ BLM 300 • Within 50 feet of CR 194 • Within 50 feet of Aspen Ridge Road (USFS 185) Within 50 feet of USFS 185D "

Travel Management: Adhere to the Monument Proclamation language prohibiting new motorized routes to protect wildlife habitat and reduce siltation of streams, The ATV loading area at Ruby Mtn has a very detrimental impact on users experiences, crowding, noise, dust, fumes, and the pre and post wilderness experience of users. It must be relocated- perhaps to the north near Chinamans gulch with a larger parking area and compatible uses.

Lands and Realty: Casual use of UAVs have a detrimental effect on wildlife, and on visitor's experience of the wild areas of BCNM, and should be generally excluded.

General Comments: There should be a more conservation oriented alternative for citizens to consider, given the special qualities that the monument was created to preserve. It is a rather narrow area that was reduced by compromise. Lands to the east are nearly equal in resource qualities, but lie outside the WSA but should be managed with a more conservation driven approach. BCNM is located with easy reach of large population centers and can be be adversely impacted by over use and and careless travel and camping damage by users. A central need to prevent resource damage and educate users must be on the ground enforcement and education. The Antiquities Act was created to protect and restore objects of prehistoric, historic and scientific interest. The protection and preservation of those objects of prehistoric, historic and scientific interest must be prioritized above and over recreational use or development. The management plan is not to be prepared to protect or restore recreation. Again, a more conservation oriented alternative would be more true to the Antiquities Act.

Name: Withheld Withheld
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/15/2019 0:00

Comments:

After reading the "BCNM planning.....Report , my preferred Alternative would be " Alternative B". Some specifics that Alternative B does not adequately address: 1) Campsites along the " Brown's Canyon" section of the Arkansas River are very badly eroded and have multiple social trails out of each campsite. Even with designating camping , the campsites should be hardened and a designated trail built out of the campsite ;so the other social trails can be closed. This would make the camping along the River much more sustainable. 2) Day Use thru the " Brown's canyon" section of the Arkansas is not sustainable at present : so permitting may be required" .This section of the River is " Wilderness Quality" and it would be a shame to loss that. 3) Dispersed Camping along the Aspen Ridge Road FS#185 & 185D has spread into the BCNM. This area needs " Designated Camping Now" 4) Alternative B also suggested not publishing routes into Railroad Gulch but "social media" will do that. Therefore Alternative B Needs Money to fund a Seasonal Ranger "boots on the ground" from April thru end if November. The ranger patrolling may then determine if more designated trails need to be built to decrease social trails and damage. 5) A Seasonal Ranger position as mentioned in #4 , would pay for itself within the first year. I am a Friends of Fourmile Volunteer in the adjacent USFS/BLM areas to BCNM :and have seen first hand, the damage that can be caused to the environment and signage when no routine patrolling occurs in an area. 6) Because BCNM is basically a "High Desert", I believe all the major riparian areas (eg middle cottonwood creek) should be designated as " wilderness characteristics" to protect the environments fragility and the wildlife that depend on these areas thank you for listening

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/17/2019 0:00

Comments:

As someone who has hiked in BCNM with the AHRA and with GARNA and on my own, and as someone who has taken raft trips through Brown's canyon, my interest is in maximizing the recreational opportunities in Brown's Canyon National Monument. Management options B and C seem to maximize recreational opportunities. An important part of recreation is the feeling of solitude, and long vistas without human interruption. Brown's canyon provides a rare opportunity for those kinds of experiences, especially in the winter time when the high mountains of the Sawatch range are impassible.

Name: Brett Landin
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/17/2019 0:00

Comments:

As a Salida resident, I strongly support the development of a hiking and cycling trail corridor between Salida and Buena Vista. These two amazing mountain towns are supported by the many folks who travel here for the recreational opportunities and helping to spread folks out from the popular Arkansas Mountain (S-Mountain) and Four Mile areas will help disperse the visit load. BCNM is a wonderful resource and provides significant space and "wild and scenic" feel that is difficult to find elsewhere, in close proximity to two communities that provide the support infrastructure for tourism. Please consider opening this area to cyclists as an important and growing user group in the outdoor industry. At the same time (coming from an avid motorcyclist) please keep this area reserved for "quiet" activities that DO NOT include motorized use of any kind (electric or gasoline). Thanks for your consideration!

Name: Pauline P. Reetz
Organization Name: Denver Audubon
Secondary Author:
Secondary Organization:

Date Submitted: 6/16/2019 8:00

Comments:

Public Scoping Comment Browns Canyon National Monument Resource Management Plan/ Environmental Impact Statement Denver Audubon is pleased to submit the following comments as part of the Scoping Process for the prospective Browns Canyon National Monument (BCNM) Resource Management Plan. We are a grassroots conservation organization with approximately 3,000 members in the Denver metro area. Some of our members have hiked, picnicked and camped in the Monument and, in addition, Denver Audubon gave a grant in support of the Browns Canyon Bioblitz of 2016. These comments will add to the comments of the Audubon Colorado Council submitted on June 13, 2019 by Council Member Joann Hackos; Denver Audubon is a member of the Audubon Colorado Council. Comments on the Basis for Analysis: Recreation: We suggest adding another Analysis Issue: How would management actions aimed at enhancing recreation resources, settings and experiences negatively impact other resources and resource uses? For example, increasing opportunities for OHV use would increase noise levels, habitat fragmentation, and disturbance that could negatively impact wildlife species. Watersheds, Soils and Water Resources. Regarding the Analysis Issue, How will management decisions impact areas with especially fragile soils ... we would like to add a suggestion for consideration in the RMP/ EIS: Non-motorized use ONLY of such areas should be considered. In some cases, creation or improvement of one single trail, accompanied by appropriate, low level signage, might reduce the proliferation of social trails and off-trail or random hiking or riding, thus providing more protection to fragile soils and to wildlife. Transportation. The analysis area should include lands in the immediate area outside the BCNM; for example, there are multiple four-wheel drive roads outside the monument boundaries, so a decision not to increase four-wheeling opportunities or OHV use inside the monument would not drastically reduce opportunities for OHV use in the Arkansas Valley. There are many already in existence; the BCNM does not have to fulfill the demand for more motorized uses. General comments: The 2016 Bioblitz recorded 96 species of birds in the BCNM, with unique finds of Gray catbird and Black-chinned hummingbird and records of Common Merganser, Dusky Grouse, Flammulated Owl, Olive-sided Flycatcher, Dusky Flycatcher, Pinyon Jay, Cedar Waxwing, Black-throated Gray Warbler, Vesper Sparrow, Red Crossbill and Evening Grosbeak, among others. Observation of the known peregrine falcon eyrie in Railroad Gulch indicated that the pair successfully young that year. A new golden eagle nest was discovered just outside BCNM boundaries on Ruby Mountain (Shively, Stephanie. 2016. Browns Canyon National Monument Bioblitz and Biotech. Report to the Audubon Society of Greater Denver. Available at www.denveraudubon.org or by request). The Bioblitz information isn't cited in the reference section but we hope that the information collected then has been/will be used in the RMP. While Forest Service and BLM legal and regulatory mandates may require that only raptors, out of all the species observed, are subjects for management, we would like to see more attention paid to songbird populations in general. Many species have suffered 40 to 60% declines in population (National Audubon Society, 2014, e.g.). They are affected by 1) condition of riparian areas, the most critical habitat for migratory and breeding birds; 2) construction and use of roads and trails through undisturbed habitats, resulting in habitat fragmentation; 3) noise levels in breeding habitats; 4) diversity and health of vegetation types. One goal of the RMP should be to keep wildlife habitats - including aquatic

habitats - as healthy as possible, free from noise, dust, and disturbances. Cultural heritage, tribal values and uses: Long-term conservation of significant cultural resources, reduction of imminent threats and protection, stabilization, enhancement, and restoration of important and at-risk cultural resources can best be provided by managing to protect the wilderness characteristics and values of lands within BCNM and by limiting motorized use to existing roads. We support the goal of protecting and maintaining wilderness characteristics in areas inventoried and found to possess wilderness characteristics, as outlined in Alt. B. In particular, trails should be designed to create minimal impacts and avoid fragmentation of wildlife habitat, and motorized vehicle use should be routed elsewhere. A system of trails, carefully designed and signed to clearly indicate trail location, would help reduce social trails and bushwhacking. For example, it is possible to hike from the town of Turret, through Stafford Gulch, over to Railroad Gulch and up Railroad Gulch to the Turret Road, but the section between the two Gulches is entirely unmarked and heavy use in future might lead to multiple "trails" and resource damage, especially to soils and cultural artifacts in the area. The trail is also unclear at various points along Railroad Gulch, leading to bush whacking and damage to vegetation. IF such a hiking trail becomes part of the BCNM trail system, a route that will avoid cultural artifacts and reduce damage to soils and vegetation - and with seasonal restrictions to avoid disturbance to nesting peregrines in Railroad Gulch - should be planned and executed. We would like to see more opportunities for quiet recreation - such as hiking, hunting, angling, horseback riding and birdwatching - in the BCNM, if they can be provided without damaging watersheds, wildlife habitats and soils. The BCNM contains a large number of cultural artifacts, such as the remnants of the railroad tracks in Railroad Gulch; we'd like to suggest that good interpretive signs, maps, and kiosks at entry points be included in any management plan to increase the public's awareness of these remarkable resources in the BCNM. In addition, the scenic, wildlife and vegetation resources deserve the highest level of protection, which can only be provided by keeping the monument open to foot and horseback travel and excluding vehicular traffic outside of existing roads. If the BCNM is managed to conserve and protect its rugged backcountry, opportunities for quiet recreation, its scenic, ecological and cultural values, its economic value to the local community will only increase, as Coloradoans seek places to enjoy clean air, silence, abundant wildlife and other wilderness-based values. Of the preliminary alternatives, B provides the most protection and we would like to see it eventually adopted. Submitted by Pauline P. Reetz, Conservation Chainan Denver Audubon 9308 S. Wadsworth Blvd. Littleton, Co 80128 Tel. 303-973-9530 Email: polly_reetz48@live.com

Name: Douglas DeLong

Organization Name: Well Sorted Automotive

Secondary Author:

Secondary Organization:

Date Submitted: 6/5/2019 0:00

Comments:

I would like to submit comments regarding the Resource Plan for Brown's Canyon National Monument. My business supports the OHV community in this area and I believe it is important to "Maintain and enhance existing motorized and mechanized travel consistent with existing travel management decisions." Accordingly, I support Alternative A with regards to reference 1004. Aspen Ridge (FS 185) should maintain open access and ideally Turret Road (FS184) would be restored and open to access. Thank you, Doug DeLong Owner, Well Sorted Automotive doug@wellsorted.com (828) 779-5051 Web: <http://wellsorted.com> FB: <https://www.facebook.com/>

Name: Leonard Chamberlain

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/30/2019 0:00

Comments:

GIS Area Comment, Object ID: 5, Range/Livestock Grazing I feel the Brown's Canyon Monument area covers too much area to the east of the actual scenic canyon and waterway it seeks to protect. This encroachment hinders the multiple use of our NF lands.

Name: Caleb Efta

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/31/2019 0:00

Comments:

GIS Area Comment, Object ID: 6, Special Designations I support the creation of the wilderness study area, and would support the Turret Road (FS 184) and Aspen Ridge (FS 185) to motorized vehicles. The protection of this monument would is greatly needed.

Name: Eric Aslakson

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/6/2019 8:00

Comments:

GIS Area Comment, Object ID: 7, Recreation Please keep this area wild and do not allow ATV's or other motorized access. There are plenty of other areas in the region where ATVs and roads overwhelm any other uses. Tincup road is a good exampl

Name: Jeff Keidel

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/7/2019 8:00

Comments:

GIS Area Comment, Object ID: 8 Travel Management I am very concerned about the potential for greatly increased traffic in the Bassam Park Area. If visitor access the BCNM from Hwy 24/285 (Trout Creek) on to CR 307 and then on to roads 187, 185, then

Comment period for 'Planning Criteria Report'

Letter #: 37

Name: Jay Gingrich

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/8/2019 8:00

Comments:

GIS Area Comment, Object ID: 10 Travel Management Protect east side of WSA from motorized trespass.

Name: Linda Gibas

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/14/2019 0:00

Comments:

GIS Area Comment, Object ID: 10 Lands with Wilderness Characteristics The BLM should manage the lands identified as having wilderness characteristics in the same manner as the existing WSA. If the WSA is removed by Congress, BLM should continue to manage it the same. GIS Area Comment, Object ID: 11 Recreation Since the dispersed camping on the west side of FS 185 (Aspen Ridge) is limited to walk into it would be good to develop a couple of campgrounds on the east side of FS 185.

Comment period for 'Planning Criteria Report'

Letter #: 40

Name: Richard Wolkowitz MD

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/17/2019 0:00

Comments:

GIS Area Comment, Object ID: 12 Recreation Brown's Canyon Trails

Name: Anon NA

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/17/2019 0:00

Comments:

GIS Area Comment, Object ID:13 We own 2 homes in Salida and would love to see a bike path from Salida to Buena Vista. Due to the river and proximity of the 2 towns, many people recreate and support businesses in both towns and a p

Comment period for 'Planning Criteria Report'

Letter #: 42

Name: Jessica Walton

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/17/2019 0:00

Comments:

GIS Area Comment, Object ID: 14 Recreation Please consider opening this area for non-motorized, recreational use, specifically cycling trails. Multi-use trails bring diversity

Name: Yolanda Walton

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/17/2019 0:00

Comments:

GIS Area Comment, Object ID: 15 Recreation please consider making trails for hikers and cyclist, as well as allowing cyclist on roads between salida and buena vista. this is good to link the two towns for economic value, as well as recreation

Name: Julia Taylor
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/18/2019 0:00

Comments:

The Railroad Gulch area should be managed to maintain the area's natural and wild qualities while providing necessary information and amenities, namely parking in the proposed location along the Austin Trail outside of the monument's boundary for people to visit with respect. This includes minimizing the potential for human conflict between visitors and local residents. The USFS should relocate the existing gate at the edge of Turret to a point on Austin Trail beyond the last location. This portion of Austin Trail is currently used for motorized access by one private property owner. There should be a dirt turnaround and parking area after the last private property north of Turret on FS 184.

Name: Julia Taylor

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 0:00

Comments:

I am the owner of the property located at 15555 Austin Trail directly before the proposed parking area and gate.

Name: Brett Ackerman

Organization Name: Colorado Parks and Wildlife

Secondary Author:

Secondary Organization:

Date Submitted: 6/17/2019 8:00

Comments:

See attached. June 13, 2019 Mr. Keith Berger, Field Manager BLM Royal Gorge Field Office 3028 E. Main St. Canon City, CO 81212 Re: Planning Criteria Report, Preliminary Alternatives and Basis for Analysis, Browns Canyon National Monument Resource Management Plan Dear Mr. Berger: Thank you for the opportunity to comment on the Preliminary Alternatives and Basis for Analysis for the Browns Canyon National Monument Resource (BCNM) Management Plan. As a co-manager of the Arkansas Headwaters Recreation Area (AHRA) which runs through the Monument, Colorado Parks and Wildlife (CPW) appreciates the opportunity to work with BLM and USFS as a cooperating agency throughout the master planning process for BCNM. The mission of CPW is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. CPW has a statutory responsibility to manage all wildlife species in Colorado, and to promote a variety of recreational opportunities throughout Colorado. One way we achieve this goal is by participating in federal land management planning processes. CPW understands that this document is intended to inform subsequent steps in the planning process by establishing sideboards for development of alternatives. As such, CPW provides the following comments and looks forward to further planning efforts to specifically advocate for alternatives that provide quality recreation opportunities while protecting wildlife and their habitats.

2.3 PRELIMINARY ALTERNATIVES As per the established planning process CPW does not at this stage advocate for a preferred alternative. Instead, CPW will assess each alternative set forth in future planning stages. It is possible that CPW will advocate for a revised alternative comprised of specific principles that may be identified in separate existing alternatives.

2.3.5 VEGETATION, WILDLAND FIRE ECOLOGY, AND FUELS 1006 (Restoration) CPW recommends that in all instances native species be used to accomplish restoration objectives. Modifying Alternative C as such would fit better within the spirit of Alternative C by ensuring protections for monument resources while not compromising broader recreation opportunity. 1009 (Natural Ignition) The exclusion of prescribed burns in Alternative B and the inclusion of prescribed burns in Alternative C seem out of place in a section addressing management of natural ignition fires. CPW suggests prescribed burns be addressed in 1008 (fire treatments), and further suggests that they be allowed under Alternative B as well as Alternative C. Prescribed burns are generally beneficial to wildlife habitat, and therefore are appropriate within the established sideboards of Alternative B.

2.3.6 VISUAL RESOURCES AND SCENERY INTEGRITY, NIGHT SKIES, AND NATURAL SOUNDSCAPES 1002 (Temporary Project Impacts) This section requires further explanation as most are not educated in federal VRM, SMS, and SIO standards. If enforcing these standards impedes habitat work, their inclusion in Alternative B would not uphold that alternative's objective of protecting wildlife. CPW suggests clarifying that habitat work could be accomplished under all alternatives regardless of VRM, SMS and SIO standards.

2.3.7 WATERSHEDS, SOILS, AND WATER RESOURCES 1005 (Surface-disturbing activities) The complete exclusion of surface-disturbing activity parameters within Alternative C may make it difficult to protect ROVs. CPW suggests parameters similar to Alternative B, but that would allow for exceptions providing they address protection of ROVs.

2.3.8 WILDLIFE AND FISH 1005 (Seasonal Use) and 1006 (Trail

Development) These two provisions may conflict with 1003 (Recreation Conflicts), and do not need to be separated from that broader provision. In addition, the current language in 1006 overlaps 1005 by discussing seasonal use prohibitions. Further, these two provisions only address conflicts with big game and raptors. Finally, numerous potential recreational conflicts exist, and extracting these two from the broader provision is not necessary and potentially convoluting and problematic. CPW recommends 1005 (Seasonal Use) and 1006 (Trail Development) be deleted since 1003 (Recreation Conflicts) encompasses practices associated with all recreation conflicts, including trail development, and allows for mitigation BMPs, including seasonal use. This argument could also stand for 1007 and 1008 (Climbing Access). 1008 (Climbing Access - Bighorn Sheep) If this provision is left in, CPW recommends Alternative B include or allow for seasonal area restrictions for Rocky Mountain bighorn sheep production (lambing) areas.

2.3.9 RECREATION

1004 (Recreation Management Zones) CPW recommends that CML lands within the Arkansas River Bench and Shore zone and all lands within the Ruby Mountain-Hecla Junction Access zone be classified as under AHRA management with existing high recreation use and planned high recreation use (Ruby Mountain R&PP 50.6 acres; Hecla Junction R&PP 84.7 acres; AHRA CML 409.9 acres). In addition, CPW requests that Map 10 be modified as follows: * The blue hashed area be labeled "Arkansas Headwaters Recreation Area Cooperative Management Lands (CML)" to reflect the common terminology used throughout AHRA management documents. * The Ruby Mt. and Hecla Junction zones be modified to accurately reflect their R&PP lease boundaries (see attached map). 1004 (Recreation Management Zones) and 1006 (Waste) Ruby Mountain and Hecla Junction total acreage is approximately 135 acres. 1008 (Monument Backcountry - River East RMZ) Inclusion of allowance for social trails seems to be a departure from previous federal planning efforts, particularly those in national monuments. CPW recommends sanctioning only officially planned and constructed trails under all alternatives. 1009 (Monument Backcountry - River East RMZ) Is "No Similar Action" missing from Alternative A? 1017 (Turret Road RMZ) and 1018 Ruby Mountain-Hecla Junction Access RMZ) CPW recommends specifically allowing parking overnight to support hunting.

2.3.11 RANGE AND LIVESTOCK GRAZING

1003 (Motorized Travel) CPW recommends allowing motorized travel not only for maintaining range improvements, but also for executing new range improvements.

2.3.12 LANDS AND REALTY

1007 (Filming) CPW proposes the following language in Alternative C: Authorize commercial filming via the appropriate agency throughout the BCNM without requiring site-specific NEPA analysis (e.g. Environmental Assessment) if the project is limited to the river surface; existing highways and pullouts; designated routes, roads, and trails; and previously disturbed or cleared areas.

3.1.3 ANALYSIS ISSUES AND METHODS

The first issue under this heading discusses protecting values in Browns Canyon WSA and USFS roadless areas, but the sub-bullets only address WSAs, and subsequent issues sometimes mention other management types (ACECs, WSRs). CPW recommends clarifying that this section applies both to WSAs and USFS roadless areas, and potentially other areas if designated.

3.9.2 ASSUMPTIONS

In the past CPW has undertaken wildlife management projects that involved capturing, radiocollaring and monitoring wildlife within the footprint of the national monument designation as part of research projects and normal wildlife monitoring activities. We are aware of the management actions that govern work within the Browns Canyon WSA. The Browns Canyon Proclamation states, "Nothing in this proclamation shall be deemed to enlarge or diminish the jurisdiction of the State of Colorado, including its jurisdiction and authority with respect to fish and wildlife management." CPW requests clarification in this section that neither the national monument designation nor the plan intend to impose any restrictions that could limit or impede wildlife management activities being conducted by CPW. Those wildlife management activities could include, but are not be limited to, trapping or capture with the use of aircraft and trailing hounds to capture and radio collar big game. In addition, the monitoring of wildlife through the use of aircraft or remote cameras.

3.10.2 ASSUMPTIONS

Proposed language for third bullet: Recreation at all AHRA R&PP Recreation Sites and within all AHRA Cooperative Management Lands (CML) within the BCNM will continue to be

managed by AHRA. 3.11.2 ASSUMPTIONS Proposed language for fifth bullet: New roads, parking areas, or trails may only be designated for motorized vehicle use in areas west of the Arkansas River and at the Ruby Mountain Recreation Site and then only as necessary to provide reasonable river, parking area, and/or campground expansion and access. CPW appreciates this opportunity to offer early recommendations for the BCNM Planning Criteria Report. As always, CPW staff is available to work with BLM and USFS on how best to provide high quality recreation while minimizing impacts to wildlife and their habitats. If you have questions or would like clarification about any of our comments please contact Brett Ackerman, Southeast Region Deputy Regional Manager at 719-227-5209 or brett.ackerman@state.co.us. Sincerely, Brett Ackerman for Brad Henley Acting Southeast Regional Manager

Name: Withheld Withheld
Organization Name: BGSU Geology
Secondary Author:
Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

First, let me apologize for the general nature and brevity of this comment. I am a professor of geology at Bowling Green State University (BGSU) in Ohio. I am director and one of the teachers of our Field Methods course (GEOL 4940), which is our capstone course required for students earning a B.S. or B.A. in Geology at BGSU (<https://www.bgsu.edu/arts-and-sciences/earth-environment-and-society/geology/field-camp.html>). This course has been in existence for over 60 years and I have been involved the last 20 years. We have between 20 and 30 students take the course each year. With the class we spend 2.5 days in the Ruby and Sugarloaf Mtns area. The students are assigned to map (digitally with GPS) the volcanic deposits and their relationship to the older granites and write a report. This is a very important project in our program and requires the students to fully cover the mapping area. We encourage them to collect small samples of each geologic unit in order to compare from place to place. It would significantly impact our field course if we cannot use this area in the future. In addition to the course, I have advised three Master's student projects on the volcanism of Ruby and Sugarloaf which has resulted in two theses and several abstracts presented at national geological conferences (GSA, AGU). I appreciate that the area needs to be conserved. The area is of unique geological interest and we hope that it can be managed in a way that will still allow access for educational purposes. Thank you, Kurt Kurt S. Panter Professor of Geology Bowling Green State University 419.372.7337 kpanter@bgsu.edu

Name: rachel holder

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 0:00

Comments:

The communities of Salida and Buena Vista have a real opportunity to increase recreational experience without sacrificing the conservation of wonderful natural resources by developing more mountain biking and hiking trails. This would allow people to access natural beauty while maintaining the beauty for generations to come. Increased mountain bike and hiker visitors to the area decrease the use of more environmentally impactful recreation such as RV camping, ATVs, and dirt bikes. Having a trail connect Buena Vista and Salida would create a new unique experience that is difficult to find where endurance athletes could hike/run/bike between communities.

Comment period for 'Planning Criteria Report'

Letter #: 49

Name: Chris Clark

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/15/2019 0:00

Comments:

GIS Point Comment, Object ID: 6 Special Designations I do not support a wild and scenic designation. All decisions should be made through the AHRA

Comment period for 'Planning Criteria Report'

Letter #: 50

Name: Ann Stevens

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/16/2019 0:00

Comments:

GIS Point Comment, Object ID: 7 Recreation Hiked on Sunday May 12th. Beautiful pinon pine eco system. Hope the BCMN stays the same or land added

Comment period for 'Planning Criteria Report'

Letter #: 51

Name: Neil NA

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/30/2019 0:00

Comments:

GIS Point Comment, Object ID: 8 Recreation I would like to see a fisherman's bridge here to make access to the other side easier and safer.

Name: Caleb Efta

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/31/2019 0:00

Comments:

GIS Point Comment, Object ID: 9 Special Designations (ACEC, WSR, WSA, Roadless Areas) I support the wild and scenic designation. I fish the river often and it deserves it. Keep it wild and free!

Name: Patrick McKay

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 5/31/2019 0:00

Comments:

GIS Point Comment, Object ID: 10 Travel Management I support alternative C to allow additional trailheads and parking and in general facilitate expanded access to this area. Maintain existing motorized access consistent with current travel plans. GIS Point Comment, Object ID: 11 Travel Management Maintain existing motorized access and dispersed camping consistent with current travel plans. Do not rehabilitate side spurs. No additional restrictions on motorized or mechanized access necessary. GIS Point Comment, Object ID: 12 Other Re: rec. 1007: Continue existing policy re: UAVs and do not impose new restrictions on casual or commercial use. Drones are already prohibited in wildernesses. Further restrictions set bad precedent. GIS Point Comment, Object ID: 13 Special Designations (ACEC, WSR, WSA, Roadless Areas) Oppose wild and scenic designation. The Arkansas is heavily used and much of it is next to a highway. Wild and Scenic status will impair recreational use. GIS Point Comment, Object ID: 15 Travel Management Reopen the full length of Turret Road to motorized use. This is a historic motorized route. Re-opening would allow greater access between Aspen Ridge and the Arkansas River.

Name: Frank Doyle

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

GIS Point Comment, Object ID: 14 Recreation This area needs some protection, commercial trips have been creating traffic jams for years, now they are also taking over the campsites. Need a ranger to ensure boats comply with rules

Name: Anon NA

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/4/2019 0:00

Comments:

GIS Point Comment, Object ID: 16 Travel Management At a minimum, existing off-highway roads and access points should be preserved. Total road use vs total area is well proportioned and no roads/trails/access should be removed/made inaccessible.

Comment period for 'Planning Criteria Report'

Letter #: 56

Name: Rick Hum

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/4/2019 0:00

Comments:

GIS Point Comment, Object ID: 17 Recreation Stream water quality should be monitored in areas where trails cross streams or creeks.

Comment period for 'Planning Criteria Report'

Letter #: 57

Name: John O'Brian

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/5/2019 0:00

Comments:

GIS Point Comment, Object ID: 18 Wildlife and Fish add foot bridge to access the East side of canyon

Name: Ray Nagashima

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/5/2019 0:00

Comments:

GIS Point Comment, Object ID: 19 Wildlife and Fish The Arkansas river is a unique fishing resource in that it has a self-sustaining population of brown trout, a legendary caddis hatch and was home water to the only extinct salmonid in the state of CO.

Name: Jeff Keidel

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/8/2019 0:00

Comments:

GIS Point Comment, Object ID: 20 Travel Management I wrote a similar comment using the area layer. ...but I am concerned about traffic in the Bassam Park Area. I AM VERY FRUSTRATED THAT THIS WEBSITE LIMITS THE LENGTH OF MY COMMENTS !!!!!!!SITE LIMITS

Comment period for 'Planning Criteria Report'

Letter #: 60

Name: Jane Lewis

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/9/2019 0:00

Comments:

GIS Point Comment, Object ID: 21 Travel Management Maintain/protect closure of FS 184 at Wilderness study area boundary, do not upgrade balance if FS 184.

Comment period for 'Planning Criteria Report'

Letter #: 61

Name: John Toepfer

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/10/2019 0:00

Comments:

GIS Point Comment, Object ID: 23 Travel Management Allow dispersed camping, but have physical barriers to restrict illegal vehicle travel

Name: Jim McGannon

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/12/2019 0:00

Comments:

GIS Point Comment, Object ID: 24 Recreation There are too many rafters on the Arkansas. It is negatively affecting the camping, vegetation, and surroundings near and in the wilderness area.

Name: Mark Merklein

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/12/2019 0:00

Comments:

GIS Point Comment, Object ID: 25 Recreation I would like to see mechanized access along 184 that would then tie into a trail from Salida to Buena Vista. The FS 184 connection would then make looping possible and bike camping options available GIS Point Comment, Object ID: 26 Recreation Would like to see a coordination with a trail connection between Salida and Buena Vista. Hiker/Biker/E-assist bikes. Loops Salida to BV and back on Aspen Ridge.

Name: Mike Smith

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/12/2019 0:00

Comments:

GIS Point Comment, Object ID: 27 Recreation Would like to see inclusion of opportunity to utilize a portion of this area for a non-motorized biking/hiking trail to connect Salida and BV trails. To allow for a quiet epic user experience.

Comment period for 'Planning Criteria Report'

Letter #: 65

Name: Dr. JoAnn T Hackos

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/13/2019 0:00

Comments:

GIS Point Comment, Object ID: 29 Lands with Wilderness Characteristics Browns Canyon National Monument Resource Management Plan/Environment Impact Statement Public Scoping Comment On behalf of the Audubon Colorado Council, Evergreen Colorado Audubon, and Conservation Co

Name: Linda Gibas
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/14/2019 0:00

Comments:

GIS Point Comment, Object ID: 30 Travel Management The last 0.38 miles of FS 184 should be closed due to excessive erosion. GIS Point Comment, Object ID: 31 Travel Management "* The USFS should examine designating a 0.5-mile system route for motorized public access and parking down the existing Austin Trail for hikers, hunters and equestrians. This also benefit Turret." GIS Point Comment, Object ID: 32 Travel Management "* There should be a dirt turnaround area after the last private property north of Turret on FS 184 at the same location where the seasonal closure sign and gate are proposed to be located." GIS Point Comment, Object ID: 33 Recreation A non-motorized route should be designated down the historic Austin Trail from the proposed parking area to RR Gulch and the Reef. GIS Point Comment, Object ID:34 Travel Management Parking at Ruby Mountain on the north end of the Monument will soon be overcrowded by ATV users. They need a separate parking area. GIS Point Comment, Object ID: 35 Recreation Would like to see a trail from the east side of the Monument into the interior. Perhaps a spur trail off of 1435. GIS Point Comment, Object ID: 36 Recreation A trail leading to an overlook of the canyon and river would give visitors a shorter route to experience the Monument.

Comment period for 'Planning Criteria Report'

Letter #: 67

Name: Bill Dyer

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/15/2019 0:00

Comments:

GIS Point Comment, Object ID: 37 Travel Management Due to increased traffic, CR 301 from Hwy 285 to CR 300 and CR 300 to Ruby Mt needs to be paved.

Name: Andrea Wilson

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/15/2019 0:00

Comments:

GIS Point Comment, Object ID: 38 Travel Management Adding non-motorized trails (including mechanized use) to this area would continue to enhance the recreation economies of Salida and Buena Vista by allowing a connection away from motor vehicles.

Name: Christopher Boyer

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/15/2019 0:00

Comments:

GIS Point Comment, Object ID: 39 Lands with Wilderness Characteristics Motorized vehicles should remain limited; there are other areas nearby for that. But would like to see trail access from the east (e.g., Austin Trail) and at least some opportunity for mountain biking

Comment period for 'Planning Criteria Report'

Letter #: 70

Name: Gary Gruenisen

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/15/2019 0:00

Comments:

GIS Point Comment, Object ID: 40 Recreation There are no safe road bike lanes, trails, shoulders,

Name: TR Evans

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 0:00

Comments:

GIS Point Comment, Object ID: 41 Recreation Support recreation access to the Railroad Gulch area from Hecla Junction, via a footbridge. GIS Point Comment, Object ID: 42 Recreation A non-motorized route should be designated down the historic Austin Trail from the proposed parking area to RR Gulch and the Reef.

Name: Don E. Riggle

Organization Name: Trails Preservation Alliance

Secondary Author: Scott Jones, Esq.

Secondary Organization: COHVCO

Date Submitted: 6/5/2019 8:00

Comments:

Browns Canyon RMP/EIS, 5575 Cleora Road Salida, CO 81201 June 4, 2019 SUBJECT: Public Scoping for a Resource Management Plan and Associated Environmental Impact Statement for the Browns Canyon National Monument, Colorado To the BLM/PSICC Browns Canyon Team: Please accept these comments relative to the scoping phase of the Resource Management Plan and Associated Environmental Impact Statement for the Browns Canyon National Monument, Colorado on behalf of the Trails Preservation Alliance and the Colorado Off Highway Vehicle Coalition. These comments are provided per the Notice of Intent published by the Bureau of Land Management (BLM) on 14 May 2019. The Browns Canyon National Monument, including the Browns Canyon Wilderness Study Area (WSA), covers approximately 22,000 acres of federally- and state-managed public lands located in Chaffee County, Colorado (includes 11,836 acres of the San Isabel National Forest and 9,750 acres of Bureau of Land Management land). Prior to providing our comments we believe a brief summary of each Organization will be helpful. The Colorado Off -Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization for over 170,000 registered OHV users in Colorado seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations, The Trail Preservation Alliance ("TPA") is a volunteer-based organization whose purpose is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of multiple-use trail riding. The TPA acts as an advocate of the sport and takes the necessary action to ensure that the USFS and BLM allocate for trail riding a fair and equitable percentage of access to public lands. For purposes of this document COHVCO and TPA are identified as "the Organizations". The Organizations are very familiar with the recreational opportunities and scenic qualities that are provided by Browns Canyon and do not question the unique merits and assets of the area and a need for some level of preservation and potential protection. While we do not question these values, it has also been our experience in the almost decade of discussions around the Browns Canyon Area Too often the desire of a small group to designate the area as Wilderness leading up to the Monument proclamation resulted in unnecessary conflict, viable options for management of the area being overlooked and a general and unnecessary division of users of the area. Even the monument proclamation was opposed by many local users and residents since historical usage was not restored for residents but rather the area was protected for the benefit of a small group of non-residents. We are asking that planners embrace an open scope of recreational opportunities in the planning process in the hope that user's passion can be reunited for the area. The Organizations contend that the designation of the Browns Canyon area as a National Monument has now relegated this area to a de facto Wilderness area and is now unavailable and closed to any citizen needing or desiring to visit the area or use any sort of motorized means to access and enjoy Browns Canyon and the surrounding landscape. This is directly contrary to the strong multiple use history of the Browns Canyon area and the lands immediately adjoining the Monument once saw extensive railroad activity in very close proximity to the river and was the main access terminal for the many

mines in the Turret Mining Area (examples of historic sites include the Calumet Mine, Chloride Camp, Hematite, Camp Jeffery and Hecla Junction of the Denver & Rio Grande Railroad's former Calumet Branch line). The entire area has been historically interlaced with railroad grades and access roads that have now been lost to use by the public under the current protections as a National Monument despite the long and diverse usage of the area for a wide range of activities. The Organizations are requesting that the scoping phase for this project include review and analysis such that motorized access and multiple-use recreation be re-established in the Browns Canyon area especially from the eastern boundary as the proclamation allows a wide range of opportunities in the area. The Organization's request is based in fact that during the original proposal by Colorado's Senator Mark Udall to designate the area with the Browns Canyon National Monument and Wilderness Act, that the substantial public input and comment to maintain motorized and multiple-use access to the Browns Canyon area was knowingly ignored and simply put aside. And further, when Senator Udall's bill failed to pass, a unilateral decision was made by the Obama Administration to designate the area as a National Monument, which was made without adequate public outreach and coordination with relevant stakeholders to ensure all interest were accurately reflected in the proclamation. The Organizations also contend that the designation of the Browns Canyon area as a National Monument and the associated closure to motorized and multiple-use recreation failed to properly consider the multiple-use policy of section 102(a)(7) of the Federal Land Policy and Management Act (43 U.S.C. 1701(a)(7)), as well as the effects on the available uses of Federal lands beyond the monument's eastern boundaries (i.e., the Aspen Ridge area and other adjoining areas of the Pike and San Isabel National Forest). Specific, established recreation corridors should be purposely identified and re established for continuing use, including motorized recreation that was there for decades for access to many high quality motorized recreational opportunities. The Organizations have a lengthy history of cooperating and collaborating with groups and elected officials desiring to impart some level of protection to the Browns Canyon area. We have consistently supported the concerns and comments of a truly diverse range of stakeholders, including affected counties, property owners, businesses, permit holders, residents and elected officials. To this end, we were participants in numerous meetings with Senator Udall's staff during the development of the originally proposed Browns Canyon National Monument and Wilderness Act. The mission of the Organizations initial involvement was to ensure a fair and balanced spectrum of uses and sensible public access to the area and an attempt to strike some type of balance around both Browns Canyon area and the North Sand Hills outside Walden and the Hermosa Watershed area between Durango and Silverton in the hope of developing a legislative package that would move the Continental Divide Wilderness legislation and resolve ongoing problems with the multiple use management of the three multiple use management areas. With the subsequent failure of the Browns Canyon National Monument and Wilderness Act to pass, and the unilateral designation by President Obama, the efforts of our Organizations to preserve fair use and shared public access has been "shut out", resulting in an area that is now designated for the privileged use of a small and elite group of users. While there was a large contingent of local users that supported reopening the connection between FSR 184 and the river, and there was minimal opposition to returning such access, the unilateral National Monument designation by the Obama Administration essentially sabotaged a precious opportunity to resolve public-land disputes more collaboratively. We stand by our principle that collaboration of users and resources is always preferable to unilateral Executive action for the benefit of a vocal minority. We are also aware that many of the concepts and ideas identified in the Browns Canyon Proclamation have become important drivers of policy under the current administration. Access for hunting, fishing and other recreation are now heightened factors for planning, and our ask is consistent with the new guidance from the Dept of Interior. Additionally, the reopening of FSR 184 between the current dead end and the Arkansas River was specifically explored in parts of discussions around the development of the possible legislation that specifically became the basis for the proclamation. We have attached two

versions of maps that were collaboratively created with Sen Udall, user groups and other local interests as part of these discussions. It is significant to note that the FSR 184 connection was being restored as this was not a controversial discussion point. The Organizations would also offer that restrictive interpretations of the proclamation and designation of the Browns Canyon area offers benefits only to a very small and limited group of the population while now excluding the mainstream public. Since the monument designation was made in 2015, the users of this now restricted area are predominately river rafters on commercial (i.e., for profit) rafting trips, and select high-end commercially guided (i.e., for profit) fishing and seasonal hunting entourages. This type of restrictive interpretation simply must be avoided. The Organizations are asking planners to realign and repair the historic footprint of FSR 184 between FSR 184 and the Arkansas River to restore historical multiple use access to the area for a wide range of valued activities, such as camping and fishing and limited day use recreational opportunities, in order local residents to gain limited access to this portion of the River. This access would be highly valued as local visitors to the Monument are not going to hire guides to gain access to this area for day use recreation. The Organizations are aware that the historic footprint of FSR 184 remains in place and could be easily reopened with a small amount of effort and funding and the Organizations have to believe such a project would easily gain funding from CPW OHV grant programs and would remedy much of the division of local residents that resulted from the discussions around designating the area as Wilderness prior to the proclamation issuance. We have enclosed a copy of the maps that were prepared by the USFS as part of the discussions around possible designation of Browns Canyon as Wilderness. Local special interest_ groups and local publications have lauded and praised the designation of the Browns Canyon area as promoting the solace and preserving the area solely for "quite uses". However, this is mere supposition as the primary use of the area is now exploited by very prolific and abundant chains of commercial and private rafting groups - a user group that is often anything but serene and quite in their use of the river and area. This interpretation is not supported by planning related to the proclamation, when it was made, and with the changing interpretation of these goals and objectives, quiet use is simply out of the question at this point. If you have questions, please feel free to contact the undersigned at: info@coloradotpa.org or 719-338-4106. Sincerely, D.E. Riggle Director of Operations Trails Preservation Alliance Scott Jones, Esq. COHVCO

Name: Ron Rak
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 5/23/2019 8:00

Comments:

COMMENTS ON BROWNS CANYON MONUMENT ACCESS From a non-motorized, hiker/ equestrian viewpoint, the major area of concern is monument access. By land, currently there are only two access points: a north trail #6045 from the Ruby Mountain Recreation Area parking lot, and a south 4WD dirt road off CR 175 and FSR 184. Motorized access is possible for about 2 miles on FSR 184, and about 2 miles on the north side on CR 300. However, both roads require 4WD vehicles, ATVs, or dirt bikes. Parking at the end of 184 where it enters the monument and along 300 is not developed. The north access is undesirable for hikers and horsemen, since there are no developed trails off of either 300 or ATV Trail 1434 leading south into the monument. Also, the most scenic part of the monument is along Brown's Canyon and other interior canyons in the south end of the monument. However, the north access may be desirable for hunters, assuming that other users would be limited, providing more of a refuge for wildlife. Trail #6045 This trail is currently a foot trail, not satisfactory for equestrian access. The first 1 ½ miles is a moderate trail, with an elevation gain and loss of about 400 feet, before crossing Little Cottonwood Creek and entering the plain paralleling the river south. There, the trail becomes easy, but the hiking distances to two river access points and the scenic canyons in the south become lengthy. Distances from the TH to the river access at River Bench 6045A is 2 ½ miles, and to River Access 6045B is 5 miles one way. The round trip distance to hike the scenic Catkin Gulch loop is 11 ½ miles, impractical for most except advanced hikers. FSR 184 Motorized Access FSR 184 (N. Spring St.) is a narrow dirt road passing through the town of Turret. It is 2WD for about ½ mile, and becomes 4WD. There is not a developed, dedicated parking area at either the beginning or ½ mile point of 184 for vehicles. Parking in the town of Turret is severely restricted (undeveloped). FSR 184 is motorized accessible for about 5 miles by 4WD, ATV, or dirt bike. It is also amenable to equestrian access; however, parking of horse trailers in Turret is severely restricted. Stafford Gulch Access From the end of CR 175, at the historic Turret Post Office, an old prospecting road heads west up Cat Gulch and then Stafford Gulch, but provides only horse and foot access. Parking at this TH (undeveloped) is severely limited to three or four vehicles. The trail is sustainable, and has been in service for many years. This trail provides access to Stafford and Railroad Gulches, probably the two most scenic canyons in the monument. River / Camping Access There are currently only three beaching points for river access: 6045A River Bench and 6045B River Access Trails, and Railroad Gulch. Primitive camping sites exist (undeveloped) at these locations. This access for rafts or kayaks provides shorter hiking distances into the center and southern parts of the monument. Trails 6045A and Bare well developed from the river, but the Railroad Gulch trail is primitive heading up the gulch. Increasing Access Development of CR 300 would likely be the responsibility of the federal government, but may have limited return. Foot and horse trails would have to be developed off this access south into the monument to make it useful. Development of trails off of ATV Trails 1434A and 1434 has potential for accessing the center of the monument from the east, with the best option being a new connection with existing Trail 6046 Catkin Gulch Loop. Development from the end of CR 175 in Turret would appear to provide the greatest accessibility to the lower 2/3 of the monument. This would provide motorized access on FSR 184 and non-motorized access into Cat and Stafford Gulches. Improving road 184 with adequate parking at the monument entrance would provide much more hiker and horse access to

the center and southern end of the monument, as well as shorter river access to River Access Trail #6045B. Improving Roads 175 and 184 are likely the responsibility of Chaffee County and the town of Turret, but may be developed with funding from the federal - or Colorado state? - governments. Ron Rak. Hiker. May 2019 Nathrop, Colorado Reference Best Maps: Fourmile Travel Management Area; USGS Chaffee County Sheets 2 and 3.

Name: Withheld Withheld

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

Regarding the long term management plan for Browns Canyon Monument. As a property owner in Salida, and a long-time visitor to the region--I would love to see the development of additional biking/hiking trails within Browns Canyon area. Specifically a long-distance trail that connects Salida to Buena Vista through the monument. With an increase in visitors to the area, and increased use by locals--additional trails will disperse usage helping maintain the quality nature experience that people desire. In addition, a longer trail will attract people who want an all-day experience vs. a shorter experience. Many of these visitors will spend money in local businesses--either supporting hotels, restaurants, shops--or refueling before driving on to their next destination. Longer trails and more trails give people a reason to stay for a longer visit. Connecting the two communities is another benefit. Backcountry trails provide a unique nature and recreation experience--one not matched by sharing roads with motorized vehicles. Hikers and mountain bikers both long to spend time in nature, with the opportunity to appreciate the sights and sounds of nature, away from traffic and commercial operations. Hiking and biking in a natural environment is what so many of us desperately need, a break from the hustle & bustle of the working week. "Everybody needs beauty as well as bread, places to play in and pray in, where nature may heal and give strength to body and soul." ~ John Muir Thanks for taking these comments into your consideration and planning. And thank you for protecting this beautiful place for future generations to enjoy!

Name: Withheld Withheld

Organization Name: Chaffee County, CO

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 8:00

Comments:

Chaffee County BOCC Comments attached Chaffee County Comments on Browns Canyon National Monument Resource Management Plan (BCNM RMP) Preliminary Alternatives We find the three preliminary alternatives described in the Preliminary Criteria Report of March 2019 to be satisfactory in providing an acceptable spectrum of planning alternatives. In general, we support Alternative C ("Focuses on a wider variety of river and upland recreation opportunities in middle and front country settings to enhance the local economy and quality of life for residents and visitors. Similar to Alternative B, Alternative C includes protections for monument resources, objects, and values, though emphasizes recreation and access ROVs more than management under Alternative B.") in general, with the following comments and suggestions: NOTE: Our comments are confined to Chaffee County equities such as access, public roads, infrastructure, and public safety. County Road/Forest Service Road (CR/FSR) 184/Turret Area: * While often referred to as a ghost town, the historic town of Turret has full-time residents and property owners who spend their weekends there. Every effort must be made to eliminate the problems of parking and trespassing on the streets in Turret and on the private property. * The "road" leading to the Austin Trail and Stafford Gulch needs to be improved to accommodate private vehicles, including pickup trucks towing horse trailers. A loop parking facility needs to be built at the end of the improved thoroughfare, before the beginning of any non-motorized trail, to provide parking for these vehicles and trailers. This facility must include features to facilitate unloading and loading horses and other pack stock. As envisioned, the looping of the facility would provide a one-way flow so trucks and vehicles would go around the loop and not have to execute challenging Y-backing maneuvers to turn around. NOTE: a site for this facility was scouted by BLM, USFS, FOBC, and a now-serving county commissioner several years ago. * A parking area should be built north of Turret on CR/FSR 184 near the Monument boundary to channel traffic away from the townsite. Aspen Ridge Road, County Road/FSR 185: * We have concerns with all our public roads providing access to BCNM. Because the Monument will spawn increased traffic, Chaffee County requests provisions be made for financial, advisory, and direct assistance to help us maintain the public roads accessing BCNM, and for a positive statement of commitment to this support be included in the RMP. * Public accommodations and improvements should be made west of CR/FSR 185 in and adjacent to the Monument for motorized camping, nature viewing, leisure hiking, and parking for accessing the primitive interior of the monument. Camping areas should follow the emerging "designated dispersed" camping model with modest improvements to enhance their attractiveness as campsites and to help minimize human impact - installed manufactured fire rings, parking bumpers (fallen timber or utility poles are acceptable for rustic ambiance), and appropriate educational signage. * Members of the public have created several sites suitable for these improvements. We encourage the RMP to capitalize on these pre-selected sites and improve them for use by people with physical challenges who may otherwise be unable to use their national monument. The public has told us where some of these sites should be, so let's use them. * Appropriate signage needs to be installed informing the public about the active grazing allotments and educating them about grazing on public lands, directing the public to respect and stay away from livestock and livestock infrastructure (stock tanks, temporary or permanent corrals, loading chutes and ramps,

etc., and the "leave the gate as you found it" practice, etc. * Similar signage should alert visitors to the presence of the Elk Mountain guest ranch and that visitors may encounter group horseback rides throughout the Monument area - not just in the Monument but on the roads and range adjacent to the Monument. A small temporary parking area and an informational sign cluster at the intersection of CRs 185 and 187 may be useful in this respect. An appropriate location for an additional temporary parking area should be identified and an informational sign cluster should be installed on the southern approach to the Monument area via CR/FSR 185. * While we request the RMP provide for these improvements, we discourage BCNM signage on US 24/285 at or near the intersections with CR 307 directing motorists to Aspen Ridge Road. Members of the public have requested this, and we concur, citing the open range and grazing allotments, the ease of pulling off the road onto the fragile grasslands, and fragility of the primitive ecosystem. We believe the number of people who will discover the route via their own initiative is at the upper limit of what the area can tolerate. * A suitable location on the southern approach to the Monument area should be identified for an additional temporary parking area and a similar sign cluster installed at that location.

CR 194/Hecla Junction: * Similar to our concerns with all other public roads, Chaffee County requests provisions be made for financial, advisory, and direct assistance to help us maintain the public roads accessing BCNM, and for a positive statement of commitment to this support be included in the RMP. * We ask for clear delineation by signage of the boundary between County lands and federally- and state-managed lands on CR 194 - this should be done at all applicable points on all roads, but especially on CR 194.

County Road 300/Ruby Mountain area: * County Road 300 has the long-noted dangerously narrow segment approaching the Ruby Mountain campground, launch and recovery site, and trailhead. While not in Browns Canyon National Monument, this situation should be of primary concern in the BCNM RMP. There is no assurance Chaffee County's application for Federal Lands Access Program (FLAP) funding to address this problem (the application was coordinated with BLM, USFS, and AHRA) will be approved, so it is of utmost importance the CR 300 approach to BCNM be included as a major element of the RMP to bolster future requests, if needed. Similarly, Chaffee County is hopeful BLM, USFS, and AHRA will participate in funding the needed improvements as partners in the success of BCNM.

Wild and Scenic River Designation: * The Proclamation makes clear the river itself - i.e., the water conveyed in the channel - is not a part of the Monument. Current management practices are working reasonably well, therefore we see no beneficial reason to designate this reach of the Arkansas as a Wild and Scenic River.

Guest Services Comment: * Consideration should be given to acquiring the property on the east side of US 285 just south of CR 194/Hecla Junction Road for a visitor center. The existing structure would probably have to be totally replaced but it's a good site and the property has never been able to find a steady purpose or tenant.

Name: Bruce Cogan

Organization Name: Chaffee County Cattlemen

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

In general alternative C is the most common sense approach for each of these proposals. Everyone should have the right to use the land but we do not need to build a proverbial freeway to encourage overuse. The most common public comments seem to reflect "use it but don't abuse it." I had the opportunity to review the document submitted by Friends of Browns Canyon and I have some concerns with it. Aircraft use must be permitted in some circumstances. Air tankers can be a tremendous resource in fire control. Drones currently have many uses and these uses are expanding rapidly. Ranchers, forest managers, and wildlife managers can use these devices in ways that can actually create less disturbance than current land based methods. Probably the best example of the use of aircraft is the spraying of the elongated mustard in the Wellsville area. Without aircraft this very aggressive invasive species would be free to propagate as the crumbling cliffs in the area are impossible to access on foot. We should not tie the hands of managers with "feel good regulations". In addition any development of the Aspen Ridge Area which draws more people would be detrimental to the area. The access road to this area is largely clay and should not be used when very wet. Improvements to this road would be very expensive and would contribute to overuse of the area.

Name: Alan Robinson
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

The Sustainable Alternative for Browns Canyon National Monument submitted by the Friends of Browns Canyon contains the following general recommendation: XII. Minimum Route Network The agencies should consider supporting as many as two scenic overlooks in the Aspen Ridge area with parking allowed only within the 100-foot buffer zone along Aspen Ridge Road. The overlooks should be accessible by foot and be designed with accessibility for visitors in mind. As a participant in developing that Alternative I am submitting an individual comment that suggests a specific location and concept for a 1.3-mile RT overlook/interpretive trail consistent with that recommendation. I recognize a specific overlook trail may not be under consideration at the present but suggest this be given consideration at an appropriate future time. Those of us familiar with the Aspen Ridge road recognize there are a number of locations from which a limited or vignette view of the Monument is possible, but the wider, more dramatic panorama is only available if you depart from the road and make your way to the edge of the steep drop-off – the escarpment. This forms an obvious boundary between the high ground of the Monument and the lower elevation interior and the river, interrupted by a dozen or more rugged gulches and creek valleys. The suggested location is one where the distance to the escarpment from Aspen Ridge Road is relatively short (about 0.65 miles) and crosses moderate terrain where the descent/ascent is less than 100 feet. The principle objective of the trail is an overview of a wide section of the Monument with the backdrop of the Arkansas River Valley and Collegiate Peaks. Prominent features within the Monument can be identified and explained there. However, there are also multiple options to provide interpretive information along the route, which in final design would form a narrow loop. Final design must also provide for a safe approach to the edge of the escarpment. The steepness of the drop-off suggests there is essentially no temptation to use this overlook as an off-trail descent to the interior of the Monument. The trail itself is envisioned as a narrow natural surface tread open to non-mechanized use (individual and family hikers, potentially horse riders) requiring low to moderate fitness and would take approximately an hour for a round trip. At the start of the trail, but about 200 feet from the road (thus inside the Monument) there is an open and gently sloping area with a fine vignette view suited to construction of a short paved trail that would accommodate visitors in wheelchairs or with limited mobility. General BCNM interpretive information could be provided at this trailhead location plus specific information about the overlook/interpretive trail. Situated approximately half-way between US 285/24 and Salida it might be an appropriate location for restroom facilities and an accessible picnic table. To avoid user conflict, no camping would be allowed at the trailhead or along the interpretive trail. As suggested elsewhere in the Sustainable Alternative, overnight camping would be available in designated dispersed campsites elsewhere along Aspen Ridge. The attached file is a PowerPoint illustrating the concept of this overlook/interpretive trail. Submitted by Alan Robinson with assistance by Karen Robinson, of Buena Vista CO. robinsonalanah@gmail.com

Name: Dan Omasta

Organization Name: Colorado Trout Unlimited

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 8:00

Comments:

Thank you for this opportunity to comment on the BCNM RMP. Please see the attached PDF document, titled: "Browns Canyon National Monument Resource Management Plan CTU Comments Final" Browns Canyon National Monument Resource Management Plan Formal Public Scoping Period Comment Colorado Trout Unlimited Submitted: June 20, 2019 I. Introduction Colorado Trout Unlimited (CTU) is a statewide, non-profit organization that represents 24 independent local chapters and more than 12,000 members across the state. The mission of CTU is to protect, conserve, and restore cold-water fisheries in Colorado. The organization also focuses heavily on youth education, conservation of and access to public lands, water quality, habitat connectivity, and native trout recovery. We work closely with numerous non-profit partners, government agencies, and outdoor businesses to achieve our mission, develop the next generation of anglers, and support sustainable fisheries into the future. Colorado Trout Unlimited supports the important work being conducted by the Bureau of Land Management and the U.S. Forest Service to develop the Browns Canyon National Monument Resource Management Plan (BCNM RMP). This living document will be critical to protecting the variety of resources described in Proclamation 9232, as well as providing guidance to the management decisions that will arise from projected population growth, increased visitation, and changing administrative priorities. The creation of Browns Canyon National Monument was heavily guided by local stakeholders and we encourage the BLM and USFS representatives to strongly account for the perspectives of local and state organizations in the development of the RMP. Fishing and water-based recreation are significant economic drivers in the Arkansas Valley, and are supported by the quality and characteristics of Browns Canyon National Monument. Colorado Trout Unlimited represents over 2,000 anglers and businesses that live within 100 miles of the monument (anglers are known to travel farther distances to explore areas that provide wilderness and quality fishing opportunities) - including areas in the Arkansas River Valley, Pueblo, Colorado Springs, Gunnison, Alamosa, and Silverthorne, CO. Trout Unlimited has over 300 members in the upper Arkansas River Valley alone. While Proclamation 9232 dictates that the Monument and its RMP will not influence valid existing water rights, agreements governing the management and administration of the Arkansas River flows, or the State of Colorado's authority with respect to fish and wildlife management, Colorado Trout Unlimited does seek to offer comments related to water quality concerns, wilderness characteristics, wild and scenic designation, access, and visitation. Colorado TU has structured its comments on the BCNM RMP to follow the format of the Planning Criteria Report and its three preliminary alternatives. Colorado TU has also been an active participant in the recent Friends of Browns Canyon stakeholder process and is a signatory to the Friends of Browns Canyon "Sustainable Alternative". II. General Management Principles Colorado Trout Unlimited supports the following general principles as a guide in developing the BCNM RMP. * Regulations and RMP actions should strive to maintain the highest level of protection for biological diversity and cultural artifacts within the BCNM; * The BLM should continue to build and prioritize partnerships with other management agencies (AHRA, CPW, USFS, USFWS), state organizations, and local groups to effectively manage the resources within BCNM; * Recreation and tourism are significant economic drivers in the Arkansas Valley and the BLM should continue to balance increased visitation and access with resource protection,

safety, and overall user experience; * The BLM should develop action plans that protect and restore riparian ecosystems and aquatic wildlife within BCNM.

III. Preliminary Alternatives Review

2.3.1 Special Designations “Goal/Desired Condition SD1: Sustain and protect outstandingly remarkable values of the BCNM to maintain the long-term sustainability of the area’s special characteristics and values for which the area was originally designated or considered for designation.” OBJ SD1.1: Browns Canyon WSA Colorado Trout Unlimited supports Alternatives B and C - “Should the Browns Canyon WSA, in whole or in part, be released from wilderness consideration, manage such released lands consistent with the goals, objectives, and management actions established in this RMP-EIS, unless otherwise specified by Congress in its releasing legislation.” BCNM was designated for its remote and wilderness values. Changing the management practices based on routinely changing priorities from one Congress to the next may damage the long-term resources that were originally designated to be protected. By continuing to manage the area under the RMP-EIS and not shift WSAs to multiple-use management, the governing agencies can maintain the quality of public lands and ROVs until specific legislation requires alternative practices. OBJ SD1.4: Wild and Scenic Rivers (WSRs) Colorado Trout Unlimited supports Alternative B - “Determine the following eligible segments as suitable for designation, and apply interim protective management: *Arkansas River Segment 2 within the BCNM (7.1 miles) - recreational classification - recreation, scenery, wildlife, botany, fish, and cultural outstandingly remarkable values. WSR eligibility and suitability determinations studies are underway. Eligible streams may be added to the list of streams that will receive interim protective management. In the absence of protections as defined in Proclamation 9232 and elsewhere in this plan, management would be the same as suitable segments in the Eastern Colorado RMP due to the contiguous nature of the segment upstream and downstream of the monument.” Colorado Trout Unlimited recognizes the importance of protecting the wild and scenic values of the entire Arkansas River reach from Leadville to Pueblo Reservoir but does not support the revocation of existing waterpower/reservoir withdrawals to do so. It is the position of CTU that the river is currently being appropriately managed through the Arkansas River Voluntary Flow Management Program, the Upper Arkansas Headwaters Recreation Area, Colorado Parks and Wildlife, U.S. Forest Service, and the Bureau of Land Management to protect the “wild and scenic” values connected to the defined reach. There is no need for federal action to manage the river in a considerably different way. We believe that Alternative A would significantly strain local relationships and impede the ability of stakeholders to work together in a flexible and adaptive system to protect the wild and scenic qualities of the Arkansas River.

2.3.5 Vegetation, Wildland Fire Ecology, and Fuels OBJ VF1.4 & VF3.1: Weed Management Colorado Trout Unlimited supports the BLM and USFS commitment to preventing and eliminating the presence of invasive and noxious weeds according to BMPs and integrated pest management. However, we express significant concern over the impacts of broadcast application from aerial spraying and the potential impacts to aquatic insects and riparian vegetation. These unintended consequences can present measurable impacts on various macroinvertebrate populations, as well as the periphyton and other riparian flora that provide forage or cover for such insects, which may affect food availability for fish and other wildlife. Therefore, we urge the BLM to avoid any aerial spraying or general broadcast of pesticides within BCNM - especially around significant drainages, wetlands, and the Arkansas River corridor.

2.3.7 Watersheds, Soils, and Water Resources Goal/Desired Condition WS1: Maintain and improve soil resiliency, ecological integrity, and productivity on monument upland and riparian habitats. Manage for functioning stable soils within the natural range of erosion variability, slope stability, and largely undisturbed conditions. OBJ WS1.1 & WS1.2: Water Rights Colorado Trout Unlimited would support the BCNM in the acquisition of water rights for the purpose of preserving recreational values, livestock watering (i.e., the establishment of water tanks to pull the cattle out of sensitive riparian and wetland habitat) and wildlife habitat so long as it complies with State laws, does not injure existing rights, and works closely with the established Arkansas River Voluntary Flow Management Program, AHRA, and CPW

to manage that water most effectively. OBJ WS1.1 & WS1.2: Plant Community Reestablishment Colorado Trout Unlimited encourages the BLM and USFS to actively manage BCNM in a way that both preserves and restores "Proper Functioning Condition" of riparian habitat and soils. We support the language of Alternatives B and C to "improve non-functioning (NF) or functioning at-risk (FAR) riparian and soil conditions, apply USFS's National Best Management Practices for Water Quality Management on National Forest System Lands (Technical Guide FS-990a; USFS 2012) on the entire BCNM." OBJ WS1.1 & WS1.2: Infrastructure Colorado Trout Unlimited does NOT support "new in-channel infrastructure to address sediment control and protect monument resources and values." BCNM was created based on the wild and scenic characteristics of the river corridor and surrounding area. That corridor relies heavily on the transport of sediment and larger rocks to promote a dynamic and changing aquatic system. Overly-managed river systems that strive to control flows and sediment can significantly impact environmental and riparian conditions that cascade into declines in fish populations and overall health. Since the monument was created to preserve the current wild nature of the river corridor and the various scenic and recreational values that have resulted from natural sediment transport (though we recognize that some sediment is controlled by impoundments on upper tributaries of the Arkansas River already), we urge the BLM to avoid the use of any in-channel infrastructure to alter the natural processes of the river. The fact that the reach is already described as a healthy, functioning stream and rated as a Gold Medal fishery suggests that there is little need to consider interventions to sediment transport within BCNM. OBJ WS1.1 & WS1.2: Partnerships Colorado Trout Unlimited supports the BLM's proposed actions to "establish new, or join existing, partnerships with local governments, the Colorado Water Conservation Board, Colorado Division of Water Resources, and other stakeholders to maintain stream flows sufficient to preserve ecological and stream functions and recreational opportunities." We also urge the BLM and the USFS to regularly interact with the members of the cooperative Arkansas River Voluntary Flow Management Program, AHRA, and Colorado Parks and Wildlife to identify flow needs and timing for recreation and wildlife. The BLM may also consider partnering with the Colorado Department of Public Health and Environment to ensure that issues of E.coli or mine drainage are not at certain thresholds within the monument. OBJ WS1.1: Surface-disturbing Activities Colorado Trout Unlimited supports the BLM's commitment to limiting the amount of surface disturbance within riparian areas, floodplains, intermittent and perennial streams, and wetlands within BCNM - as well as the channel of the Arkansas River itself. We support the intent of Alternative B, but also understand that there are some vegetation and recreational projects (i.e., repairing an eroding fishing trail along the river/stream) that require disturbance. During these necessary disturbances, we urge the BLM and its partners (i.e., AHRA) to keep surface impact to a minimum, follow BMPs, and ensure quality mitigation and restoration of the impacted area. Such projects should require enough funding and resources for remediation and restoration after the disturbance is complete. Additionally, in-channel disturbances such as sluice box and dredge mining should be avoided within BCNM because of their significant impact to macroinvertebrate habitat and safety of recreationists and wading anglers. Proclamation 9232 specifically bans additional mining activity in the Monument and we urge the BLM to protect the river resource and public safety within BCNM by banning in-channel mining operations. We understand that there is significant sluice box and dredge mining taking place above and below the Monument, so interested parties can participate in those locations outside of BCNM. OBJ WS1.1 & WS1.2: Waste Disposal Colorado Trout Unlimited supports Alternative B and the BLM's approach to develop (and maintain) an education program to encourage proper human and pet waste disposal along the Arkansas River. While the concept of installing "primitive restroom facilities" in the event of water quality violations seems like it could solve the problem of improper human waste disposal (Alternative C), it will only affect a very small area of the river since there are already large facilities at the two primary river access sites (Ruby Mountain and Hecla Junction). The installation and maintenance of such facilities along the river corridor would take significant staff and financial resources over time - even

the “primitive” pit toilet systems take monitoring, testing, repairs, and cleaning - as well as pumping if the sites are improperly used. Therefore, since the nature of BCNM is remote wilderness, CTU’s position is that proper education and enforcement would be more effective tactics to deal with human waste issues and comply with the overarching wilderness setting of BCNM. 2.3.8 Wildlife and Fish OBJ WF1.1, WF1.2, WF1.4: Habitat Quality, Stream Habitat and Aquatic Colorado TU fully supports the BLM and USFS management objectives to “maintain and/or improve habitat quantity and quality... sufficient to sustain wildlife populations in coordination with CPW” and to “Maintain and/or improve aquatic stream habitat to support productive and diverse fisheries and other aquatic populations.” The biological integrity and diversity of the terrestrial and aquatic habitats are key values identified within Proclamation 9232 and should be conserved and enhanced as much as possible within the scope of the BCNM RMP. OBJ WF1.5: Public Education Colorado Trout Unlimited strongly supports “increase(d) public education and appreciation of fish and wildlife species through interpretation” within the BCNM RMP. We suggest that in order to protect the long-term health and designation of the Gold Medal fishery, the BLM promotes best practices for fish handling, catch and release, barbless hooks (or pinched barbs), and artificial flies and lures only. This type of information can be displayed on kiosks located at fishing trailheads (primarily located at Ruby Mountain, Fisherman’s Bridge, and Hecla Junction), as well as on BCNM printed materials and website. The BLM should also partner with CPW and AHRA to support collaborative messaging at the front- country sites for visitors and in interactions with agency staff. It is also recommended that the BLM partner with AHRA and CPW to initiate a Creel Census to determine fishing pressure within BCNM, angling method, catch rates, angler satisfaction, etc. CPW could then use this information to formulate specific angling regulations within BCNM as necessary. 2.3.9 Recreation OBJ REC1.2: Opportunities-Settings Colorado TU supports the BLM’s commitment to managing for sustainable recreation and visitor access to BCNM, specifically the eligible WSR for river and on shore fishing/angling opportunities, as well as the scenic and wilderness values. That being said, it will be critical that the BLM works closely with AHRA and CPW to monitor the impacts of increased visitation (OBJ REC1.4) on the quality of fishing, riparian condition, remoteness, and overall experience. OBJ REC 1006: Waste Colorado Trout Unlimited supports the action to require human and pet waste removal from along the Arkansas River shore and within the Arkansas River RMZ (Alternative C). Since, there are already public waste facilities at Ruby Mountain and Hecla Junction, it does not seem reasonable to require visitors to remove human waste to an offsite location from those sites (Alternative B). The BLM should continue to work with AHRA, CPW and other partners to make sure that boaters and visitors are informed of the waste management requirements and have the proper equipment while on the river. OBJ REC 1020: Hunting and Fishing Colorado TU endorses the action plan to allow fishing and hunting to continue in BCNM, as well as supports the BLM in its decision to coordinate commercial permits for fishing with CPW and issue such permits in a manner that will reduce conflicts among users. IV. Conclusion In closing, Colorado Trout Unlimited recognizes the significant workload that BLM and USFS staff face under the revised timelines of the BCNM RMP process. As an organization that represents more than 12,000 anglers in Colorado, as well as thousands of anglers and TU members from out of state, we strongly urge RMP staff to shape their decisions to protect and restore the biological, cultural, and recreational values of Browns Canyon National Monument. With projections for increased visitation and backcountry pressure over time, the Monument will be forced to make difficult, and sometimes unpopular, decisions to protect the ROVs that built the foundation for Proclamation 9232. However, we urge the BLM to maintain a strong focus on conservation and protection in this first RMP in order to ensure that resources are not lost or injured before they can be fully inventoried and prioritized. V. Contact Information Submitted on behalf of Colorado Trout Unlimited by: Dan Omasta Grassroots Coordinator Colorado Trout Unlimited 1536 Wynkoop Street Suite 320, Denver, CO 80202 Email: domasta@tu.org

Name: Alan Robinson
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

The Sustainable Alternative submitted by the Friends of Browns Canyon has the following recommendation: X. Maintaining and Managing for Recreation B. Dispersed Camping The agencies should designate dispersed camping sites, as appropriate, with clearly numbered posts at all designated camping locations, including Ruby Mountain, Hecla Junction and along Aspen Ridge. Designated camping areas should be enforced with adequate agency resources. As a participant in developing the Sustainable Alternative I am submitting an individual comment that goes beyond that general recommendation to provide detail on existing dispersed campsites and spur roads along Aspen Ridge. I also make suggestions on future management and formal designation of these sites and spur roads; these are my personal views and not necessarily shared by all participants in or supporters of the Sustainable Alternative. The attached file is a map illustrating location of the nine known existing dispersed campsites in this area. (GPS coordinates can be made available on request.) The northernmost is on FR185D and the remaining eight are along FR185, which forms the eastern boundary of the BCNM, with a 100ft buffer to the west of the road. Sites 1, 3 and 4 are associated with non-system spur roads (not identified on the PSINF NMVUM) approximately 500 yards in length; the remaining sites, except site 8, are associated with shorter non-system spurs from 50 to 200 yards; site 8 is very close to being at the 100ft buffer edge. All are essentially within the Monument. Most of those spur routes, including the longest ones, and their camping sites, have been in place for at least 15 years, as documented in the inventory associated with the 2003 Fourmile Travel Management Plan/EA. In other words, all of these sites were in existence at the time of the Monument's Proclamation. I recognize these spurs lie within a USFS Roadless Area, and further that they were not recognized as legitimate in the Fourmile Travel Management Plan, which covers this area now included in the Monument. I grant there is there is a reasonable argument they should have been closed years ago. I take the alternative view that in reality they have existed and have been used, probably for decades, and are popular sites whose impacts currently are not extreme and are in the future manageable. With this record of historical use, I believe the case can be made that the Proclamation's intent to continue certain existing uses can be applied in this instance. Therefore, (with exceptions noted below) I suggest they should be proposed as system routes and designated dispersed campsites in the future BCNM Management Plan, subject to any required NEPA process beyond the current EIS. Note that in my view these nine sites are all that are necessary and their status – and enforcement – as "designated" dispersed sites means that no ad hoc/user-created additional sites or spur roads should be tolerated, nor should a designated individual site be allowed to expand without limits. (See also the Alternative's other recommendation on installation of agency-constructed fire rings at all designated dispersed sites.) Since 185/ Aspen Ridge Road serves as the boundary there is an issue of campsite management to the east of the road, outside the Monument and under the singular management responsibility of the Forest Service. In my view the Forest Service should also establish designated dispersed camping along the east side of 185 as a pro-active response to pressures that may develop due to designated dispersed camping along the west side within the Monument. The exception to designating these nine sites and spurs would be for sites 6 and 7. These are at the location identified in my separately submitted comment suggesting development of an overlook/interpretive trail out to the

escarpment. Mixing camping with that trail's use and a potential wheelchair-accessible short trail and restroom facilities would not be compatible. Thank you for the opportunity to provide more specific recommendations beyond what might be provided in your own preliminary Alternatives, the Sustainable Alternative or other citizen submissions. Please refer to the attached map file.

Comment period for 'Planning Criteria Report'

Letter #: 80

Name: Joe Stone

Organization Name: Friends of Browns Canyon

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 8:00

Comments:

SEE ATTACHED

Sustainable Alternative Proposed for the Management of Browns Canyon National Monument



submitted to
U.S. Bureau of Land Management and U.S. Forest Service
for inclusion in the
Browns Canyon National Monument Resource Management Plan

prepared by
Friends of Browns Canyon
and a coalition of stakeholders

June 20, 2019

Executive Summary

Browns Canyon National Monument (BCNM) protects 9,792 acres of land managed by the U.S. Bureau of Land Management (BLM) and 11,811 acres of land managed by the U.S. Forest Service (USFS) in Central Colorado. The agencies are currently undergoing formal planning for the monument to determine the future management of the area.

The Sustainable Alternative was developed by a group of over 20 local Chaffee-county-based citizens representing numerous organizations along with decades of land use and close observation of the area now designated as BCNM. Development of this alternative sought and received technical advice from local, regional and national organizations interested in the area and specializing in public land management. The Sustainable Alternative has broad community support from over 80 local businesses, residents, land owners, and various regional and national organizations.

The overall objective of the Sustainable Alternative is to prioritize the intent and stipulations of Proclamation 9232 (Proclamation), which established BCNM. The Sustainable Alternative draws on existing legislation and agency directives and proposes realistic and sustainable management prescriptions for the BLM and USFS to implement. The Sustainable Alternative affirms the Proclamation's guarantee of continuation of existing uses and rights, including grazing permits and water rights. It generally avoids recommendations concerning the Arkansas River corridor, whose management is acknowledged to remain the responsibility of the State of Colorado and the Arkansas Headwaters Recreation Area (AHRA).

The Sustainable Alternative seeks to address a vast variety of the management issues pertaining to BCNM. Some of the recommendations within are in direct response to the draft alternatives in the agencies' Planning Criteria Report, published in April 2019. Other suggestions are outside of the scope of the Planning Criteria Report. A few suggestions pertain to lands just outside BCNM boundaries. We acknowledge that these suggestions are outside of the current planning effort, but believe it is vital for the agencies to consider them throughout planning within the monument as they both directly and indirectly affect monument access and visitation as well as the resources, objects and values the monument was established to protect.

Our approach in developing the Sustainable Alternative was to review existing land-use designations and recommend how these existing designations could form the basis of a zoning approach for land use within BCNM. This was necessary to ensure the monument is managed appropriately to protect the resources, objects and values that it was designated to protect. We considered known locations of monument objects as well as known areas of recreation and interest. Through this approach, we delineated the following:

- Areas more appropriate for high visitor use (Front Country Zone).
- Areas for reaching areas of high visitor use (Passage Zone).

- Areas more targeted to backcountry use (Backcountry Zone).
- Areas managed for primitive, wilderness characteristics (Primitive Zone).

Examples of general recommendations within the Sustainable Alternative include:

- Emphasis on adequate and timely inventory of monument resources.
- Assurance that the agencies will provide the necessary financial and staffing resources to maintain and enforce proposed actions and infrastructure, along with a caution not to propose more than can be addressed with anticipated resources.
- Support of the agencies' intent to work closely with American Indian tribes to identify areas of tribal cultural significance and to develop strategies to avoid impacts to these resources from recreational use or vandalism.
- Potential closure of some existing non-system spurs off Aspen Ridge Road and potential establishment of designated dispersed camping at others, with parking outside of the monument boundary.
- Potential location for an interpretive/overlook trail off Aspen Ridge Road with accessibility for visitors with limited mobility.
- Resolution of conflict in the Turret area due to private road and property owner issues.
- Providing visitor access from Turret to the Railroad Gulch/Stafford Gulch area.
- Informational kiosks near BCNM entry points along designated routes.

This document is intended to serve as a blueprint for management recommendations and strategies. Our goal in submitting this BCNM Sustainable Alternative is to ensure the monument planning process protects the area's resources, objects, and values for future generations and to give voice to local constituencies and cities. We formally request that the BLM and USFS analyze the impacts of the Sustainable Alternative during the National Environmental Policy Act process in developing a monument resource management plan and adopt this Sustainable Alternative as the core of any future management plan for BCNM.

Browns Canyon National Monument Sustainable Alternative Supporters

146 Taphouse
350 Central Colorado
350 Colorado
A Church
Absolute Bikes
Adobe Park Productions
American Whitewater
Arkansas River Outfitters
Association, representing
29 outfitters
Arkansas Valley Digital
Imaging
Backcountry Hunters and
Anglers
Badfish SUP
Bald Mountain Electrical
Benson's Tavern
Blue Collar Projects
Boathouse Cantina
Braveheart Properties
Café Dawn
Central Colorado
Conservancy
Circle R Hotel
City of Salida
CO Creative LLC
Collegiate Peaks Chapter
of Trout Unlimited
Colorado Committee of 3
Million
Colorado Headwaters
Colorado Mountain Club
Colorado Trout Unlimited
Conservation Colorado
Conservation Lands
Foundation
Defenders of Wildlife
Dolores River Boating
Advocates
Ecoflight
Elements Composting
Elevation Beer Co.

Evergreen Café
Eye Candy
Fat Tees
First Street Flooring
Friends of Browns Canyon
Friends of Fourmile, a
chapter of the Greater
Arkansas River Nature
Association (GARNA)
Fritz Restaurant
Geosphere International
Great Western Storage
Grit and Thistle Film Co.
High Country Conservation
Advocates
Hittle Landscape Architects
Huddle 4 the Environment
Hunnicut Properties
Hunt to Eat
Itty Bitty Lakes Gallery
jalaBlu Yoga
Kaleidoscope Toys
Katie Maher Fine Art
Lifestream Water Systems
Little Cambodia
McCoy & McCoy, Inc.
Moonlight Pizza
Natural Habitats Design
Oak Construction
On Time Builders
Palace Hotel
Phreckles Photography
Pinon Vacation Rentals
Poncha Mini Storage
Pure Greens
Riverboat Works
Rocky Mountain Live
Rocky Mountain Wild
Rok Skool
Roxy's Bottle Shop

Salida Business Alliance,
representing 57 local
businesses
Salida Dental Hygiene
Salida Dermatology
Salida Fly
Salida River Adventures
Salida Mountain Sports
Salida School of Stringed
Instruments
Salida Walking Tours
Sierra Club Colorado
Chapter
Simple Foods
Soulcraft Brewing
State Farm
Stone Media
SubCulture Cyclery
Sunshine Apothecary
Susan Mayfield Art
Sutty's Records and Art
Tanda CAD Drafting
Taylor, Julie, Turret resident
The Firefly Restaurant
The Hodgepodge
The Iron Shop
The Lettucehead Company
The Link School
The Mixing Bowl
The Trailhead
The Wilderness Society
Tim Brown Photography
Vely Agency
Veterans Expeditions
Wenham Design
Western Resource
Advocates
Western Slope Conservation
Center
Wild Connections
Wilderness Workshop
Wood's Distillery

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Acronyms and Abbreviations

ACEC	Area of Critical Environmental Concern
AHRA	Arkansas Headwaters Recreation Area
BCNM	Browns Canyon National Monument
BLM	U.S. Bureau of Land Management
FLPMA	Federal Land Policy and Management Act
LRMP	Land and Resource Management Plan
NCA	National Conservation Area
NEPA	National Environmental Policy Act
NFMA	National Forest Management Act
NLCS	National Landscape Conservation System
OSV	Over-snow vehicle
Proclamation	Presidential Proclamation 9232, establishing Browns Canyon National Monument
RMP	Resource Management Plan
ROW	Right-of-way
SRP	Special recreation permit
UAV	Unmanned aerial vehicle
USFS	U.S. Forest Service
VFMP	Voluntary Flow Management Program
VRM	Visual Resource Management
WSA	Wilderness Study Area

I. Introduction

The purpose of this document is to describe the resources, objects and values that require protection under the Feb. 19, 2015, Presidential Proclamation 9232 (referred to throughout this document as “the Proclamation”) establishing Browns Canyon National Monument (BCNM). This document provides recommendations for the responsible management and protection of monument resources in the development of the BCNM Resource Management Plan (RMP).

II. Background on Sustainable Alternative

A. Purpose for Sustainable Alternative

The Sustainable Alternative was developed with collective input from various stakeholders, including local residents and landowners, business owners, local ranchers and agricultural operators, local and national public interest groups, and public land experts, who represent diverse perspectives in the management and protection of BCNM. This proposal was developed through a consensus-based process that (1) identified key resources, land uses and values within BCNM and (2) formulated recommendations for the consideration of U.S. Bureau of Land Management (BLM) and U.S. Forest Service (USFS) staff in the continuing process of developing a BCNM RMP.

This document is representative of the views of a large cross-section of the community in and near Salida and Buena Vista, Colo. Overall, it represents the goals of the broader community in advocating for the protection of the area as a national monument and the implementation of the Proclamation.

B. General Parameters to Sustainable Alternative

This alternative is consistent with the limitations expressed in the Proclamation with regard to valid existing rights and other specified rights or authorizations. This alternative does not support altering valid existing water rights, agreements governing the management and administration of Arkansas River flows, existing grazing permits or leases, the rights of any American Indian tribe, the State of Colorado’s authority with respect to fish and wildlife management, or valid existing easements, including the railroad corridor.

Generally speaking, the Sustainable Alternative does not cover issues related to the Arkansas River, including Arkansas Headwaters Recreation Area management of recreation along the river corridor.

The Sustainable Alternative does not capture all areas of interest of the undersigned parties. Each signatory may also submit individual comments – through the BCNM planning process and other related planning processes – that must be considered by the federal agencies.

III. Basis for BCNM Management

The Federal Land Policy and Management Act (FLPMA) requires the BLM to manage public lands under multiple-use principles unless an area has been designated by law for specific uses, in which case the BLM must manage the land for those specific uses [43 U.S.C. § 1732(a)]. In the context of BCNM management, this means that Proclamation 9232, which established BCNM, shall take precedence over provisions of FLPMA's multiple-use mandate.

Pursuant to the legal authority granted by Congress in the Antiquities Act of 1906 (16 U.S.C. §§ 431-433), President Obama designated BCNM for the explicit purpose of protecting and preserving identified historic and scientific objects. Accordingly, the standard approach to multiple-use management does not apply to this monument, and any effort to adopt such a management approach to the detriment of its natural and cultural objects and values would be in violation of the Proclamation and the mandates of FLPMA. The BLM must manage the monument for the protection and preservation of its natural, cultural, historic and scientific values. Other than activities needed for protection of monument objects, the BLM must not allow uses in BCNM that conflict with the directives of the Proclamation.

Because of its significance, which merited designation as a national monument and inclusion in the National Landscape Conservation System (National Conservation Lands), the monument requires different management from other BLM lands. The designation of national monuments, together with the establishment of the National Conservation Lands, represents the cornerstone of a new era in land stewardship, in which BLM focuses on a mission of stewardship to: “conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations” [16 U.S.C. § 7202 (2009)].

As stated in the Proclamation, BCNM will be co-managed by the USFS and BLM. According to the agencies, with respect to USFS lands, the BCNM planning process intends to result in an amendment to the current Pike and San Isabel National Forests and Cimarron and Comanche National Grasslands Land and Resource Management Plan (LRMP), which was completed in 1984. (See Browns Canyon Planning Assessment, Feb. 2018, p. 7). Because the existing LRMP is one of the oldest in the country, completed 35 years ago, this approach in the BCNM planning process would undoubtedly require significant changes to the existing 1984 LRMP.

As an alternative approach and as previously stated in Friends of Browns Canyon and The Wilderness Society's comments on the Planning Assessment, submitted in September 2018, it is much more efficient and straightforward to develop the monument management plan under the USFS 2012 planning regulation rather than trying to stitch 2012 rule amendments into a 1982 rule plan. We strongly believe that approach would lead to confusion and potential disagreements over guiding direction. As previously highlighted in the September 2018

comments, we suggest the BCNM planning effort should be a complete and thorough process under the National Environmental Policy Act (NEPA), simultaneously abiding by all current BLM and USFS planning requirements.

The most important aspect of this planning effort is ensuring that the objects that this area was designated to protect are conserved, protected and restored over the life of the plan. While discretionary uses may be allowed to continue if compatible with that charge, the agencies must limit or prohibit such uses if they conflict with the values that the area was designated to protect.

In preparing a management plan for BCNM, the agencies must ensure they have a current inventory of resources, consider the uses of these lands as stated in the Proclamation and consider public input. The FLPMA and National Forest Management Act (NFMA) encourage and provide the agencies authority to consider and implement recommendations suggested in the BCNM Sustainable Alternative.

Providing meaningful opportunities for public involvement in the planning process not only increases the efficiency of the planning process, but is also a necessary step for the managing agencies to fulfill their statutory obligations under NEPA (42 U.S.C. § 4321 et seq). This community-based Sustainable Alternative fits squarely within the mandated public process. It is reasonable, reflects the requirement and intent of the Proclamation, is based in science, is distinct from the agencies' recommendations in the Planning Criteria Report, and is feasible for BLM and USFS personnel to implement. We respectfully suggest the agencies include this alternative for detailed analysis in the BCNM RMP.

IV. General Management Considerations

The Proclamation established BCNM to preserve “prehistoric, historic, and scientific values” by protecting “objects of historic or scientific interest.” These objects are summarized in Appendix B. The monument was designated to protect these objects and values and provide for their proper care and management.

The entire monument, with particular emphasis on the roadless and wilderness quality lands, must continue to be protected for its rural and remote character. The management prescriptions proposed throughout the Sustainable Alternative seek to maintain and protect this character. These Sustainable Alternative recommendations are based upon the best available data, including that provided in previous BCNM public documents, firsthand knowledge (contributed by numerous local stakeholders participating in its preparation) and historical documentation. These recommendations, including some that pertain to public lands adjacent to the monument boundary, represent the most practical and effective actions available to preserve the monument’s “prehistoric and historic legacy and maintain its diverse array of scientific resources,” as required by the Proclamation.

All undesignated non-system travel routes within the monument should be inventoried by the agencies. Following the inventory process, the agencies should effectively close (using signage and physical barriers as needed) and decommission or restore (actively or naturally) the identified non-system routes as necessary. In limited instances, the agencies should consider designating non-system routes as (1) system routes (proposed for a portion of the Austin Trail and for spurs with potential to be designated as scenic overlooks in the Aspen Ridge area) or (2) dispersed campsites (proposed along Aspen Ridge, with parking located in the 100-foot buffer between Aspen Ridge Road and the monument boundary). We have identified several routes through this process that should be closed as well as specific instances where the agency should conduct additional research for future management. (See Map A6.)

In general, the BLM and USFS, in collaboration with cooperating agencies, should provide enough professional staff and law enforcement officers to ensure compliance with BCNM regulations and pertinent laws. The monument should be managed to accommodate current and future uses. Most importantly, the agencies should be careful not to invite more activity than can be sustainably managed, such as by providing maintenance-intensive infrastructure, developments requiring frequent staff patrolling, and by undertaking high-visibility programs to promote visitation to the Monument.

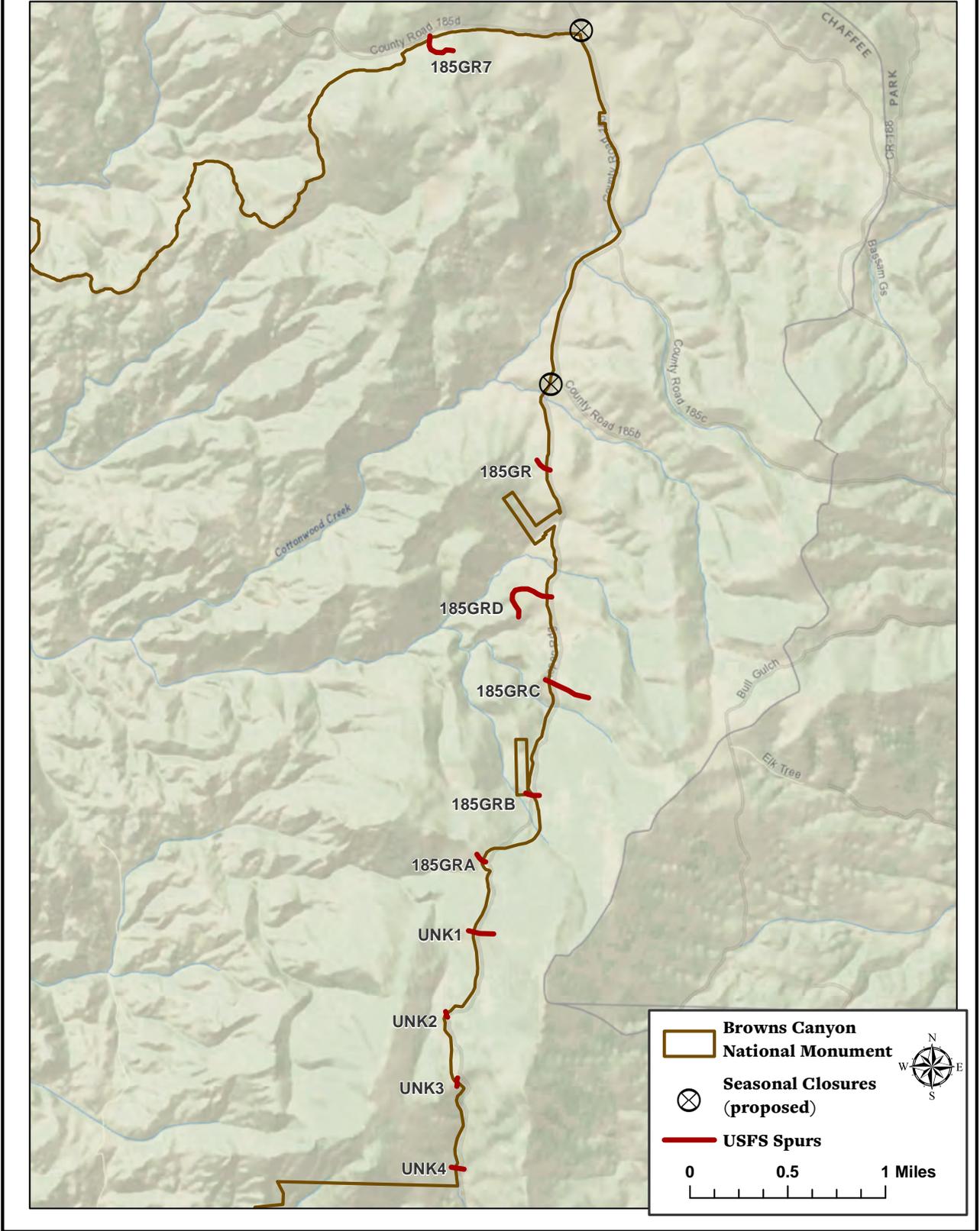
V. Management Zones

A. Proposed Management Zones

The BLM should consider delineating management zones for the entire monument that emphasize certain types of management and experiences for the area as allocated in the RMP based on the Proclamation and the protection and restoration of the monument objects and resources. This allows for other management decisions, such as designated routes for travel or vegetation treatments, to be based on the criteria for that zone. This is also a good way of integrating recreation goals and experiences into the RMP, particularly for management plans for areas included in National Conservation Lands, that include a visitor experience element throughout the entire planning area. Management zones are broadly defined landscapes that describe the type of uses and experiences that will be expected in the specific areas.

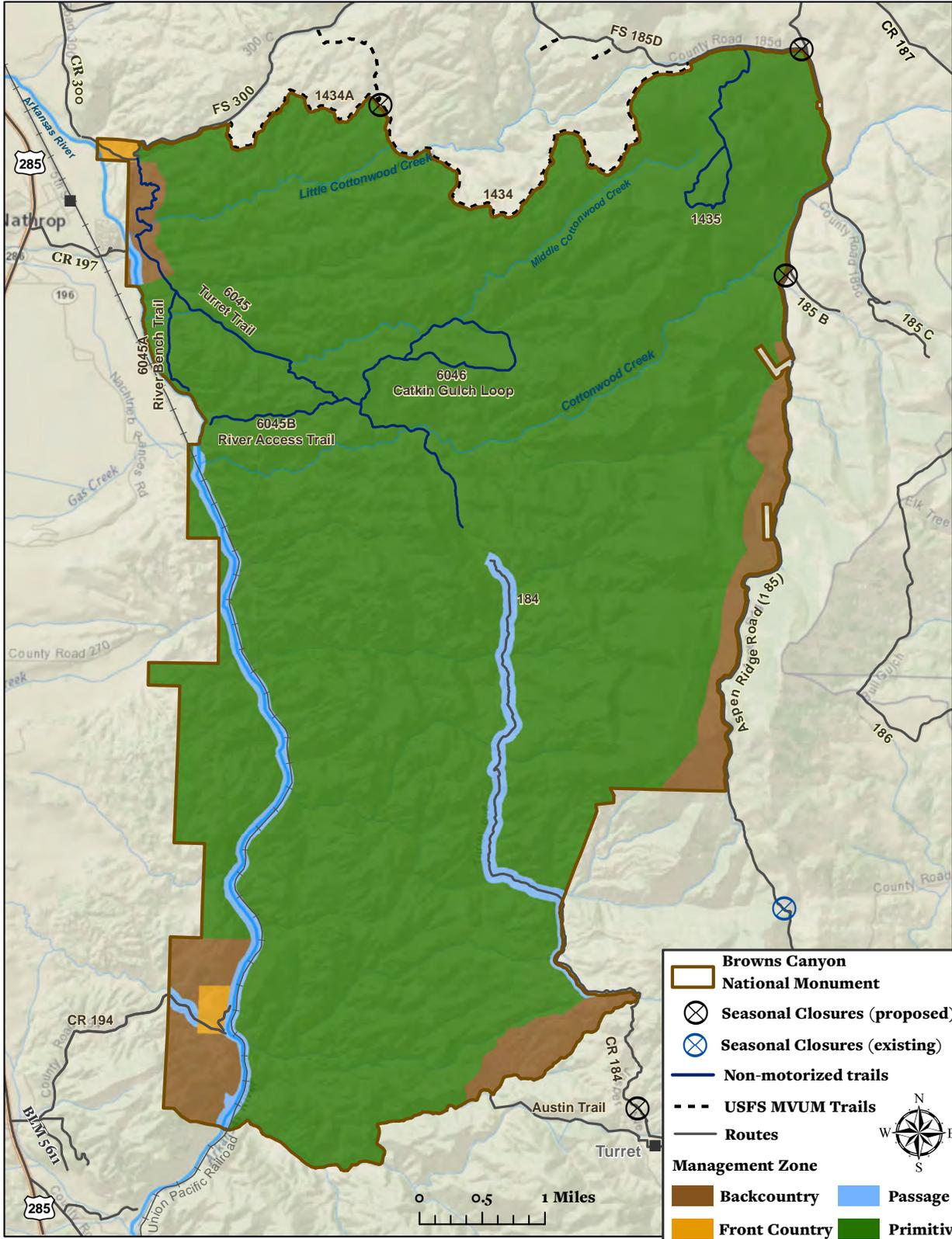
There are several examples where the BLM has defined these types of management zones in RMPs. One is the Grand Staircase-Escalante National Monument (GSENM) Management Plan. In this plan, the BLM describes four zones to “provide guidance to help define permitted or excluded activities and any stipulations pertaining to them.” [See GSENM Management Plan, p. 8 (Nov. 1999)]. These zones include: Front Country, Passage, Outback and Primitive zones. The general purpose for visitor experience is unique to each zone, and each zone also has management prescriptions – such as visual resource

Browns Canyon National Monument USFS Spurs



Map A6: Inventory of FS 185 spurs in the BCNM Aspen Ridge area.

Browns Canyon National Monument Proposed Management Zones



Map A1: BCNM Proposed Management Zones.

management, infrastructure or vegetation management – based on those purposes. (See GSENM Management Plan, pp. 8-9). As stated in the GSENM Management Plan,

Management zones are used in this Plan to display various management emphases and strategies that will best fulfill the established purposes of the Monument and the overall vision. ... These zones, which are delineated by geographic area, provide guidance to help define permitted or excluded activities and any stipulations pertaining to them. In this context, zones are tools that guide decision making on permitting visitor uses and other activities within the Monument.

Another example is the Craters of the Moon National Monument RMP, which includes the Front Country, Passage, Primitive and Pristine zones for the entire planning area. (See Craters RMP, pp. 13-14.) The plan describes the use of zones as a useful way to guide decisions to meet desired conditions for each issue addressed in the plan.

Other management zones for the planning area that BLM has used include titles like “Rustic” and “Wilderness” zones or can parallel labels for RMZs that are designated in Recreation Management Areas. There is currently no standard way to create management zones for a planning area; they are often based on the needs and uses of that particular area. However, once designated, zones can provide guidance not only for travel and transportation management decisions, but also for the management of other resources and management prescriptions, such as visual resource management classifications.

In order to identify management zones for the monument, we completed an analysis of the monument objects of interest and overlaid this with known areas of recreation and areas of interest to delineate the following areas: Front Country, Passage, Backcountry and Primitive zones.

In completing this zoning exercise, we recommend management prescriptions for each zone that represent the purpose of that zone. (See Map A1.) The BLM and USFS should consider designating the following management zones and prescriptions for BCNM.

1. Front Country Zone

The focal point of the Front Country Zone is visitation by providing infrastructure and visitor support services in popular day-use areas. Active management will be more necessary than in other zones. Access is easy and convenient, and the encounter rate is very high. High maintenance and intervention will be required to accommodate concentrated visitor use. Opportunities for challenge and adventure are less important compared to other zones. Education and interpretation will focus on the monument objects of interest and resources or for public safety (e.g., Ruby Mountain, Hecla Junction).

2. Passage Zone

The purpose of the Passage Zone is to provide travel routes which receive use as throughways to allow access to other zones and trailheads or for administrative purposes. The Passage Zone can also provide recreational opportunities, particularly the Arkansas River Passage Zone. Rudimentary facilities should be provided as necessary to protect resources, educate visitors about monument features and enhance public safety. This may include parking, trailheads, primitive campsites, and information kiosks or signs (e.g., the area near the Arkansas River corridor, FS 184, CR 194, CR 300).

3. Backcountry Zone.

The Backcountry Zone provides a less developed, self-directed visitor experience while accommodating motorized and non-motorized access on designated routes. Management is generally passive. Facilities are rare and provided only where essential for monument object and resource protection. Administrative control and the need for maintenance should remain moderate, with trail and route markers as well as designated parking and staging areas. The density of routes may be low to medium in select areas. Other non-motorized routes may exist in these zones at low densities. There will be a low to moderate chance for encounters with other people (e.g., trailheads in the northwest corner of the monument and the Aspen Ridge area).

4. Primitive Zone

The purpose of the Primitive Zone is to provide undeveloped, self-directed areas that serve quiet-use and non-motorized recreation in a primitive setting. Management should generally be passive and consistent with the management of wilderness quality lands. These areas generally have sensitive monument objects and resources; therefore, should have a low density of low-standard, multi-use, non-motorized trails. There will be a low chance for encounters with other people (e.g., the area east of the Arkansas River that is outside of backcountry and passage zones, including the WSA, the area west of the Arkansas River and the area near Stafford and Railroad gulches).

5. Recommendations

The BLM and USFS should designate management zones as proposed in this alternative to help guide management decisions and prescriptions in the RMP based on the protection of monument objects, resources and values. The BLM and USFS should release preliminary maps of management zones for public comment prior to issuing the draft BCNM RMP. The proposed allocation of these various zones throughout the monument is depicted in Map A1. The BLM and USFS should ensure capacity to enforce and manage the zones as designed, especially in areas with new facilities and areas where the ability to enforce the management plan is a top concern cited by the citizens team.

B. Changes to BLM-proposed RMZs

As previously stated, we strongly recommend the agency utilize the proposed management zones suggested above. However, if the agencies choose to retain the proposed RMZs suggested in the BCNM Planning Criteria Report (Appendix A, Map 10), we recommend the following changes to those RMZs.

1. Monument Backcountry – River West RMZ

The western boundary of BCNM should be surveyed and adjusted, as needed, using cadastral mapping. The area should also be surveyed to better understand its resources and evaluate potential future usage. (See Planning Criteria Report, p. 40, and Appendix B, pp. 4-5.)

2. Arkansas River Shore and Bench RMZ

The geography of the Arkansas River Shore and Bench RMZ, as proposed by the agencies in the planning criteria report, varies significantly from the shore area to the bench area. The Arkansas River Shore and Bench RMZ boundaries should be shifted to where the Bench and Turret trails split. This would make the eastern part of the zone part of the Backcountry – River East RMZ, since not many people travel past where the Bench Trail ends. (See Planning Criteria Report, p. 38, and Appendix B, p. 1.)

3. Monument Backcountry – River East RMZ

The Monument Backcountry – River East RMZ should maintain its primitive setting, including no new trailheads or other facilities, and trail management should focus upon resource protection rather than development.

No maps or information should be made available onsite within this area, and staff presence should be minimal in this area. Signage in backcountry and primitive zones should be minimized and should primarily be for visitor safety and resource protection.

FS 1435, a non-motorized system trail, should be shifted to be included in the Backcountry – River East RMZ. The agencies should manage for issues at the current FS 1435 trailhead,



The trailhead for FS 1435, a non-motorized system route, shows evidence of motorized access. Even though the motorized trespass was not recent, the slow rate of revegetation demonstrates the delicate nature of this high-elevation environment; hence, the need for agency attention at the current FS 1435 trailhead, including placement of barriers and/or signage as needed to limit motorized access and implement seasonal closures.



This view from FS 185 spur 185A (see Map A5), encompasses the southern Sawatch Range from Mt. Princeton in the north (right) to Mt. Shavano in the South. From this vantage point, visitors can see the Continental Divide, the highest mountain range in Colorado, the Chalk Cliffs, and the unique geologic features of BCNM, demonstrating the cultural value of providing an accessible scenic overlook at this established site.

including barriers and/or signage as needed to limit motorized access and implement seasonal closures. (See Planning Criteria Report, p. 39, and Appendix B, pp. 3-4.)

4. Aspen Ridge RMZ

There should be no new trails or trailheads in the Aspen Ridge RMZ, except for designating system routes for potential scenic overlook(s), accessible by foot only, in places already suitable. (See Sustainable Alternative maps A5 and A6 for additional information.) The USFS should conduct additional research to explore the potential for these scenic overlook(s). Any new parking or pull-offs along Aspen Ridge Road should be located outside the BCNM boundary, to the west of Aspen Ridge Road, in the 100-foot buffer section. (See Section X.B.1 for more details.)

The area must be surveyed for monument objects and resources prior to the agencies considering any development within the monument's boundaries (e.g., new overlooks and trails). The addition of any scenic overlook(s) will be subject to appropriate NEPA process.

The agencies should aspire to the principle of accessibility for visitors with varying capabilities, including visitors with limited mobility, when considering

new scenic overlook trails with a designed use of hiking. (See Planning Criteria Report, p. 41, and Appendix B, p. 5.)

5. Railroad Gulch RMZ

The Railroad Gulch RMZ should be managed to maintain the area's natural and wild qualities while providing necessary information and amenities, including parking in the proposed location along the Austin Trail outside of the monument's boundary for people to visit with respect. This includes minimizing the potential for conflict between visitors and local residents (as related to Planning Criteria Report, p. 42, and Appendix B, p. 6).

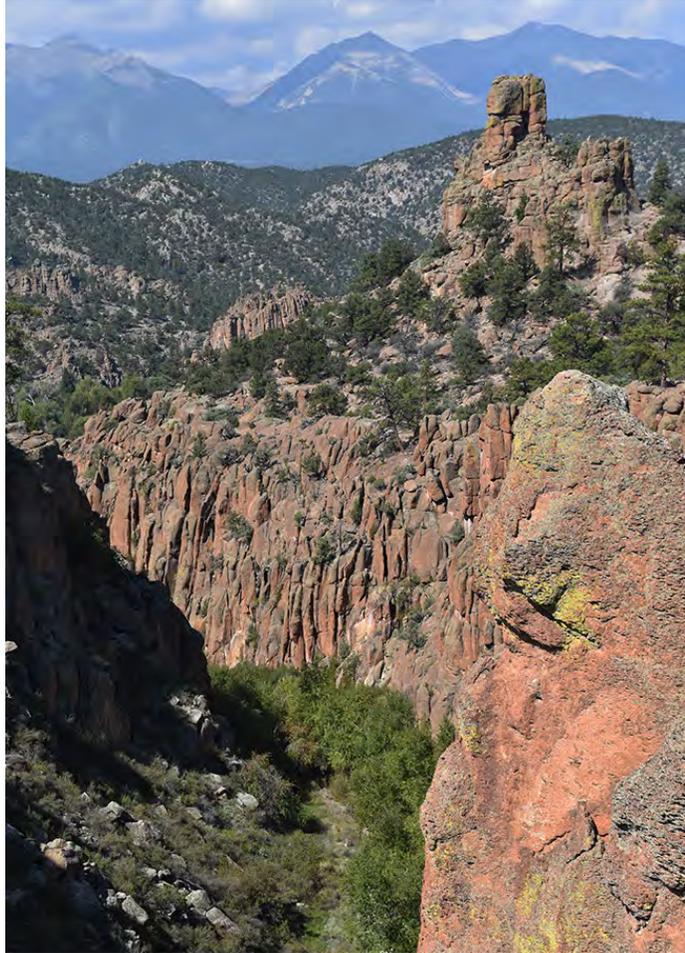
VI. Inventory of Cultural Resources and Monument Objects

The agencies should prioritize further inventorying for monument resources. The monument must be protected to conserve these resources, and it is vital for the agencies to have accurate and detailed information about where certain objects exist. The management actions that are ultimately proposed in the BCNM management plan should reflect the results of such inventories.

A. Cultural

1. Background

The Browns Canyon area of the Upper Arkansas River Valley has long offered both a permanent source of water and a means of transportation for its human inhabitants. The area lies within the transition zone between the cultural traditions of the Great Basin and Plains peoples. As a transportation corridor where stable sources of subsistence resources could be found, both migrating people and permanent inhabitants left traces of their presence in



Railroad Gulch is one of the most iconic areas in BCNM. As such, it attracts visitors who currently risk unwittingly trespassing on private property and subsequent conflict with local residents due to the lack of adequate parking along the Austin Trail.

this area. Ancestors of the Ute, Apache, Eastern Shoshone, and Comanche Indians are known to have traversed this dramatic landscape while hunting and gathering. ...

While most archaeological resources in the Browns Canyon area have not yet been surveyed or recorded, the story of people living in the Upper Arkansas River Valley is told through artifacts dating back over 10,000 years (Presidential Proclamation 9232).

As stated in the Proclamation, the Browns Canyon landscape has provided a home for humans for over 10,000 years. While much of the area has not yet been surveyed for cultural resources, there are 18 known archaeological sites within BCNM, including five prehistoric open lithic sites that have been determined to be eligible for listing in the National Register of Historic Places.

Given the longstanding investment of tribal nations in the lands within BCNM, direct engagement with tribal nations regarding ongoing monitoring and management of cultural resources in the national monument is necessary to appropriately care for and manage monument objects. There are multiple examples across public lands in the U.S. of federal-tribal cooperation and co-management of public lands, such as Santa Rosa-San Jacinto Mountains National Monument in California and Kasha-Katuwe Tent Rocks National Monument in New Mexico. The BLM can look to these and other examples within the scope of existing law and policy to develop the best options for BCNM.

2. Objective

Management of cultural resources and cultural landscape values should be a cooperative effort that encourages collaboration among the BLM, USFS, tribal governments and local governments while respecting confidentiality and tribal sovereignty (as related to the Planning Criteria Report, pp. 14-15).

3. Recommendations

- The agencies should work closely with interested tribes to manage cultural resources and culturally significant sites appropriately.
- The agencies should develop a cultural resource management plan that includes a schedule for required inventories and incorporate the appropriate management actions based on those inventories into the BCNM RMP.
- Broad cultural landscapes and values, as well as more specifically defined sites and locations of cultural importance to tribes, should be addressed throughout the NEPA analysis.
- The agencies should work with tribes to identify which cultural sites are likely to receive (and are appropriate to receive) high-visitor traffic. The agencies should manage these sites using specific prescriptions.
- The agencies should work closely with interested tribes to manage cultural resources and culturally significant sites appropriately. The Sustainable Alternative supports the development of appropriate

educational and science-based programs related to these cultural resources within the national monument.

- The agencies should explore implementing educational programs and materials related to geology, minerals, paleontology and cultural-historical resources important to American Indian tribes. The Sustainable Alternative supports the agencies developing “educational programs and local on-site or community-based interpretation and media (e.g., tours, signs, pamphlets) to foster an appreciation for the unique resources of the region, to create opportunities for public viewing and appreciation of the resources, and to promote scientific and educational use” (as suggested in Alternative B of the Planning Criteria Report, p.16).

B. Biological Resources

1. Background

The area’s unusual geology and roughly 3,000 foot-range in elevation support a diversity of plants and wildlife, including a significant herd of bighorn sheep. ...

The topographic and geologic diversity of Browns Canyon area has given rise to one of the most significant regions for biodiversity in Colorado. ...

The plant community in this area has repeatedly evolved during periods of climate change since the Eocene Epoch. Geologic and climatic changes since the Precambrian have made the area an important site for research on geology and paleoecology as well as the effects of climate change, wildland fire, and other disturbances on plant and animal communities (Presidential Proclamation 9232).



The biological resources in BCNM include a herd of bighorn sheep as well as other wildlife species as well as a unique community plant species.

Browns Canyon National Monument is home to a vast variety of biological resources. These resources are listed in Appendix B, highlighting all the monument objects described in the Proclamation. Because the monument should be managed for the protection of these resources, it is important for the agencies to have a clear understanding of where biological resources are located and concentrated.

2. Recommendations

The agencies should prioritize inventorying and documenting the location and status of all of the monument's biological and ecological objects as well as any endangered or threatened ecological species within the monument.

C. Wilderness Characteristics

1. Background

The Browns Canyon area represents one of the only riparian ecosystems along the Arkansas River that remains relatively undisturbed and contains an intact biotic community (Presidential Proclamation 9232).

The Browns Canyon area is unique in that it is relatively untouched, undisturbed and intact as compared to much of the surrounding landscape. The BLM established the Browns Canyon Wilderness Study Area (WSA), now within the monument boundaries, in recognition of the undisturbed nature of this area. Similarly, the USFS recognizes the undisturbed nature of BCNM lands with a formal designation of the Aspen Ridge Roadless Area.

2. Recommendation

The USFS should use this opportunity to conduct inventory and evaluation for wilderness characteristics throughout all USFS lands in the monument. Because the Pike San Isabel National Forest Plan has not been updated since 1984, the current planning effort could qualify as a “significant amendment” under the NFMA [16 U.S.C. 1604(f)(4)]. As such, this is a prime opportunity to conduct wilderness inventory and evaluation in order to gather a clear understanding of the wilderness characteristics and values that exist within the monument. For all areas found to possess wilderness characteristics, the USFS should recommend management as wilderness.

VII. Special Designations

The BLM and USFS lands within BCNM have been subject to agency planning stretching over many years, including several Congressional efforts to establish Wilderness through the legislative process. These efforts have resulted in several special designations currently in force. The planning process for BCNM should not change any of these designations – the RMP should not override special designations but should consider them to be additional valid complementary layers guiding monument management.

A. Browns Canyon WSA

1. Background

Pursuant to longstanding BLM policy and as briefly highlighted on p. 10 of the Planning Criteria Report, the agency is obligated to continue to implement

measures to protect the wilderness values within the Browns Canyon WSA. There have recently been legislative attempts to generally reduce BLM WSA protection. For example, Representative Greg Gianforte (R-Mont.) recently introduced two bills to release WSAs on hundreds of thousands of BLM-managed acres in Montana. [See H.R. 5148 and H.R. 5149, 115th Cong. (2nd Sess. 2018).] Considering this political landscape, as well as the need for clear management prescriptions for future agency implementation, the BCNM RMP should proactively ensure preservation of the lands within the Browns Canyon WSA by clearly stating management protections for the area in the RMP.

2. Recommendation

The BCNM RMP should provide direction to manage the WSA as if it were designated as Wilderness, even if the WSA designation is released by Congress.

B. Aspen Ridge Roadless Area

1. Background

The USFS lands within BCNM have a long history of being considered for wilderness designation. Approximately 11,185 acres of USFS lands within the monument are designated as the Aspen Ridge Colorado Roadless Areas unit. (See Browns Canyon Final Planning Assessment, p. 7.) The Aspen Ridge Roadless Area is managed under the Colorado Roadless Rule. (See 36 C.F.R. 294, 81 Fed. Reg. 9181, Feb. 19, 2016.)

Similar to recent Federal legislative initiatives to release on WSAs, there are currently state-based pressures to remove roadless area protections. For example, Utah Governor Herbert recently petitioned the U.S. Department of Agriculture to revoke and rewrite the national Roadless Rule as applied to



The Aspen Ridge Roadless Area provides a uniquely undamaged landscape with wilderness qualities.

Utah's forests to open these lands to development. (See <https://governor.utah.gov/2019/03/01/utah-submits-request-to-the-department-of-agriculture-regarding-federal-land-maintenance> and https://ourforests.utah.gov/wp-content/uploads/2019/02/UtahRoadlessRulePetition_28Feb2019.pdf.) In light of these known and anticipated pressures, as well as the need for clear management prescriptions to be outlined in the RMP for future agency officials, it is important for the USFS to consider proactive management to preserve the wilderness character of the lands within the Aspen Ridge Roadless Area, such as those suggested in the following recommendations.

2. Recommendations

- The USFS should use the current planning process as an opportunity to recommend wilderness for the entirety of Aspen Ridge Roadless Area within the monument.
- The USFS should include language in the RMP, providing commitment to manage the Aspen Ridge Roadless Area under the same protections even if the roadless area designation were to be removed.

C. Lands with Wilderness Characteristics

1. Background

In order to possess wilderness characteristics, an area must “possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation” and can also contain supplemental values [BLM Manual 6310.06(C)(2)]. Through this planning process, BLM should recognize the wide range of values associated with lands with wilderness characteristics that supplement and benefit other resources for which the agency manages. Many of these resources within BCNM are specifically identified in Proclamation 9232 as purposes for which the monument was designated. These include scenic values, recreation, cultural resources, wildlife habitat, connectivity and riparian areas. Lands with wilderness characteristics are briefly discussed in the Planning Criteria Report (pp. 17-18).

2. Objective

The BLM should recognize the wide range of values associated with lands with wilderness characteristics, specifically those identified in the Proclamation, and manage for their protection.

3. Recommendation

The BLM should manage the lands identified on Map 3 of the Planning Criteria Report (p. A-3) as having wilderness characteristics, namely Railroad Gulch and Browns Canyon North – Ruby Mountain for their wilderness values. This is consistent with the Sustainable Alternative's recommended Primitive Management Zone, which covers both of these areas. (See Section V.A.)

D. Areas of Critical Environmental Concern

1. Background

In 1993, the Browns Canyon Area of Critical Environmental Concern (ACEC) was recommended for designation for its unique natural character. The area was designated as an ACEC in 1995 and included in the 1996 Royal Gorge Field Office RMP. The area is known for its primitive and water-related recreation that highlights Browns Canyon's unique natural character and scenic and visual qualities. Additionally, the bluffs within Browns Canyon have significant raptor values and provide bighorn sheep habitat. (See Royal George Resource Area, Draft Resource Management Plan and Environmental Impact Statement, Appendix K, p. K-2, Sept. 1993.) The 1996 Royal Gorge RMP states that wildlife values within the Browns Canyon ACEC will be enhanced (pp. 3-18), protection of historical values and resources will be enhanced (pp. 3-23), and archaeological resources will be protected (pp. 3-24).

The obligations of the BLM with regard to ACECs under FLPMA remain in place in conjunction with the duties under the Proclamation. A critical aspect of the statutory language cited above is FLPMA's requirement that BLM "give priority" to ACEC designation and protection [43 U.S.C. § 1712(c)(3)].

Overlapping designations are common in BLM land-use planning, including for National Conservation Lands. For example, just a few of these include:

- Perry Mesa and Larry Canyon ACECs in the Agua Fria National Monument.
- High Rock Canyon and Soldiers Meadows ACECs in the Black Rock Desert – High Rock Canyon Emigrant Trails National Conservation Area (NCA).
- Cow Creek ACEC in the Upper Missouri River Breaks National Monument.
- Appellton-Whittell ACEC in the Las Cienegas NCA.
- Scotch Creek and Oregon Gulch ACECs in the Cascade-Siskiyou National Monument.
- Vekol Valley Grassland ACEC in the Sonoran Desert National Monument.
- Watermelon Mountains ACEC in the Ironwood Forest National Monument.
- San Rafael RNA, San Pedro River RNA and St. David Cienega RNA ACECs in the San Pedro Riparian NCA.

2. Recommendation

The BLM should maintain the Browns Canyon ACEC as it has been managed since 1996 with an emphasis on protecting wildlife and scenery in the area (in contrast to draft Alternatives B and C within the Planning Criteria Report, p. 11).

E. Wild and Scenic Rivers

1. Background

As stated in the Browns Canyon National Monument Final Planning Assessment:

A complete Wild and Scenic River Analysis for the Arkansas River was completed during the BLM's 1996 Royal Gorge RMP process. The Wild and Scenic River Study report was completed in 1992 as part of that process. ... An updated eligibility report was developed in 2015.

In both the 1992 and 2015 reports, all segments of the Arkansas River upstream of the Royal Gorge Park were determined to be eligible ... and met the criteria under the "recreational" classification. An updated suitability report has not yet been finalized but will be incorporated into the revised Eastern Colorado RMP (p. 225).

2. Recommendations

- In absence of protections as defined in Proclamation 9232 and elsewhere in the Sustainable Alternative, management should continue as it has operated, with suitable segments in the Eastern Colorado RMP, due to the continuous nature of the segment upstream and downstream of the monument.
- The agencies should highlight that the Proclamation and the Voluntary Flow Management Program (VFMP) both adequately address management for this river segment.



This view of the Sangre de Cristo Range and the aspen forest (for which Aspen Ridge is named) provides an example of BCNM visual resources.

VIII. Maintaining Wilderness Characteristics, Natural Values

A. Management for the Protection of Visual Resources

1. Background

Various federal laws, including NEPA and FLPMA, require that public lands be managed in such a way as to preserve scenic and aesthetic values. The BLM has created and codified a Visual Resource Management (VRM) system that allows for the identification and classification of a variety of visual values. (See BLM Manual 8400.) Visual resources are inventoried based on scenic quality, public sensitivity to disturbance, and distance from viewer (Manual H-8410-1) and assigned a class (I-IV) defining the level of permissible surface disturbance. In all cases where surface disturbance is to take place, effort should be taken to make the disturbance as low-contrast as possible (Manual 8431); however, the degree of contrast preferred will ultimately depend on the class of the resource being maintained, as defined by BLM Manual 8400.

2. Objective

Inventory visual resources within the monument by following the process outlined in BLM Manual H-8410-1 (1986).

3. Recommendations

- Land with pre-existing management requirements – WSAs, ACECs, and Roadless Areas, etc. – should receive Class I designation, allowing only minimal, if any, surface disturbance. This is pursuant to BLM Manual 6330 and is consistent with management under other RMPs.
- For areas outside of special designations, resource managers should determine visual resource classes, which correspond to the proposed Primitive, Backcountry, Front Country and Passage zones identified earlier in this document.
- Visitor infrastructure at points of interest should maintain a low contrast to the surrounding landscape while complementing the ecological, geological or historical nature of the site, regardless of the VRM classification of the surrounding terrain.

B. Rights-of-way and Utility Corridors

1. Background

Federal agencies may issue land use authorizations, including rights-of-way (ROWs) for the use, occupancy and development of BLM- and USFS-administered lands. Facilities that require ROWs include power lines, pipelines and roads. Surface disturbance activities associated with ROWs can negatively

impact the natural, cultural and historical resources, objects, and values of BCNM.

2. Recommendation

The entire monument should be managed as an ROW exclusion area, precluding any new ROW authorizations.

C. Night Skies Management

1. Background

Night skies unimpaired by light pollution are important for the role they play in visitor perception and experience as well as various ecological and natural processes. Additionally, preventing light pollution saves local residents and business owners money and prevents wasted energy. Night skies are briefly discussed on p. 25 of the Planning Criteria Report.

2. Recommendation

The agencies should actively manage the lands within and surrounding the monument to preserve night-sky resources. This would apply to activities and infrastructure within BCNM but may also include working with the local community to develop policies and actions that minimize or avoid light pollution and glare within BCNM from sources outside of the monument.

D. Soundscapes

1. Background

Soundscapes are managed by the BLM as part of their Air Resource Management plan (BLM Manual 7300), authorized through FLPMA's requirement to "maintain an inventory of all public lands and their resources." The FLPMA makes specific mention of noise as a source of pollution in directing the agency to "provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards." The agency's Air Resource Management plan requires the impacts of noise be considered when development may affect sensitive resources such as wildlife, heritage resources and special value areas like WSAs, ACECs or National Conservation Lands. However, there is no systematic process by which BLM evaluates the impact of noise or through which the agency can promote natural soundscapes.

The U.S. National Park Service has robust management practices for measuring and administering soundscapes and noise pollution that can serve as a starting point for developing a sound management practice in the monument. (See <https://www.nps.gov/subjects/sound/index.htm>.) Soundscapes are briefly addressed in the Planning Criteria Report, p. 26.

2. Objective

Inventory the monument's soundscape and define allowable levels of noise pollution.

3. Recommendations

- Identify and map locations of natural and cultural resources within BCNM (pursuant to inventory recommended in Section VI, above) that may be sensitive to the impacts of noise. Sites may include primitive and wilderness quality areas, which have minimal to no human-source noise present, American Indian cultural areas where noise intrusion would be culturally inappropriate, wildlife areas where sound may have negative impacts, etc.
- Utilize the zoning designations (Backcountry, Front Country, etc.) to describe the maximum allowable amount of human-source noise in each area.
- To the extent possible, the agencies should complete sound modeling to assess management alternatives for the effects of noise on recreation and wildlife.

E. Vegetation

1. Invasive Species Management

a. Background

The spread of invasive species poses a significant threat to conservation values. Invasive species management is addressed in the Planning Criteria Report, p. 19-24.

b. Objective

The agencies should focus on preventing the introduction of invasive species within the monument.

c. Recommendations

- The agencies should explore and implement requirements around visitors using local firewood, weed-free hay for horses and other specific measures as necessary to prevent the introduction and spread of invasive species.
- In the event the agencies determine manual or chemical control of invasive species is required, no spraying of herbicides or pesticides via aircraft should be allowed in BCNM. Any use of all-terrain vehicles to apply herbicides and pesticides should be limited to designated routes, subject to seasonal closures (in contrast to Alternatives B and C in the Planning Criteria Report, p. 21).

2. Restoration

a. Background



This mountain bluebird is just one example of the wide range of bird species found in BCNM.

The 15-Year Strategy for BLM Conservation Lands names restoration of landscape values as being one of the highest priorities in planning and management for National Conservation Lands. BLM Manual 6100 states, “Where practicable, habitat rehabilitation within NLCS [National Landscape Conservation System] units will be accomplished with native plant materials appropriate for restoring or

improving native habitat. In general, native plant materials should be sourced as locally as possible.” [See BLM Manual 6100 at 1.6(N)(6).]

b. Objective

The agencies should explore opportunities to restore the monument’s resources and values, consistent with the Proclamation.

c. Recommendation

Non-native species, including non-native sterile and non-persistent species, should not be used for restoration objectives.

IX. Protection of Wildlife

A. Background

Some of Colorado’s most emblematic animal species call Browns Canyon home. ...

The Browns Canyon area ... provides essential habitat for mammals and birds alike and attracts hunters and wildlife viewers. ...

The area also provides habitat suitable for peregrine falcons, which have been identified for possible future reintroduction here, as well as potential habitat for the threatened Canada lynx. ...

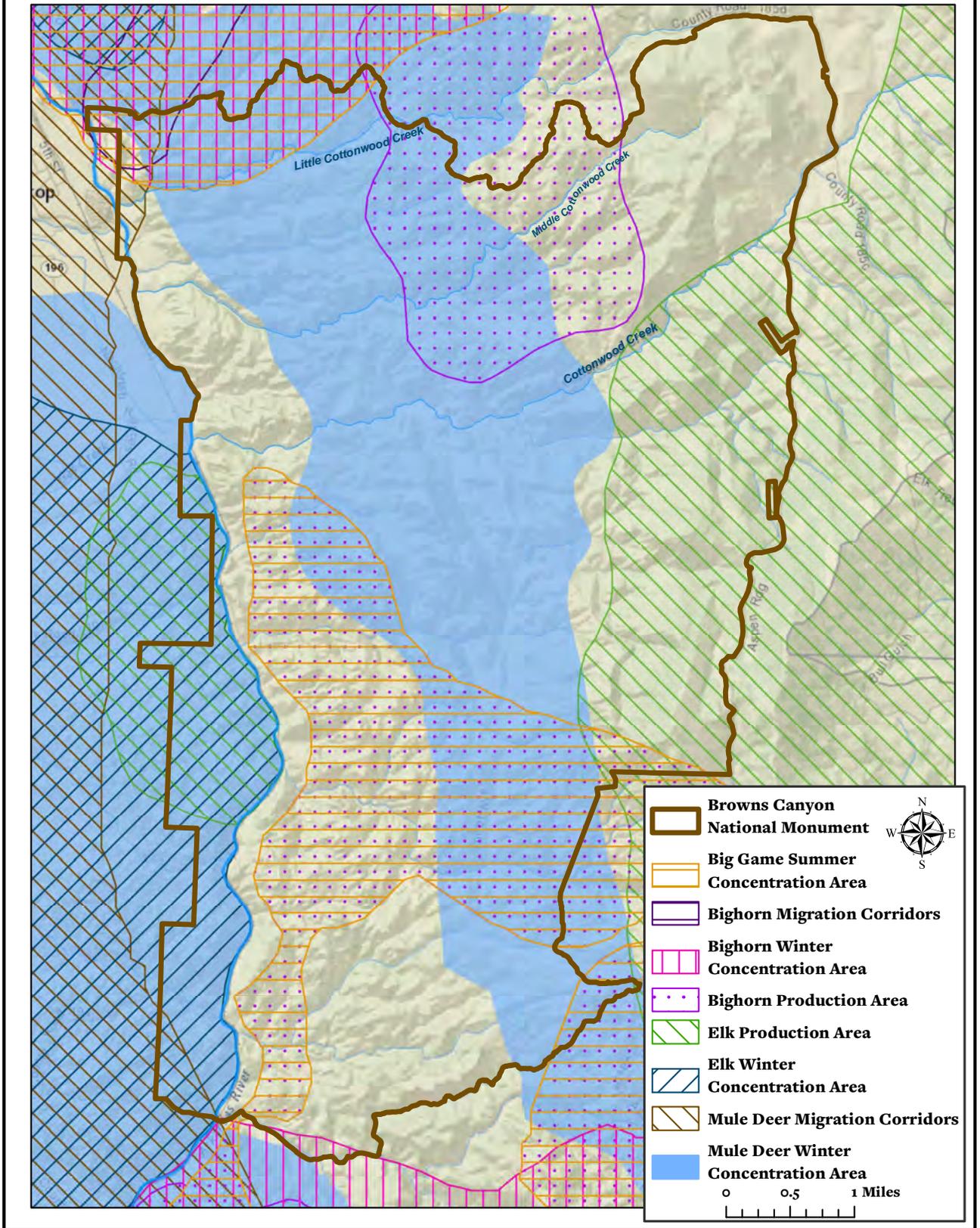
A stunning diversity of other bird species ... attract(s) ornithologists and bird enthusiasts alike to these remote hills (Presidential Proclamation 9232).

As highlighted previously, a large portion of the Proclamation describes the monument’s varied wildlife species, their habitat and the importance of ecological connectivity within BCNM. The current management planning process presents a critical opportunity for the agencies to inventory, monitor and appropriately manage for wildlife within the monument.

B Objective

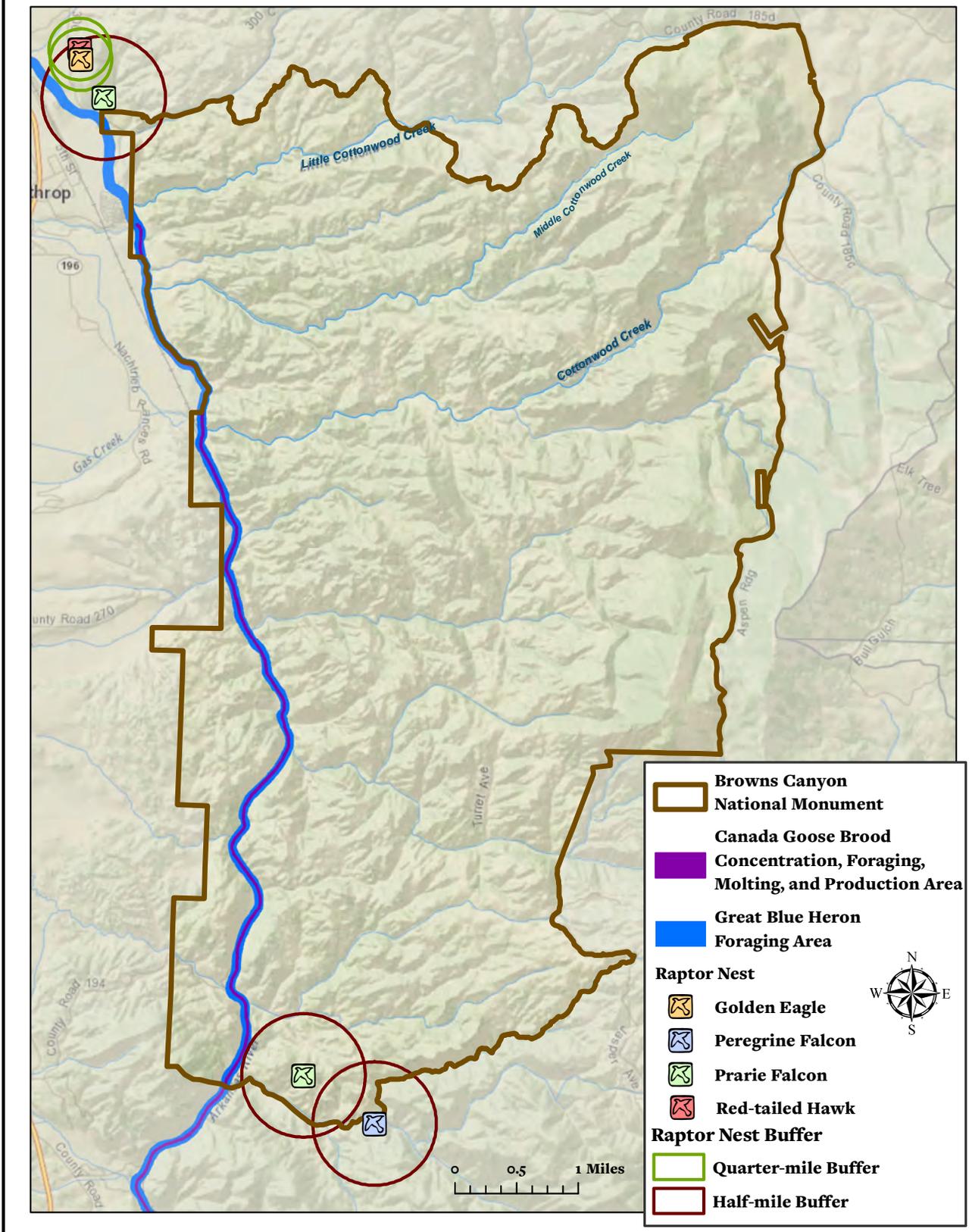
Formalize a monitoring and management program to maintain healthy wildlife populations.

Browns Canyon National Monument Big Game Seasonal Range



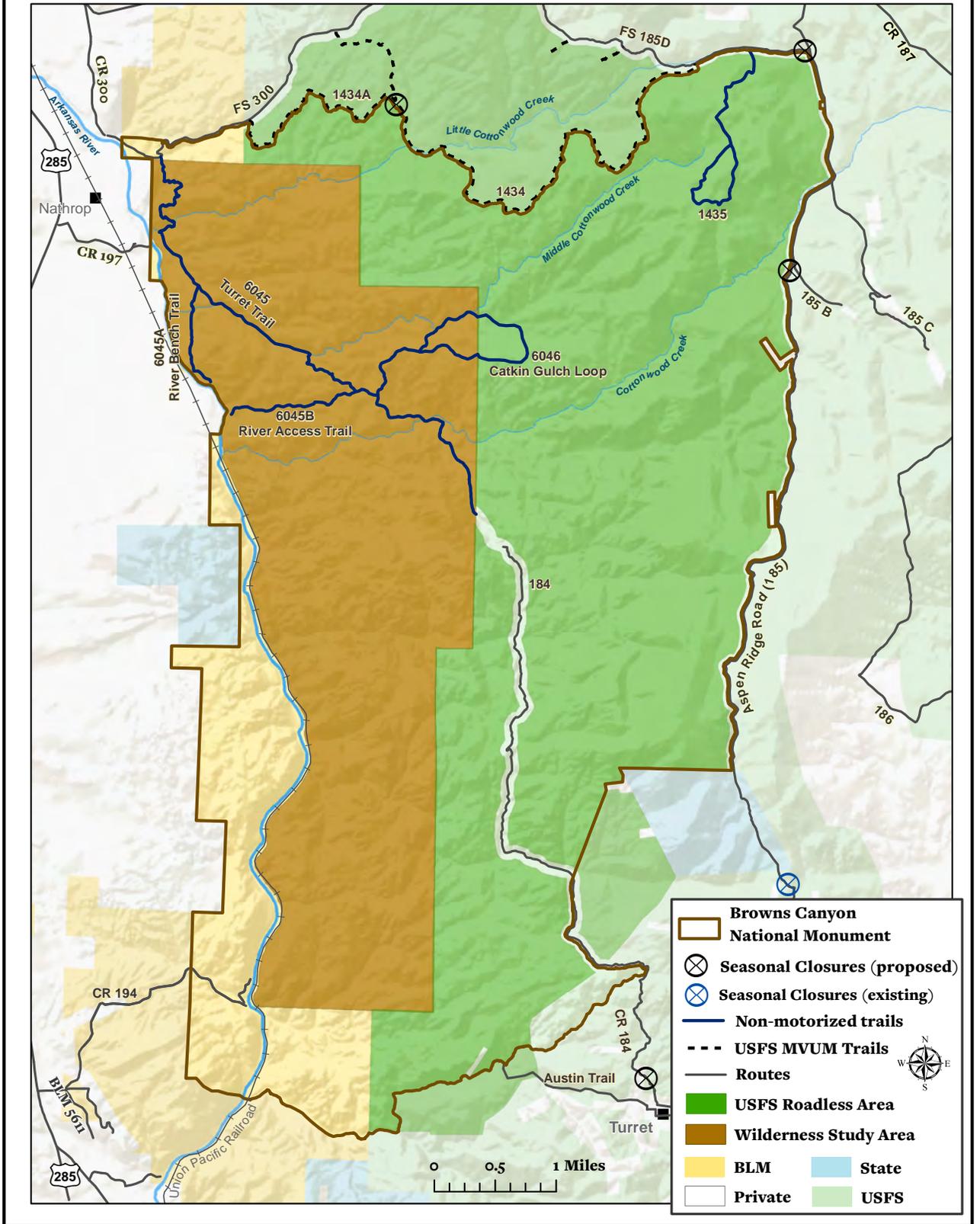
Map A3a: Big Game Seasonal Range within BCNM.

Browns Canyon National Monument Raptor and Waterfowl Habitat



Map A3b: BCNM Raptor Nesting Sites.

Browns Canyon National Monument Routes & Trails



Map A2: BCNM Minimum Route Network map showing proposed seasonal closure gates.

C. Recommendations

- The BCNM plan should adopt planning and decision-making processes (including data collection, analysis and monitoring) that employ measurable planning objectives at multiple biological scales (i.e., wildlife populations, habitat and ecosystem conditions) to ensure viable wildlife populations are sustained.
- Sensitive wildlife habitat should be defined as including raptor nesting areas, big game winter concentration areas, elk and bighorn sheep production areas, fall black bear concentration areas, and other significant and priority habitat areas. (See Maps A3a and A3b.)
- The agencies should particularly investigate raptor nest habitat for peregrine and prairie falcon to analyze potential impacts from visitation as well as potential restrictions to visitation, if necessary.
- The management plan should adopt a strategy of avoid, minimize and/or mitigate when considering management actions (especially new facility development) that may impact significant and priority wildlife habitats and locations. The preferred strategy to consider is avoidance, followed by minimization and mitigation if avoidance is not feasible.
- No new trails should be developed within big game winter range.
- The agencies should implement seasonal closures for special recreation permits and large group events within all sensitive wildlife habitat.
- Seasonal closure gates should be relocated to be more consistent with where travelers are coming from and include realistic places for visitors to turn around (e.g., FS 184, FS 185, FS 185D). (See Maps A1 and A2 for more information.)

X. Maintaining and Managing for Recreation

A. Addressing Increased Visitation and Recreation

1. Background

Browns Canyon National Monument provides world-class recreation opportunities and is frequently accessed by members of the local community as well as visitors from surrounding cities and towns, including Colorado's Front Range population. As noted in the previously published socioeconomic report, Colorado's population is steadily increasing and is expected to continue to increase into the foreseeable future. [See Browns Canyon National Monument Socio-Economic Baseline Assessment, pp. 9-10 (April 2018).] As such, additional visitation is expected to occur within the monument, with emphasis on Front Country and Backcountry sites (as mentioned in the Planning Criteria Report, pp. 36-44).

2. Objective

The agencies should adequately plan for and have the necessary resources to provide sustainable access to the monument.

3. Recommendations

- Additional interpretive resources, developed in collaboration with interested tribal governments, and signage should be developed to manage for expected increase in visitation.
- The agencies should create informational kiosks near BCNM entry points along designated routes. There should be interpretive materials, brochures and maps of the resources in the monument available for visitors. This would be particularly beneficial for Front Country sites.
- The agencies should monitor specific locations that see high visitation and continue to build a database of baseline information to inform triggers that will identify if overuse is becoming an issue.
 - Examples of triggers for overuse: development of new campsites, loss of vegetation cover, clearing land for firewood, increase in bare ground, soil compaction, erosion, decreased wildlife counts and viewing, etc.
- There should be clear signage and education for visitors on rules regarding waste at trailheads and at other locations the agencies determine to be necessary due to impacts.
- Waste receptacles, including pet-specific waste signage should be placed at Front Country sites (Ruby Mountain and Hecla Junction).
- Agencies should provide adequate resources to enforce monument policies and prescriptions, possibly using a similar model to the AHRA.

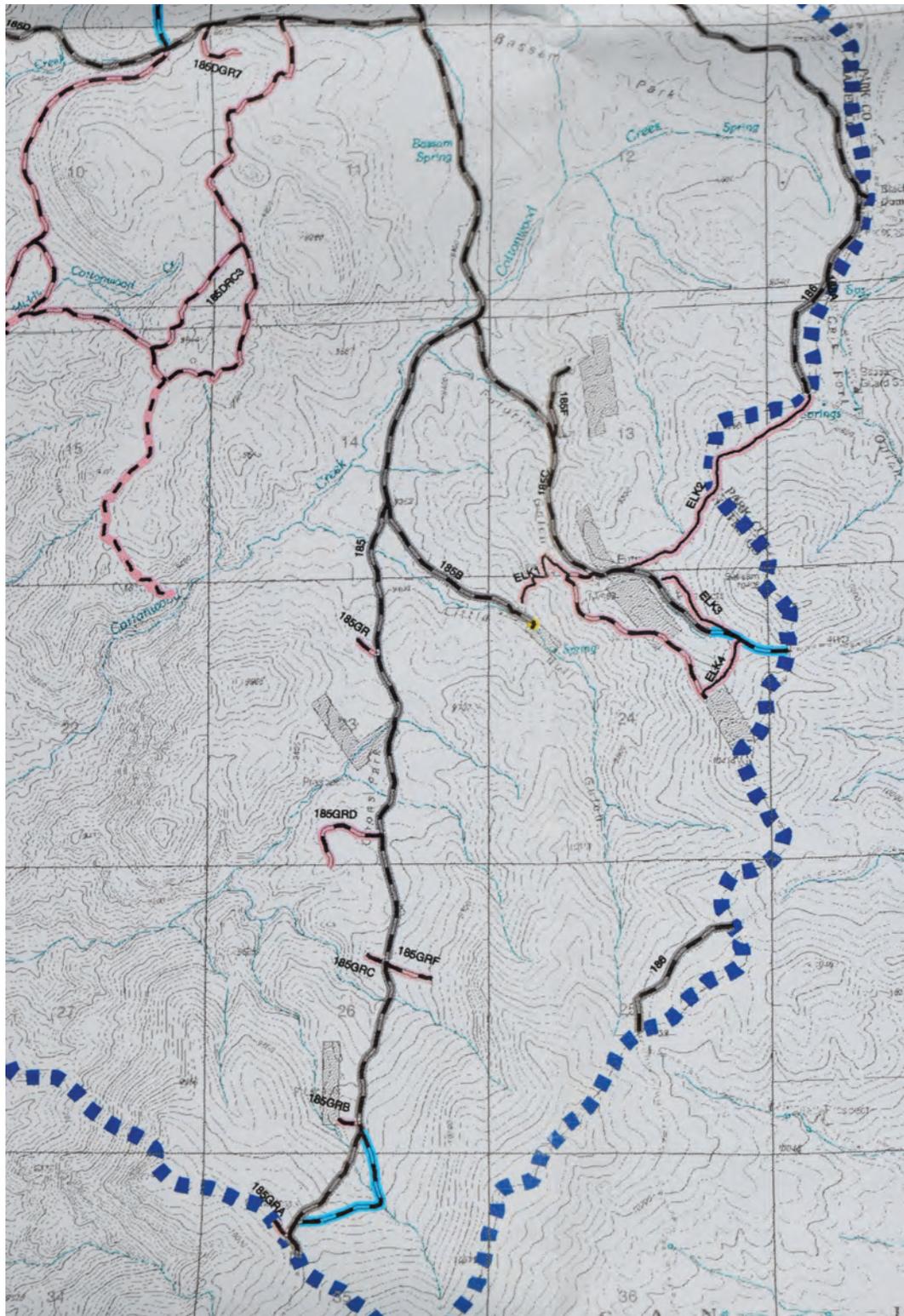


This undesignated campsite is one of several along FS 185 (Aspen Ridge Road). Converting some of these designated campsites and installing permanent fire rings would provide camping opportunities while limiting impacts such as proliferation of fire rings and additional undesignated campsites.

B. Dispersed Recreation

1. Camping

a. Background



Map A5: Detail from a USFS Fourmile Travel Management Plan map (Feb. 28, 2002) showing the northeastern corner of BCNM west of FS 185. The map documents historical use of FS 185 spurs with USFS designations. Additional spurs exist further south, and most of these sites would be appropriate for designated uses with parking permitted within 100 feet of the roadway.

Camping provides various health benefits and is part of an American tradition of spending time in our nation's public lands. Camping provides an opportunity to engage communities, families, businesses, visitors and organized groups to experience BCNM and continues to raise the profile of protected public lands in the area. There are already formally developed designated campsites within the Ruby Mountain and Hecla Junction areas. There is also general dispersed camping, subject to existing agency regulations, in the land surrounding the monument (e.g., USFS lands east of Aspen Ridge Road). There are currently at least nine undesignated dispersed sites, five of which are shown in Map A5, that we have documented to exist west of Aspen Ridge Road (i.e., sites that contain existing fire rings and in many cases evidence of recent visitation). These sites exist either within the 100 ft. buffer between the BCNM boundary and FS 185 or past the 100 ft. buffer and within the monument itself. (See Map A6.)



This designated campsite is at spur 185GR west of FS 185 (Aspen Ridge Road). Establishing more designated campsites along FS 185 within the 100-foot buffer between the road and the monument boundary would minimize impacts to monument objects.

b. Objective

Provide opportunities for individuals, families and organized groups to experience the BCNM through a range of overnight camping experiences, from developed campgrounds to dispersed primitive camping, while prioritizing efforts to ensure that camping is done in a sustainable manner, providing necessary resources, education and support for appropriate visitor behavior. The agencies must seek to minimize impacts to Monument resources by supporting camping just outside Monument boundaries and/or by establishing designated dispersed sites within the 100 ft buffer near Aspen Ridge road.

c. Recommendations

- All undesignated non-system travel routes within the monument should be inventoried by the agencies. Following the inventory process, the agencies should effectively close the identified non-system routes (using signage and physical barriers as needed) and decommission or restore (actively or naturally) the routes as necessary. In limited instances, the agencies should consider designating a few dispersed camping sites and potential scenic overlook(s) on spurs, with the requirement that parking be in the 100-foot buffer between Aspen Ridge Road and the monument boundary, and the sites being accessible by foot only.
 - Generally speaking, the agencies should prioritize designating pre-existing campsites with evidence of use (including existing fire rings) that are fully located within the 100-foot buffer

between the monument boundary and Aspen Ridge Road (FS 185), as camping impacts would be concentrated within the 100 ft. buffer, thereby minimizing impacts to monument objects.

- The agencies should work to clearly indicate with appropriate signage what campsites are within and outside of the monument as well as specific requirements that apply to the various locations.
- The agencies should designate dispersed camping sites, as appropriate, with clearly numbered posts at all designated camping locations, including Ruby Mountain, Hecla Junction and along Aspen Ridge. Designated camping areas should be enforced with adequate agency resources.
- Agency-constructed fire rings, fire bowls, or pits should be included at all designated campsites, whether in formal campgrounds or along roads (e.g., Hecla Junction, Ruby Mountain, Aspen Ridge Road); user-constructed fire rings should be prohibited at these specific designated dispersed sites.
- Except for within the primitive zone, all campfires should be within a contained structure. Within the primitive zone, the agencies should adopt wilderness fire policies for the primitive zones within the monument.
 - Wilderness fire policies include:
 - A lightweight backpacking stove is recommended. If a campfire is desired, build it in a manner that minimizes impact. Campfires should be at least 100 feet from lakes, streams and trails. Collect only dead and downed wood that is less than three inches in diameter. Only use wood that can be broken by hand.
 - Use existing fire rings. Dead wood removed from Krummholz (dwarf trees near timberline) affects their survival.
 - Do not build a fire on exposed rock surfaces to prevent scarring.
 - If possible, use a fire blanket or a fire pan (like a pan used to change motor oil). Place several inches of soil in the bottom of the pan and build the fire on this. Always use extreme caution and avoid building fires in dry or windy conditions.
 - If adverse impacts to monument resources and values occur due to visitation or camping, the BLM and USFS should have specific triggers in place to alert the agencies to implement additional actions to potentially limit or close specific locations to camping.
 - Examples of triggers for adverse impacts: impact to cultural resources or other monument objects, development of new campsites, proliferation of fire rings, increased illegal dumping, increased waste from campsites, loss of vegetation cover, clearing land for firewood, increase in bare ground, soil

compaction, erosion, decreased wildlife counts and viewing, etc.

C. Other Recreation

1. Rockhounding and Casual Rock Collection

a. Background

The creation of the Browns Canyon landscape is attributed to glacial movement that “filled the valley below with masses of sediment, including the gold, silver, and semi-precious gems that fueled the mining booms of the 1800s” (Proclamation 9232).

The Proclamation recognizes that “the garnets that lend their name to Ruby Mountain in the northern part of the Browns Canyon area, continue to interest professional and amateur geologists.” As such, the garnets, gems and other resources within the monument should continue to be protected and present for continued education and enjoyment.

b. Objective

Develop clear guidelines for rockhounding and casual collection within the monument to preserve the resources that BCNM was designated to protect.

c. Recommendations

- The collection of monument resources and objects, rocks and minerals, petrified wood and fossils, or other naturally occurring items should be prohibited at all locations within the monument aside from Ruby Mountain (as suggested in Alternative B in the Planning Criteria Report, p. 17).
- Within Ruby Mountain, garnet collection and rockhounding should be allowed at designated and signed locations. Agencies should develop and clarify specifications around “reasonable use” for rock collection. Suggested specifications include:
 - Collecting nothing for commercial use.
 - No fossil, artifact nor petrified wood collection or removal.
 - No cultural or historical artifacts or artifacts from prehistoric sites.
 - Collection limited to use of hand tools and picks.
 - No more than 25 pounds per day per person, and no more than 100 pounds by any individual in one year. Individuals may not pool daily nor annual limitations.

2. Drones

a. Background

There are now more unmanned aerial vehicles (UAVs) in the United States than manned aircraft. Recreational drone use is increasing exponentially, and

standards are needed to ensure the protection of wildlife and resources as well as public and agency safety. Flying UAVs is permitted on some BLM lands.

b. Objective

Ensure the protection of resources in BCNM, compliance with the Proclamation, as well as safety and visitor experience when considering management prescriptions for UAVs.

c. Recommendation

The use of drones and other UAVs should be prohibited in the monument. The only exception that should be considered is for emergency response purposes, including firefighting and search and rescue operations.

3. Off-road Vehicle Use

a. Background

Per the Proclamation, motor vehicle use should be limited to designated motorized routes within BCNM. There is only one motor vehicle route within the monument, FS 184. As such, motorized vehicle travel is limited to FS 184, subject to the relevant and existing seasonal closures. Off-road vehicle use is addressed in Planning Criteria Report, p. 46. Over-snow vehicle (OSV) use is not currently addressed in the 1996 Royal Gorge RMP.

b. Objective

Ensure the protection of resources in BCNM, compliance with the Proclamation, as well as safety and visitor experience when considering management prescriptions for off-road vehicle use.

c. Recommendations

- Similar to other national monument plans, OSV use in BCNM should be prohibited or limited to designated routes. [See Chimney Rock National Monument Final Management Plan p. 13 (August 2015) and San Gabriel Mountains Monument: Monument Plan pp. 22-23 (April 2018).] If permitted, OSV use would be subject to seasonal closures for wildlife and limited to FS 184.
- While there is frequently not enough snow to consider OSV use within the monument, the agencies should proactively include language to specify the extent of allowing such use along FS 184.

4. Target shooting

a. Background

Target shooting is not currently permitted anywhere within BCNM. The BCNM Planning Criteria Report considers alternatives related to target shooting on p. 37.

b. Objective

Ensure the protection of resources in BCNM, compliance with the Proclamation, as well as safety and visitor experience when considering management prescriptions for recreational target shooting.

c. Recommendation

Target shooting should continue to be prohibited in all areas of the monument, especially since a public shooting range is already in place just west of BCNM.

5. Competitive events

a. Background

Any events hosted within the monument must be managed consistent with the protection of monument objects and subject to group limitations and special recreation permit requirements. Competitive events are briefly addressed in the Planning Criteria Report on p. 19.

b. Objective

Develop clear guidelines for competitive events within the monument to preserve the resources that BCNM was designated to protect.

c. Recommendation

Competitive events should not be allowed in the monument. As previously mentioned, this does not pertain to river recreation.

6. Special Recreation Permits

a. Background

Special recreation permits (SRP) may be issued by managing agencies to businesses, organizations, and individuals to allow organized group use and visitation to public lands. Guidelines for issuing SRPs are important to ensure visitation to the monument is sustainably accounted for and managed. The Planning Criteria Report mentions SRPs on p. 19.

b. Objective

Develop clear guidelines for using SRPs to preserve the resources that Browns Canyon was designated to protect.

c. Recommendations

- Special recreation permits should be classified into distinct classes, ranging from least intensive to most intensive, based on specific factors such as the size of equipment, size of area used, number of participants, frequency of use, compatibility with other uses, etc.
- Special recreation permits should only be issued if the permitted activities would not negatively impact monument objects and values.

XI. Directional and Interpretive Signage

A. Background

Visitors to the area may be travelling through and unaware that they have entered BCNM. There is currently a lack of informational materials, directional signage, and interpretive opportunities available for visitors to the national monument.

Additionally, many visitors to BCNM may benefit from greater accessibility. Considerations may include blindness, deafness/hearing loss, mobility impairments, wheelchair accessibility, etc. The Department of Interior's website states, "Public lands are for everybody, regardless of ability." (See Accessibility Across America's Public Lands, U.S. Department of Interior, <https://www.doi.gov/blog/accessibility-across-americas-public-lands>.) By considering ways to increase accessibility to all visitors, the agencies can ensure that BCNM can become a more inclusive place.

B. Objective

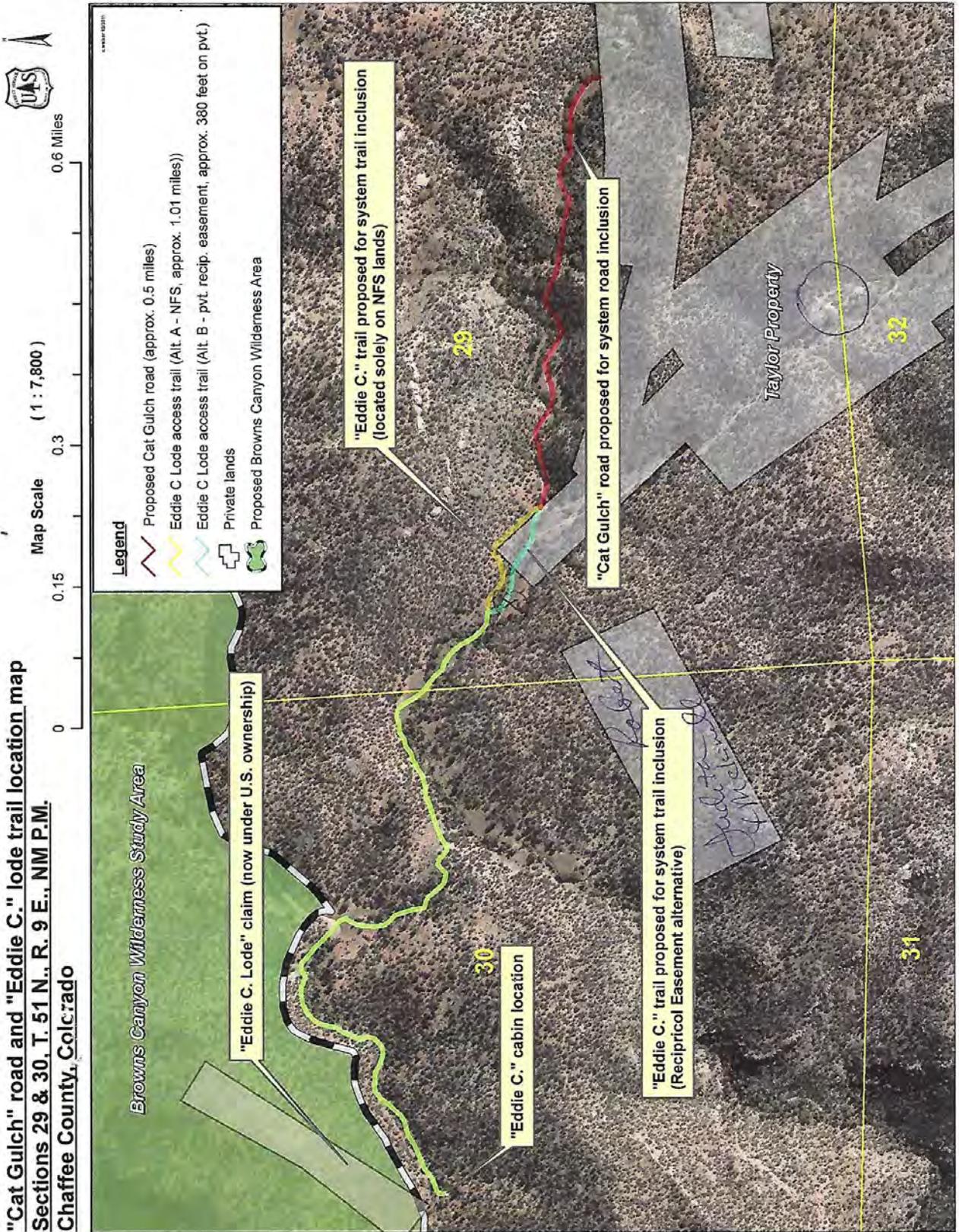
Consider visitor experience and opportunities for additional signage, interpretation and accessibility while ensuring protection of monument resources.

C. Recommendations

- Signage should be limited to trailheads and only in locations as necessary due to impacts (e.g., to direct people to trails, to keep people on trails, to manage illegal/undesignated route usage).
- There should be educational and interpretive materials at key sites, particularly where visitation is expected to substantially increase. This includes Front Country sites (e.g., Ruby Mountain and Hecla Junction), as well as the Aspen Ridge area.
- The BLM should place signage specifying that visitors are "Entering Browns Canyon National Monument" on CR 194 near the Hecla Junction parking area for visitors approaching Hecla Junction.
- The agencies should work to create educational materials focused on Native American cultural information and visiting with respect, developed as appropriate in collaboration with relevant Tribes (as described in Alternative B in the Planning Criteria Report, see p. 14).
- There should be no signage in the WSA nor in primitive areas except as needed for educational, directional, or interpretive purposes related to the trail systems.

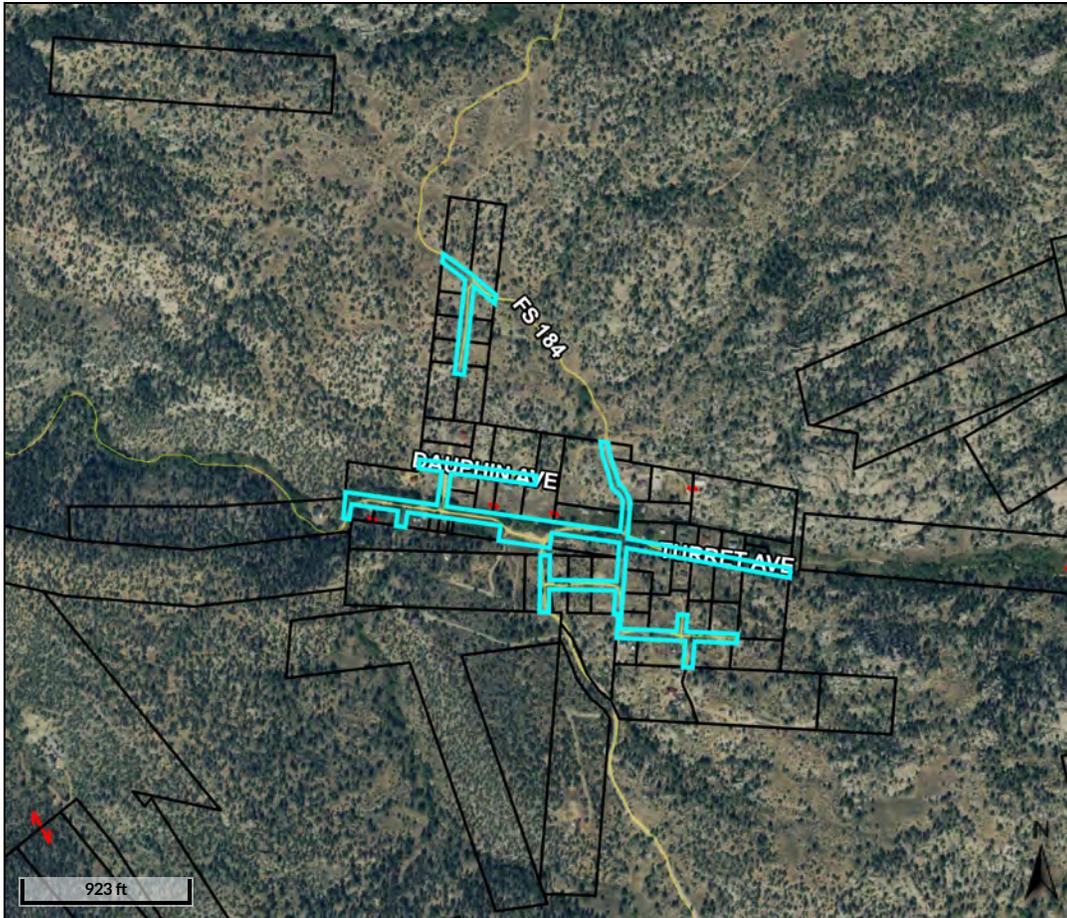
1. Recommendations specific to Turret, access to Railroad Gulch and FS 184

- The agencies should provide support to Turret to place clear signage in and around the town limits to direct visitors along routes



Map A4: USFS map from December 2011 showing proposed Cat Gulch system route along the historic Austin Trail, which currently serves as an administrative route and provides motorized access to a private inholding, the Taylor Property.

Turret HOA street map vert



- Legend**
-  Parcels
 -  Parcel Joins
 -  Roads

Parcel Number	R353529413053	Physical Address	Total Value	\$1,500				
Property Class	n/a	Owner Address	TURRET HOME OWNERS	Last 2 Sales	Date	Price	Reason	Qual
Taxing District	04		ASSOCIATION INC	n/a	0	n/a	n/a	n/a
Acres	7.42		C/O SHERMAN PEGGY	n/a	0	n/a	n/a	n/a
			P O BOX 1528					
			SALIDA, CO 812017528					

Brief Tax Description BLK 13 LOTS 1 THRU 9
 FOREST SERVICE RD ACROSS
 BLKS 22 & 23 &
 ADJ ALLEYS &
 ACROSS BLKS 26 & 2
 (Note: Not to be used on legal documents)

Date created: 4/30/2019
 Last Data Uploaded: 4/29/2019 5:19:26 PM

Developed by 

Map A7: A map from the Chaffee County Assessor's website showing that all roads in Turret are privately owned by the Turret Homeowners Association. The most direct access to iconic BCNM features like Railroad Gulch is through Turret along the historic Austin Trail. The current location of the gate on Austin Trail leaves insufficient room for visitor parking, contributing to private property trespass in Turret.

through Turret and strongly discourage any parking, visiting or loitering around private property. Because all property in Turret is private property and all the roads within the town limits are owned by the Turret Homeowners Association, signage should make it explicitly clear that there is zero tolerance for parking for any reason within the town limits. (Map A7 shows that even the roads in Turret are private property.)



The current location of the gate on Austin Trail at the edge of Turret does not allow for sufficient parking, leading visitors to park on private property and risk conflict with local residents.

- Clear signage indicating private property in the Turret area and information for visiting with respect should be made clear to minimize the potential for increased visitation to infringe upon property rights of Turret-area residents as well as to minimize the potential for human conflict.
- There should be clear signage indicating access to FS 184, including where parking is allowed and information about the primitive condition of the road – for example, “FS 184 is not maintained, high clearance 4WD essential” directional arrows and mileage, “Public road through private property, please stay on road,” etc.
- The USFS should relocate the existing gate at the edge of Turret to a point on Austin Trail beyond the last private property owner’s driveway (outside BCNM) and develop a new parking area/turnaround at that location. This section of road lies outside the monument boundary and would adhere to the Proclamation’s restrictions on motorized access within the monument. (See Map A4.)
 - This portion of Austin Trail is currently used for motorized access by one private property owner and USFS personnel.
 - Implementing this recommendation would help to minimize social and environmental impacts to the residents of Turret, including private property trespass and damage, illegal parking, and the potential for verbal and physical conflict between visitors and private property owners.
 - This recommendation would facilitate non-motorized access to the key monument attractions (Stafford Gulch, Railroad Gulch and The Reef) along an established, 134-year old trail. According to local historian Dick Dixon, author of “The D&RG’s Calumet Branch and the Turret Mining Area,” Austin Trail existed as early

as 1885, was a mail route by 1897 and was historically used for motorized traffic.

2. Recommendations Specific to Aspen Ridge

- The USFS and BLM should work with interested tribes to develop interpretive signage for the area. Signage should be placed at view-point(s) and should include interpretive information as well as guidelines related to ethics and impacts of off-trail use on Native American sites and artifacts. Signage in the area should only be in places deemed appropriate by the tribes.
- The Aspen Ridge area should have clear signage to delineate differences in camping requirements within the monument, as opposed to camping on the eastern side of FS 185 (outside BCNM). (See also Section X.B.1 related to dispersed camping.)
- The Aspen Ridge area should have designated campsites with permanent fire rings where campers can park in the 100-foot buffer zone and carry gear by foot to the campsite. One such campsite is already in place at a spur off FS 185 designated 185GR on a Fourmile Travel Management Plan map dated Feb. 28, 2002. (See Map A5.)

XII. Minimum Route Network

A. Background

In developing a minimum route network for BCNM, the BLM and USFS must focus on the predominant obligation to protect monument objects, as required by Proclamation 9232, the Antiquities Act of 1906, FLPMA and NEPA.

Overall, this requires the agencies to ensure that the approved system-route network will best fulfill the purposes of managing BCNM for protection and preservation of its natural, cultural, historic, scenic and scientific values while also providing for types of recreational use mentioned in Proclamation 9232. This can be achieved by first considering the presence of objects of interest and bearing in mind that a level and type of travel should be permitted consistent with the protection of those values.

This is an opportunity to design a route system that identifies where, when and how travel should be authorized. The design should provide the minimum route network necessary to support enjoyment of the monument while minimizing impacts and risk of harm to monument objects. The route network should also be sustainable in terms of agency resources for monitoring and management.

A “minimum route network” is defined as the smallest system of routes designed to provide for the enjoyment of the designated area without compromising the conservation, protection and enhancement of the resources that the

area was established to protect. The BLM uses the term “route” to include roads, primitive roads and motorized trails. (See Map A2.)

The BLM should focus travel planning in Key Decision Areas. Key Decision Areas are defined as those areas most important for travel planning decisions because they are:

- Places where the public already has a history or pattern of visiting and where there have already been resource conflicts.
- Places the public already has a history or pattern of visiting and where there have not yet been any apparent resource conflicts, but where there could be resource conflicts if usage and visitation increased.
- Places at which there will likely be an increase in visitation due to the implementation of the management plan (i.e., visitor center/kiosk, interpretive signage, etc.).
- Places that are readily accessible and extremely sensitive such that they require proactive protection regardless of current/expected visitation.
- For key decision areas, the BLM should further focus on a core set of planning actions and principles in addition to the overall priority of protecting monument objects, including:
 - Not designating redundant routes.
 - Re-routing or closing existing routes where they are harming monument objects and/or other sensitive resources (cultural resources, wilderness characteristics, wildlife habitat, riparian areas) or likely to lead to off-route exploration.
 - Preparing and implementing closure and rehabilitation plans for unnecessary routes.
 - Ensuring a robust monitoring plan is in place that provides for tracking whether management actions are succeeding and a method for adjusting management if they are not.
 - Enforcement capacity and approaches to supplement agency capacity (such as volunteers).
 - Managing special designations, including the Aspen Ridge Roadless Area, the Browns Canyon WSA, and the Browns Canyon ACEC to protect the characteristics they were designated to protect.

We have identified some key decision areas in our recommendations.

B. Objective

The agencies should maintain the minimum route network necessary to manage for safe and sustainable visitation to BCNM while preserving the resources the monument was designated to protect. Designating a minimum route network in the monument will not only help curtail the direct impacts of routes but will also help alleviate problems associated with other threats to

conservation values, such as the spread of invasive species and damage to cultural resources.

C. Recommendations

- The agencies must have a budget to fund potential new improvements to access roads, in response to increased visitation. It would be helpful for the RMP to provide clarification on funding and an implementation strategy, including triggers for such improvements.
- The BLM should conduct additional research to evaluate the space connecting the River Access Trail and the River Bench Trail. Because of the proximity of the two trails, there is concern about visitors bushwhacking in an effort to connect the two trails and putting themselves and monument resources at risk. The agency's research should examine tradeoffs of reducing risk to both people and resources, along with impacts to visitor experience, wildlife, vegetation, soils, wilderness characteristics, etc., if a connecting trail were to be developed.
- The USFS should examine designating a 0.5-mile system route for motorized public access down the existing Austin Trail. The Austin Trail is already a motorized route used for USFS administrative purposes and by private property owners for decades but is not currently a system route open to motorized public use. As documented by Dick Dixon, local historian and author of the book "The Calumet Branch and Turret," The Austin Trail has been used since at least 1885. It was a mail route by 1897 and was historically used for motorized traffic and mining equipment. A USFS map dated December 2011 shows the Austin Trail as "Cat Gulch road proposed for system road inclusion." (See Map A4.) This would provide for car parking and a turnaround for access to the Railroad Gulch/Stafford Gulch/Reef area. The parking area is proposed for a location past the last residence on the Austin Trail west of Turret. The route and parking area should meet all wildlife closure requirements.
 - The agencies should consider placing a composting toilet located at the proposed parking area, outside of the monument's boundaries, which we acknowledge is subject to additional NEPA.
- A non-motorized system route should be designated from the proposed Austin Trail parking area (referenced in Section V.B.5, Section XI and the previous bullet point) for public access to the Railroad Gulch/Stafford Gulch/Reef area. This trail would follow the existing, currently non-system Austin Trail, established ca. 1885, and end at the confluence of Stafford Gulch and Railroad Gulch, just short of Hecla Castle.
- There should be a dirt turnaround area after the last private property north of Turret on FS 184 at the same location where the seasonal closure sign and gate are proposed to be located. (See Section IX.)

- The agencies should consider supporting as many as two scenic overlooks in the Aspen Ridge area with parking allowed only within the 100-foot buffer zone along Aspen Ridge Road. The overlooks should be accessible by foot and be designed with accessibility for visitors in mind.

Recommendations Specific to FS 184

- The last 0.38 miles of FS 184 should be closed due to excessive erosion.

Recommendations specific to Ruby Mountain and Hecla Junction

- Parking for Ruby Mountain and Hecla Junction area will soon be outgrown. The BLM should proactively consider solutions to manage for increased visitation.

Recommendations Specific to Aspen Ridge:

- The USFS should prioritize research for determining which spur roads off FS 185 and 185D due to illegal motorized use. We recommend the agencies use of substantial structural barriers, at or outside the Monument boundary, with minimal intrusion to visual aesthetics to discourage the use of unauthorized routes. The exception to this would be for camping sites and spur roads the agency determines are appropriate for designated dispersed camping or a scenic overlook.

XIII. Conclusion

The Sustainable Alternative presents community-developed recommendations for the future management of BCNM. The BLM and USFS should consider the recommendations and information presented in this Alternative while making decisions throughout the BCNM planning process. If you have any questions or concerns about this proposal, please contact Friends of Browns Canyon at friendsofbrowncanyon@gmail.com or The Wilderness Society at katie_meehan@tws.org.

Sincerely,

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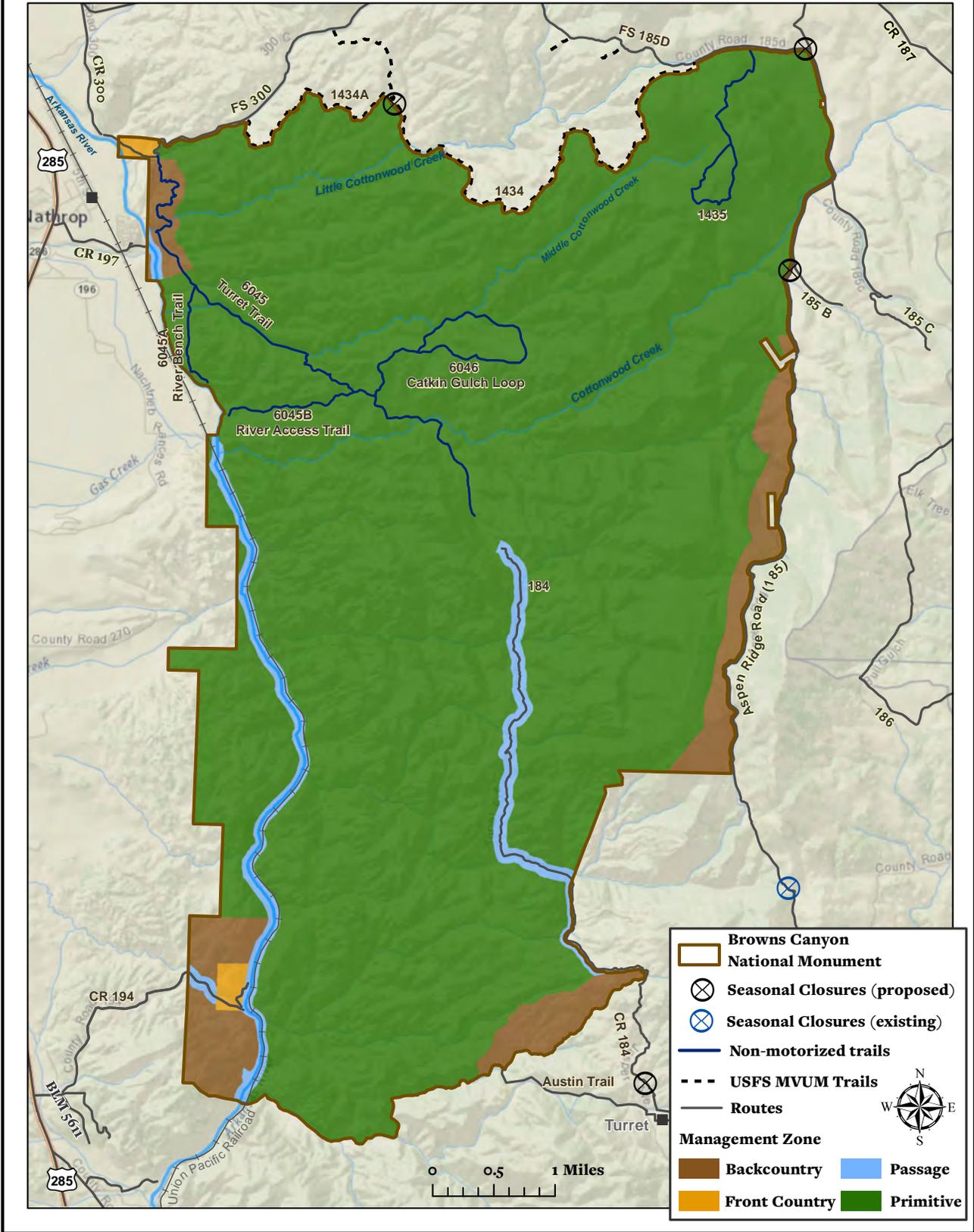
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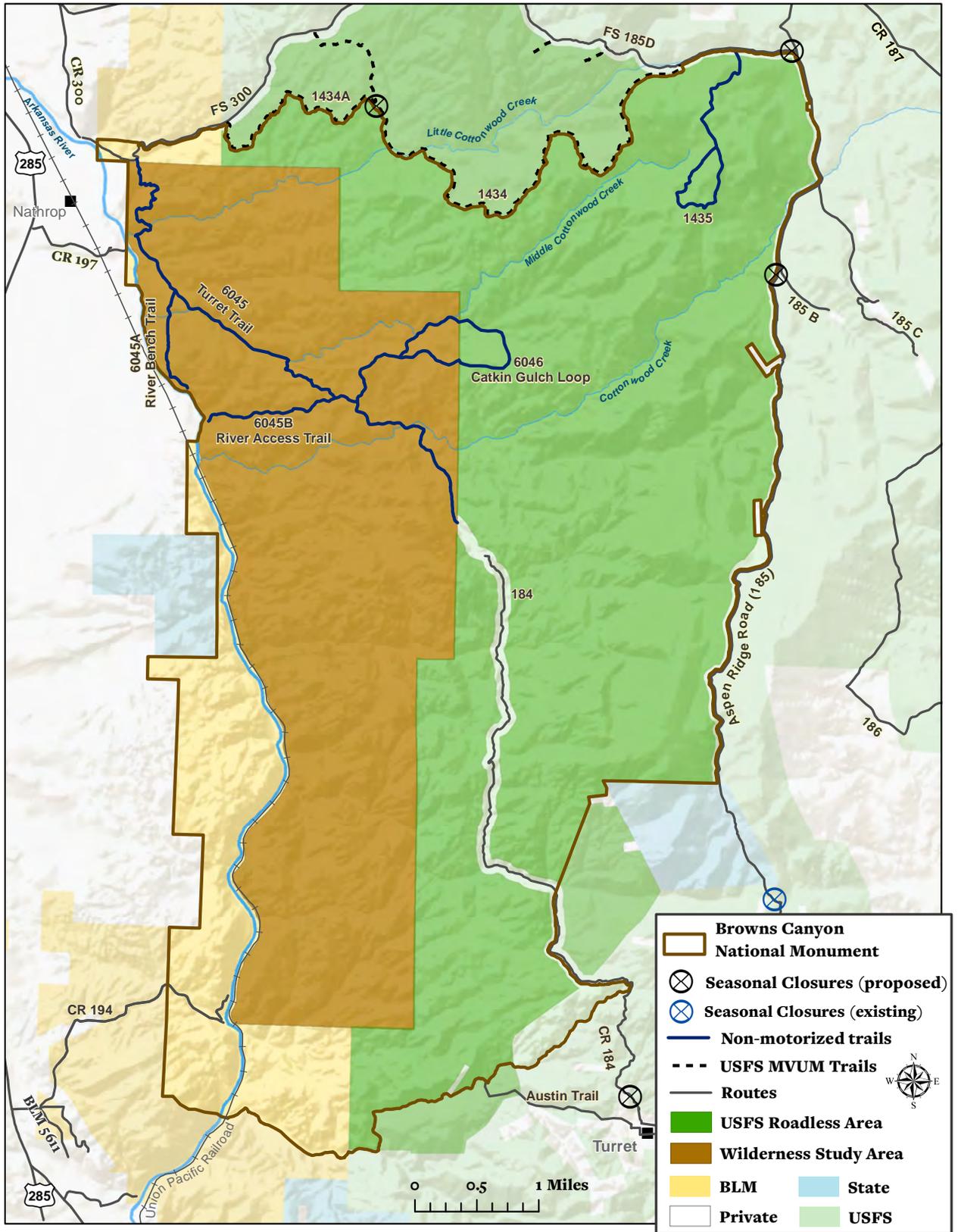
Appendix A
Maps of Browns Canyon National Monument

Browns Canyon National Monument Proposed Management Zones



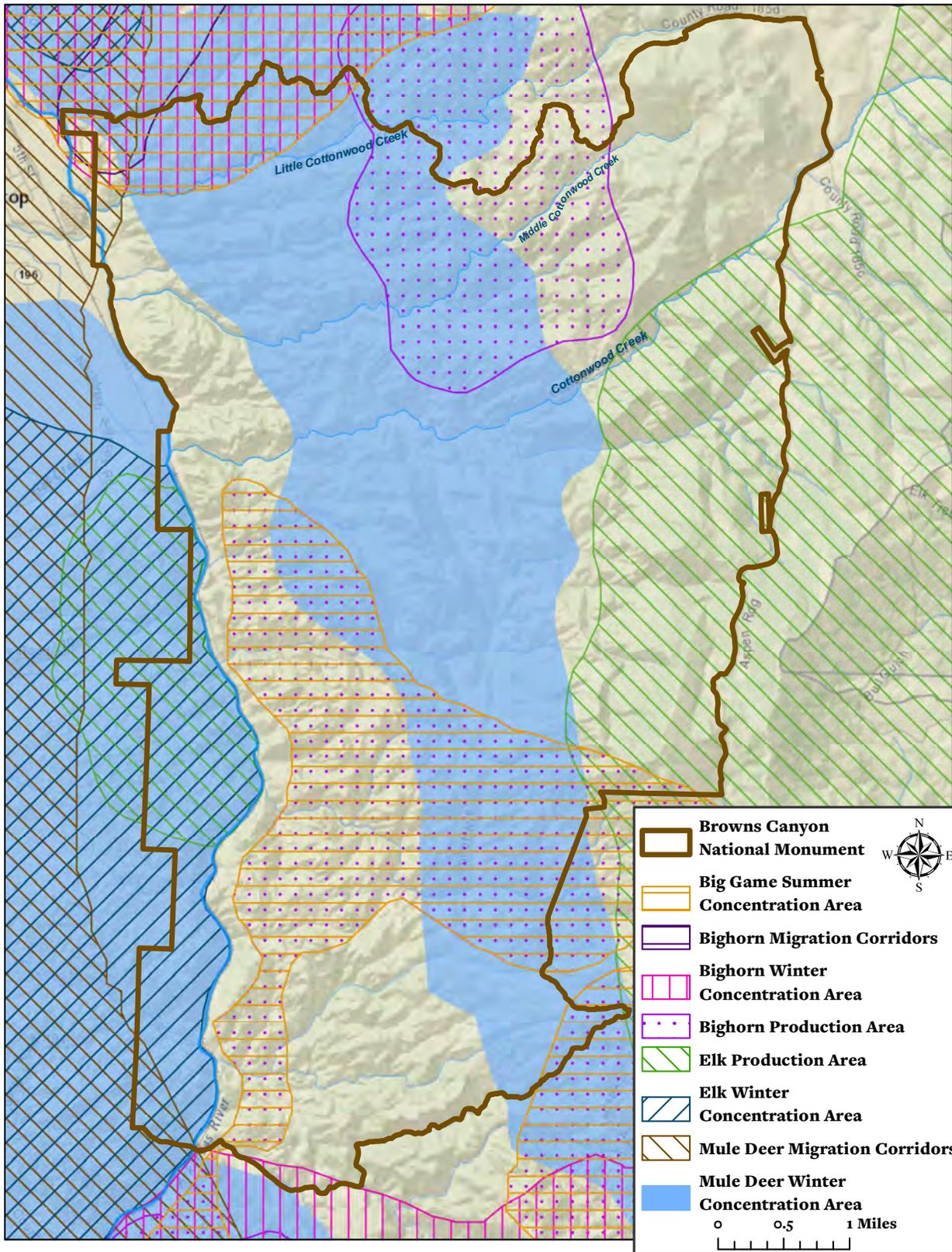
Map A1: BCNM Proposed Management Zones.

Browns Canyon National Monument Routes & Trails



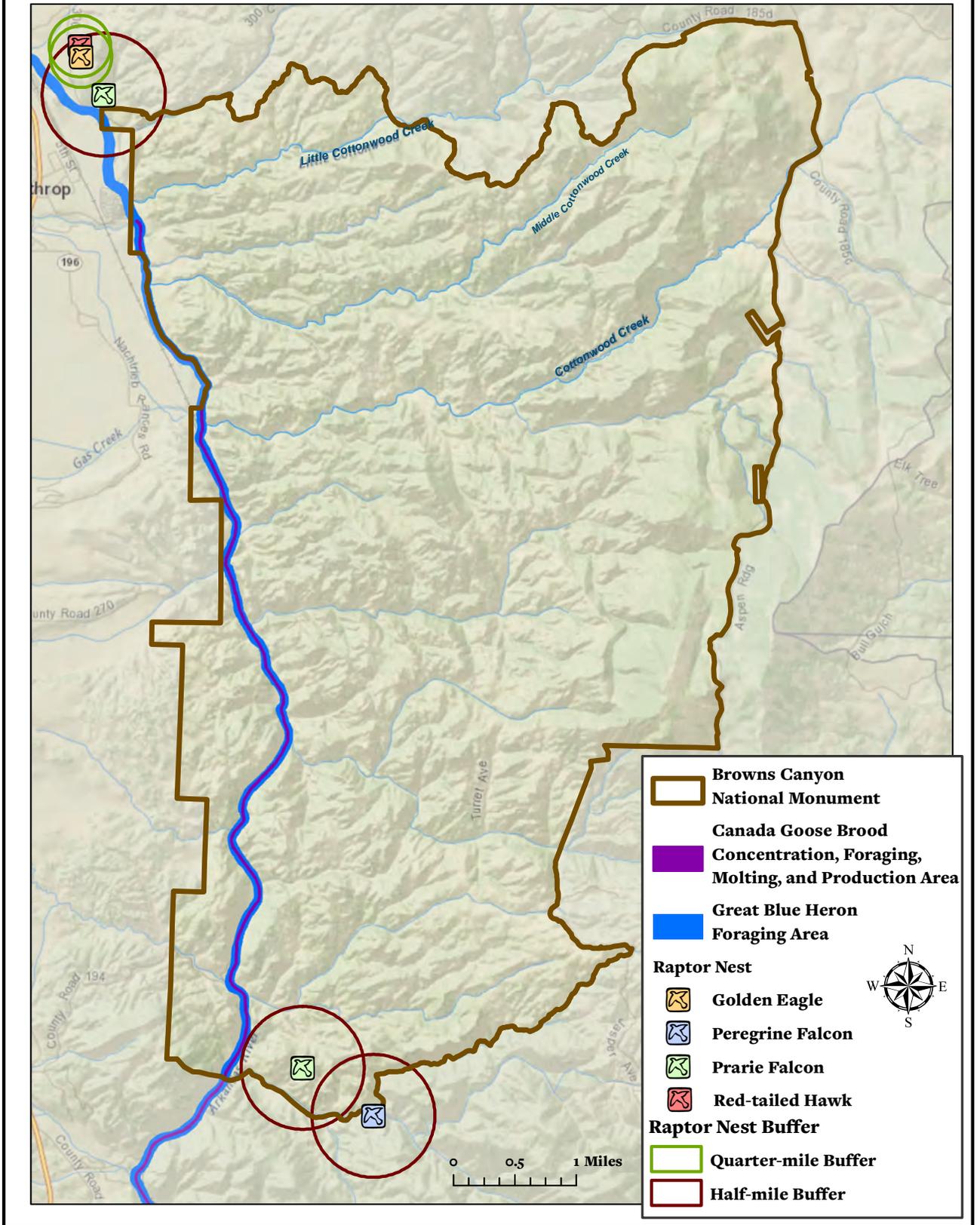
Map A2: BCNM Minimum Route Network.

Browns Canyon National Monument Big Game Seasonal Range

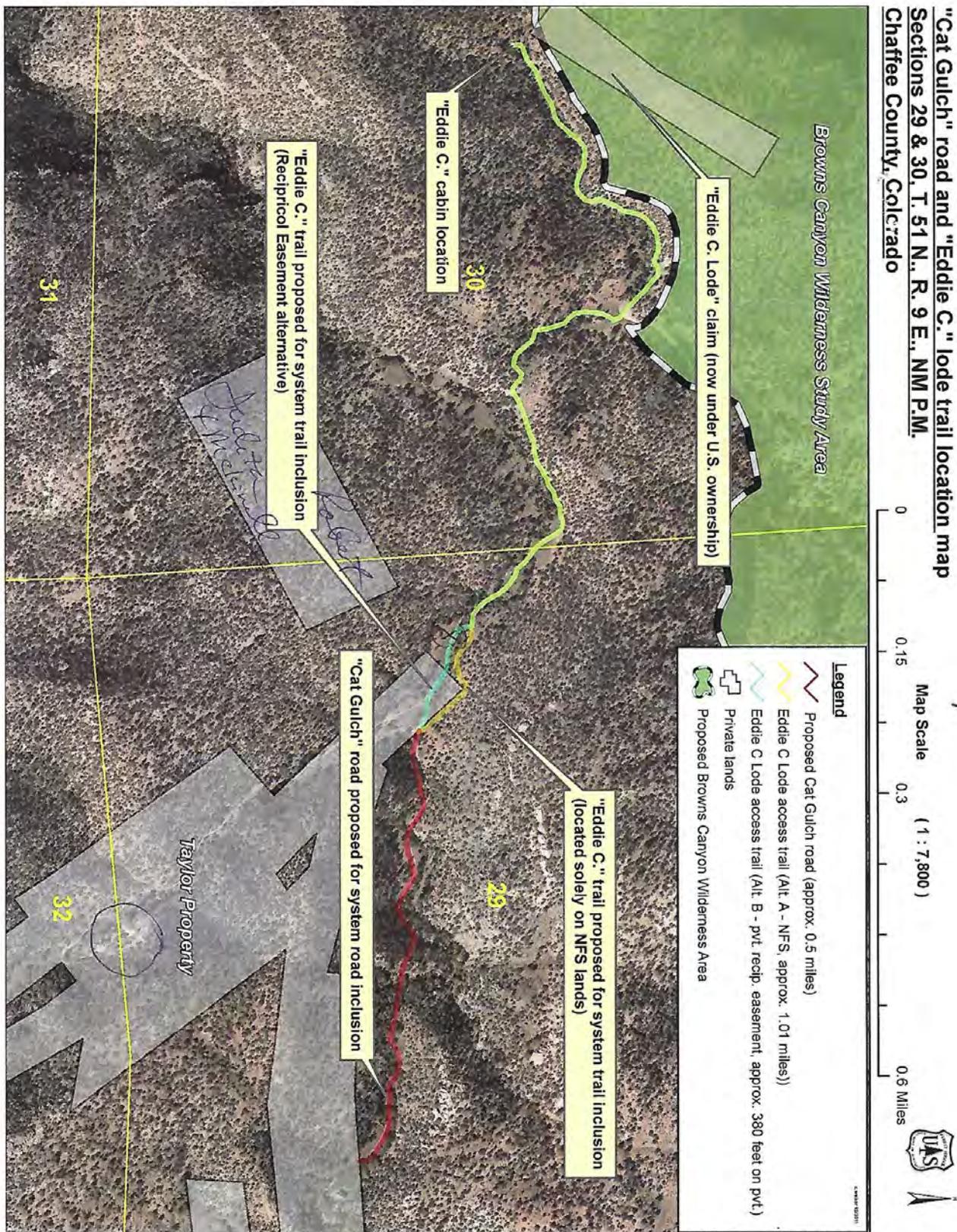


Map A3a: Big Game Seasonal Range within BCNM.

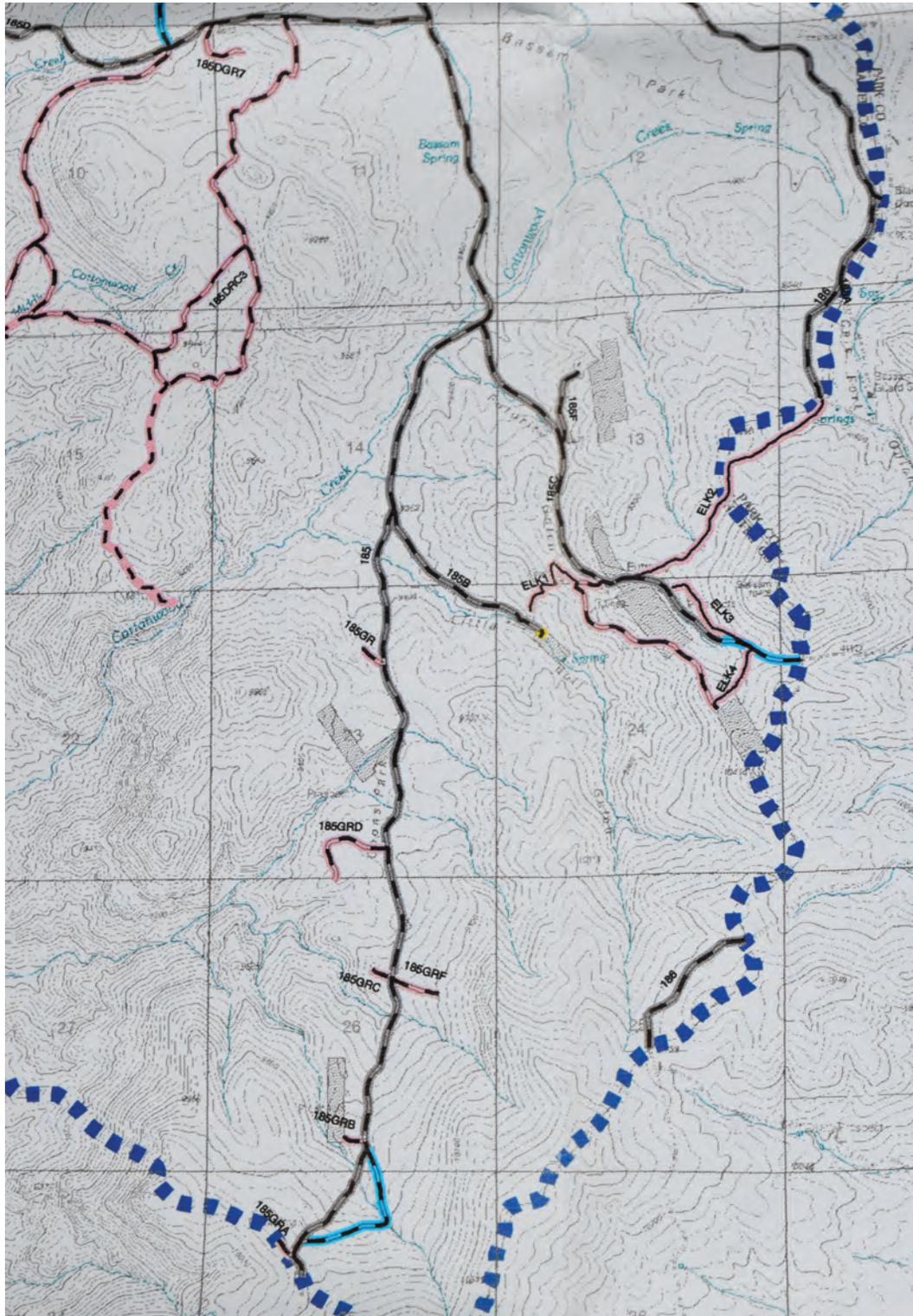
Browns Canyon National Monument Raptor and Waterfowl Habitat



Map A3b: BCNM Raptor Nesting Sites.

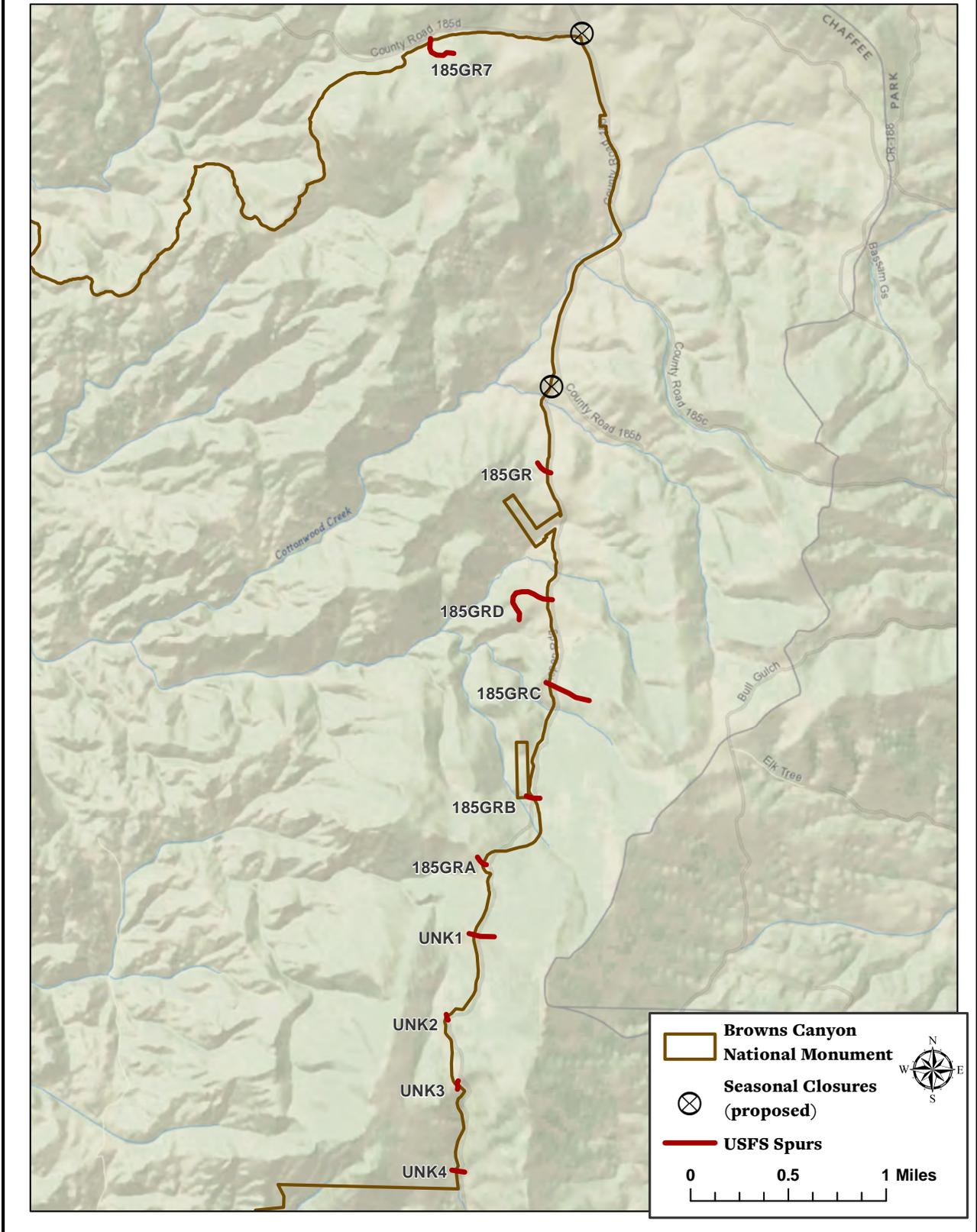


Map A4: USFS map from December 2011 showing proposed Cat Gulch system route along the historic Austin Trail, which currently serves as an administrative route and provides motorized access to a private inholding, the Taylor Property.



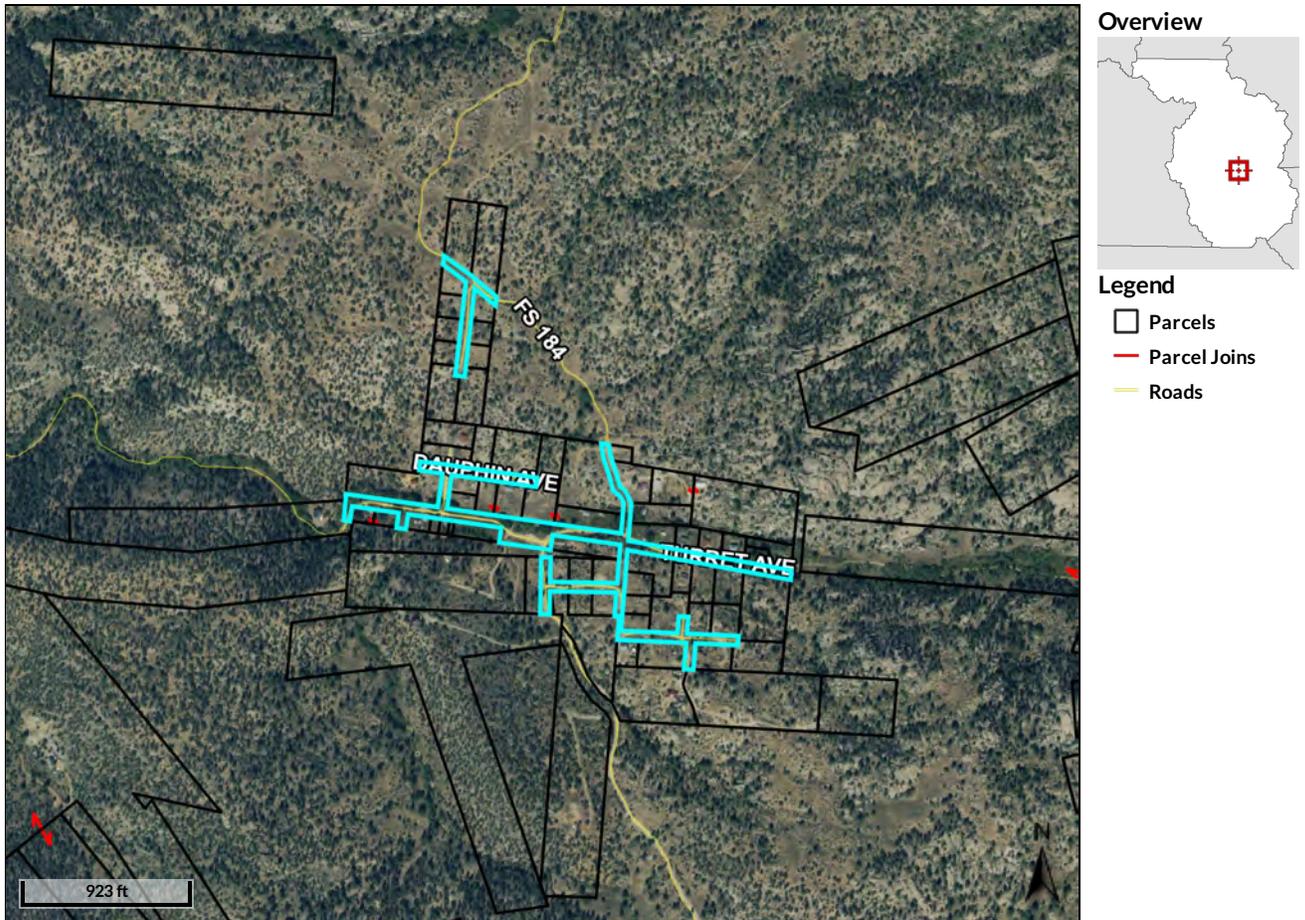
Map A5: Detail from a USFS Fourmile Travel Management Plan map (Feb. 28, 2002) showing the northeastern corner of BCNM west of FS 185. The map documents historical use of FS 185 spurs with USFS designations. Additional spurs exist further south, and most of these sites would be appropriate for designated uses with parking permitted within 100 feet of the roadway.

Browns Canyon National Monument USFS Spurs



Map A6: An Inventory of Spur Roads off FS 185 (Aspen Ridge Road).

Turret HOA street map vert



Parcel Number	R353529413053	Physical Address		Total Value	\$1,500	Last 2 Sales			
Property Class	n/a	Owner Address	TURRET HOME OWNERS			Date	Price	Reason	Qual
Taxing District	04		ASSOCIATION INC			n/a	0	n/a	n/a
Acres	7.42		C/O SHERMAN PEGGY			n/a	0	n/a	n/a
			P O BOX 1528						
			SALIDA, CO 812017528						

Brief Tax Description BLK 13 LOTS 1 THRU 9
 FOREST SERVICE RD ACROSS
 BLKS 22 & 23 &
 ADJ ALLEYS &
 ACROSS BLKS 26 & 2
 (Note: Not to be used on legal documents)

Date created: 4/30/2019
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Developed by 

Map A7: A map from the Chaffee County Assessor's website showing that all roads in Turret are privately owned by the Turret Homeowners Association. The most direct access to iconic BCNM features like Railroad Gulch is through Turret along the historic Austin Trail. The current location of the gate on Austin Trail leaves insufficient room for visitor parking, contributing to private property trespass in Turret.

Appendix B
Browns Canyon National Monument
Objects of Historic or Scientific Interest

Appendix B: Browns Canyon National Monument Objects

PHYSICAL ENVIRONMENT		
Geographical	Mountains and mountain ranges	<ul style="list-style-type: none"> - Sugarloaf Mountain - Ruby Mountain
	Masses of Sediment	<ul style="list-style-type: none"> - Gold - Silver - Semi-Precious gems
	Transition Zone	<ul style="list-style-type: none"> - Provides for a mix of vegetation and wildlife - Mix of dominant plants
	Canyons	<ul style="list-style-type: none"> - 1.6-Billion-year-old Precambrian granodiorite batholith makes us canyon
	Rock Formations	<ul style="list-style-type: none"> - Canyon named for the light brown rock that from the presence of feldspar that has been exposed to hear - Most of the canyon was formed when hot magma solidified into granite - Granite then transformed into gneiss
	Glaciers	<ul style="list-style-type: none"> - Glacial cirques - Flat & mesa like terraces - Large Moraines - Formed during the Pleistocene Epoch era
	Stones/Rocks	<ul style="list-style-type: none"> - Pink Granite, Metamorphic Rock

	River	<ul style="list-style-type: none"> - Arkansas River - Allowing for water & transportation for inhabitants
Scenic Qualities	Views of Collegiate Peaks & Sawatch Range	8 of Colorado's highest peaks and three wilderness areas Rafter on the most popular section of the river Wild & Scenic backdrops
Paleontological/Fossils	Bivalves	
	Brachiopods	
	Gastropods	
	Enchinoids	
	Bryozoans	
	Crinoids	
	Conodonts	
	Nautiloids	
	Vertebrates	- Sharks & bony fish
ARCHEOLOGICAL, HISTORICAL AND CULTURAL RESOURCES		
Tribal History	Ancestors of Indian Tribes	<ul style="list-style-type: none"> - Ute - Apache - Eastern Shoshone - Comanche

Landscape Features/in	Rainbow Rock	<ul style="list-style-type: none"> - Colored stripes along the cliff face - Red: Iron Oxide - Green/Yellow/Orange: Lichens
	Sugarloaf Mountain	<ul style="list-style-type: none"> - has rhyolite
	Ruby Mountain	<ul style="list-style-type: none"> - Red garnets that are often collected by rock hobbyists in the area
	Early-History	<ul style="list-style-type: none"> - Artifacts dating back 10,000 years show human existence within the River valley - 18 known archeological sites with in <p>5 Prehistoric open lithic sites that are eligible for the National Register of Historic Places</p>
Historical Significance	Archaic Period:	<p>Seasonal Camp sites with:</p> <ul style="list-style-type: none"> - Culturally modified trees - Wickiups - Tipi rings - Chipped stone manufacture - Ceramic pottery kiln - Rock shelters - All date back to Archaic period (8,000-13,000 before present)

	European Exploration	<ul style="list-style-type: none"> - Spaniard Juan de Ulibarri, first European, to cross the Arkansas River in 1706 - 18th & early 19th Century Spanish army patrolled the upper Arkansas River valley as north as Leadville to secure the territory of Spanish influence - Other famous explorers: Zebulon Pike and Captain John C. Fremont in Early 19th Century - First European inhabitants were fur trappers & gold miners - in the 1800s
	Industrial Revolution	<ul style="list-style-type: none"> - Discovery of gold in Arkansas River in the 1850s and 1870s lead to influx of people - 1870s stage roads carried thousands of people through the region - 1880s: Construction began on Rio Grande and Denver Railway - Operated until 1899 - Officially abandoned in 1923
	Industrial Revolution	<ul style="list-style-type: none"> - Discovery of gold in Arkansas River in the 1850s and 1870s lead to influx of people - 1870s stage roads carried thousands of people through the region - 1880s: Construction began on Rio Grande and Denver Railway - Operated until 1899 - Officially abandoned in 1923
BIOLOGICAL ENVIRONMENT		
Vegetation	Pinon Juniper	

	Douglas Fir	
	Ponderosa Pine	
	Aspen	
	Cottonwood	
	Alder thickets	
	River Birch	
	Shrubs	
	Lichens	
	Blue Grama Grass	
	Yucca	
	Cholla	
	Prickly Pear	
	Alpine Bluegrass	
	Blue Bunchgrass	
	Arizona Fescue	
	Indian ricegrass	
	Wildflowers	- Scarlet gilia - Larkspur Bloom
	Mountain Muhly	

	Globally Impaired	<ul style="list-style-type: none"> - Riparian Forest: <i>Populus angustifolia</i> - <i>Juniperus scopulorum</i> - Fendler's Townsend Daisy (<i>Townsendia fendleri</i>) - Fendler Cloack-fern (<i>Argyrochosma fendleri</i>) <p>State: Livemore Fiddleleaf (<i>Nama dichotomum</i>)</p>
	Endangered species	<ul style="list-style-type: none"> - Greenback cutthroat trout (<i>Oncorhynchus clarki stomias</i>) - Canada Lynx (<i>Lynx canadensis</i>)
Wildlife	Other Birds	<ul style="list-style-type: none"> - Cliff Swallow - Canada Jay - Mourning dove - Flicker - Blue Jay - Wild Turkey - Western screech owl - Saw whet owl
	Raptors	<ul style="list-style-type: none"> - Red-tailed Hawk - Swainson's Hawk - Golden Eagles - Turkey Vultures - Great-Horned Owl - Prairie Falcons

	Mammals	<ul style="list-style-type: none"> - Mountain lions - Bighorn sheep - Mule deer - Bobcat - Red & gray fox - American black bear - Coyote - American pine marten - Kangaroo rat - Elk - Tree & ground squirrels
	Reptiles and amphibians	<ul style="list-style-type: none"> - Sensitive Boreal Toad - Northern Leopard Frog

Name: Alan Robinson
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

The Sustainable Alternative submitted by the Friends of Browns Canyon has the following recommendation: XII. Minimum Route Network The BLM should conduct additional research to evaluate the space connecting the River Access Trail and the River Bench Trail. Because of the proximity of the two trails, there is concern about visitors bushwhacking to connect the two trails and putting themselves and monument resources at risk. The agency's research should examine tradeoffs of reducing risk to both people and resources, along with impacts to visitor experience, wildlife, vegetation, soils, wilderness characteristics, etc., if a connecting trail were to be developed. Having been a participant in the citizens group developing the Sustainable Alternative submitted by the Friends of Browns Canyon I am submitting an individual comment providing detail on the potential for connecting the River Bench and River Access trails in the northern section of the BCNM. The two attached maps provide context. The first is a general view of part of the existing formal trail system south of Ruby Mountain, indicating the location of the disconnect between these two trails. The second is a detail section at that disconnect including a GPSd track of my recent exploratory off-trail hike in an attempt to find a feasible route where a safe system connector trail could be constructed. Overall my conclusion is there is potential for such a connection more or less along this route but that there would be trail-location and -construction challenges in making it at roughly similar standards as the two trails it would connect. See notes on the detail map. I recommend the Monument's management team further examine this area – or identify a different and less challenging route – with the goal of making a safe system-approved trail connection that would expand opportunities for a longer loop trail experience.

Name: Mike Sugaski
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/19/2019 8:00

Comments:

This letter is in response to the public scoping process for the Browns Canyon National Monument. Mountain biking within the BCNM- Mountain biking should be allowed in order to provide a semi-primitive experience for mountain bikers allowing them to have a more solitude experience while communing with nature. It is a wonderful way to access the monument. The trail(s) could also provide for a much-needed connector route between Buena Vista and Salida. There is more national interest in allowing mtn. biking in wilderness areas as can be seen in Senate Bill S1695. So, it should not be dismissed all together even if the decision is to defer it to a future time after congress makes a decision to allow or disallow. Mountain biking is one of the fastest growing outdoor activities in the state. Wilderness is partly defined as the absence of man's presence... take only pictures-leave only footprints. BCNM has remains of much of man's presence with past logging operations, mining, cabins and mill sites, cattle grazing, railroading, and jeeping roads. It isn't a purist's primitive setting. Camping within the BCNM- Camping and recreation in Chaffee County is growing by 15% per year as identified through the Recreation in Balance working group. This group is looking at where the most critical areas are as it relates to the amount of use and impacts to our natural environment. Identified as one of the top areas to take action is the Fourmile Travel Management Area which includes most of the BCNM. Most of this area has been inventoried by Friends of Fourmile with additional inventory to take place this year. Options for mitigating the impacts include designated disperse campsites particularly along riparian areas. The Aspen Ridge corridor has seen a substantial increase of campers over the past few years. Camping is going beyond the one car length causing new spurs and user created routes. More conflicts between campers and cattle operations are occurring particularly around water sources where cattle have to frequently access. With a few spots to camp sanitation is becoming a problem and will only get worse. Pack-In, Pack-Out even for human waste should be considered as a management tool in highly used designated dispersed site. The solution is to prioritize the most sensitive areas and start to manage accordingly with designated disperse campsites, barriers, signage, and more frequent patrols. A developed campsite should be considered in the surrounding area to help handle the increase use, possibly somewhere near Bassam Park. Camping along the river is more of a roaded natural experience. The boaters are accustomed to seeing hundreds of people a day floating the river. This corridor should support a higher number of people than say the backcountry where one must hike a distance to camp, and encounters are far fewer. Capacity limits should be set for the appropriate ROS settings and sensitivity to the environment. Rail to Trail- Should the opportunity arise that the railroad tract is abandoned it should be converted to a rail-to-trail. This would provide a unique non-motorized recreational opportunity much like the river is to access the BCNM. Pg. 2 BCNM comments Cattle operation- Grazing operations and improvements i.e., water developments, fences, gates, salting, and rotation, should be managed so as not to conflict with recreation where possible. This means relocation of some structures may optimize both cattle and recreation opportunities. Law Enforcement- A dedicated law enforcement officer for the BCNM should be appointed as the plan is being implemented. This would help set the direction and enforcement for implementing the plan, particularly in the backcountry east of the river. Use of volunteers and dispersed campsite host would help tremendously as well. Working with the county

and other organizations- Chaffee County along with many civic and 5013c organization like GARNA will go a long way in helping manage these resources. The county has recently passed a 1 percent sales tax to help manage many of the problems BCNM will be facing. They are currently going through a planning process to help them decide where the problems are and how to mitigate and allocate funds to correct these problems. The citizens of Chaffee County are a very concerned and giving community when it comes to their quality of life including the natural environment in which they live. The Common Grounds, Recreation in Balance, GARNA, Central Colorado Conservancy are just some examples of the organization that have accomplished a lot in Chaffee County. Mike Sugaski 204 W Park Ave Salida , Colorado 81201 Past Recreation and Lands Staff, Salida RD for 17 yrs. Forest Service Lead for Fourmile Travel Management Plan, 2002 Member, Leadership group for Recreation in Balance

Name: Hattie Johnson

Organization Name: American Whitewater

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 8:00

Comments:

See Attached letter Hattie Johnson, PLA Southern Rockies Stewardship Director hattie@americanwhitewater.org 970.456.8533 June 20, 2019 U.S Department of the Interior Bureau of Land Management Royal Gorge Field Office Canon City, Colorado U.S. Department of Agriculture U.S. Forest Service Pike and San Isabel NFs & Cimarron and Comanche National Grasslands Salida, Colorado Re: Planning Criteria Report of Preliminary Alternatives Report/Basis for Analysis for Browns Canyon National Monument (BCNM) Resource Management Plan American Whitewater appreciates the opportunity to submit comments on the BLM and USFS Preliminary Alternatives Report and Basis for Analysis for BCNM Resource Management Plan (RMP). American Whitewater supports planning initiatives that protect and improve the robust recreational and whitewater opportunities that exist throughout the Planning Area. American Whitewater was a signatory on the Friends of Browns Canyon Sustainable Alternative and supports all comments included therein. Our brief comments included in this letter highlight the issues of Wild and Scenic special designations and other aspects important to the river recreation community. The interests of the boating community depend on healthy riparian habitats, healthy river flows, well-maintained river access areas, and sustainable management practices to protect these resources for future generations. To protect these values, we are submitting comments in support of management actions that give the most protection to riparian values and river recreation opportunities throughout the BCNM region; our comments focus on how the Wild and Scenic Rivers (WSR) suitability determination from the Eastern Colorado RMP for the Arkansas River will be applied in this planning effort and how that protection can be maintained. About American Whitewater American Whitewater is a national 501(c)(3) non-profit organization with a mission "to conserve and restore our nation's whitewater resources and enhance opportunities to enjoy them safely. With 6,000 individual and 100 affiliate club members, American Whitewater represents the interests of over 80,000 river enthusiasts. 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 Arkansas River and other rivers in the BCNM region attract our members from across the region and the country, and we support management actions that protect and preserve healthy riparian systems and provide unique recreational opportunities. American Whitewater's comments cover two sections of the Planning Criteria Report: Special Designations Wild and Scenic Rivers and Recreation - specifically, camping on the Arkansas River Shore and Bench RMZ. 2.3.1 Special Designations Wild and Scenic Rivers - American Whitewater strongly opposes the actions outlined in Alternative C based on the proposal to find Wild and Scenic eligible segments not suitable and to release them from protective management. - American Whitewater generally opposes Alternative A: The No Action Alternative. Alt. A does not meet the needs of the Browns Canyon National Monument Management Plan or the needs of the communities and resources within the planning area. The agencies should highlight that the Browns Canyon Proclamation and Voluntary Flow Management Program both adequately address management for this river segment. Recommendations to Congress on designation of Arkansas

River Segment 2 would jeopardize that voluntary agreement and endanger the recreation, scenery, wildlife, botany, and fish outstandingly remarkable values. - We strongly encourage the BLM to consider the aspects of Alternative B that protect eligible and suitable river segments under the National Wild and Scenic Rivers System. We support Alt. B because it maintains the interim protective management provided by a suitability determination and provides an opportunity for more segments and tributaries to be inventoried and included. - In absence of protections as defined in Proclamation 9232 and elsewhere in this plan, management should continue as it has operated, with suitable segments in the Eastern Colorado RMP, due to the continuous nature of the segment upstream and downstream of the monument.

2.3.9 Recreation

The diverse nature of recreation within BCNM provides heavy front country use within the river corridor. American Whitewater supports planning initiatives that protect and improve the robust recreational tourism economy and whitewater opportunities that exist throughout the Planning Area. Population growth within Colorado is expected to continue to increase at a rapid rate and with that we expect to see higher use on our state's public lands. Management that can adapt to that growth and maintain the resources, objects, and values detailed in Proclamation 9232 is critical. Overnight camping on the river can have impacts from waste, fire, vegetation trampling, and others. Permit systems allow for a chance to require certain gear items (fire pan, sealed toilet systems, etc.) that help to reduce those impacts. However, permit systems also present accessibility issues to visitors. The existing experience on the Arkansas River in BCNM allows for spontaneous camping trips and maintains access to visitors without the resources required for permitted river sections. We suggest that a system to manage camping on the Arkansas River Shore and Bench RMZ should be easily used and provide a way to not only avoid conflicts between river and walk - in access but also between commercial and private users. The option of a free, on-site, self-issued permit could identify those sites available, ask visitors to sign up for their intended site, and to enforce gear requirements listed above. We understand that implementation decisions around camping on the Arkansas River Shore and Bench RMZ will be included in the Arkansas Headwaters Recreation Area - Management Plan. We intend to be a part of that process. Thank you for the opportunity to submit these comments and we look forward to staying involved as this process moves forward. Sincerely, Hattie Johnson, PLA Southern Rockies Stewardship Director hattie@americanwhitewater.org
American Whitewater

Comment period for 'Planning Criteria Report'

Letter #: 84

Name: Sean Hackett

Organization Name: Colorado Department of Public Health and Environment

Secondary Author:

Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

Please add CDPHE as a cooperating agency to the email list for this proposal.

Name: Withheld Withheld

Organization Name: Trout Unlimited

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 8:00

Comments:

Comments from Trout Unlimited on Browns Canyon National Monument RMP are attached as a word document ... Browns Canyon National Monument Resource Management Plan Formal Public Scoping Period Comment Trout Unlimited June 20, 2019 Please accept the following scoping comments on behalf of Trout Unlimited (TU) regarding the proposed Browns Canyon National Monument Resource Manager Plan. Trout Unlimited is a national, non-profit conservation organization consisting of more than 300,000 members and supporters dedicated to conserving, protecting and restoring North America's trout fisheries and their watersheds. Statewide, Colorado TU has more than 12,000 members and 24 local chapters that exist within the Bureau of Land Management Field Office and U.S. Forest Service region surrounding Browns Canyon. These volunteer members actively use and enjoy the resources of the many rivers, lakes and watersheds located on Colorado's public lands, including the Arkansas River, its tributaries and adjacent landscapes. Trout Unlimited's national office and Colorado-based staff work closely with Colorado Trout Unlimited (CTU) and several other conservation partners, government agencies and outdoor businesses to achieve our mission. Our organization, along with CTU, has been engaged in the recent Friends of Browns Canyon stakeholder process. Although TU national is not a signatory to the Friends of Browns Canyon "Sustainable Alternative," we are writing to voice our support for the proposal and offer additional comments related to water quality concerns, wilderness characteristics, wild and scenic designation, access, and visitation reiterating those submitted by CTU in Submission ID: SCOP--1-514813. Trout Unlimited supports the following general principles as a guide in developing the BCNM RMP. • Regulations and RMP actions should strive to maintain the highest level of protection for biological diversity and cultural artifacts within the BCNM; • The BLM should continue to build and prioritize partnerships with other management agencies (AHRA, CPW, USFS, USFWS), state organizations, and local groups to effectively manage the resources within BCNM; • Recreation and tourism are significant economic drivers in the Arkansas Valley and the BLM should continue to balance increased visitation and access with resource protection, safety, and overall user experience; • The BLM should develop action plans that protect and restore riparian ecosystems and aquatic wildlife within BCNM. The following comments reflect those submitted by CTU, structured to follow the format of the Planning Criteria Report and its three preliminary alternatives. Preliminary Alternatives Review 2.3.1 Special Designations "Goal/ Desired Condition SD1: Sustain and protect outstandingly remarkable values of the BCNM to maintain the long-term sustainability of the area's special characteristics and values for which the area was originally designated or considered for designation." OBJ SD1.1: Browns Canyon WSA Trout Unlimited supports Alternatives B and C – "Should the Browns Canyon WSA, in whole or in part, be released from wilderness consideration, manage such released lands consistent with the goals, objectives, and management actions established in this RMP-EIS, unless otherwise specified by Congress in its releasing legislation." BCNM was designated for its remote and wilderness values. Changing the management practices based on routinely changing priorities from one Congress to the next may damage the long-term resources that were originally designated to be protected. By continuing to manage the area under the RMP-EIS and not shift WSAs to multiple-use management, the governing agencies can maintain the quality of public lands and ROVs until specific legislation

requires alternative practices. OBJ SD1.4: Wild and Scenic Rivers (WSRs) Trout Unlimited supports Alternative B – “Determine the following eligible segments as suitable for designation, and apply interim protective management: • Arkansas River Segment 2 within the BCNM (7.1 miles) – recreational classification – recreation, scenery, wildlife, botany, fish, and cultural outstandingly remarkable values. WSR eligibility and suitability determinations studies are underway. Eligible streams may be added to the list of streams that will receive interim protective management. In the absence of protections as defined in Proclamation 9232 and elsewhere in this plan, management would be the same as suitable segments in the Eastern Colorado RMP due to the contiguous nature of the segment upstream and downstream of the monument.” Trout Unlimited recognizes the importance of protecting the wild and scenic values of the entire Arkansas River reach from Leadville to Pueblo Reservoir but is opposed to revoking existing waterpower/reservoir withdrawals to do so. It is the position of TU that the river is currently being appropriately managed through the Arkansas River Voluntary Flow Management Program, the Upper Arkansas Headwaters Recreation Area, Colorado Parks and Wildlife, U.S. Forest Service, and the Bureau of Land Management to protect the “wild and scenic” values connected to the defined reach. There is no need for federal action to manage the river in a considerably different way. We believe that Alternative A would significantly strain local relationships and impede the ability of stakeholders to work together in a flexible and adaptive system to protect the wild and scenic qualities of the Arkansas River. 2.3.5 Vegetation, Wildland Fire Ecology, and Fuels OBJ VF1.4 & VF3.1: Weed Management Trout Unlimited supports the BLM and USFS commitment to preventing and eliminating the presence of invasive and noxious weeds according to BMPs and integrated pest management. However, we express significant concern over the impacts of broadcast application from aerial spraying and the potential impacts to aquatic insects and riparian vegetation. These unintended consequences can present measurable impacts on various macroinvertebrate populations, as well as the periphyton and other riparian flora that provide forage or cover for such insects, which may affect food availability for fish and other wildlife. Therefore, we urge the BLM to avoid any aerial spraying or general broadcast of pesticides within BCNM – especially around significant drainages, wetlands, and the Arkansas River corridor. 2.3.7 Watersheds, Soils, and Water Resources Goal/Desired Condition WS1: Maintain and improve soil resiliency, ecological integrity, and productivity on monument upland and riparian habitats. Manage for functioning stable soils within the natural range of erosion variability, slope stability, and largely undisturbed conditions. OBJ WS1.1 & WS1.2: Water Rights Trout Unlimited would support the BCNM in the acquisition of water rights for the purpose of preserving recreational values, livestock watering (i.e., the establishment of water tanks to pull the cattle out of sensitive riparian and wetland habitat) and wildlife habitat so long as it complies with State laws, does not injure existing rights, and works closely with the established Arkansas River Voluntary Flow Management Program, AHRA, and CPW to manage that water most effectively. OBJ WS1.1 & WS1.2: Plant Community Reestablishment Trout Unlimited encourages the BLM and USFS to actively manage BCNM in a way that both preserves and restores “Proper Functioning Condition” of riparian habitat and soils. We support the language of Alternatives B and C to “improve non-functioning (NF) or functioning at-risk (FAR) riparian and soil conditions, apply USFS’s National Best Management Practices for Water Quality Management on National Forest System Lands (Technical Guide FS-990a; USFS 2012) on the entire BCNM.” OBJ WS1.1 & WS1.2: Infrastructure Trout Unlimited does NOT support “new in-channel infrastructure to address sediment control and protect monument resources and values.” BCNM was created based on the wild and scenic characteristics of the river corridor and surrounding area. That corridor relies heavily on the transport of sediment and larger rocks to promote a dynamic and changing aquatic system. Overly-managed river systems that strive to control flows and sediment can significantly impact environmental and riparian conditions that cascade into declines in fish populations and overall health. Since the monument was created to preserve the current wild nature of the river corridor and the various scenic and recreational values that have resulted from natural sediment transport

(though we recognize that some sediment is controlled by impoundments on upper tributaries of the Arkansas River already), we urge the BLM to avoid the use of any in-channel infrastructure to alter the natural processes of the river. The fact that the reach is already described as a healthy, functioning stream and rated as a Gold Medal fishery suggests that there is little need to consider interventions to sediment transport within BCNM. OBJ WS1.1 & WS1.2: Partnerships Trout Unlimited supports the BLM's proposed actions to "establish new, or join existing, partnerships with local governments, the Colorado Water Conservation Board, Colorado Division of Water Resources, and other stakeholders to maintain stream flows sufficient to preserve ecological and stream functions and recreational opportunities." We also urge the BLM and the USFS to regularly interact with the members of the cooperative Arkansas River Voluntary Flow Management Program, AHRA, and Colorado Parks and Wildlife to identify flow needs and timing for recreation and wildlife. The BLM may also consider partnering with the Colorado Department of Public Health and Environment to ensure that issues of E.coli or mine drainage are not at certain thresholds within the monument. OBJ WS1.1: Surface-disturbing Activities Trout Unlimited supports the BLM's commitment to limiting the amount of surface disturbance within riparian areas, floodplains, intermittent and perennial streams, and wetlands within BCNM – as well as the channel of the Arkansas River itself. We support the intent of Alternative B, but also understand that there are some vegetation and recreational projects (i.e., repairing an eroding fishing trail along the river/stream) that require disturbance. During these necessary disturbances, we urge the BLM and its partners (i.e., AHRA) to keep surface impact to a minimum, follow BMPs, and ensure quality mitigation and restoration of the impacted area. Such projects should require enough funding and resources for remediation and restoration after the disturbance is complete. Additionally, in-channel disturbances such as sluice box and dredge mining should be avoided within BCNM because of their significant impact to macroinvertebrate habitat and safety of recreationists and wading anglers. Proclamation 9232 specifically bans additional mining activity in the Monument and we urge the BLM to protect the river resource and public safety within BCNM by banning in-channel mining operations. We understand that there is significant sluice box and dredge mining taking place above and below the Monument, so interested parties can participate in those locations outside of BCNM. OBJ WS1.1 & WS1.2: Waste Disposal Trout Unlimited supports Alternative B and the BLM's approach to develop (and maintain) an education program to encourage proper human and pet waste disposal along the Arkansas River. While the concept of installing "primitive restroom facilities" in the event of water quality violations seems like it could solve the problem of improper human waste disposal (Alternative C), it will only affect a very small area of the river since there are already large facilities at the two primary river access sites (Ruby Mountain and Hecla Junction). The installation and maintenance of such facilities along the river corridor would take significant staff and financial resources over time – even the "primitive" pit toilet systems take monitoring, testing, repairs, and cleaning - as well as pumping if the sites are improperly used. Therefore, since the nature of BCNM is remote wilderness, TU's position is that proper education and enforcement would be more effective tactics to deal with human waste issues and comply with the overarching wilderness setting of BCNM. 2.3.8 Wildlife and Fish OBJ WF1.1, WF1.2, WF1.4: Habitat Quality, Stream Habitat and Aquatic TU fully supports the BLM and USFS management objectives to "maintain and/or improve habitat quantity and quality... sufficient to sustain wildlife populations in coordination with CPW" and to "Maintain and/or improve aquatic stream habitat to support productive and diverse fisheries and other aquatic populations." The biological integrity and diversity of the terrestrial and aquatic habitats are key values identified within Proclamation 9232 and should be conserved and enhanced as much as possible within the scope of the BCNM RMP. OBJ WF1.5: Public Education Trout Unlimited strongly supports "increase(d) public education and appreciation of fish and wildlife species through interpretation" within the BCNM RMP. We suggest that in order to protect the long-term health and designation of the Gold Medal fishery, the BLM promotes best practices for fish handling, catch and release, barbless hooks (or pinched barbs), and artificial flies

and lures only. This type of information can be displayed on kiosks located at fishing trailheads (primarily located at Ruby Mountain, Fisherman's Bridge, and Hecla Junction), as well as on BCNM printed materials and website. The BLM should also partner with CPW and AHRA to support collaborative messaging at the front-country sites for visitors and in interactions with agency staff. It is also recommended that the BLM partner with AHRA and CPW to initiate a Creel Census to determine fishing pressure within BCNM, angling method, catch rates, angler satisfaction, etc. CPW could then use this information to formulate specific angling regulations within BCNM as necessary.

2.3.9 Recreation OBJ REC1.2: Opportunities-Settings TU supports the BLM's commitment to managing for sustainable recreation and visitor access to BCNM, specifically the eligible WSR for river and on shore fishing/angling opportunities, as well as the scenic and wilderness values. That being said, it will be critical that the BLM works closely with AHRA and CPW to monitor the impacts of increased visitation (OBJ REC1.4) on the quality of fishing, riparian condition, remoteness, and overall experience. OBJ REC 1006: Waste Trout Unlimited supports the action to require human and pet waste removal from along the Arkansas River shore and within the Arkansas River RMZ (Alternative C). Since, there are already public waste facilities at Ruby Mountain and Hecla Junction, it does not seem reasonable to require visitors to remove human waste to an offsite location from those sites (Alternative B). The BLM should continue to work with AHRA, CPW and other partners to make sure that boaters and visitors are informed of the waste management requirements and have the proper equipment while on the river. OBJ REC 1020: Hunting and Fishing TU endorses the action plan to allow fishing and hunting to continue in BCNM, as well as supports the BLM in its decision to coordinate commercial permits for fishing with CPW and issue such permits in a manner that will reduce conflicts among users. Conclusion Trout Unlimited recognizes the significant workload that BLM and USFS staff face under the revised timelines of the BCNM RMP process. As an organization that represents more than 300,000 anglers nationwide, thousands of whom reside in Colorado and visit from out of state, we strongly urge RMP staff to shape their decisions to protect and restore the biological, cultural, and recreational values of Browns Canyon National Monument. With projections for increased visitation and backcountry pressure over time, the Monument will be forced to make difficult, and sometimes unpopular, decisions to protect the ROVs that built the foundation for Proclamation 9232. However, we urge the BLM to maintain a strong focus on conservation and protection in this first RMP in order to ensure that resources are not lost or injured before they can be fully inventoried and prioritized. Contact Information Submitted on behalf of Trout Unlimited by: Scott Willoughby Colorado Coordinator Trout Unlimited/Sportsmen's Conservation Project PO Box 4838, Eagle, CO 81631 Email: scott.willoughby@tu.org

Comment period for 'Planning Criteria Report'

Letter #: 86

Name: Tom Sobal

Organization Name: Quiet Use Coalition

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 8:00

Comments:

See Attached

BCNM RMP/EIS
5575 Cleora Road
Salida, CO 81201

Submitted via electronic Web submission via <https://go.usa.gov/xn2eC>

June 20, 2019

Dear BLM and USFS;

Please accept and consider these comments on behalf of the Quiet Use Coalition and the undersigned regarding the Browns Canyon National Monument RMP-EIS Public Draft Planning Criteria Report.

We appreciate and thank you for the opportunity to comment on this Public Draft EIS Planning Criteria Report.

Develop and offer an alternative that emphasizes conservation

We believe that the agencies must develop and offer an alternative that better protects, preserves and conserves the objects of historic and scientific interest for which the Browns Canyon National Monument (BCNM) was created.

Although Preliminary draft Alternative B claims to focus on protecting Monument resources and objects, we believe it does not adequately protect elements such as wildlife, designated areas, cultural areas, riparian areas, etc.

We recommend that the BLM develop and offer an additional alternative to ensure that a sufficient range of alternatives is considered, as required by 40 CFR 1502.14(a), and to capture and consider additional conservation oriented issues.

We have included numerous recommendations in these comments that could be used to develop this alternative.

Monuments and recreation

While we support and encourage responsible recreational use on public lands, we believe that this management plan must focus primarily on protecting the objects of scientific and historic interest for which the Monument was created and less on providing additional recreational opportunities.

We disagree with the statement “In accordance with the Antiquities Act of 1906, the BLM and USFS will ensure protection, conservation, and proper care and management of all identified BCNM ROVs as described in the Planning Assessment Report” on page 6 of the proposal.¹

The Antiquities Act of 1906 states, in Section 2
“That the President of the United States is hereby authorized, in his discretion, to declare by public proclamation historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated upon the lands owned or controlled by the Government of the United States to be national monuments, and may reserve as a part thereof parcels of land, the limits of

¹ Throughout this document, when we refer to a page number, record number, or alternative letter, or state ‘the proposal’ we are referring to the posted document “Planning Criteria Report: Preliminary Alternatives and Basis for Analysis”

which in all cases shall be confined to the smallest area compatible with proper care and management of the objects to be protected.”

Was Browns Canyon National Monument created for recreation?

A primary question in the management plan is if recreation is, or is a significant, object of scientific or historic interest that is to be protected, preserved or enhanced in the Monument?

The Monument Proclamation includes approximately three pages of text detailing Native American presence and other history, biodiversity, flora, fauna, geology, cultural aspects of the Monument as objects of scientific, prehistoric and historic interest. The Antiquities Act allowed President Obama to create the Monument to preserve objects of scientific and historic interest. Is recreation an object of scientific or historic interest?

The Proclamation states on page 4:

“The protection of the Browns Canyon area will preserve its prehistoric and historic legacy and maintain its diverse array of scientific resources, ensuring that the prehistoric, historic, and scientific values remain for the benefit of all Americans. The area also provides world class river rafting and outdoor recreation opportunities, including hunting, fishing, hiking, camping, mountain biking, and horseback riding.”

Almost as an afterthought, the Proclamation states in a single sentence the “area also provides” a list of outdoor recreation opportunities. That is the only place in the Proclamation where the word ‘recreation’ appears. The Proclamation does not state that recreation will be protected or preserved. It does not specifically state the recreation opportunities are a value.

The Proclamation states the area also provides those recreation opportunities, implying that they are currently provided. Nothing is mentioned about the Monument providing, preserving or maintaining recreation opportunities in the future, let alone providing for a possible expansion of such opportunities.

We believe it is clear that the Monument was not created to protect or preserve recreation opportunities. The protection and preservation of those objects of prehistoric, historic and scientific interest must be prioritized above recreational use or development.

Page 5 of the Proclamation states, “For purposes of protecting and restoring the objects identified above, the Secretaries shall jointly prepare a management plan for the monument”... Those objects are objects of prehistoric, historic and scientific interest. The management plan is not to be prepared to ‘protect’ or ‘restore’ recreation.

We agree with the statement on page of the monument, and variations in management of recreation are therefore the driving factor behind much of the variation in the management alternatives.” As the primary human use of the Monument, recreation also is viewed by some as providing the greatest anthropocentric value of the Monument. Recreation is also, however, the greatest threat to objects of scientific and historic interest for which the Monument was created according to the Antiquities Act. We believe there is a great need in this Management Plan to provide land managers with tools and clear direction that will help avoid, minimize and mitigate the adverse impacts of recreational use on wildlife, natural, ecological, geologic, cultural and other resources.

Throughout the planning process, it must be recognized that the best and most effective method of protecting and/or maintaining a resource or value is to avoid, or at least minimize, human impacts to that resource or value. Where impacts cannot be avoided, they must be minimized as needed to protect the resources and values. We believe all objectives should be modified, where appropriate, to include avoidance as a component to be considered in order to protect a resource or value.

We believe emphasis on enhancing, promoting and developing recreation in the Monument is misplaced.

The emphasis of the Management Plan should be to protect the objects of scientific and historic interest in the Monument.

Special Designations

Retain the ACEC

We disagree with the proposed loss of the Browns Canyon ACEC designation within the Monument, as suggested in record 1002 on page 11 for Alternatives B and C.

The 11,697 acre (according to RGFO RMP record of decision from May 1996) Browns Canyon ACEC designation within the Monument must be maintained. There is no guarantee that a National Monument designation, and any protections that go with it, will be retained. Administrative efforts in 2017 to reduce the size of Bears Ears and Grand Staircase-Escalante National Monuments suggest that National Monument designations may not be permanent.

This ACEC includes BLM lands beyond the Monument Boundary. Maintaining the ACEC within the Monument would promote continued consistent management of BLM within a larger 11,697- acre area.

The Browns Canyon ACEC was designated to protect wildlife and scenic values in the area. The 1996 BLM Royal Gorge Field Office Resource Management Plan Record of Decision (ROD) states (at 2-1-13) that within this ACEC:

- livestock grazing will be excluded in some areas and adjusted on other areas
- timber harvesting and wood gathering will be allowed only for enhancement of protected values
- locatable mineral entry will not occur
- mineral materials development will not occur
- VRM class II avoided for major rights-of-way
- retention in public ownership
- off-highway vehicle use limited to designated roads and trails.

In addition, the ROD also states that within this ACEC:

- wildlife values will be enhanced (at 3-18)
- protection of historical values and resources will be enhanced (at 3-23)
- archaeological resources will be protected (at 3-24).

We believe that the BLM should continue to manage this entire ACEC to at least the minimum levels described above.

Wild and Scenic River

We support the proposed action for Record 1004 on page 12, which suggests that the 7.1 miles of the Arkansas River Segment 2 within the Monument be determined to be suitable as a recreational Wild and Scenic River. This segment of river and the lands extending from its banks possess numerous outstanding remarkable values worthy of protection. The protections afforded to this river segment by the Monument proclamation are similar, but there is no guarantee those protections and the lands along the river will remain as a National Monument. It is our understanding that the river itself is not included as part Monument and cannot be directly protected by the Monument. (See, e. g, Proclamation at 6.) Protections associated with a Wild and Scenic River determination would apply to the river itself. A determination of suitability for Segment 2 of the Arkansas River would apply additional protection

that would extend well beyond the Monument boundary, since Segment 2 includes sections of the river both upstream and downstream of the Monument.

Protect Wilderness Values in the WSA

Under all alternatives, the BLM Wilderness Study Area (WSA) must be managed to protect its wilderness values, as required by the Federal Land Policy and Management Act. 43 U.S.C. 1782(c).

The BCNM Management Plan should include direction to manage the WSA as designated Wilderness, even if Congress releases it as a WSA.

We recommend that additional management actions be applied within the WSA in order to protect its wilderness values.

Limit group size to 12 individuals

In order to preserve and protect the wilderness character of this WSA, we suggest limiting group size to 12 individual heartbeats, i.e., total of humans and animals. This WSA is to be managed as Wilderness, and it is important to keep the group size down in order to preserve the expected primitive recreational experience of those seeking solitude in this area. Larger groups detract from this experience. Furthermore, this is a relatively small WSA and much of the terrain in this area is very steep, rugged and rocky. This serves to concentrate most human visitation in smaller portions of this small areas. Thus, larger groups will have a relatively greater impact on solitude in this WSA than they might in larger areas with more accessible terrain.

It is especially important to have party size limits where camping is allowed. Impacts from camping (sanitation, cooking, fires, persistent trampling of vegetation, etc.) are much greater than those for most day use activities.

Dogs, horses and other animals brought in by the group should all count toward the 12 'individual heartbeat' limit.

Dogs horses and other animals must be under physical constraint at all times.

Dogs cannot be allowed to chase, bother or harass wildlife or other human visitors. They must be under physical restraint at all times in the WSA.

Prohibit overnight camping within 300' of any surface water.

All of this WSA is are relatively dry and arid, and any surface water that does exist (rivers, streams, ponds, springs, seeps, etc.) are vitally important for wildlife. Camping should not be allowed within 300' of any surface water sources, in order to protect these fragile riparian areas and allow unencumbered wildlife access. All washing of dishes or people should take place at least 300' from surface water.

The exception to this should be within 300 feet of the Arkansas River within the WSA, where camping should be restricted to designated sites due to the popularity of use in this area.

Limited overnight camping to 3 nights in the same location.

In order to limit excessive vegetation disturbance and soil compaction, camping should be limited to three consecutive nights in the same location. Users should be encouraged to camp in existing, previously disturbed campsites located on durable surfaces.

Prohibit camping within ¼ mile of Ruby Mountain Trailhead

A prohibition on camping within one-quarter mile of the Ruby Mountain Parking area and trailhead within the WSA will help prevent this area from being used as an extended car camping area for those parking at the trailhead. It will help preserve some wilderness values in this heavily used area.

Campfires should be limited

Users should be encouraged to use portable stoves for cooking to minimize campfires.

If an open fire is desired, it must be in an existing fire ring or fire pan. The creation of new fire rings should be prohibited. Any fires should be kept small. The entire WSA is within the ACEC, where wood gathering is supposed to be allowed only for the enhancement of protected values. Users that wish to have a campfire should be required to bring wood in from outside the Monument and WSA.

Activities should be non-competitive

Competitive events should be prohibited to maintain wilderness characteristics.

Travel should be limited to designated routes

In order to prevent the damaging proliferation of user created routes, users should limit their travel to designated routes whenever possible. Where there are no designated routes, but already used routes are visible, the users should travel on durable surfaces and/or the existing routes whenever possible, provided use of the routes is not causing resource damage, such as eroding soils or streambanks or adversely impacting water quality.

Any visible undesignated travel routes that exist or forms should be evaluated for length, sustainability, impacts to wildlife, cultural resources, etc. Undesignated routes with unacceptable impacts should be closed with natural appearing materials and the use of native species for re-vegetation.

Frequency of use should be restricted.

Commercial and educational uses in these WSAs should be limited to 30 days per year for each group applicant.

Seasonal restrictions on use should be implemented.

Use should be seasonally restricted from in certain areas or sections of areas to protect wildlife, such as big game winter range, birthing areas or other sensitive wildlife from disturbance during critical seasons. We recommend that the Turret Trail be seasonally closed from December 1 through April 15 each year at a point a few feet east of the junction with the River Access Trail to coincide with any seasonal closure on Forest Road 184 (Currently December 1 through April 15).

We recommend that the Catkin Gulch Trail be seasonally closed each year from December 1 through June 30. This would coincide with seasonal closures of Trail 1434 outside the Monument for big game winter range, and help protect a Bighorn Sheep Production Area already heavily fragmented by use of this route.

Educate users to leave no trace.

All users, and especially commercial SUP holders, should be strongly encouraged to practice and educate their clients on basic leave no trace principles. We recommend educational material be readily available online and clearly posted in a kiosk at the Ruby Mountain Trailhead.

Wilderness Special Use Permits (SUPs) should be adaptively managed

The BLM should use adaptive management with special use permits in these WSAs. The BLM should err on the side of wilderness resource protection in permitting special uses in these WSAs. This means starting small when it comes to the number, duration, size, frequency, scope and type of permitted special uses, and number of people for each use, within these WSAs. The impacts of these uses should be monitored, and then the SUPs may be adjusted accordingly if conditions change and/or it is shown that the resource can handle more use. We suggest keeping these SUPs on a yearly renewal cycle until it is proven that resources are being maintained with use from these SUPs. The BLM should reserve the right to terminate or require modifications to these SUPs if it is determined that changing conditions warrant this.

Adaptive management should be used throughout the WSA

The BLM should regularly monitor conditions and use throughout the WSA, and adjust management if conditions exceed acceptable limits of change. Additional management may include, but not be limited to, requiring permits for overnight camping, limiting camping to designated sites, seasonal area closures to protect sensitive wildlife habitat, etc.

Protect Roadless Area Characteristics

Almost all US Forest Service land within the Monument is part of the larger Aspen Ridge Upper Tier Roadless Area. We believe that additional language must be included in the Management plan to ensure that Roadless Characteristics are maintained throughout Roadless lands within the Monument, in case Roadless Designations are removed or modified.

On page 54, an assumption states “Adverse impacts on Roadless areas are those that do not protect sources of drinking water, important fish and wildlife habitat, and semi-primitive or primitive recreation areas that include both motorized and non-motorized recreation opportunities, and naturally appearing; beneficial impacts are those that preserve and enhance these resources and areas.” We believe this fails to adequately include all nine characteristics identified in the 2001 Roadless Area Conservation Rule. Undisturbed soil, water and air; biodiversity; reference landscapes; traditional cultural properties and sacred sites; and other locally identified unique characteristics must also be specifically included.

Lands with Wilderness Characteristics

We agree with and support all proposed actions for Records 1001-1004 on pages 18 and 19 for Alternative B. This management will only affect 625 acres of BLM land and should not significantly modify current and proposed uses of those land areas. These lands have repeatedly been included in proposed Wilderness Bills, which have received widespread public support and past BLM and USFS endorsement.

When the Browns Canyon Wilderness Study area boundaries were defined and delineated, they were somewhat arbitrarily set boundaries on the north and south end. This was contrary to the generally accepted practice of establishing Wilderness boundaries so they are based on visible, on-the-ground features, such as human linear disturbances and/or geographic features.

Recommend Wilderness

We support a wilderness suitability determination be included as part of the management plan.

We believe the Management Plan should consider recommending most lands east of the river for Wilderness designation.

Most lands east of the Arkansas River within the Monument boundary have been previously included in numerous Wilderness proposals, including bills introduced in Congress. Both the BLM and USFS have gone on record as supporting previous Wilderness designation for much of the Monument. The 2019 Colorado Wilderness Act, introduced in May, includes most lands east of the river within the Monument as part of a larger proposed Browns Canyon Wilderness Area. There has been widespread public support for a Browns Canyon Wilderness Area.

We support Wilderness designation for all land within the Monument included in the WSA, the Aspen Ridge Roadless Area, and additional BLM lands inventoried as having Wilderness Characteristics north and south of the existing WSA.

We question the assumption on page 72 that states “Recreation along the Arkansas River will continued to be primarily managed by the AHRA.” The WSA boundary extends all the way to the edge

of the river in some parts of the Monument. Although the river itself and its use is not included in the Monument or this management plan, river based recreation along the river on its banks must be fully considered in this plan.

Page 69 contains an assumption, with which we fully agree, detailing threats of river based recreation to fish and wildlife. The potential threat that river based recreation poses to wilderness values in the WSA, however, must also be mentioned and considered. Large river based groups can adversely affect the desired experience of solitude for WSA users when they come ashore within the WSA. The development of non-system, undesignated routes and heavily used dispersed camping areas along the river can affect the untrammelled appearance of the land and result in the imprint of man becoming noticeable.

Although AHRA might primarily manage recreation on the river, the BLM has an obligation to ensure that land-based recreation in the Monument protects wilderness values in the WSA, and wildlife and scenery in the ACEC.

Cultural Heritage, Tribal Values and Uses

We support objective CR 2.2 on page 14. One of the greatest threats to cultural resources is the deliberate or unintentional vandalism or destruction of those resources due to public use of the areas those resources are located. Keeping the public out of areas with significant cultural resources is one of the best ways to protect those resources. Designated routes within these areas facilitate additional public visitation and use on and off those routes, which has the potential to result in additional impacts to those resources.

We support objective 3.2 and proposed actions associated with Record 1004 in the proposal, as long as this use is based upon traditional ways. For example, Native Americans should be allowed to access locations off designated routes within the Monument by foot or horse travel, but special exceptions for motorized access off designated routes should not be allowed.

Geology, Minerals, and Paleontology

We agree with and support Record 1002 actions for Alternatives B and C on page 16 to “Work with the rock-climbing community to prevent damage to sensitive geological features.” We believe this action should be expanded, or an additional action created, which clarifies that actions will require work with all Monument users to prevent damage to sensitive geologic features, not only the rock climbing community. Recreational mineral collectors, recreational target shooters, hikers, campers and other users of the Monument can potentially damage sensitive geologic features via their use in the Monument.

We agree with and support Record 1003 on page 16 including proposed actions to “Apply mine hazard mitigation in a manner that protects resource values of the area including wilderness characteristics, wildlife habitat, and cultural site integrity and in a way that protects public safety while employing minimal resources.” We believe this should be expanded to also include the protection of scenic values; natural, botanical and geologic resources; and existing designated facilities if and when any mitigation occurs. We have witnessed damage to other resources and facilities as a result of mine hazard mitigation in other locations on public lands near the Monument.

We agree with and support Record 1004 on page 16 and proposed actions for Alternatives B and C to “Prohibit collection of monument resources and objects: rocks and minerals; petrified wood and fossils of plants, animals, fish, insects, invertebrate animals; bones, waste, other products from animals; or

other naturally occurring items at all other locations beyond Ruby Mountain.” Rocks, minerals, petrified wood, fossils, etc. are all objects of historic and scientific interest that must be preserved in the Monument. We have noted extensive damage to lands resulting from the apparently legal collection of resources and objects just outside Monument boundaries, and this must be prevented from occurring within the Monument. There are hundreds of thousands of acres of public land adjacent to the Monument and nearby in which collectors may practice their hobby, so that this prohibition does not constitute a significant hardship.

We support Record 1005 on page 17 to “Allow garnet collection and mineral collection at Ruby Mountain only for educational, experiential, or scientific purposes via SUP/SRP.” Ruby Mountain has been extensively ‘picked-over’ for garnets and other minerals for decades, to the extent that all obvious and visible collectables are gone. It requires extensive work with a pick and hammer to expose new collectable minerals. Actively breaking apart rocks within the Monument in an attempt to expose minerals has a high potential to permanently deface and modify rock surfaces in this area.

All of Ruby Mountain within the Monument is within the Browns Canyon Wilderness Study Area. Extensive digging for minerals has the potential to modify this Mountain so that parts of the area no longer appear natural. Digging and chiseling in the search for minerals may create caves, rubble piles, or other features that would noticeably appear to be created by humans. Such excavations could compromise the wilderness values of this WSA, which the BLM is required to protect.

While we support the continued non-commercial hobby collection of small amounts of minerals at Ruby Mountain, we believe that this use must be regulated to protect geologic features and wilderness values in the Monument. Requiring collectors to obtain a permit (which could be issued for no or minimal fee) would allow the BLM to maintain some oversight into mineral collection activity in this area. A requirement to obtain a permit would provide the BLM opportunities to better educate collectors about appropriate practices, amounts, regulations, etc. associated with mineral collection in this area.

The BLM should develop clarify and distribute specifications and regulations regarding rock and collection at Ruby Mountain. These should include a prohibition of collecting for commercial use, a prohibition on fossil, petrified wood or artifact collection or removal; limiting collection to use of hand tools; and limiting the amount of collection that can occur per day and per year.

It must be noted that the collection of minerals is different from the search for minerals. A required permit for collection would not prohibit anyone from non-invasively searching for minerals at Ruby Mountain, as long as they do not remove those minerals.

If mineral collection is allowed at Ruby Mountain, the boundary in which this activity is allowed must be delineated so the public can easily determine it. The outer boundary of the Monument and this area on the west and north side can be marked on the ground with signage. We recommend that the south and eastern boundaries be defined using easily identifiable natural land features rather than signage, to preserve wilderness values.

Vegetation and invasive species

We support proposed actions for Alternative B associated with Records 1002-1009 on pages 21-24. We believe the majority of the Monument should be managed consistently across agency boundaries as suggested on page 7. The majority of lands within the Monument are within the Aspen Ridge upper tier Roadless Area and the Browns Canyon Wilderness Study Area, which limit and restrict the amount of vegetation treatments that may occur.

We recommend any new trail or other development avoid individual/groups of sensitive plants with a 100 foot buffer around the plants. This will help protect soils, hydrology, the micro-ecosystems, pollinators, and the plants themselves from disturbance and human use resulting from the presence of the facility and any use off the facility.

We are particularly concerned about the allowance in the Proclamation for development of new motorized roads and trails west of the Arkansas River in the Monument. This area has known occurrences of Arkansas Canyon Stickleaf (*Mentzelia densa*) and likely occurrences of Brandegee Wild Buckwheat (*Erigonum brandegeei*) on it, particularly south of County Road 194.

A trained botanist must survey areas for sensitive plant species before any ground disturbing activity is approved and implemented. It must be noted that some plants may not be easily visible at all times of the year. Some plants may not be visible during abnormally dry years.

Special attention needs to be given to the following species known to occur in the Monument:

Brandegee Wild Buckwheat (*Erigonum brandegeei*)

Arkansas Canyon Stickleaf (*Mentzelia densa*)

Fendler's False Cloak Fern (*Argyrochosma fendleri*)

Fendler's Townsend Daisy (*Townsendia fendleri*)

Pale Blue-eyed Grass (*Sisyrinchium pallidum*)

Colorado Tansy-aster (*Xanthisma coloradoense*)

Hall's Milkweed (*Asclepias hallii*)

Livermore Fiddleleaf (*Nama dochotum*)

Any revegetation that occurs within the Monument should only use native plant species.

Regulations for use within the Monument should include requirements that prevent the introduction of invasive species. Only local firewood and weed-free hay should be allowed in the Monument.

Night Skies, and Natural Soundscapes

We believe that the preservation and enhancement of dark night skies and natural soundscapes is important and must be fully considered in the Plan. Skies that remain unimpaired by light pollution are important for nocturnal wildlife, ecological processes, and desired visitor experiences. Impaired natural soundscapes can affect desired recreational experiences and the sense of place. Anthropogenic noise is recognized as a significant stressor to many wildlife species impacting behavior, physiology and important life cycle events.

The Management Plan must include language to proactively manage for natural night skies and natural soundscapes.

Objective VR 1.1 on page 25 must be modified to specifically state that the maintenance of natural soundscapes is an objective for lands within the Monument.

Objective VR 1.2 must be modified to specifically include and state that infrastructure will avoid and minimize impacts to night skies and natural soundscapes as an objective.

Watersheds, Soils, and Water Resources

We support proposed actions for Alternative B associated with Records 1005 and 1006 on page 28.

We recommend that additional GIS riparian and wetland area data be used to identify riparian areas and fully protect them during planning. We have attached two sources for this data as kmz files.

Wildlife and Fish

We support additional protections for wildlife and fish, and their habitats, to be included in the Monument Management plan.

Maps 8 and 9 in the Appendix of the proposal must be modified to depict priority wildlife habitat areas extending at least one half mile outside of the Monument Boundary. We believe the study area for determining the effects of the alternatives on terrestrial and avian wildlife and special status species as suggested on page 68 must be expanded to include additional lands outside the Monument Boundary.

Proposals may be considered and actions may be implemented just within or outside of the Monument boundary that have the potential to impact priority wildlife habitat not currently depicted just outside the boundary. Impacts to wildlife at the boundary are not limited to species habitat connectivity. Map 9 correctly indicates that nest buffers extend across the boundary, and the impacts to other priority habitat areas across the boundary must also be considered. Wildlife do not recognize or limit their use of land and behaviors based upon artificially created invisible anthropocentric boundaries. Wildlife will sense and respond to visual, auditory, olfactory and other sensory stimuli that are detectable across any boundary lines.

Page 75 includes a number of priority habitats for species that may be found in or near the Monument. Map 9 must be updated and expanded to include additional priority habitats in and near the Monument. This should include Bald Eagle roost sites and winter concentration areas (very high and high priority habitats, respectively) within and near the Monument near Ruby Mountain according to current (2/2019) CPW GIS data. Wild Turkey Production areas are another high priority habitat found within the Monument.² Wild Turkey was specifically listed as one wildlife species included as an object to protect in the Monument Proclamation.

Additional priority habitats must be identified and depicted.

On Map 9, the 1/4 mile buffer zone around a Red-tailed Hawk nest should be expanded to 1/3 mile, to match current CPW recommendations.³

We agree with and support many of the Assumptions and Analysis Issues and Methods described on pages 58-72, although we have some concerns with how these are translated into potential management recommendations in the preliminary draft Alternatives.

We agree with and support Objective WF 1.5 on page 29, with the understanding that enforcement is a component of education. Compliance with regulations pertaining to wildlife is enhanced for some if being caught and cited is a possibility.

For Objective WF 2.3 on page 30, avoidance of new actions and activities must be included as a consideration for areas around certain raptor nests. Avoidance is specifically listed as a Colorado Parks and Wildlife recommendation for certain raptor nests.⁴

On page 30, Objective WF3.1 for Big Game species should be modified to state "Avoid and minimize adverse human disturbance of big game species in BCNM...". Avoidance is the most effective way to

² Based upon the House Bill 1298 Species Impact Assessment

³ Klute, D. 2008. Recommended buffer zones and seasonal restrictions for Colorado raptors. Colorado Division of Wildlife (now Colorado Parks and Wildlife). Pages 2 and 4, Online June 2019
<https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/RaptorBufferGuidelines2008.pdf>

⁴ *ibid.*

address adverse human disturbance and impacts on wildlife. Avoidance must be considered as a possible objective when considering management actions to protect wildlife and priority wildlife habitat.

Avoidance is recommended as potential way to minimize adverse impacts to wildlife resources for the following priority species/ habitats:

- Bighorn Sheep production, wintering areas, and migration corridors
- Mule Deer critical winter range and migration corridors
- Elk winter concentration areas, production areas, and migration corridors
- Raptor nests⁵

For Record 1003 on page 31 of the proposal, we strongly recommend the proposed action for all alternatives be modified to state “Consider avoidance, or allow for minimization and/or mitigation and,...”. The proposed action as stated improperly excludes the possibility of avoidance when considering proposed management actions and decisions related to proposed new public and permitted actions in the Monument. Avoidance should always an option when considering methods to minimize adverse impacts to wildlife.

While we support seasonal use restrictions near raptor nests, as suggested in Record 1005 on page 32 of the proposal, we believe this should apply to all human use and not just SRP and large group events. Current Colorado Parks and Wildlife recommendations for buffer zones and seasonal restrictions for Colorado raptors apply to all human use, not just larger events.⁶ The presence of one human can result in considerable impact. Recommended restrictions on human encroachment around raptor nests include any activity that brings humans into the area near the nest.

We do support the concept of seasonal area closures in significant priority wildlife habitat areas, and not just seasonal route closures in those areas, as suggested in Record 1005 on page 32 of the proposal. Although many people will travel on designated routes, not everyone will, and those traveling off designated routes may adversely impact wildlife more so than those traveling on designated routes.

We support seasonal area closures for all human use around site specific priority habitats, such as raptor nests. We also support area closures for locations within larger priority habitat areas where wildlife congregate and/or rely on a more specific locations for a lifecycle need. For example, we would support and recommend area closures for cliffs in Bighorn Sheep Summer use areas (as cliffs provide needed security habitat), specific water sources in winter concentration or production areas (as access to water is needed), or other locations.

We would also support and recommend seasonal area closures for some of the smaller priority habitat areas where human disturbance has the potential to result in significant impacts to the entire area. For example, we would support a seasonal area closure on Monument lands in the elk production area west of the river, since this entire area is only approximately 1800 acres. We would also support a seasonal closure to the part of the ~3500 acre Bighorn Sheep production area within the northern part

⁵ CPW, 2009. Best Management Practices to Minimize Adverse Impacts to Wildlife Resources. Colorado Parks and Wildlife. Species specific recommendations. Appendix A. Online June 2019.

https://cogcc.state.co.us/documents/reg/OpGuidance/Colorado%20DOW%20Final%20BMPs_090309.pdf

⁶ Klute, D. 2008. Recommended buffer zones and seasonal restrictions for Colorado raptors. Colorado Division of Wildlife (now Colorado Parks and Wildlife). Online June 2019

<https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/RaptorBufferGuidelines2008.pdf>

of the Monument, since this area is relatively small and is heavily impacted by existing routes and high levels of use outside the Monument.

We recommend that all existing seasonal closures for wildlife on routes adjacent to and within the Monument be more permanently retained and not subject to review every few years. This includes closures on Forest Roads 184, 185, 185.D, and most of ATV trail 1434.

Even though some of these routes and closures are not within the Monument, they are immediately adjacent to the Monument and define its boundary. The Monument is part of and depends upon a much larger ecosystem surrounding it, and does not exist as an isolated island. This is especially true for wildlife that can move freely across Monument boundaries.

We recommend that the seasonal closures of all of the above routes be modified so that they apply to all human recreational use. Currently the closures only apply to motorized wheeled vehicle use. Hiking, skiing, snowmobiling and all other forms of human use can also result in significant impacts to wildlife. There is direction in the current Forest Land and Resource Management Plan supporting the closure of routes to all human use in order to protect wintering wildlife.⁷ Recent decisions by the Salida District USFS to seasonally close the Vitamin B and Sands Gulch quiet use trails to all human use during the winter recognize and support the concept that all human use during the winter can adversely affect wildlife.

Studies also indicate that human presence and use can affect and displace wildlife.⁸ The impacts of routes adjacent to the Monument affects wildlife within the Monument boundaries.

We generally agree with and support Record 1019 for all Alternatives on page 44 of the proposal, which states that all recreational activities will comply with current posted seasonal closures.

This record supports extending seasonal closures to all human recreational use, and not just certain modes of travel. Although it has been shown that certain modes of travel impact wildlife differently than others, all human travel results in negative impacts.⁹

We believe consideration should be given to seasonally prohibit all human activity, not just recreational activity, in sensitive wildlife habitat. Not every individual would consider all of their activity as recreational activity. Permitted, scientific, monitoring and other non-recreational activities should also avoid using seasonally closed routes. Wildlife will be impacted by human presence in an area, and will not necessarily respond differently depending upon the reason for any humans being present in an area.

This statement in record 1019 refers to current seasonal closures. Current implies that it only apply to seasonal closures that exist now. We believe it should be expanded to include all seasonal closures, including any new seasonal closures which may be applied in the future. We believe there should be

⁷ Forest Plan Transportation System Management 02 Standard/Guideline a,3 at III-159 states "Planned management of road use during winter will prevent or minimize disturbance to wintering big game animals."

Forest Plan Dispersed Recreation Standard/Guideline 02 a at III-152 states "Close management area to cross-country ski trail development and to snowmobile use."

Forest Plan Dispersed Recreation General Direction 02 at III-152 states, "Manage winter use for very low or low densities. Close areas to human use to the degree necessary to prevent disturbance of wildlife."

General Direction and Goals for 5B areas include at III-149 "Existing local roads are closed and new motorized recreation use is managed to prevent unacceptable stress on big game animals during the primary big game use season."

⁸ Wisdom, M. J. et al. 2018. Elk responses to trail-based recreation on public forests.. Forest Ecology and Management. 411. 223-233

⁹ Ibid.

additional seasonal closures applied to travel routes, such as the Catkin Gulch loop. We believe any new seasonal closure should apply to all human activity.

We are concerned with the use of the word “posted” in this statement and its definition. We believe the word “posted” should be defined and clarified to mean enacted/determined in a decision, displayed on site with a sign, contained in an Order, and/or displayed on a map. This removes any ambiguity that may result from the lack of signs in the field as a result of vandalism, removal or other factors. Although we support making educational information available to the public using as many means as possible, these regulations must remain in effect even if one or more of the means is currently unavailable.

The list of seasonally closed routes on page 44 should also include Forest Road 185.D. This road is seasonally closed and it forms the basis for part of the northern boundary of the Monument.

The list of seasonally closed routes on Page 44 of the proposal interestingly lists Trail 1434.A as being seasonally closed. This may be an error, as no part of trail 1434.A is currently seasonally closed. We would support seasonally closing this trail which forms the basis for over 2 miles of the northern boundary of the Monument. This trail slices through elk severe winter range, Mule Deer Winter Concentration Area and Severe Winter Range, and a Bighorn Sheep Winter Concentration Area and Sheep Winter Range.¹⁰ Seasonally closing this trail will benefit wintering wildlife both in and just outside of the Monument. In addition, there have been concerns with unauthorized motorized use on the seasonally closed segment of trail 1434 that helps define the northern edge of the Monument, and also motorized use off Trail 1434.A into the Monument itself.

It must be affirmed that these seasonal route closures are to protect wintering wildlife, even though they also protect route tread surfaces from damage during mud seasons. These seasonal closures not be modified outside of the current December 1 to April 15 time date to accommodate the desires of recreationists that claim the routes are dry. While the seasonally closed routes themselves may be dry, conditions in other nearby locations may not be suitable for wildlife.

Adaptive management should be specified to permit seasonal closures to be extended beyond the April 15 date in the spring. Big game will move in and out of areas in the spring as changing weather and late season storms limit available forage and delay spring green up.

We recommend some modifications to the locations of and/or infrastructure associated with existing seasonal closures on Forest Roads 184, 185, 185.D and ATV trail 1434 to better protect Monument wildlife and resources. See attached Appendix A for details.

We also recommend seasonal closures of a section of the Turret trail and the entire Catkin Gulch Trail to protect wildlife, detailed in the Trails section later in this document.

One of the greatest potential threats to wildlife in the Monument is recreational use, including dispersed recreational use and the development of new trails.

Recreation

A sentence on page 33 should be modified to read “How can rapidly increasing visitor use **be responsibly** balanced with protection of resource values in the monument?”

We believe Objective REC 2.3 on page 35 must also include “close, restore and decommission” as an option for consideration of trails, especially if “permitted non-system trails” are going to be considered.

¹⁰ According to February 2019 Colorado Parks and Wildlife Species Activity GIS Data. Available online June 2019 at <https://cpw.state.co.us/learn/Pages/KMZ-Maps.aspx>

There are current existing and developing non-system trails that should be considered for closure, restoration and decommissioning due to their impacts on resources and private land trespass. To only include “maintain, improve or expand” as options for trail consideration improperly limits the range of potential actions. This objective as written improperly suggests an inherent pro-recreation bias as opposed to a more balanced approach that must also consider resource, plant and wildlife habitat protection.

We believe Objective REC3.4 Recreation Restoration on page 36 must be expanded to include restoration from recreation and other users to be applied to damage that has occurred to land, vegetation and soils also. Unauthorized travel and use has been shown to have the potential to permanently alter soils, land, vegetation, slope hydrology, etc. It should be an objective to provide clear direction to restore damaged areas and prevent further damage.

We agree with and support Record 1003 on page 36 and the action for Alternatives A and B that will prohibit camping at trailheads and day use facilities. Camping occupies space that is intended for parking and access for day users, and negatively impacts desired experiences of other trail and day use visitors.

We believe this action should be expanded to also prohibit dispersed camping within 300 feet of to the initial ¼ mile of all trails where they intersect with a road. This will clarify the definition and intent of prohibiting camping at trailheads, and help prevent the use of the area along trails as extended motorized dispersed campsites.

Recreation and Management Zones

We disagree with, and object to, the assumption on page 72 that states, “Areas designated for recreation management are recognized as a primary resource use. Consideration of specific management strategies is required to protect recreation opportunities.”

This is an extremely anthropocentric oriented assumption, and ignores other inherent and intrinsic values of the Monument. As we detailed on pp. 1-2 of these comments, the Monument proclamation spends three pages describing in detail geologic, wildlife, botanical, biodiversity, etc. related objects to be protected within the Monument. The vast majority of these objects, while currently valued by humans, must be protected according to the Proclamation whether humans value them or not.

The entire Monument is proposed to be divided into Recreation Management Zones. We do not favor this approach, as it implies that recreation is the primary resource use of these areas.

We believe there are many areas within the Monument in which recreation must not be a primary resource use. For example, recreation should not be a primary resource use in priority wildlife habitat areas such as birthing and nesting areas. Humans do not need and depend upon recreation in these areas to survive as wildlife depend upon these areas. The Browns Canyon Wilderness Study Area must be managed to protect wilderness values. Recreation is not the primary value of Wilderness.

While the BLM may be required to delineate the type and intensity of recreation opportunities on its lands, it is also required to retain wilderness values in managing the type and intensity of recreation in the WSA.

There are existing areas on USFS lands within the Monument where the current Forest Plan prescribes management to emphasize big game winter range, grazing, and aspen production rather than recreation. Page 34 of the preliminary draft alternatives states that the Forest Service is not required to delineate recreation opportunities on its land as the BLM is. Although the Forest Service considers the Recreation Opportunity Spectrum (ROS) on its lands, we believe ROS determinations are non-binding.

We have concerns with the BLM imposing its regulations on USFS lands merely for the sake of consistency.

The preliminary draft alternatives document does not provide any baseline data regarding current existing BLM or US Forest Service recreation zone management. We request that this information be made available to the public in both online map and GIS data form in order to permit the public to properly evaluate current and proposed recreation management in the monument.

We have concerns regarding proposed actions for alternatives B and C for Record 1004 on page 37. While not opposed to the concept of managing recreation by zoned areas, no explanation is provided for the boundaries of zoned areas as depicted for these zones.

We have the following comments and concerns regarding these zones and Map 10.

- Aspen Ridge zone

We do not understand the basis for the western and northern boundary of this zone. There are no designated facilities adjacent to and west of the Aspen Ridge Road, and the boundary of the Aspen Ridge Roadless Area begins 300 feet west of that road. The proposed boundary does not follow any geographic features or known patterns of public use.

Use on and off a designated road has different impacts on adjacent lands than the impacts from a designated quiet use trail. Auditory, olfactory and visual impacts (including speed of travel) may affect wildlife differently for roads as opposed to trails.

The desired recreational experiences and expectations of users of the Forest Trail 1435 are very different from the recreational experiences and expectations of users of Forest Road 185.

We believe the area around Trail 1435 should not be part of the Aspen Ridge zone and should be managed as a primitive backcountry zone. Very few people use Trail 1435.

Almost all of the user along the Aspen Ridge Road remain in their vehicles and never enter the Monument itself, whose boundary is 100 feet off the road. Some users illegally drive onto unauthorized unclosed routes to the west of this road into the Monument, expecting the routes to lead them to something such as a viewpoint, but only one unauthorized route provides an expansive view.

With one exception to provide for a 200 foot long trail to an overlook (see attached Appendix B), we recommend that this zone be eliminated from consideration for new trails. Any dispersed motorized camping or other modifications along the Aspen Ridge Road could be accommodated outside the Monument boundary within 100 feet of the road.

- Railroad Gulch

We do not understand why this is considered a recreation zone. There are no designated recreational facilities in it. A no-trespassing railway corridor forms the western end. Those who enter the eastern end trespass across private land to do so. The area receives relatively little human visitation.

There are significant wildlife habitats in and adjacent to this zone, which CPW recommends avoiding for new trail development (falcon nest, Red-tailed hawk nest, bighorn sheep lambing area). Seasonal restrictions are difficult to enforce, and the development of new trails will negatively affect wildlife and wildlife habitat.

To label this as a distinct a separate recreation zone in this plan, separate and distinct from Backcountry zones, seems presumptuous. This is especially so since the draft preliminary plan states all new trails will be approved in a separate process outside of this planning process.

We do not understand why the area in upper Stafford Gulch in the Monument would be included in this zone and not the backcountry zone. This area receives little to no human use.

We believe the Railroad Gulch zone should be managed as a Primitive Zone, if not eliminated altogether and combined with the rest of the Monument interior

- Monument Backcountry River East

We believe the Monument Backcountry-River East should incorporate almost all of the Aspen Ridge and Arkansas River Bench and Shore proposed zones, and all of the Railroad Gulch proposed zone areas.

This entire area should be managed as a Primitive Zone.

Our recommendation for the Monument Backcountry East zone is that it coincide with current and past proposed Wilderness Area boundaries east of the river. This zone would extend all the way to the current Monument boundary in most areas. This zone would extend within 100 feet of BLM Forest road 300, 185.D, 185 and 184. It would extend to within 100 feet of ATV Trails 1434 and 1435. It would extend up to the edge of the Monument Boundary in all other areas except along the river, where this zone would be 200 feet east of the river or to the railroad tracks (whichever is furthest east at that point) for areas east of the river.

We support Wilderness designation for the lands within our proposed version of this zone and believe that wilderness values must be maintained and not compromised throughout this zone.

We do not support the proposed framework for this zone as suggested in Appendix B of the proposal. We believe that some of suggested management for this zone does not coincide with direction contained in the Proclamation. For example, on page B4 it is suggested this the desired future condition for this zone be semi-primitive motorized or roaded natural. Management Prescription area 2B on pages III-116-124 of the current Forest Plan emphasizes rural and roaded-natural recreation opportunities. Many of the standards and guidelines, and general direction for 2B areas in that Plan would not be compatible with the Proclamation, the Colorado Roadless Rule, or protection of objects of scientific and historic interest.

- Arkansas River Shore and Bench zone

We believe it is inappropriate to manage lands that are part of a Wilderness Study Area in a manner similar to other BLM lands not part of the WSA.

We believe that the WSA trails (River Access and much of the Turret Trail) have more in common with Monument Backcountry than the Arkansas River Shore on the east side of the river, and thus both in the WSA.

Thus, we recommend that this zone be eliminated and become part of the Monument Backcountry River East zone.

We accept a different management approach for lands adjacent to the Arkansas River that are cooperatively managed with AHRA, due to the high volume of use in this area. We recommend a new zone be created to be named the Arkansas River Zone. This zone would include all lands cooperatively managed with AHRA directly adjacent to the river. This zone should include all lands extending 200 feet from the river in the Monument, except those lands that are part of

the Hecla Junction and Ruby Mountain leased areas. This zone would not include any land within the railroad right of way and east of that right of way where the railroad passes through the Monument.

Management of all lands within this zone in the WSA must consider the need to protect wilderness values.

- Hecla Junction and Ruby Mountain

We generally support including the AHRA leased areas as separate management zones, as depicted on Map 10

Clarification is needed on the extent of the recreational user fee area at Ruby Mountain. Does this extend to the trailhead parking area and the switchbacks on Road 300? Do users who enter this area from the east via Road 300 or the designated Turret Trail need to pay a fee to enter this area?

The proposed preliminary draft plan on page B-7 improperly suggests that garnet collecting be an activity in this zone. Ruby Mountain is not included as part of this zone. Ruby Mountain itself is part of the WSA and not included in the AHRA leased area.

- Turret Road

We do not support the statement on page B-7 of the proposal, which states that a desired future condition for this zone is to 'provide for 4 X 4 driving'. The Proclamation does not specifically include or mention anything about 4x4 driving being provided for along Forest Road 184. Motorized use is not specifically mentioned as a recreation activity that occurs in the Monument and it was not identified as an object of scientific or historic interest.

- Backcountry river west

The northern section of Monument lands west of the river contain some of the least visited and wildest lands in the entire Monument. There are no developed facilities on these lands, and they contain a significant elk production area. We recommend that the northern 811 acres of Monument lands west of the river retain their wild and primitive character and be managed as a Primitive Zone. (See attached Appendix C for details)

Please see attached Appendix D for an analysis that suggests that the majority of the Monument acreage has primitive Recreation Setting Characteristics and should be managed as a Primitive Recreation Zone.

Travel and Transportation

We agree with and support the part of the proposed action on page 46 for record 1005 Alternatives B and C that states "Rehabilitate and reclaim routes within the monument stemming from the Aspen Ridge Road to prevent motorized vehicle use." All of these unauthorized routes improperly extend into the Monument boundary east of the river, where no new motorized use is allowed. They all improperly extend further, over 300 feet from the edge of FR 185, meaning they facilitate unauthorized motorized in the Upper Tier Aspen Ridge Roadless Area. None of these routes have ever appeared on any Salida District Motor Vehicle Use Map (MVUM) produced since 2009. Not appearing on an MVUM means that

these routes were not open or available to public motorized use under new decisions and actions to comply with requirements of the 2005 Travel Management Rule. The publication of MVUMs superseded any previous travel management decisions for motorized use.

The Salida District made previous attempts to close these routes to motorized use via the installation of educational signage. These signs were vandalized and or removed, and never replaced, resulting in ongoing unauthorized motorized use.

Studies have shown that a combination of signage and barriers are the most effective means of educating users about unauthorized route closures.¹¹ We recommend that the management plan specifically include direction for agencies to close any and all unauthorized and undesignated routes with a combination of signage and structures to deter further use.

Direction must also be included to allow agencies to either actively rehabilitate and reclaim undesignated routes, or passively allow these routes to naturally revegetate on their own, with minimal additional site-specific analysis. This reflects and carries over previous decisions made in the 2002 Fourmile Travel Management Plan in this area, which directs agencies to close routes using self-sustaining drainage, revegetation (with native plant species) and closure to discourage future use.¹²

While we believe the unauthorized routes along the Aspen Ridge Road should be a prioritized, we strongly believe there are additional unauthorized routes in the Monument that must be closed and rehabilitated. At a minimum, management direction for unauthorized routes must not be restricted to only those routes along the Aspen Ridge Road. As an example, there is an undesignated and expanding quarter mile long unauthorized motorized route extending into the Monument and Roadless area off Forest Road 185.D that needs similar treatment. The plan must allow agencies to treat all undesignated routes.

Forest Road 184

We recommend that the northernmost .38 miles of Forest Service 184 be closed to all motor vehicle use at 38°42'21.95"N 106° 0'44.75"W and converted to a designated trail open to hiking and horse riding use. This section of road is steep and is experiencing excessive erosion. There is not a suitable or sustainable motor vehicle turn around location at the current end of this road. Much of the last .38 miles of this road is located in a riparian area. This segment of road does not provide significant or desirable motorized recreation opportunities.

There is already a suitable and flatter disturbed area for vehicles to turn around just south of the proposed closure point.

The Proclamation states that Forest Road 184 can only be improved for the care of identified objects of historic and scientific interest or as necessary for public safety. Recreation and motorized use and recreation was not specifically identified as an object of scientific and historic interest in the Proclamation.

The Browns Canyon Proclamation states on page 5 “motorized and mechanized vehicle use in the monument shall be allowed only on roads and trails designated for such use, consistent with the care

¹¹ Lawhon, B., Taff, B. D., & Schwartz, F. (2016). Undesignated Trail Management and Messaging Study Report. The City of Boulder, Department of Open Space and Mountain Parks. Boulder, Colorado.

¹² USFS and BLM (2002) Decision Notice and Finding of No Significant Impact. Fourmile Travel Management Plan.

and management of the objects identified above. After the date of this proclamation, new roads or trails may only be designated for motorized vehicle use in areas west of the Arkansas River... “

Motor vehicle use is currently limited to the designated tread of Forest Road 184 by 36 CFR 261.13. A potential exception would be for parking or motorized dispersed camping, which is currently restricted to within one vehicle length of the edge of designated routes.

The one-vehicle length exception is allowed by the current Salida District Motor Vehicle Use Map, which states “ Where designated parking areas are not available, and where not specifically prohibited, unsafe, or causing resource damage, parking on National Forest System lands within one vehicle length off of designated routes is authorized.’ This is also supported by FSM 7716.1(1) “Parking off of a designated road is limited to either one vehicle length (or a maximum of 30 feet) from the edge of the road. “

The Motor Vehicle Use Map exception to allow motor vehicle use off a designated route to park or camp should not be permitted within the Monument, as the Proclamation states that motor vehicle use “ shall be allowed only on roads and trails designated for such use.” (Emphasis added.) An exception to allow motor vehicle use off the tread surface of a designated road is not allowed according to the Proclamation.

We believe any action taken to physically allow or facilitate additional motor vehicle use off Forest Road 184 (for a turn-around, dispersed motorized camping, parking, or other uses) would require a decision to permit such use. Such a decision would result in the designation of a new section of road or motorized trail if it extends beyond the edge of the road. The Proclamation specifically prohibits such designations along Forest Road 184 within the Monument and east of the Arkansas River.

Allowing off route motor vehicle use as an exception, and taking specific action to designate, facilitate and directly encourage additional off route motor vehicle use, are two distinctly separate things.

If one reads the Proclamation carefully, motorized use is not specifically identified or mentioned as an object (of historic or scientific interest) to be cared and managed for within the Monument.

The recreation opportunities mentioned on page 5 of the Proclamation that the area also provides notably do not include motorized recreation or use. We strongly believe that motorized use/recreation, and these other recreational opportunities, are not objects of scientific and historic interest for which the Monument was created to protect and preserve.

It is not necessary to improve Forest Road 184 in the Monument for public safety. Forest Road is a rough maintenance level 2 available for high clearance 4WD vehicles that only receives low volumes of motor vehicle use. It is a dead end local road. Users of this route already expect, and likely have experienced, Forest Service roads on the Salida District that are far rougher than the current condition of Forest Road 184.

It must be noted that there is nothing in the Proclamation that would prevent the future closure of all or part of Forest Road 184 within the Monument, and the Monument Management Plan must not include any language to prevent that.

We believe the assumption on page 74 under Travel and Transportation Management, 3.11.2 that states “The Fourmile TMP and Arkansas River TMP would remain in place throughout the planning period” is not correct. While many of the route designations in the Fourmile TMP and Arkansas River TMPs remain in place, aspects of those plans have been superseded and replaced by more recent decisions. More recent decisions the 2005 USFS Travel Management Rule and subsequent publication of Salida District Motor Vehicle Use Maps and Forest Orders, and the Monument Proclamation itself).

As examples, the Fourmile Travel Management Plan allows motorized travel for the purpose of dispersed camping to 100 feet from a designated road or trail (Fourmile Travel Management Plan Decision Notice and FONSI 2002 page 4 From the EA, Page II-3, D., Actions Common to the Proposed Action and Alternative C). The 2005 USFS Travel Management Rule, subsequent Urban Front Country Orders, and publication of MVUMs have changed this and motorized dispersed camping is authorized within one vehicle length of designated National Forest System routes. The Arkansas River TMP limited motor vehicle travel for parking, including camping, to 100 feet from the centerline of a designated road or trail only if this travel does not cause or is unlikely to cause significant undue damage to or disturbances of the soil, wildlife, wildlife habitat, improvements, cultural, or vegetative resources or other uses of the public lands.

The Monument Proclamation, however, states, “motorized and mechanized vehicle use in the monument shall be allowed only on roads and trails designated for such use”. (page 5). The Proclamation does not allow any vehicular use off designated routes for parking or camping. The Browns Canyon Monument Proclamation was signed and went into effect on February 19, 2015. On that date, the Proclamation superseded the previous remaining allowances for motor vehicle travel off designated routes in the Fourmile and Arkansas River Travel Management Plans.

The Fourmile and Arkansas River Travel Management plans did not specify any restrictions for over snow motorized vehicle use. The Monument Proclamation, however, states, “motorized and mechanized vehicle use in the monument shall be allowed only on roads and trails designated for such use”. (Page 5). The statement in the Proclamation did not specify or limit the mode or season of use when referring to motorized and mechanized use, so **all** modes of motorized and mechanized use, during all seasons, is only allowed on roads and trails designated for such use within the Monument.

The Proclamation thus prohibits all cross-country travel over snow by motorized and mechanized vehicles.

We know of no documented decision that identifies designated specific routes available and open for over snow motorized vehicles (such as snowmobiles) or over snow mechanized vehicles (such as fat bikes) within the Monument. All normally open roads within the Monument that do not have seasonal vehicle restrictions on them (County Road and BLM road 300, County Road 194, and perhaps roads in the Ruby Mtn. and Hecla Jct. recreation sites) would remain open and available for motorized or mechanized over snow use.

An existing Forest Order seasonally closes all of Forest Road 184 from December 1 to April 15 to motorized wheeled vehicle use to protect wildlife habitat. While this order may not specifically apply to over snow motorized or mechanized use, there is no documented decision that states that Forest Road 184 is open to motorized or mechanized use over snow use. We thus believe Forest Road 184 should not be open to mechanized or motorized over snow vehicle use.

See the attached Appendix A for more information about a seasonal closure on Forest Road 184.

Recommended Additions and Additional Comments

Unauthorized and Undesignated routes should not be depicted on public maps

We believe it is inappropriate and misleading to depict and label designated system motorized routes on maps the same as undesignated, unauthorized and/or permitted/administrative roads not open to public use.

Maps 3, 10, 11 and 12 in the Appendix of the proposal depict and label a number of non-system routes that do not appear on the USFS Motor Vehicle Use Map as “Motor Vehicle Use Roads”. Many maps assign non-system undesignated routes a name or a number.

For example, numerous maps label an undesignated non-system route as the ‘Austin Trail’.

It is improper to depict and label all of these routes as “Motor Vehicle Use Roads” when some are legally open to public motorized use while others are legally closed to public use and/or all motor vehicle use. Routes within and outside of the Monument are depicted incorrectly. Improper depiction and labeling of routes confuses the public as to which routes are legally available for their legal motorized use and which are not. This map may tempt some members of the public to illegally use motor vehicles on these closed routes, resulting in safety concerns, resource damage, and exposing them to possible citations.

Private roads are improperly depicted on the map, and this may result in trespassing on those roads and private land.

Depicting closed and non-system routes on a public map is similar to depicting the location of sensitive Native American archaeological sites on a public map. Irresponsible members of the public for illegal and inappropriate behavior could use both types of maps.

The maps fail to consistently and accurately depict all unauthorized and undesignated routes that exist on the ground, if that was the intent. There are numerous routes of similar status that exist on the ground that are not depicted on these maps.

These maps must be modified and rereleased to the public with all undesignated routes and routes not open to public use removed and an explanation provided. Only routes legally designated as open to the public should be depicted on maps released to the public.

The previously printed and distributed Browns Canyon National Monument public visitor brochure did a much better job of only depicting publicly open designated travel routes on its map. The only error we noted on that map was incorrectly depicting routes 185.DA and 185.DB as roads. These routes are motorized trails, as public roads are not permitted within the Aspen Ridge Roadless Area.

Regulatory Objectives and Implementation Plan

Within one year of plan approval, the BLM and USFS must issue orders on Monument lands for the following:

- Restrict all motorized and mechanized use to designated routes
- Seasonally close roads and trails to all human use where determined necessary, in sensitive wildlife habitats, and install signs and gates to educate the public about this
- Prohibit over snow vehicle use except on designated routes
- Prohibit collections of resources and objects, (except possibly) in a defined area at Ruby Mtn).
- Install signage where designated routes enter the Monument
- Develop and Finalize an Implementation Plan

All too often, good decisions made in planning processes that are never implemented.

We strongly recommend that the Management Plan include clear direction that requires implementation of certain key elements of the plan within a set time period.

We recommend that the Management Plan include a requirement to develop and finalize an Implementation Plan within one year.

Private land edge holdings

We believe that it should be a goal and objective to acquire private land edge holdings adjacent to the Monument boundary, should opportunities arise in the future, to include these as public land.

There are three relatively small private land inholdings along the eastern Monument boundary that would be valuable additions if acquired as public land. These parcels are primarily undeveloped, and are virtually indistinguishable from adjacent Monument or other public land.

Certain types of allowed development of and activity on these private land parcels could potentially result in significant adverse impacts to the objects of historic and scientific interest on nearby Monument lands.

Retain Public lands

We believe that a specific goal and objective must be included which states that federal lands or interest in lands within the Monument must not be conveyed out of federal ownership.

There have been proposals in recent years to transfer ownership of some federal lands to states. We believe that it is essential to keep an area as significant as Browns Canyon National Monument in full ownership of the federal government, so that it can be properly managed to be protected and preserved for all.

Rights-of-way & utility corridors

The entire monument should be managed as a rights-of-way exclusion area for new rights-of-way authorizations. Installation, use and maintenance of these corridors will compromise protection of the objects for which the Monument was created.

Parking at Hecla Jct. and Ruby Mtn.

The Monument concept was promoted by suggesting that most visitation and use be focused and concentrated in the developed recreation sites at Ruby Mountain and Hecla Junction. These locations have improved public county roads leading into them, and already have a certain degree of already existing improvements that can accommodate increased use.

Public vehicle parking capacity in these areas is limited and will soon be exceeded. Capacity is already exceeded during some days for brief periods.

The agencies should explore other environmentally responsible means to transport people into these areas. The possibility to develop a shuttle bus system from parking locations outside of the Monument should be explored, especially during peak use times. Such a shuttle bus system should be implemented if determined to be suitable. Reducing the use of motor vehicles will likely reduce emissions, which may help combat and limit climate change.

There are numerous examples of shuttle busses being required for public access to areas on public lands. The shuttle bus system to access Maroon Lake near Aspen is a prominent example.

OHV staging and use at Ruby Mountain

We recommend that OHV parking and staging be prohibited at the Ruby Mountain trailhead parking area, and be directed to the Chinaman Gulch Trailhead.

Parking and staging for OHVs at Ruby Mountain occupies space desired for vehicle, trailer and user parking for hikers and equestrians at Ruby Mountain. While Ruby Mountain is the primary access point

for the designated trail system into the WSA, OHV users have numerous other options from which to park, stage and access the abundant designated OHV route system in the adjacent Fourmile area.

Starting, warming up, and using OHVs in this parking area results in conflicts with other users coming to this area to seek a wilderness experience in the WSA.

The Ruby Mountain Trailhead Parking lot is located in the bottom of a riparian area. Inefficient OHV engine use, and possible oil and gas spills from refueling, are potentially adding unnecessary pollution to the environment in this area.

The possibility of directing all OHV parking to the nearby Carnage Canyon area should be explored, in order to direct and focus OHV parking and staging to another area away from Ruby Mountain.

It is a much shorter, easier and faster drive to reach the Carnage Canyon trailhead from improved highways than it is to reach the Ruby Mountain Trailhead. It is over 3.2 miles from Highway 285 to the Ruby Mountain Trailhead. It is less than 2.4 miles from Highway 285 to the Carnage Canyon Trailhead, and only 2.1 miles from Highway 24 to the Carnage Canyon Trailhead.

A shorter and easier drive to the trailhead translates to more riding time for OHV enthusiasts.

Off road motorcyclists will be able to access designated motorcycle trails almost directly from the Carnage Canyon Trailhead.

The Carnage Canyon Trailhead offers many advantages for OHV users that the Ruby Trailhead does not. The Carnage Canyon Trailhead is already over 1 acre in size, with room to expand. The Ruby Mountain Trailhead is less than a third of an acre in size and expansion opportunities are limited. Overnight camping seems to be accepted at the Carnage Trailhead, whereas it is likely prohibited at Ruby Mountain. State Grant OHV funds could be used to add additional facilities at the Carnage Trailhead.

Use of the Carnage Canyon Trailhead by OHV enthusiasts will relieve some of the congestion and crowding at Ruby Mountain.

There have been management concerns with OHVs driving off Road 300 to the north and east of the parking area/Trailhead in the past, and this road is steep and difficult to maintain. Directing some of the OHV traffic off this road could alleviate some of those concerns.

There is an undesignated pullout to a viewpoint on a hilltop to the south of BLM road 300 at approximately 38°45'12.49"N 106° 3'51.42"W, just outside the Monument boundary. This pullout could be improved and designated to offer OHV riders (and others) coming down Road 300 from the east a great view and turn-around area. Signage could be installed at this location to inform them that OHV use ends on Road 300 in 1/3 of a mile, and there is no OHV access to the River or Ruby Mtn. Recreation site ahead.

The current use of OHVs on BLM road 300 within the Monument to and west of the Ruby parking area to the campground and other facilities at the Ruby Mountain Recreation site must be clarified. We believe that general OHV recreational use coming down road 300 from the east must end at the Ruby trailhead parking area. Noise, fumes, excessive dust and mixed-use safety concerns from unrestricted OHV use in the campground and other facilities at Ruby Mountain will result in additional conflicts, and will add to traffic and congestion in this area.

We would support prohibiting OHV use on one third mile of Road 300 west from the current Ruby Mountain Trailhead parking area, especially if a new designated pullout/overlook/turn-around area was created at the location described above.

Almost all of Road 300 west of that pullout is within the Monument boundary.

We recommend that a possible exception could be considered for OHV recreationists that pay to occupy a designated campsite at Ruby Mountain. These users could be allowed to ride their OHVs directly to and from their designated campsite on BLM road 300 to the east, in order to access additional OHV opportunities.

We recommend that AHRA monitor the amount of OHV related camping that actually does occur in the designated campground at Ruby Mountain. We believe the number of people that camp at Ruby Mountain in order to ride OHVs from the campground is minimal. We would support prohibiting campers from riding OHVs east of the campground to the Trailhead/parking area, which would simplify and clarify management of the area and eliminate any confusing exceptions.

OHV use in Hecla Junction must be clarified

OHV use on non-county roads within the leased recreation area at Hecla Junction must be clarified. Although there is no OHV use permitted on County Road 194 within the Monument, regulations pertaining to OHV use by campers or others visiting Hecla Junction are not readily apparent.

We recommend that all OHV use be prohibited on the designated routes within the Hecla Junction recreation site. Similar to Ruby Mountain, noise, fumes, excessive dust and mixed-use safety concerns from unrestricted OHV use in the campground and other facilities at Hecla Junction will result in additional conflicts, and will add to traffic and congestion in this area. In addition, the limited designated road network that could possibly be used by OHVs in Hecla Junction does not provide meaningful and adequate OHV use opportunity.

The Management Plan should require clarification of OHV use at and within these recreation sites. Regulations and restrictions regarding this use should be made available to the public posted and printed educational material. Signage at the junction of County Roads and BLM road in these areas should be posted to educate the public about OHV restrictions.

Drone use

We recommend that the use and operation of drones and other unmanned aerial vehicles be prohibited in the Monument and the immediate airspace above the Monument. Drone use is already prohibited in part of the Monument including the Ruby Mountain recreation site as that area is within 5 miles of the Buena Vista Regional Airport. Drone use can disturb wildlife and Monument users, and detract from wilderness values and the quality of the recreational experience for visitors. An exception could be considered for emergency response purposes.

Recreational Target Shooting

Recreational target shooting should be prohibited in all areas within the Monument. This use has a high potential to adversely impact wildlife and recreational users due to noise, perceived conflicts and safety concerns. Noise can affect perceptions of solitude and thus compromise wilderness values.

One of the best designated recreational target shooting areas in the state exists just west of the Monument boundary on BLM land. Use of this area is free and it provides adequate opportunities for recreational target shooting in the general Browns Canyon area.

The proposed Target Shooting restrictions proposed as part Record 1005 on page 37 for Alternatives B do not include existing USFS shooting restrictions as defined in 36 CFR 261.10 (d). These existing regulations prohibit shooting as follows:

(1) In or within 150 yards of a residence, building, campsite, developed recreation site or occupied area,

(2) Across or on a National Forest System road or a body of water adjacent thereto.

Boundary line west of the river

We fully support a survey to determine and mark the Boundary line of the Monument west of the river. Currently most of this line is not marked or delineated on the ground.

We have concerns with what appears to be continued unauthorized motorized use emanating from private land onto Monument lands at locations west of the river. Unauthorized routes must be closed and signed as closed on the ground. Private property owners must be contacted to inform them of Monument regulations.

According to current BLM GIS data, there is an area of land west of the river that is not allocated for grazing. Since there are no fences delineating this boundary, it appears as though stock from adjacent private land can freely cross into the Monument and graze. Since there are no fences separating BLM land from private land, it appears as though open grazing occurs on both private land and Monument land. Some existing grazing fences do not appear to be located on allotment, pasture or private/BLM boundaries. (See the attached Appendix C)

Without fencing, it may be difficult to regulate the timing, amount and other types of grazing regulations within the Monument. Although it appears as though the adjacent private landowner also holds all the grazing permits in this area, grazing use in this area must be clarified.

Impacts on Turret Community

Residents and property owners of Turret are concerned that the potential increased visitation and use of Forest Road 184 and other areas around their community due to Monument designation will result in additional problems such as private land trespass, noise, congestion, parking, etc.

We recommend that promotional literature and information associated with the Monument not focus or direct visitation or use on Forest Road 184. It should be clear and obvious that Forest Road 184 is a rough, unmaintained dead end 4 Wheel Drive road that is seasonally closed. It should be clear that there are limited recreational amenities and opportunities available along Forest Road 184.

We recommend that signage be placed on Forest Land along County Road 184 before the town of Turret to inform users that the Maintained County road ends ahead. The signage could be placed at a point where County Road 184 is wide enough to permit vehicle turn around.

Turret property owners should work with the County to place signage in Turret that better marks County Road 184 through town. Turret property owners should clearly mark private drives and town streets as private.

A sign should be placed at the start of Forest Road 184 on Forest Land at 38°38'28.74"N 105°59'20.42"W that identifies the road as Forest Road 184, and informs users that the road is a rough, steep, dead-end, unmaintained road that is seasonally closed.

Similar signage should be placed along Forest Road 184 at a point just before the road descends into Green Gulch and enters the Monument. This is at 38°39'43.47"N 106° 0'4.73"W where there are places to turn around. Additional signage and structures may be required here to keep motorist from driving off road into the Monument over flat grassy areas to the west.

Trails and new trail development

We agree with, and fully support, the assumption on page 74 which states "Any potential additions to the non-motorized trail system would be designated after the completion of the RMP and require

subsequent site-specific NEPA analysis with additional public input.” It is beyond the scope of this planning process to get into the specifics of considering the additions of new facilities.

We know that there are other proposals being submitted that request new quiet use trails and roads be developed both in and out of the Monument.

We are generally opposed any new trail development within the Monument, outside of the Ruby Mountain and Hecla Junction recreation areas. We question the need for any new trails, especially since existing trails receive relatively little use and are poorly maintained.

It must be recognized that all quiet use trails open to bicyclists, horse riders and hikers have been shown to result in negative impacts on wildlife and wildlife habitat. Trails require funding, time and energy to responsibly and comprehensively manage. Comprehensive management includes more than mere maintenance.

We would support a suitability analysis to determine which areas and locations might be appropriate for new trails and which areas are inappropriate. We recommend that new trails not be developed in the following areas:

- Within one half mile of raptor nests
- In elk production areas
- In Bighorn Sheep production areas
- In elk or deer winter concentration areas
- In riparian areas
- In Bighorn Sheep winter range
- In identified priority habitats of Threatened or Endangered Species
- Where they would significantly fragment sizable blocks of habitat
- Within 300 feet of sensitive plant species.

We believe that any new trails being considered in the WSA must fully consider the impacts upon solitude and primitive unconfined recreation. For example, a designated trail connecting the River Bench Trail with the River Access trail would form a new designated trail loop that would likely attract and increase use of both of these trails, compromise solitude, and remove opportunities for primitive unconfined recreation.

We do not support designating, marking, promoting and opening permitted outfitter/guide trails in the northeast and east side of the Monument as officially designated public use trails. Public use on these permitted trails will result in conflict with permitted use. These permitted trails are not designed or managed for public use.

We question the need to develop new trails when there are existing designated trails that receive very little use. As an example we placed a game camera on Trail 1435 in the Monument last summer and were only able to capture 12 users on that trail from May to the middle of September (not including administrative and permitted use).

We recommend that a type of compensatory mitigation be considered and applied if new trails in the Monument are desired, since existing trails receive so little use. For example, a proposal to add a new trail in the Monument might be conditionally approved if an existing trail such as 1435 that receives little use is closed.

We recommend that no new trails in the Monument should be considered for approval until existing designated trails are stabilized and properly maintained, and a long-term agreement with a local volunteer user group is in place to assist with the management and maintenance of the existing trails. As an example, the designated Turret Trail is extremely eroded in a few locations, as is Trail 1435.

We support placing hard seasonal closures that apply to all users on trails that significantly intrude into sensitive priority wildlife habitats. This should include raptor nesting areas, big game winter concentration and birthing areas, etc.

We support consideration and further analysis to realign, relocate or reroute existing designated trail segments out of areas where they are resulting in resource impacts or are not sustainable. (such as on some steep slopes or to avoid sensitive plant habitat). These reroutes should be considered primarily to minimize resource impacts and not improve user experience.

We have serious concerns about proposals to designate and create a new public road and parking area west of Turret to provide access to a new proposed public trail. There would be impacts to riparian areas, bighorn sheep winter range and production areas, other wildlife, and falcon nests. If these proposals were approved and implemented, and appropriate seasonal closures applied, the routes would only be open three months out of the year. It would be difficult to effectively enforce seasonal closures of these routes for the rest of the year, if they were designated and constructed.

Socioeconomic conditions

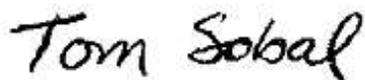
We agree with the determination in Table 2 on page 8 that no management actions specific to socioeconomic conditions should be included in the alternatives. It is difficult to quantify the effects of actions on socioeconomic conditions, and an action that may prove beneficial to some may be detrimental to others.

We believe claims by various user groups that their group contributes more to public land management serve to alienate and divide user groups. The amount of funding specific user groups contribute is miniscule when compared to the primary source of funding for federal public land management: federal tax dollars.

We ask that you respectfully consider these comments and offer a range of alternatives that protect the objects of scientific and historic interest identified in the Proclamation.

We thank you for allowing us to comment.

Sincerely

A handwritten signature in black ink that reads "Tom Sobal". The signature is written in a cursive, slightly slanted style.

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Appendix A

Recommended changes to existing seasonal closures.

We recommend all seasonal closures include signage and physical barriers (locked gates and additional fencing to prevent locked gate bypass) unless otherwise specified.

Seasonal closures should apply to all human uses, including over snow vehicle use.

Although the Forest Plan states that winter trailheads and thus parking should not be provided for vehicles along seasonally closed roads in 5B Winter Range areas, all of the selected locations have space for vehicles to turn around in front of the locked seasonal closure gates. Parking should be discouraged at these locations with signage.

Seasonal route closures must be properly depicted on Motor Vehicle Use Maps, and other visitor maps.

Install lockable seasonal closure gates and signage on Forest Road 184

PSICC Order #2016-15 seasonally closed Forest Service Road 184 for 5 years or until rescinded. The order seasonally closes all of the 6.52 miles of this Forest road north of Turret, including long sections of road outside the Monument boundary.

We recommend that a sign be installed at the start of Forest Road 184 just beyond the start of Forest Road 184 near Turret indicating the road is seasonally closed. This sign should be on USFS land at 38°38'28.73"N 105°59'20.46"W.

A locked gate could be installed in this location, but private land owners behind the gate would likely want access to their land and may want a key.

Until the details of private inholding and edgeholding motorized access are sorted out along Forest Road 184, a seasonal closure sign and lockable gate at a pinch point at 38°38'48.17"N 105°59'26.02"W should be installed.

This proposed location of this new locked gate is beyond any known potential private property access in or near Turret. The Head of the Turret Property Owners approved this proposed gate location in May of 2019.

The sign on this gate should indicate that Forest Road 184 is seasonally closed to all human use, including over snow vehicle use. If this is not possible since this gate location is outside the Monument, another gate and sign should be installed at a pinch point just south of Greens Gulch at 38°39'44.10"N 106° 0'4.80"W.

Forest Road 184 is the only seasonally closed route on the Salida District east of highway 285 that does not have a lockable seasonal closure gate on it. For the past few winters, it had an incorrectly placed sign on it.

The entire seasonally closed segment of road 184 is within a 5B management prescription area. There is strong direction in the current forest plan that suggests seasonally prohibiting motorized use and other uses on this route.

Current Colorado Parks and Wildlife GIS data indicates that the entire seasonally closed segment of 184 is in Bighorn Sheep, elk and Mule Deer winter range and a Mule Deer Winter Concentration area and Critical Winter Range. All three of these big game species are impacted by continued winter use on FR 184. CPW considers identified Bighorn Sheep winter range as a sensitive habitat and Mule Deer Winter Concentration areas as very high priority habitat. CPW recommends seasonal closures of these areas during the winter to minimize adverse impacts to these species.

Over 6 miles of designated route 184 are proposed to be better seasonally closed by this gate. A gate will help protect over 4500 acres of winter range habitat. Our analysis indicates that installation of this one gate will result in greater benefits compared to other potential seasonal closure actions on the rest of the Salida District.

This protected area will expand areas that are currently protected by existing seasonal closures (FR 185.D, ATV trail 1434, FR 185) to the north and east. A larger expanded block of seasonally unfragmented habitat will provide wildlife with more feeding options and greater habitat security during the winter months.

Our monitoring has found that people are still using road 184 with motor vehicles during the seasonal closure period. This use is occurring past the seasonal closure sign.

The inconsistent presence of snow on this route cannot be relied upon to prevent unauthorized seasonal use. There are times when sections or the entirety of this route is snow free during the winter closure period, due to variations in weather and precipitation, and the location of this route on the drier east side of the valley.

Inconsistent and lower amounts of snow on this route permit easier unauthorized motor vehicle access on this route during the seasonal closure period. Since this entire route is at a relatively lower elevation than other seasonally closed routes on the District, snow accumulates later and melts off sooner. This allows unauthorized vehicle use later into the winter and earlier in the spring.

The lack of snow on this route does not indicate it is not important for big game. Snows at higher elevations can make forage unavailable for animals during the seasonal closure period. Since this route is at a lower elevation, a gate will help provide habitat security and access to new growth for big game in the early spring when they are most vulnerable.

A seasonal closure gate on road 184 will promote more consistent management of seasonal closures in this area. There are gates on numerous other seasonally closed routes on the east side of the valley, including roads 185, 185.D, 309, 311, 376, 375, 308, 318 and Trail 1434.

Although the current and two previous versions of Forest Visitor Maps indicate that snowmobile use in this area is restricted to Forest Road 184, there is no documented evidence of an order or decision that supports permitting seasonal snowmobile use on Forest Road 184.

We agree that snowmobile use should be restricted in the 5B area through which this segment of 184 passes, as there is clear direction in the Forest Plan to do so.

There is no clear direction in the Forest Plan, however, to specifically permit or allow roads in 5B areas to remain open to snowmobile use. On the contrary, the plan provides clear direction as a Standard/Guideline at III-152 to close 5B management areas to snowmobile use. The seasonally closed segment of Forest Road 184, and the road tread corridor itself, is part of this 5B management area.

The Forest Plan also comprehensively includes all forms of recreation, including snowmobiles, when it provides general direction at III-152 to "Close areas to human use in to the degree necessary in winter to prevent disturbance to wildlife." Prevent is a strong word, and suggests taking action to avoid wildlife disturbance, rather than action to minimize or mitigate disturbance to wildlife as a management decision to accommodate snowmobile use on the road would otherwise do. Prevent suggests something closer to prohibit, rather than accept or discourage. Words like prevent and close certainly do not suggest active management to accommodate or facilitate a use.

Current signage on 184

In 2016, a sign was installed on FS Road 184 at 38°38'40.56"N 105°59'33.01"W which is .25 miles north of/beyond the point at which Order 2016- 15 seasonally closes FS road 184.



Sign in 2016, the post and sign are now gone.

This sign was located just a few feet from the road where it was visible. This sign was not placed at the beginning of the seasonally closed segment of FR 184, where it should be, perhaps because some private land owners have (or expect) permitted or other access to their private land on the first segment of FSR 184.

This sign was not placed in a location where a locked gate could effectively prevent use, due to open terrain, lack of thick vegetation and the presence of unauthorized or unknown status side routes that allow easy motorized bypass of this sign.

Soon after this sign was installed vandalized/removed or possibly even moved to a new location.

As of December 2018, the only sign informing the public that this route is seasonally closed was located at 38°39'24.16"N 105°59'31.94"W. This is 1.4 miles from the point at which Order 2016- 15 seasonally closes FS road 184. This sign is not very visible, as it is located over 20 feet from the edge of the road. It is also located on the wrong side of the road for a traffic and travel management sign. Even if people turned their vehicles around at the location of the current sign, they are disturbing over 1500 acres of quality winter habitat. A December 2018 visit to the area found numerous elk and deer tracks in the snow along the 1.4 mile section of Forest Road 184 that should be closed but is not.

We are not sure why the seasonal closure sign had been installed in the current location. Perhaps someone thought that the posts remaining from the vandalized/removed Browns Canyon National Monument installed in 2015 were the posts for the seasonal closure sign.

Either way, the current location of this sign is unacceptable.



December 2018 location of seasonal closure sign, on old Monument signposts



Same location and posts with National Monument sign in 2015

Relocate seasonal closure on Forest Road 185.D

We recommend moving the seasonal closure point on Forest Road 185.D to a location closer to the intersection with Forest Road 185.

Forest Road 185.D parallels and forms the visible landmark for part of the northern boundary of the Monument at its northeast corner.

There is an existing seasonal closure on road 185.D at 38°45'56.14"N 105°58'23.98"W consisting of a lockable gate in a grazing fence line. This closure allows winter use on Forest Road 185.D for approximately 580 yards west of the intersection with Forest Road 185.

There are a number of concerns with the current location of this seasonal closure. The seasonal closure where it is currently located is difficult to monitor, as it is not visible from Forest Road 185. The 580 yards of currently allowed winter travel on Forest Road 185.D provides no significant motorized recreation opportunity. This 580 yards of human use adversely impacts wintering big game both in and outside of the Monument.

A concern is that motorists avoid a snow-covered Forest Road 185.D. This road is slightly trenched. Wind blows snow into the route trench in this exposed area and the snow becomes hard and packed through the winter. The packed, hard and deeper snow does not melt as quickly or blow away in strong winds. Motorists avoid driving on the snow packed road and drive next to the road, braiding it (see photo below). This use destroys vegetation and forage for stock and big game, as well as exposing bare soil to erosion.

We recommend relocating the seasonal closure on Forest Road 185.D to within 50 yards of Forest Road 185.



Photo taken 4/16/19 looking west at Forest Road 185.D from 38°45'56.78"N 105°58'4.68"W. This is approximately 80 yards west of Forest Road 185. The actual road 185.D is filled with blown in snow and ice since it is slightly trenched.

Water diversion berms are visible as snow free lines across road 185.D. Instead of driving on the actual snow and ice covered road 185.D drivers parallel the road creating a braided route.

Relocating the seasonal closure gate on the north end of Forest Road 185.

We recommend relocating the existing seasonal closure to a point just south of 185.B road, to allow access to Elk Mtn Ranch private development. A gate and supporting/reinforcing fence could be installed at/near 38°44'19.61"N 105°58'13.21"W. This is approx. 1.5 miles north of the existing seasonal closure.

This new location is just south of a point where Forest Road 185 changes from a road open and maintained for passenger vehicles to a rougher 4WD road. The road begins to climb steeply up a north facing slope behind this new closure location, and that segment of road is frequently impassable due to deeper and lingering snow. There is a gulley and ephemeral stream located just south of/behind this gate location, which can be used with fencing to discourage locked gate bypass. Relocating the closure to this location will help preserve the tread surface of FR 185 from damage due to vehicle use when wet or muddy. Relocating this closure point will help preserve and protect wintering elk, deer and sheep both within and outside the Monument.

Reinforcing Closure of Trail 1434

ATV Trail 1434 is seasonally closed with a locked gate at the point where it intersects with trail 1434.A. A longtime concern is that OHVs can easily bypass this gate to ride on Trail 1434 when it is seasonally closed.



Fresh motorcycle tracks on seasonally closed section of Trail 1434, early April 2019 indicating unauthorized use and bypass of seasonal closure gate



Fresh UTV tracks on seasonally closed section of Trail 1434, early April 2019, indicating unauthorized use and bypass of seasonal closure gate.

Some riders know that once they bypass this closure, they can ride make connections on seasonally closed routes and unauthorized routes to other open routes both outside of and within the Monument itself.

The seasonal closure gate on Trail 1434 must be reinforced with the addition of smooth wire wildlife friendly fencing on both sides to prevent the unauthorized vehicle bypass.

Appendix B

Potential Overlook Trail and zone off FR 185 in Browns

Although the development of new trails should not be considered in this plan, below are our recommendations for the

Of the six previously disturbed unauthorized motorized routes along Forest Roads 185 and 185.E in the monument, one is the most suitable as a potential overlook.

This location is most suitable as the best location for an overlook as opposed to other locations for a number of reasons. These include its high elevation (10,150 feet), existing use and disturbance as an overlook, west facing exposure (towards the view), lack of existing vegetation to block sightlines and relatively flat ground for sustainability.



Potential 92 acre overlook zone in Browns off FR 185 as light blue shading.

Centered at 38°42'14.78"N 105°58'34.25"W

Monument boundary as yellow line.

This zone has a 50 foot setback from a proposed walking trail route to differentiate it from other zoning in the area.

Vehicle parking will occur outside the Monument adjacent to FR 185.



Overlook zone on topo map indicating exposure and vegetative cover.



Looking west at the disturbed area/overlook from FR 185. The Monument boundary is just behind aspen trees on the right.



Looking west from FR 185. These OHVs are parked about 60 feet from the edge of FR 185.



Looking east from just within the Monument at the same line of OHVs.



Enhanced aerial image of this route and .25 miles of unauthorized motorized use (red line) with Browns Canyon National Monument boundary (yellow line) and Aspen Ridge Upper Tier Roadless Area (green line and shading)

Note that existing aspen trees (circled in blue) that are between FR 185 and the overlook area and the view to the west are outside of the roadless area boundary. These trees could be managed to improve the view from this location.



Aerial view of potential overlook management.

The dark green line is the extent of about 500 square feet of potential vehicle parking/pullout space, within 30 feet of FR 185. This would permit space for up to 10 full sized vehicles parallel parked or over 15 vehicles with head in parking.

The bright green line is a potential new 200 foot long gently sloping out and back foot trail to facilitate an overlook experience. Existing vegetation blocks the view from most other locations in this area.

Red lines not part of parking or the trail are unauthorized motorized routes that will be closed and revegetated (much of this will revegetate naturally if vehicles are kept off it).

Note the visible Elk Mtn Ranch permitted trail that passes through this area north to south. This would have to be signed as authorized/permitted use only.

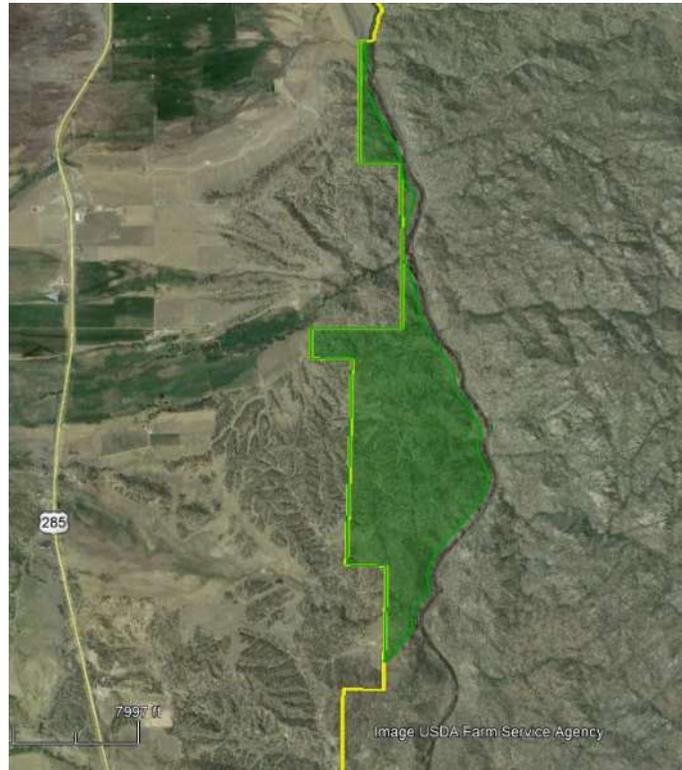
No overnight parking, camping or fires should be permitted in this area.

We recommend that the area around this new trail be delineated with a structure (buck and rail fence or low post barrier) to contain human use.

Appendix C

The area west of the river should be primarily managed as a primitive zone.

The northern section of land west of the river contains some of the least visited and wildest lands in all of the Monument, and we recommend primitive management/zoning for 811 acres of those lands.



Recommended primitive management zone
for 811 acres of monument land west of the river (green shading)
Monument boundary as yellow line

Human visitation and use of the lands in this area are extremely low due to a combination of private land (including the railroad line), fences, steep terrain, the river, and a CO state land section that all combine to make public access difficult and very limited.

Access via boat from the river is difficult, due to steep terrain and the lack of suitable and safe pullouts/beaches.

Most of the adjacent private, state and BLM land in that area is also undeveloped.

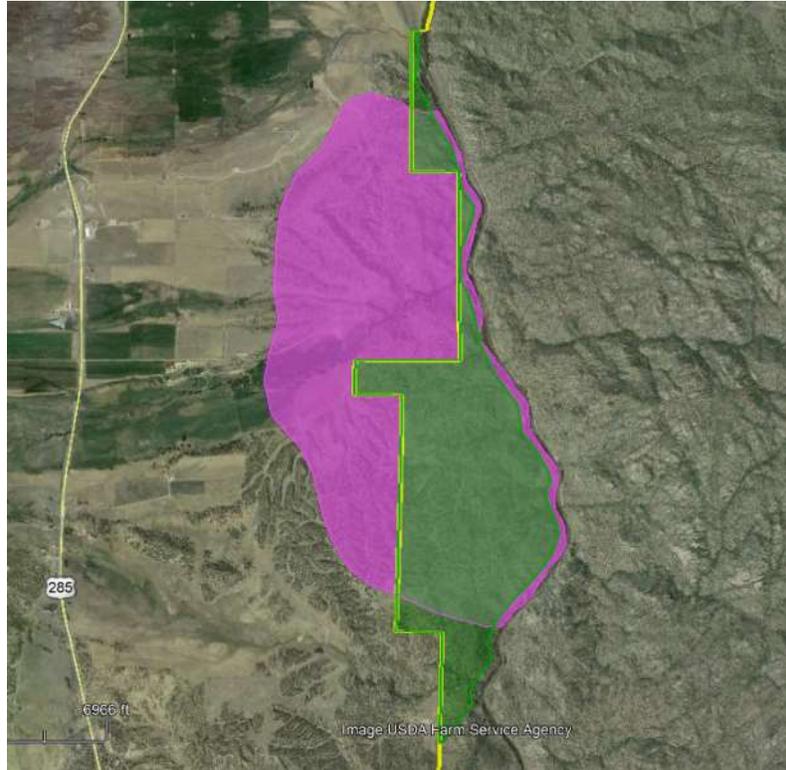
Over 230 acres of this area is over one-half mile from a motorized or mechanized route. This satisfies the physical component for a primitive recreation setting.(see attached Appendix D).

This entire 811 acres could be considered to be in a primitive recreation setting, as it satisfies the primitive social and operational components of a primitive recreational setting.

The remoteness of these Monument lands and lack of human presence make this area an ideal place to experience solitude, primitive unconfined recreation, and untrammelled natural land. This area of the Monument should be managed to maintain these characteristics, with no additional facilities or development.

The lack of human presence in this area makes it ideal habitat for wildlife

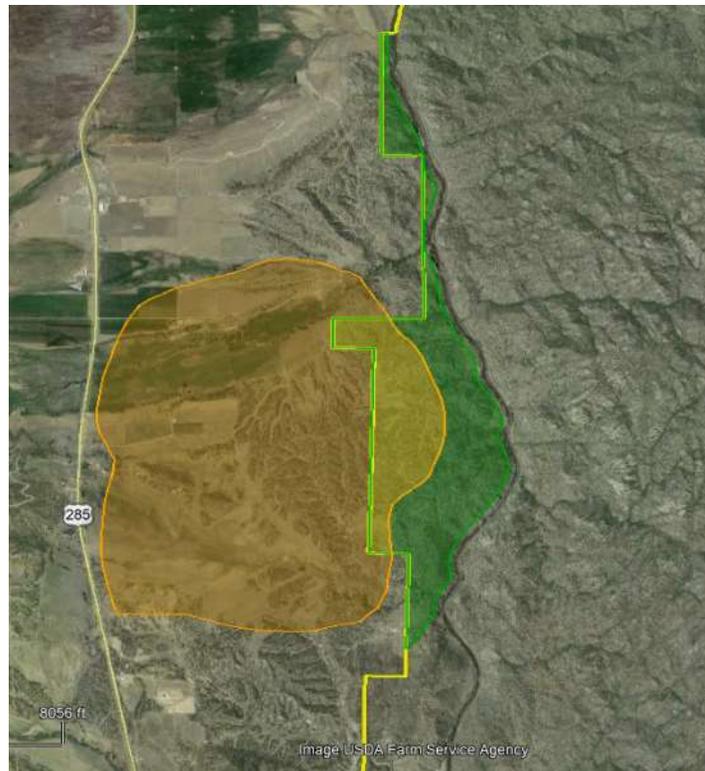
There is a CPW identified¹³ 1800 acre elk production area in this area, of which over 44% is within the Monument. Approximately 33% of this calving area is private land, with 20% of that already subdivided into home sites. Since there is no guarantee that the private land portion of this production area will be preserved as quality suitable elk habitat, the importance of protecting the public lands in this area for wildlife is magnified.



CPW identified elk production area as pink shading including area in Monument to pink line at river..
Recommended primitive area as green shading.

This area is also part of a CPW identified summer concentration area for elk. Encouraging additional activity or development in this area will fragment and negatively impact elk and fragment elk habitat.

¹³ Colorado Parks and Wildlife Colorado Parks and Wildlife Species Activity GIS Data, (updated 2/2019) Accessed online June 2019 via <https://cpw.state.co.us/learn/Pages/KMZ-Maps.aspx>



Elk summer concentration area, shaded as light orange

A proposed high density residential subdivision on the Centerville Ranch to the west will also fragment and impact habitat in this area, making undeveloped Monument lands more important for wildlife.

This area of the Monument is also an important CPW identified winter concentration area and severe winter range for deer and elk.

Much of this area is also within the very high biodiversity Browns Canyon on the Arkansas River Potential Conservation Area as identified by the Colorado Natural Heritage Program.

The southern boundary of this primitive zone in our maps corresponds to an existing fenceline that cuts through the Monument. Although we believe this is a fence related to grazing, this fenceline is not associated with any specific pasture or allotment boundary line, and has some incorrect signage on it. This fenceline is an existing feature on the landscape and could serve as a reference to differentiate a more primitive area/zone from a backcountry zone to the south. This fence also keeps human use low on its north side.

Signage on this fence that suggests that the land is private and hunting is not allowed must be removed.

A kmz file is attached that indicates the southern boundary of this more primitive 811 acre area as this fenceline.



Looking northwest at fenceline at $38^{\circ}40'0.56''\text{N}$ $106^{\circ}3'8.99''\text{W}$
The land on both sides of this fence is within the National Monument, and thus the sign stating that the land is Posted and hunting is not allowed is incorrect.

Appendix D

BLM Recreation Setting Matrix and Primitive Recreation Characteristic Settings

Over half of the lands within the Monument that could be considered as having Primitive Recreation Setting Characteristics when applying the BLM Recreation Setting Matrix and BLM Manual H-8320-1.¹⁴

We calculated over 6300 acres of BLM land within the Monument that could be classified as being in a primitive recreation setting class.. These lands are over one-half mile from a motorized or mechanized route and meet the social and operational components of a primitive recreation setting.

Using the same method, we calculated that there are over 4900 acres of USFS lands in the Monument that could also be considered to be in a primitive recreation setting class (if BLM methodology was applied to USFS lands). There are two USFS areas that would qualify as being in a primitive setting: a 3900+ acre northern area and a 1000+ acre southern area.

In calculating this, we considered routes outside the Monument boundary, including public and private land routes. We only considered the designated roads and trails on public lands as routes.

We did not consider the railroad line as a route, since it receives zero to no official use, and public use on the tracks or corridor is trespassing.

By our calculations, over 11,200 acres of the Monument could be in a primitive recreation characteristic setting.

Many more acres of land currently meets social and operational components of a Primitive recreational setting, although they happen to be within one-half mile of a motorized or mechanized route. Terrain and topography including steep hills, rock formations, and other natural barriers to human use and movement (such as the Arkansas River) allow these additional lands to function as a primitive recreation setting.

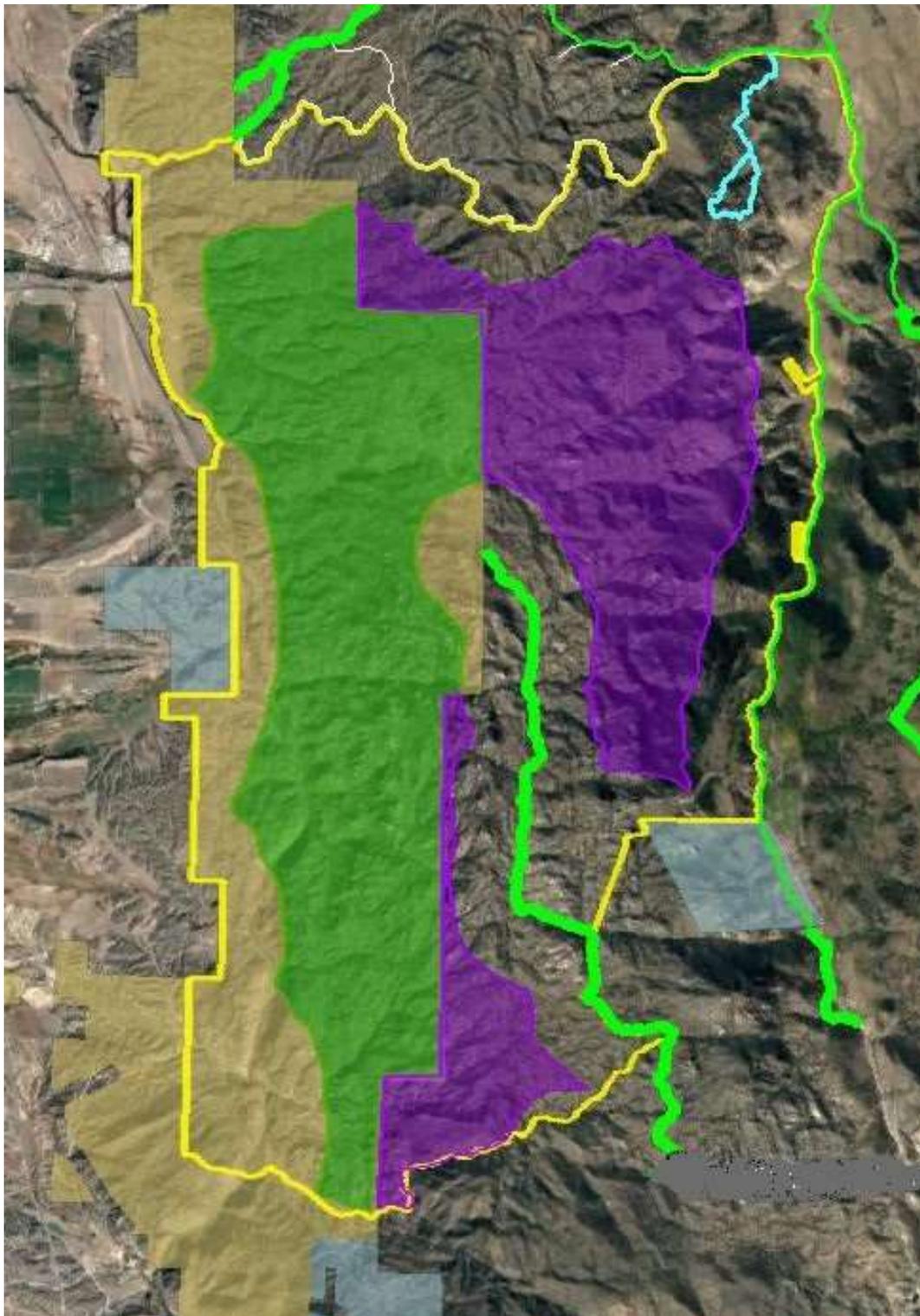
We believe the total overall volume of use, and average party sizes, using trails emanating from Ruby Mountain Trailhead in the WSA allow that area to be considered in the primitive class. This is especially true if one averages the contacts and party sizes over an entire year or even an entire summer season.

Other parts of the Monument, including the Stafford and Railroad Gulch areas and the area near Forest Road 185, function as part of the primitive class, since there are no developed recreational facilities in them.

Trail 1435 receives very low levels of use, so it too could be considered to functionally be part of a primitive recreation setting.

We believe most of the Monument should be within a Primitive Recreation Management Zone, to delineate primitive recreation opportunities and preserve primitive recreation setting characteristics.

¹⁴ Matrix class available online at https://www.blm.gov/sites/blm.gov/files/uploads/IM2011-004_att5.pdf
Manual 8329 online at https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_H-8320-1.pdf



BLM lands with physical primitive recreation setting characteristics shaded as green ~6300 acres
USFS lands with physical primitive recreation setting characteristics shaded as purple ~4900 acres

Name: Amy Moyer

Organization Name: Colorado Department of Natural Resources

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 8:00

Comments:

Please see attached comments from the Colorado Water Conservation Board on the wild and scenic values on the waterways within Browns Canyon National Monument as part of the public scoping process. June 19, 2019 Keith Bergert Field Manager BLM Royal Gorge Field Office 3028 E. Main St. Canon City, CO 81212 RE: Browns Canyon National Monument Wild and Scenic River Values Dear Mr. Berger: The Colorado Water Conservation Board ("CWCB") appreciates the opportunity to comment on Wild and Scenic values of the waterways within the Browns Canyon National Monument ("BCNM") as part of the BLM's public scoping process for the BCNM Resource Management Plan / Environmental Impact Statement. As the BLM conducts its eligibility analysis for the stream segments identified within the BCNM, the CWCB requests that the BLM consider existing flow protections for those stream segments, and where applicable, recommend that the CWCB appropriate instream flow ("ISF") water rights or increases to existing ISF water rights to protect flow-related Outstandingly Remarkable Values ("ORVs"). Note that the CWCB currently holds a decreed ISF water right on Brown's Creek for 5 cfs (5/1 - 9/30) and 2 cfs (10/1 - 4/30), decreed in Case No. 75W4287. The CWCB values its long-standing partnership with the BLM on instream flow protection and hopes to be able to work with the BLM to protect any flow-related ORVs in the BCNM using the State's Instream Flow Program. Thank you for considering these comments. Please contact Linda Bassi of my staff if you have any questions. Sincerely, Rebecca Mitchell, Director Colorado Water Conservation Board

Name: Susan Jenkins

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 0:00

Comments:

GIS Area Comment, Object ID: 16 Recreation Please consider 1) keeping this area free from motorized access; 2) creating more biking/hiking trails; 3) a bike trail connecting BV to Salida - all would profit from combo of preservation/access

Name: Mike Sugaski
Organization Name:
Secondary Author:
Secondary Organization:

Date Submitted: 6/18/2019 0:00

Comments:

GIS Area Comment, Object ID: 17 Recreation Add designated dispersed camping suitable for the landscape and social tolerance/spacing GIS Area Comment, Object ID: 18 Recreation allow designated disperse camping GIS Area Comment, Object ID: 19 Travel Management Consider this corridor for a mostly singletract mountain bike route that would connect Salida With BV. Going through this portion of the Monument would offer a very primitive biking experience. GIS Area Comment, Object ID: 20 Recreation allow a primitive mtbiking experience within the Monument that could also be used for a connector trail between Salida and BV GIS Area Comment, Object ID: 21 Recreation Allow a roaded natural Mtb experience, single tract,which would help in connecting Salida with BV

Comment period for 'Planning Criteria Report'

Letter #: 90

Name: Emma Dunn

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 8:00

Comments:

GIS Area Comment, Object ID: 22 Recreation Please consider opening this area for non-motorized, recreational use, specifically cycling trails. Multi-use trails bring diversity

Comment period for 'Planning Criteria Report'

Letter #: 91

Name: Lauren Atkinson

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

GIS Area Comment, Object ID: 23 Other The preferred alternative for BCNM allows for the continuation of multiple use through the duration of the special use authorizations, increase recreation infrastructure and policy. (See atchmnt)

Name: Kristie Van Voorst

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

GIS Area Comment, Object ID: 24 Recreation I would love if you created additional trails that allow mountain bikes. We already come on occasion and would come to the area more often if there were more trails. We spend money in BV and Salida

Comment period for 'Planning Criteria Report'

Letter #: 93

Name: Jesse R Bowers

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 0:00

Comments:

GIS Point Comment, Object ID: 43 Travel Management Please consider multi-use trails, to include bikes, linking Buena Vista and Salida through the monument.

Name: Hank Jenkins

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

GIS Point Comment, Object ID:44 Special Designations (ACEC, WSR, WSA, Roadless Areas) Please install one trail north south through Brown's Canyon WSA to allow human power and horse modes of transport. Please maintain WSA despite any converse Federal directives.

Name: John Kreski

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

GIS Point Comment, Object ID: 46 Travel Management Please consider separate parking designation for vehicles with OHV trailers and parking for vehicles alone. Crowding is happening at the trailhead with multiple users. GIS Point Comment, Object ID: 47 Recreation An increase of parking will

be needed within the AHRA R&PP lease as multiple users (rafters, fishermen, hikers, campers are exceeding the space on hildays and weekends. GIS Point Comment, Object ID: 48 Recreation

An increase of overnight camping from both river and land will cause conflict without a sign in to occupy. Historically, rafters have establish harden campsites from the river.

Name: Greg Wright

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

GIS Point Comment, Object ID: 49 Recreation The north entrance at Ruby Mountain will need more parking. A clearly marked trail from Hecla Junction north would be great for one day visitors. A trail from Salida to BV should be considered.

Name: Logan Myers

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/20/2019 0:00

Comments:

GIS Point Comment, Object ID: 50 Recreation All riverside camping should remain under the jurisdiction of the AHRA. They have the best knowledge of how to manage it. GIS Point Comment, Object ID: 51 Recreation An alternative location for a required trailhead to Railroad Gulch could be located here. I have hiked it and a passenger car can get here. GIS Point Comment, Object ID: 52 Recreation Recreation in the backcountry should be maintained at all costs. Any regulation limiting backcountry access need to be rooted in sound studies.

Comment period for 'Planning Criteria Report'

Letter #: 98

Name: Bruce Goforth

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

DUPLICATE

Comment period for 'Planning Criteria Report'

Letter #: 99

Name: P.T. Wood

Organization Name: City of Salida

Secondary Author:

Secondary Organization:

Date Submitted: 6/19/2019 0:00

Comments:

DUPLICATE

Name: Bruce Goforth

Organization Name:

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 8:00

Comments:

"Gentlemen", my comment'> regarding the Brown's Canyon National Monument management plan are as tallows: * The monument/wilderness area, should to the extent possible, with the various recognized grazing, water rights, and designated roads vs. "social trails" noted, remain in a natural state as is appropriate for Dept. of Interior and/or other federal agency national monuments. It is appropriate and desirable to have trail systems which allow for the use and enjoyment of the public consistent with the purposes of national monuments. Some new trail or trail sections will need to be constructed. One such trail should be adjacent to the main visitor entrance to serve as an interpretive trail with way side exhibits highlighting the native flora and fauna. It should be accessible for handicapped as well as the general populace. At some national monuments, a dog on leash may be allowed on such a trail. This may be considered. Otherwise dogs on leash should be allowed, but only on a designated pet area adjacent to the main entrance kiosk/visitor center for potty purposes. * A visitor center building should be built, if not possible initially, then eventually, complete with exhibits, restrooms, books for sale, etc. At the very least, interpretive Kiosks with map of the national monument, and with fliers, should be provided. * Wildlife sensitive areas such as springs, watering holes, riparian areas, and birthing and or wintering areas essential to reproduction and survival should not have trails located in, on or adjacent-with the effect of destroying key habitat, and/or disturbing/flushing wildlife species such that species are unable to have ready use of these critical areas. Watchable wildlife designated sites with exhibits should be provided to allow the public to enjoy wildlife at sensitive areas-for viewing, without causing wildlife to leave or abandon (temporarily or otherwise these areas. Seasonal closings of trait sections or sensitive sites may be necessary. * These principles of habitat and species protection should be followed by river users also, such that pull-out sites may only be used in designated places along the river. * Management of the national monument whether for recreational vehicles, wildlife, etc. should be on an agency collaborative basis consistent with the adopted management plan, i.e. no recreational vehicle use except on designated roads vs, use everywhere. * Mining in various forms should not be allowed on or adjacent to the national monument. if an existing use such as along the river is taking place, that claim should be purchased or not renewed so as to protect the integrity of the monument's habitat, wildlife, scenic beauty, bank stabilization, and/or water quality. An ethos of come to enjoy but not disturb or destroy should guide management decisions. *Roads leading into the monument should be well signed and maintained. Sincerely, Bruce Goforth

Name: P.T. Wood

Organization Name: City of Salida

Secondary Author:

Secondary Organization:

Date Submitted: 6/18/2019 8:00

Comments:

RE: Letter of Support - Browns Canyon National Monument Sustainable Alternative To Whom It May Concern: The City of Salida is grateful for the opportunity to comment on the Browns Canyon National Monument Resource Management Plan. The City has a deep and vested connection with BCNM and hopes that this letter will assist in development of the RMP to serve our residents and guests of the City of Salida. Please accept this letter as the City Council's support for the Sustainable Alternative as proposed and presented to the BLM by the Friends of Browns Canyon. We believe that the Sustainable Alternative ensures local partners and community members have a seat at the table for implementation of the RMP and provides a voice for local control and management of this cherished resource. It is the City Council's belief that the Sustainable Alternative *

- * Allows for protection, conservation and enhancement of ecological values in the area .
- * Maintains access for visitors.
- * Protects cultural resources.
- * Supports local and regional economies.
- * Ensures local stakeholders have a voice.
- * Protects wildlife.

We look forward to continuing to participate in the public process for development of the BCNM RMP and its implementation. We hope that the City of Salida's support of the Sustainable Alternative as proposed by the Friends of Browns Canyon will be incorporated into the RMP and public record. Thank you for your attention to this matter and diligence on behalf of our nation's public lands.