

SUMMARY VERSION, *June 15, 2011*

**Center for Native Ecosystems • Colorado Environmental Coalition
Colorado Mountain Club • Colorado Wild • San Juan Citizens Alliance
Sheep Mountain Alliance • The Wilderness Society • Western Colorado Congress
Wild Connections • Wilderness Workshop**

May 12, 2011

Dominguez-Escalante National Conservation Area
Bureau of Land Management

The undersigned organizations respectfully submit comments and recommendations regarding potential wild and scenic river segments within the Dominguez-Escalante National Conservation Area (NCA), as described in the Bureau of Land Management's (BLM) *Dominguez-Escalante National Conservation Area, Summary Report for Wild and Scenic River Eligibility, November 2010*. The following comments and recommendations relate to the range of alternatives to be considered, and to final protective prescriptions, in the BLM's pending resource management plan for the NCA.

The organizations preparing the comments and recommendations include a spectrum of local, statewide, and national conservation and quiet-recreation expertise. In preparing our comments, these organizations have relied on extensive field exploration and study, documents review, and consultations with various local landowners, ranchers, water providers, and others with interest in, and knowledge of, the streams and their surrounding lands.

As such, we believe that the following comments provide a thoughtful, objective, and well researched set of recommendations.

General observations and RMP range of alternatives

Wild & scenic uniqueness in Colorado

The unique and extensive array of outstandingly remarkable values found in and along these stream segments suggests that all eleven stream segments warrant a finding of suitability for wild & scenic protection. This is an especially important consideration in a state that has seen, so far, only one stream designated by Congress for protection under the Wild and Scenic Rivers Act.

Outstandingly remarkable values in context of NCA designation

It is significant that all of the outstandingly remarkable values identified for these streams, in the BLM's wild & scenic eligibility report, are additionally recognized by the Act of Congress that designated the NCA and wilderness as values essential to the NCA and its proper management—a fact that warrants careful attention from the NCA Advisory Council and from the BLM, beyond the basic and normal wild & scenic suitability review.

All-suitable option in RMP range of alternatives

In order to be consistent with the laws and policies implementing the National Environmental Policy Act (NEPA), and to provide interested citizens complete options on which to comment, the range of alternatives in the NCA's draft RMP should include at least one alternative that finds all eleven streams suitable for wild & scenic management and protection.

Selective findings of suitability, selective recommendations to Congress

Even among the stream segments we recommend as suitable—and among segments the BLM RMP ultimately finds suitable—the option of actually recommending congressional action should be used selectively. The resulting option—finding of suitability without formal recommendation for congressional action—in at least one instance, may provide the best combination of careful, protective, and flexible management without legislation.

Summary

In general:

- The draft RMP should include at least one alternative finding all eleven stream segments suitable;
- The final RMP should include a combination of wild & scenic suitable streams with recommendation to Congress, suitable streams without recommendation to Congress, and non-suitable streams;
- The final RMP should include clear, reliable measures that protect the natural condition of all eleven streams, their respective corridors, and the full range of outstandingly remarkable values identified in the BLM's wild & scenic eligibility report.

Suitable streams, with recommendation to Congress *federal portions:*

- Rose Creek – 3.9 miles; **100% federal**; Wild; *Scenic*
- Cottonwood Creek – 18.27 miles; **100% federal**; Scenic; *Vegetation*
- Dry Fork Escalante Creek – 2.89 miles; **84.1% federal**; Recreational; *Vegetation*

Suitable streams, without recommendation to Congress:

- Gunnison River, Segment 3 – 17.48 miles; **80.2% federal**; Recreational; *Recreational, Fish, Cultural Vegetation*
- Escalante Creek, Segment 1 – 8.45 miles; **68% federal**; Scenic; *Scenic, Recreational, Geologic, Wildlife, Vegetation*

Non-suitable streams (with strong administrative protections in the RMP):

- Gunnison River, Segment 1 – 15.73 miles; Scenic; *Recreational, Fish, Historical*
- Big Dominguez Creek, Segments 1 and 2 – 15.86 miles & .78 mile; **100% federal**; Wild; *Scenic, Recreational, Wildlife, Geological, Cultural*
- Little Dominguez Creek, Segments 1 and 2 – 13.14 miles & 2.45 miles; **100% federal**; Scenic; *Scenic, Geological, Wildlife, Cultural*
- Escalante Creek, Segment 2 – 8.48 miles; **10.6% federal**; Recreational; *Fish, Wildlife, Vegetation*