

PROPOSED

Ruby-Horsethief Recreation Area Management Plan



Bureau of Land Management
Grand Junction Field Office
McInnis Canyons National Conservation Area

June 6, 2011

Chapter 1 – Introduction

1.1 The Planning Area

The Colorado River runs for 21 miles through Horsethief and Ruby Canyons between Loma, Colorado, and the Colorado-Utah state line in Mesa County. Approximately 98% of the land adjacent to the river in this area is managed by the Bureau of Land Management’s Grand Junction Field Office and McInnis Canyons National Conservation Area.

This segment of the river has long been valued for its scenic, recreational, cultural, paleontological, geologic, and wildlife resources and has been managed to preserve those resources for many years. These qualities were recognized by the 1987 Grand Junction Resource Area Resource Management Plan which identified the Colorado River through Horsethief and Ruby Canyons as an “Intensive Recreation Management Area” and instructed BLM to prepare a recreation management plan for the area.

The 1998 Ruby Canyon-Black Ridge Integrated Resource Management Plan (IRMP) designated the Colorado River through Ruby-Horsethief as a “Special Area”, now called the Ruby-Horsethief Recreation Area (RHRA). This area is approximately 2,600 acres in size and includes the river and lands immediately adjacent to it. In 2000, Congress designated almost all of the land surrounding the river corridor as the Colorado Canyons National Conservation Area. CCNCA was renamed McInnis Canyons National Conservation Area (MCNCA) in 2005. MCNCA consists of 123,430 acres of public land that surround the Colorado River through Ruby-Horsethief. The act creating MCNCA specifically exempted the Colorado River from the NCA up to the 100 year high water mark but it also directed BLM to “develop a comprehensive management plan for the long-range protection and management” of MCNCA and the Black Ridge Canyons Wilderness. The Act instructed that the management plan should “include all public lands between the boundary of the Conservation Area and the edge of the Colorado River and, on such lands, the Secretary [of the Interior] shall allow only such recreation or other uses as are consistent with this Act” (Section 6(h)2(e)). Due to the river corridor not being a part of the National Conservation Area, planning guidance for the Ruby-Horsethief Recreation Area comes from the 1998 Ruby Canyon-Black Ridge IRMP while lands adjacent to the RHRA are subject to planning actions identified in the 2004 MCNCA Resource Management Plan (RMP). These plans are complementary in nature and feature many of the same management actions.

This plan focuses on recreational use of the Ruby-Horsethief Special Area identified in the 1998 Ruby-Canyon Black Ridge IRMP and included in the 2004 McInnis Canyons NCA RMP. The RHRA begins 1.2 miles west of the Loma boat launch and continues to the Colorado-Utah state line and includes the Colorado River and lands below the 100 year high water mark. It is an extremely

popular recreation destination with more than 22,000 user days in 2010 and more than 20,000 nights of camping.

1.2 Purpose and Need for the Plan

The purpose of this plan is to provide for comprehensive management of river recreation to provide opportunities for quality recreation experiences and beneficial outcomes while continuing to protect the natural, cultural, geologic, and recreational resources of the river corridor. Past planning efforts have identified broad management goals for the area and call for BLM to manage the RHRA to “provide opportunities for visitors to engage in overnight flat-water boating for social group and family affiliation in a naturally appearing red-walled river canyon”. While recreation is the primary component of this plan, BLM manages the RHRA not only for its recreational values but also because of its outstanding scenic, geologic, wildlife, fisheries, and cultural resources.

Recreational use of Ruby-Horsethief has grown significantly since the first major planning process for the area in 1998. In 2010, there were more than 22,000 visitor days in the RHRA. Overuse of the area was first recognized as a component of the 1998 plan in which the number of commercial outfitters was capped at its current level (34 in 1998, down to 22 in 2009) and the discussion of a permit and fee system was begun. Management plans in 1998 and 2004 encouraged BLM to delay implementation of a permit and fee system for as long as practical in order to preserve the open, unrestricted nature of the canyons. As use has continued to grow over the past 15 years, both physical and social impacts have also increased and now require increased management presence in the river corridor.

1.3 Scope of the Plan

There is a complex pattern of administrative levels within the Ruby-Horsethief Recreation Area. Approximately 98% of the land adjacent to the river in this area is managed by the Bureau of Land Management’s Grand Junction Field Office and McInnis Canyons National Conservation Area but under separate legislative authorities. The RHRA was created by the 1998 Ruby Canyon-Black Ridge IRMP. This plan established the Colorado River corridor as one of three management zones and contained long-range management and implementation actions for management of the area. In 2000, most of the area included in the RC-BR IRMP was designated by Congress as the Colorado Canyons National Conservation Area. Due to water rights concerns, the river and the banks up to the 100 year high water mark were not included in the CCNCA. However, the *Colorado Canyons National Conservation Area and Black Ridge Canyons Wilderness Act of 2000* (Public Law 106-353) specifically noted in Section 6(h)(2)(E) and Section 6(l)5(B) that BLM maintains the authority to manage recreational use of the Colorado River and the public lands between the river and the Conservation Area boundary:

[The Management Plan shall]....(E) include all public lands between the boundary of the Conservation Area and the edge of the Colorado River and, on such lands, the Secretary shall allow only such recreational or other uses as are consistent with this Act.

and:

Nothing in this Act shall affect the authority that the Secretary may or may not have to manage recreational uses on the Colorado River, except as such authority may be affected by compliance with paragraph (3). Nothing in this act shall be construed to affect the authority of the Secretary to manage the public lands between the boundary of the Conservation Area and the edge of the Colorado River.

Therefore, management of the RHRA is authorized under both the RC-BR IRMP (1998) and the CCNCA RMP (2004). This RHRA recreation management plan incorporates direction from both the 1998 RC-BR IRMP and the 2004 MCNCA RMP to identify actions to manage recreational use of RHRA to continue to “provide opportunities for visitors to engage in overnight flat-water boating for social group and family affiliation in a naturally appearing red-walled river canyon” as well as opportunities for visitors to attain beneficial outcomes identified in both of the comprehensive land use plans.

1.4 Objectives of the Plan

- Manage RHRA to continue to provide outstanding recreational opportunities for visitors
- Preserve RHRA’s natural, cultural, scientific, and recreational resources for the enjoyment of present and future generations
- Reduce conflict between visitors
- Support the local economy and businesses by establishing a fair allocation of private and commercial use of Ruby-Horsethief to achieve management objectives
- Manage RHRA within the guidelines established by the 1998 Ruby Canyon-Black Ridge IRMP and the 2004 McInnis Canyons NCA RMP.

1.5 Planning Process Overview

As recreational use of RHRA has grown over the past 15 years, BLM has implemented management actions to help mitigate the physical and social impacts of such use as directed by the two Resource Management Plans in place for the area. These actions were taken in place of developing a

comprehensive recreation management plan for the area. Unfortunately, physical and social impacts continue to increase and prompted BLM to develop a comprehensive recreation management plan for the Ruby-Horsethief Recreation Area.

BLM began the initial outreach effort for this planning process in 2008 with a presentation to the MCNCA Advisory Council, a group of 10 citizen-stakeholders representing a wide variety of users of the area. The Advisory Council was called for by the act creating the National Conservation Area, and these representatives were appointed by the Secretary of the Interior to assist BLM with the development of the MCNCA RMP. In 2009, the MCNCA Advisory Council became a subgroup of the Northwest Colorado Resource Advisory Council and continues to offer advice to BLM on management of the area including involvement with this management plan.

Formal planning for this project began in 2009. BLM hired an additional river ranger for the summer season. This ranger was stationed primarily at the Loma boat launch and served as a primary contact for thousands of boaters entering the RHRA. BLM also established a planning website where all planning documents and presentations were made available to the public. In addition to the planning webpage, BLM created a dedicated email address to receive comments from the public at the very beginning of the planning process.

The planning process was formally begun with a letter to private boaters, all commercial outfitters and other known stakeholders including the Colorado Division of Wildlife, Colorado River Outfitters Association, and the Western Slope No-Fee Coalition discussing the need for this planning process as well as BLM's goals for it. This letter also announced the date of BLM's first public meeting on the issue. This meeting was held on July 16th, 2009 and started with a presentation to the MCNCA Advisory Council at which BLM staff discussed why BLM was beginning this process and the goals it had. More than 55 people attended this presentation at which both private and commercial boaters were well-represented.

The draft RHRA Management Plan was released in March, 2010 and an open house was held on May 1st, 2010 to answer questions about the draft plan. Following this meeting, a 60 day comment period began during which time BLM received more than 60 comments. BLM utilized information from these comments, public meetings, and meetings with the Northwest Resource Advisory Council's McInnis Canyons NCA subgroup to select an alternative from the draft plan. This alternative, most closely representing Alternative C from the draft plan, was then modified into the proposed Ruby-Horsethief Recreation Area Management Plan.

1.6 Concurrent Planning Efforts

In 1979, the National Park Service conducted a study to determine if the Colorado River through the RHRA was eligible for Wild and Scenic River (WSR) status. This study identified a 27.7 mile segment of the Colorado River from Loma to Westwater Canyon to be eligible and suitable for WSR status.

The 1979 study tentatively identified this segment as “scenic” due to the presence of outstandingly remarkable values related to scenery, recreation, geology, fish, wildlife, and archaeology.

The segment of the Colorado River from the Loma boat launch to the Colorado-Utah state line was found to be eligible for scenic status during the Grand Junction Field Office’s Wild and Scenic River Eligibility Report evaluation in 2009. The determination of whether or not the river is suitable for designation will be made during the ongoing Grand Junction Field Office RMP revision and should be complete by 2013.

The outstandingly remarkable values identified during the 2009 eligibility evaluation include scenic, recreational, fish, wildlife, geological, and historical resources.

1.7 Management Authority

1.7.1 Laws

- The Federal Land Policy and Management Act of 1976 (FLPMA) contains the Bureau of Land Management’s general land use management authority over the public lands, and establishes outdoor recreation as one of the principal uses of those lands (43 U.S.C. 1701(a)(8)). Section 302(b) of FLPMA directs the Secretary of the Interior to regulate through permits or other instruments the use of the public lands, which includes commercial recreation use. Section 303 of FLPMA authorizes the BLM to promulgate and enforce regulations, and establishes the penalties for violations of the regulations, and Section 603 directed BLM to review its remaining roadless areas and make recommendations as to whether or not each area should become a congressionally designated Wilderness Area.
- The Federal Land Recreation Enhancement Act (FLREA) authorizes the BLM to collect fees for recreational use in areas meeting certain criteria (16 U.S.C. 6802(f) and (g)(2)), and to issue special recreation permits for group activities and recreation events (16 U.S.C. 6802(h)).
- Federal law gives BLM jurisdiction over the entire shoreline of a lake or reservoir, and controls use and charges fees even if the bureau does not actually “own” the water; navigability is not an issue. There is also case law (*United States v. Lindsey*, 595 F.2d 5 (9th Cir. 1979)) that cites the property clause of the Constitution in affirming the government’s right to require permits (and by extension, fees) for rivers in order to protect the public interest in protecting and managing the lands and resources on the river bank.

1.7.2 Rules

- Ruby Canyon-Black Ridge Supplementary Rules (2000)

- McInnis Canyons National Conservation Area Supplementary Rules (2010)
- Bureau of Land Management Rules for Recreation Permits on Public lands (2007)
- Colorado Division of Wildlife – Rules for Loma Boat Launch State Wildlife Area
- Colorado State Parks – Colorado Boating Statutes and Regulations (2009)
- Colorado State Parks – River Outfitter Licensing Regulations
- Utah State Parks – Boating Laws and Rules (2010)

1.7.3 Plans and other Documents

- Ruby Canyon-Black Ridge Integrated Resource Management Plan (1998) – the RC-BR IRMP establish setting characteristics for the river corridor as well as identifying beneficial outcomes that visitors should be able to obtain while visiting the area; it also designated the RHRA as a “Special Area” and instructed BLM to evaluate the need for a permit and fee system
- McInnis Canyons National Conservation Area Resource Management Plan (2004) – McInnis Canyons NCA includes all lands surrounding the river corridor above the 100 year high water mark. However, BLM manages the recreational use as a component of the NCA due to the interconnected nature of the two areas and the MCNCA RMP makes land use allocation decisions for the RHRA
- Black Ridge Canyons Wilderness Management Plan (2004) – all public lands above the 100 year high water line on the south side of the river are part of the Black Ridge Canyons Wilderness Area
- Bureau of Land Management Interim Management Policy and Guidelines for Lands under Wilderness Review (1995) – most of the land on the south side of the river was identified as a Wilderness Study Area in 1980. Lands above the 100 year high water line were designated as Wilderness by Congress in 2000 but lands between the banks of the river and the 100 year high water line were not released from WSA state and are managed under this policy
- Grand Junction Field Office Resource Management Plan (1987) including Wild and Scenic River eligibility and suitability study (2010) – in 2009 the BLM Grand Junction Field Office identified the Colorado River through the RHRA as ‘eligible’ for WSR status
- Colorado River Monitoring Plan (2008) – McInnis Canyons NCA’s Colorado River monitoring program began in 2008 and measures both physical and social impacts in the area. For the first two years, rangers have focuses on recording baseline data for all campsites that can be used to measure future increases or decreases in impacts

- BLM-Colorado Recreation and Visitor Services Strategy – provides strategic direction for the application of BLM recreation objectives in the development of management plans and their implementation in day-to-day field operations
- Memorandum of Understand between the BLM-Grand Junction Field Office, BLM-McInnis Canyons National Conservation Area, and BLM-Moab Field Office – this agreement documents the coordinated efforts of the Grand Junction Field Office, McInnis Canyons NCA, and Moab Field Office to manage the RHRA corridor between Loma and Westwater
- Memorandum of Understanding (MOU) between the BLM-McInnis Canyons National Conservation Area and the Colorado Division of Wildlife – this agreement establishes a general framework of cooperation between the BLM and CDOW for the cooperative management of the Loma boat launch and the segment of the Colorado River accessed from the Loma boat launch.

1.8 Land Ownership and Jurisdiction

1.8.1 River Corridor

Almost all of the land within the Ruby-Horsethief Recreation Area is public land managed by the Bureau of Land Management. Public land begins approximately 1.5 miles downriver from the Loma boat launch and continues on both sides of the river to the Colorado-Utah state line with the exception of three small private parcels adjacent to the river, each less than 300 acres in size and all with non-river access. The land on both sides of the river corridor above the 100 year high water mark is managed by the BLM as McInnis Canyons National Conservation Area. The public lands adjacent to the 100 year high water line on the south side of the river are part of the Black Ridge Canyons Wilderness Area while the public land between the banks of the river and the 100 year high water line remain as a Wilderness Study Area.

1.8.2 Loma Boat Launch

The Loma boat launch is the primary access point for visitors to Ruby-Horsethief with more than 80% of Ruby-Horsethief visitors beginning their trip there. The Loma launch has a mixed land ownership pattern on the beach and access road. The Colorado Division of Wildlife (CDOW) acquired the property to provide improved access to hunters and fishermen. CDOW built a small parking lot and installed a toilet along the access road above the boat launch. CDOW and BLM jointly manage this site, originally through a 1982 Cooperative Management Agreement which was updated to a Memorandum of Understanding (MOU) in 2007. BLM staff maintains the toilet but do not have authority to enforce rules or regulations on the CDOW property unless activities there directly damage the BLM resource area. The lands immediately north and west of the

beach are private property. The access road is a Mesa County road from the I-70 interchange down to the boat launch and crosses BLM and private land.

1.8.3 Westwater Take Out

The Westwater boat ramp is across the state border in Utah and is the primary take out for 90% of river users; the other 10% combine Ruby-Horsethief with Westwater Canyon for a longer trip. The Westwater boat launch is managed by the BLM-Moab Field Office. The Westwater Canyon segment of the Colorado River is a permitted section of river with a limited number of launches available during the permit season.

1.9 Visitor Facilities

1.9.1 Loma Boat Launch

The Loma boat launch is the primary access point for Ruby-Horsethief and is a critical public contact point for BLM to provide information to RHRA visitors. BLM has two large information kiosks, two interpretive signs, and two visitor registers at the Loma boat launch. BLM river rangers traditionally spend several hours on busy days at the Loma launch making personal contacts to inform visitors about the rules of the river corridor, particular those related to camping, fires, and sanitation. In 2009, BLM hired an additional river ranger who was stationed primarily at the Loma boat launch. This ranger made more than 2,000 contacts throughout the season, and helped reduce visitor conflicts and resource impacts both at the launch and at campsites. The information kiosks contain a large map of the RHRA including the location of all designated campsites as well as rules, regulations, and tips for navigating the river. In 2010, BLM was unable to hire an additional river ranger whose primary responsibility was staffing the Loma launch but this position was staffed in 2011.

1.9.2 James M. Robb Colorado River State Park – Fruita Section

The state park at Fruita is a secondary launch for visitors to Ruby-Horsethief. Few non-motorized boaters floating RHRA begin their trip here due to its location four miles upstream from Loma and the need to float several miles within sight and sound of Interstate 70. This launch is more popular with motorized boaters because they pass through that stretch of river more quickly. The state park has a more improved boat launch and is accessible at all water levels. BLM has a RHRA information kiosk at the state park.

The Fruita state park also provides the only local camping opportunities for boaters. Camping is not permitted at the Loma boat launch or on the nearby BLM lands (BLM manages these lands for day-use only mountain biking).

1.9.3 Other upstream put-ins

A small percentage of river users launch from the property of one of BLM's larger commercial outfitters. This outfitter rents boats and other gear and allows their customers to launch from private property just upstream from the state park. BLM has a RHRA information kiosk at this outfitter's launch site, as well as at two other locations upriver from this point: Connected Lakes State Park in Grand Junction and Harky's Launch in Palisade, Colorado.

1.9.4 Westwater boat ramp

The Westwater boat ramp is the primary take-out for most river users. It is relatively small and is prone to congestion, especially on Sunday morning and afternoon when large numbers of RHRA floaters are taking out while Westwater boaters are trying to get on the river. BLM-Grand Junction works with BLM-Moab to support their management of the boat launch with financial support for the care of three vault toilets as well as education of RHRA boaters on boat ramp etiquette in the tight confines of Westwater. According to boaters and BLM-Moab staff at the Westwater boat ramp, the increased presence of river rangers at the Loma boat launch significantly reduced the crowding and conflict at the Westwater take out in 2009.

Chapter 2 – Recreation Management Direction

2.1 BLM Recreation Management

2.1.1 BLM Land Use Planning

BLM’s Land Use Planning Handbook (H-1601-1) provides guidance on Land Use Plan decisions. These decisions involve identifying Special Recreation Management Areas (SRMAs). SRMAs are areas that have a distinct primary recreation-tourism market as well as a corresponding and distinguishing recreation management strategy. For each SRMA, BLM identifies discrete Recreation Management Zone (RMZ) boundaries. Each RMZ has four defining characteristics – it: (1) serves a different recreation niche within the primary recreation market; (2) produces a different set of recreation opportunities and facilitates the attainment of different experience and benefit outcomes (to individuals, households and communities, economies, and the environment); (3) has distinctive recreation setting character; and (4) requires a different set of recreation provider actions to meet the strategically-targeted primary recreation market demand. To address these four variables within each RMZ, BLM makes the following land-use allocation decisions:

1. Identify the corresponding recreation niche to be served;
2. write explicit recreation management objectives for the specific recreation opportunities to be produced and the outcomes to be attained (activities, experiences, and benefits);
3. prescribe recreation setting character conditions required to produce recreation opportunities and facilitate the attainment of both recreation experiences and beneficial outcomes, as targeted above (the recreation opportunity spectrum is one of the existing tools for both describing existing setting character and prescribing desired setting character); and
4. briefly describe an activity planning framework that addresses recreation management, marketing, monitoring, and administrative support actions (e.g., visitor services, permits and fees, recreation concessions, and appropriate use restrictions) necessary to achieve explicitly-stated recreation management objectives and setting prescriptions (see Implementation Decisions subsection below).

Both the Ruby Canyon-Black Ridge Integrated Resource Management Plan (1998) and the Colorado (McInnis) Canyons National Conservation Area Resource Management Plan (2004) designated SRMA’s that included and surrounded the river corridor. Both of those plans also designated the Colorado River to be a distinct RMZ including explicit recreation management objectives and prescriptions for physical, social, and administrative recreation setting character conditions (sections 2.2.2, 2.2.3).

2.1.2 Benefits Based Management

During the last 30 years, recreation management for BLM meant managing a variety of outdoor recreation activities. This approach to meeting user demand by activity treats recreation as “fun and games” for participants. People wanted hiking trails, so BLM built hiking trails. People wanted to float rivers, so BLM developed a river program and so on. Since recreation management was structured around individual activity demands, the BLM’s recreation program/staffing was therefore structured around such principle recreation activities and initiatives as off-highway vehicles (OHV), river boating, hiking, trails, interpretation, permits and fees, etc.

Managing recreation today on BLM public lands is much more complex. Technological advances have brought new recreation activities to the public lands, including exponentially increasing mountain bike and off-highway vehicle use. This diversity of often competing recreation activities desired by visitors coupled with the dramatic increasing use of public lands, caused BLM recreation managers to realize that activity based management forced recreation planning, management, staffing and funding into a “reactive” mode. Public land managers were focused on facilitating activity use of the public lands without attention to the changes in setting we were causing, thereby diminishing the character of the lands that produced beneficial outcomes to the public.

At the same time, visitors and residents voiced concerns that the character of the recreation settings in which they recreate were just as critical as the activities available to them on public lands. Recreation management focusing solely on activities could allow the distinctive landscape character – especially areas that were characterized by more primitive, natural looking, and undeveloped recreation settings – to change. In turn the recreation experiences made available for visitors could be impacted. While recreation management has negligible control over such external influences as private land growth and energy development, public land managers can enhance visitors’ quality of life and beneficial outcomes produced for communities, economies, and the environment itself through a management approach that follows this strategy.

To improve recreation services and internal operations, BLM Colorado has moved beyond an activity-focused approach to an “outcomes focused” approach called benefits-based management (BBM). BBM is the application of an outcomes-focused philosophy to the delivery of recreation services. BBM provides the conceptual framework to view, plan and collaboratively provide recreation services as a means to larger “ends” —beneficial outcomes to individuals, communities, economies and the environment. By paying attention to “why people recreate” and the supporting recreational setting characteristics —“what the public lands are becoming,” in addition to “what people want to do”—and how that may impact land health standards, managers have a logical framework that considers all the essential workings (implementation actions, recreation settings, recreation opportunities and outcomes, and potential resource

impacts) that go into delivering the quality recreation services BLM’s visiting and resident customers desire.

2.2 Management Guidance from BLM Land Use Plans

2.2.1 Overview of existing land use plans

There are many laws, rules, and plans that influence how BLM manages the Ruby-Horsethief Recreation Area. However, two of these are broad land use plans that include the RHRA within their planning areas. The Ruby Canyon-Black Ridge Integrated Management Plan (1998) and the McInnis Canyons National Conservation Area Resource Management Plan (2004) both provide general and specific direction for management actions for BLM to take within RHRA. Each plan has goals and objectives for the area as well as physical, social, and administrative setting prescriptions. Both plans also list detailed beneficial outcomes that visitors should have the opportunity to attain while recreating in the area. An overview of the management direction giving in both plans is listed below.

2.2.2 Ruby Canyon-Black Ridge Integrated Resource Management Plan (1998)

The 1998 Ruby Canyon-Black Ridge IRMP established the Ruby-Horsethief Recreation Area and identified the Colorado River as one of its three primary planning zones and established the Ruby-Horsethief Recreation Management Zone. The RC-BR IRMP instructed BLM to “*manage this zone to provide opportunities for visitors to engage in boating (raft, canoe, kayak), day hiking into the lower ends of major canyons, viewing wildlife and waterfowl hunting activities”.* This plan also lists ‘*psychological experiences*’, ‘*individual benefits*’, ‘*household and community benefits*’, ‘*economic benefits*’, and ‘*environmental benefits*’ that visitors should have the opportunity to achieve while recreating in this area. BLM’s recreation management policy is to manage the area to maintain the physical, social, and administrative setting of an area so that visitors have the opportunity to achieve these targeted outcomes.

The beneficial outcomes identified for RHRA in the 1998 RMP (p. 5-29):

Psychological Experiences (on-site only)

- Meeting desired challenges
- Enjoy risk taking canyon adventures
- Enjoying the closeness of family and friends
- Enjoying learning outdoor recreation and outdoor social skills
- Savoring canyon country aesthetics
- Enjoying reflecting on personal and family values
- Enjoying mental and physical rest

Individual Benefits – psychological and physiological (most significant)

- Restored mind from unwanted stress
- Greater self-assurance
- Greater outdoor knowledge, skills, and self-confidence
- Greater cultivation of outdoor oriented lifestyle
- Increased quality of life
- Greater aesthetic appreciation
- Well informed and more responsible visitors

Household and Community Benefits (most significant)

- Improved functioning of individuals in family and community
- Heightened sense of community pride and satisfaction
- Reduced numbers of at-risk youth
- Maintained and enhanced group cohesion and family bonding
- Greater nurturance of others

Economic Benefits (most significant)

- Well equipped customers
- Increased value added to local-regional economy

Environmental Benefits (most significant)

- Greater environmental stewardship

The RC-BR IRMP also listed specific management actions for BLM to take within the Ruby-Horsethief Recreation Area. Actions relevant to the current planning process include (p. 5-30):

Resources and Facilities – Physical Setting

- In cooperation with Colorado State Parks, help design facilities to be built at the Fruita Recreation Site to overcome the physical limitations of the Loma launch site
- Remove tamarisk at key sites along the river to create new undeveloped camping sites and lunch sites

Human Use and Occupancy – Social Setting (p. 5-31)

- Manage the zone, including the lower one and one-half miles of Knowles, Mee, and Rattlesnake Canyons, for an optimum group size not to exceed 25 people to promote the realization of the targeted benefits, to protect the riparian environment and side canyons from overuse by large groups (inside the Black Ridge Canyons Wilderness)
- Visitors may camp at undeveloped campsites on public lands throughout the corridor unless LAC monitoring indicates a need for directing use and hardening specific sites that were historically used to reduce visitor camping impacts

- Manage the lower 1.5 miles of Knowles, Mee, and Rattlesnake Canyons under the social setting prescription for the Ruby Canyon zone, all remaining portions of Black Ridge West will be managed according to the Black Ridge West social setting prescriptions

Service Delivery System – Administrative Setting

- Designate the Colorado River corridor between Loma and Westwater as a “Special Area”, and compile a business plan and conduct a study on the feasibility of charging all users a fee for the use of the area
- Continue to evaluate other additional access sites to the river
- Direct allocation of river use will only be undertaken after all indirect measures (e.g. including education, information, facility construction to ease pressure off of high-use areas and high-use periods, increasing access to and developing opportunities on the Gunnison River, etc.) are exhausted
- To promote achievement of targeted benefits, both commercial jet boat and personalized watercraft operations will be discouraged
- BLM will increase on-site presence at the put-in locations
- To promote the achievement of targeted benefits, limit the number of commercial float outfitters to current levels (34), and do not issue additional permits if existing outfitters relinquish their permit

2.2.3 McInnis (Colorado) Canyons National Conservation Area Resource Management Plan (2004)

The McInnis Canyons National Conservation Area was designated by Congress in 2000 and encompasses almost all of the land in the Ruby Canyon-Black Ridge IRMP planning area except for the river corridor up to the 100 year high water mark. The Colorado Canyons National Conservation Area and Black Ridge Canyons Wilderness Act of 2000 (Public Law 106-353) specifically mentioned BLM’s continuing authority to manage recreational use of the river corridor and adjacent lands the 2004 NCA RMP designated the river corridor as the Colorado River Corridor Recreation Management Zone and identified a management objective and targeted beneficial outcomes for the area.

The management objective identified for the Colorado River Corridor in the 2004 CCNCA RMP is for BLM to *“manage this zone to provide opportunities for visitors to engage in overnight flat-water boating for social group and family affiliation in a naturally appearing red-walled river canyon”*. The primary activities identified for this zone are *“overnight rafting, canoeing, and kayaking”* as well as *“associated camping and wilderness hiking.”*

This plan also identified targeted beneficial outcomes for this area, many of which are taken from the 1998 RC-BR IRMP:

Personal Benefits

- Restored mind from unwanted stress
- Greater cultivation of outdoor-oriented lifestyle
- Greater environmental awareness and sensitivity
- Renewed human spirit
- Greater outdoor knowledge, skills, and self-confidence
- Greater aesthetic appreciation
- More well-informed and responsible visitors

Household and Community Benefits

- Heightened sense of community pride and satisfaction
- Maintained and enhanced group cohesion and family bonding
- Improved functioning of individuals in family and community

Economic Benefits

- Maintenance of gateway community's distinctive recreation-tourism market niche or character
- Positive contributions to local-regional economic stability
- Increased local tourism revenue
- Increased work productivity

Environmental Benefits

- Increased stewardship and protection of River Corridor

The CCNCA RMP also made physical, social, and administrative setting prescriptions for BLM to maintain in order to provide visitors with the opportunities to obtain the identified beneficial outcomes.

Physical

- North of the river is *middle country* and south of the river is *back country*. The corridor is natural in appearance, although there is a railroad track within the corridor on the north side of the river. The corridor is presently unimproved w/ potential for low key improvements

Social

- Group size up to 25
- Expect 15-29 encounters per day and eventually in the 30+ range during the peak use times
- There is some evidence of camping along the banks

Administrative

- Brochures are available and information is posted at the launch site. Nothing is available beyond the launch site
- Agency presence and enforcement is randomly present
- Motorized use allowed in concurrence with state regulations

2.3 Recreation Use Statistics and Trends

2.3.1 Data collection methods

BLM has maintained a voluntary visitor register sheet at the Loma boat launch for more than 15 years. Over that time, an average of 7,336 people annually have signed in before floating Ruby-Horsethief. 8,409 people registered in 2009, the second highest total since 1995. In 2010, this number increased to 9,511. This represents the highest visitor use ever for the RHRA. For the past 5 years, BLM has also maintained a second voluntary campsite registration sheet. This sheet gives a more accurate measure of total use of Ruby-Horsethief because it records the actual number of people that are camping each night. However there are a few factors that lead to undercounting via these registers. Since both sheets are voluntary, some visitors choose not to sign up at all, while having two registers can confuse some visitors, leading them to only use one of them.

In 2008, BLM installed a second vehicle counter at the Loma boat launch. Vehicle counters are the traditional method for counting visitor use; but boat launches present a unique situation in which vehicles may be overcounted due to the number of vehicles being used to run shuttles, and because vehicle counters don't count visitors in the vehicles. To supplement this data, in 2009, BLM hired an additional river ranger who was stationed primarily at the Loma boat launch. Through his efforts, most visitors used the campsite registration system (some still refused, citing its voluntary nature) and more accurate counts were made from data collected by vehicle traffic counters by using ranger counts to verify traffic counter figures.

2.3.2 Annual visitor use

8,409 visitors signed in at the Loma boat launch visitor register in 2009, while more than 17,000 camping nights were recorded on the voluntary campsite register. Both of these numbers indicated the highest visitor use counts since 2001 until being eclipsed in 2010. Between 2001 and 2009, annual visitor registrations averaged 7,528. Actual use is likely at least 10% higher than these figures due to the number of visitors who either refuse to register or float by Loma without knowing about the voluntary campsite registration system. Because almost all physical and social impacts in the river corridor are due to the number of camp nights spent, this plan focuses more on overnight use, and when and where that use is occurring.

In 2010, 9,511 visitors signed in at the Loma boat launch visitor register and more than 20,000 camping nights were recorded on the voluntary campsite register. Both of these figures represent the highest visitor use ever within the Ruby-Horsethief Recreation Area.

2.3.3 Overnight use

17,028 camp nights were recorded on the voluntary campsite register in 2009.

Month	Camp nights
March	334
April	836
May	2,039
June	3,073
July	3,945
August	3,294
September	2,427
October	1,072
Total	17,020

2.3.4 Overnight use by night of week

58% of all camp nights were on Friday and Saturday.

Night of week	Camp nights	% of total use
Monday	1,247	7%
Tuesday	1,263	7%
Wednesday	1,188	7%
Thursday	1,538	9%
Friday	4,318	25%

Saturday	5,645	33%
Sunday	1,829	11%
Total	17,020	100%

The busiest 26 nights were either Friday or Saturday nights. High use nights like these begin in early May and run until late September.

rank	day	date	Camp nights
1	Fri	7/24	352
2	Sat	7/25	344
3	Fri	6/5	314
4	Sat	6/6	266
5	Sat	7/11	265
6	Sat	8/8	264
7	Sat	8/15	256
8	Sat	9/5	252
9	Fri	6/19	244
10	Sat	7/4	239
11	Fri	8/14	229
12	Sat	6/27	227
13	Sat	8/1	222
14	Sat	6/20	214
15	Fri	7/3	214
16	Sat	5/9	208
17	Sat	6/13	204
18	Fri	8/7	195
19	Sat	8/22	195
20	Sat	9/26	188
21	Fri	5/1	182
22	Sat	8/29	180
23	Fri	9/4	178
24	Sat	9/19	176
25	Fri	7/31	174

2.3.5 Average overnight use by night of the week

Overnight use is highest on Friday and Saturday nights with almost 50% of all camping occurring on weekends.

	Mon	Tue	Wed	Thu	Fri	Sat	Sun
May	17	11	16	29	123	173	52
Jun	51	49	40	76	215	228	75
Jul	75	77	68	107	238	262	86
Aug	89	110	93	69	179	284	98
Sep	43	46	44	47	146	191	51

2.3.6 Overnight use by camping area

Overnight use is not evenly distributed across campsites. The Black Rocks area is most popular, followed by the Mee and Cottonwood sites as well as Knowles 1. By comparison, Fault Line, Salt Creek, and Knowles 2 (recovering from a human-caused fire in 2007) are less popular due to their location in the river corridor.

Camping area	Camp nights	% of total use
Black Rocks	8,167	49%
Mee	3,705	22%
Cottonwood	2,660	16%
Rattlesnake/Bull	1,036	5%
Knowles	891	5%
Fault Line/ Salt Creek	569	3%

2.3.7 Group size

The overall average size for camping groups in Ruby-Horsethief in 2009 was 7.8 people per group but there is significant variation by night of the week as well as between private and commercial groups.

	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Total
May	6.1	4.7	4.2	4.4	7.0	8.1	7.2	6.0
Jun	7.1	8.9	6.4	7.6	9.3	9.4	7.1	8.0

Jul	7.6	7.9	6.8	9.5	10.1	9.2	7.6	8.4
Aug	7.6	7.9	6.8	9.5	10.1	9.2	7.6	8.4
Sep	8.8	9.7	8.5	7.1	8.4	8.6	7.0	8.3
Total	7.4	7.8	6.5	7.6	9.0	8.9	7.3	7.8

Groups are largest on weekends and smallest midweek. Commercial groups are generally significantly larger than private groups. While some commercial outfitters cater to smaller groups, several of the larger outfitters in Ruby-Horsethief frequently guide groups of more than 20 people. BLM estimates that the average private group size is 7 people while the average commercial group is 16 people.

2.3.8 About Ruby-Horsethief visitors

Of the more than 8,400 registered river users in 2009, 32% were from Mesa County, 61% were from within Colorado but outside Mesa County and 7% were from out of state. 10% of users reported that this was their first time in Ruby-Horsethief, and 13% continued on through Westwater Canyon. 34% of visitors responded that they floated Ruby-Horsethief once a year, while 42% of visitors responded that they came to Ruby-Horsethief a few times a year. 13% of visitors said they floated Ruby-Horsethief at least four times a year.

2.4 Current Management

2.4.1 Regulations common to all visitors

All visitors to RHRA are required to carry and use a portable human waste containment system. Campfires must be built in a visitor-provided firepan and all ash must be carried out. Any trash must be packed out by the visitor.

2.4.2 Camping

Camping is currently permitted on public lands anywhere along the river corridor and is not limited at any time of the year. The majority of preferred campsites are designated by 5x5 wooden posts with the names of the sites. These posts have been installed over the past 10 years to help boaters find the campsite they were looking for.

During high water, camping opportunities outside of designated sites are extremely limited. For the past several years, visitors have been encouraged to camp in these designated sites to help maintain a more natural and scenic river corridor.

Since 2005, use of designated campsites has been loosely regulated with the introduction of a voluntary campsite registration system at the Loma boat launch. Camping groups sign up on the form for the campsite they intend to stay at on the night of their trip. This system works fairly well during nights of low use (> 150 campers/night) but quickly breaks down during more popular times due to the ability of one group to have a negative effect that cascades down the river corridor. The typical problem encountered in the river corridor is having a group not register for but occupy a campsite. The group that registered for that site then floats to the next site, leaving the group that registered for that site to continue down the river, and so on.

2.4.3 Motorized use

Motorized use is permitted in the RHRA in accordance with state regulations. The majority of motorized use is related to fishing and hunting, although some visitors enjoy motorized day trips through the corridor for hiking, picnicking, or wildlife viewing. Some commercial outfitters provide motorized trips through RHRA. Upstream motorized travel is not permitted between the Westwater boat ramp and the Colorado-Utah state line. The use of personal motorized watercraft has increased in the past few years. This activity generates the second-most complaints from visitors to RHRA (after campsite conflict issues). Most of these complaints deal with noise but the overall number of complaints is relatively low (approximately 5-10 each year).

2.4.4 Day-use

Day use in RHRA is not limited. Due to the length of the river segment and speed of the river, most day use is motorized although some non-motorized boaters enjoy RHRA as a long day trip, especially during high water early in the season when flows are faster.

2.4.5 Commercial use

As of early 2011, 22 commercial outfitters are permitted to operate in RHRA. These outfitters have Special Recreation Permits issued through the Grand Junction and Moab Field Offices. The 1998 RC-BR IRMP limited commercial permits to the number existing at that time and directed BLM not to issue additional commercial operating permits.

The 2004 MCNCA RMP maintained the 1998 guidance, but allows BLM to issue new commercial permits after completing a capacity analysis and evaluating impacts.

Commercial outfitters must follow all Colorado State Parks boating regulations and any additional stipulations BLM may include with their operating permit, and those commercial outfitters operating in Utah via Westwater Canyon must follow Utah State Parks and Recreation Carrying Passengers for Hire laws and rules.

Chapter 3 – Recreation Management Issues

3.1 Introduction

The Ruby-Horsethief float is a highly valued river recreation experience that is enjoyed primarily by Colorado residents but is becoming increasingly popular with out-of-state visitors. There were more than 20,000 visitor days in Ruby-Horsethief in 2010. Floaters through Ruby-Horsethief enjoy outstanding scenery, geology, and natural resources as well as a relatively easy Class I-II whitewater float that helps less experienced boaters improve their skills.

As a relatively easy float, this is a unique resource in Colorado (per <http://americanwhitewater.org/content/River/state-summary/state/CO/>). Only two or three rivers segments in Colorado are comparable to it on a flow, seasonality, and difficulty basis within a five hour drive of the Denver metropolitan area; these are segments of the Dolores, Gunnison and Arkansas. However, none of these rival the 20 mile float length and overnight camping opportunities through Ruby-Horsethief.

The primary drivers in the need for a new management plan for the Ruby-Horsethief corridor are the significant growth in both physical and social impacts. As discussed in an earlier section, both 1998 RC-BR IRMP and the 2004 NCA RMP direct BLM to manage the physical and social setting of the river corridor to provide a specific recreation opportunity for visitors and to provide them with the opportunity to achieve specific beneficial outcomes from their recreation activity. As use of the river has increased over the past ten years, achievement of some of these benefits has grown more difficult. Due to the crowding of campsites and the voluntary registration system, many people consider their float trip a race to their requested campsite to make sure they get there before anyone else. Others simply ignore the voluntary registration system and take whatever open campsite they can find. This leads to significant conflict between visitors. This crowding is also leading to an increase in the overall size of campsites and a proliferation of satellite campsites around existing sites.

As of 2010, there were 28 signed campsites in the Ruby-Horsethief corridor. In 2008, nine of these sites were converted to 'double sites' to accommodate more camping groups. This was done by signing each of these double sites as "site A" and "site B", and changing the campsite register to show that two groups could share a site to increase capacity. This process was successful in increasing the number of groups (counting shared sites there were 37 campsites) that could camp in Ruby-Horsethief, but it also led to an increase in the size of disturbed areas of these sites, and did little to reduce visitor conflict for campsites. Many visitors have also complained that they did not like sharing sites, and river rangers frequently observed small groups sign up for both of the shared sites at a single location so they did not have to share, greatly reducing the efficiency and usefulness of the system.

Overnight use in Ruby-Horsethief has never been limited. As use has increased over the past ten years, overcrowding of certain campsites and camp areas has become more of a problem. This overuse has led to significant visitor conflict and serious resource impacts in some areas. Overuse is the driving factor in the development of this plan that focuses on managing overnight use to reduce visitor conflict and impacts associated with camping in order to maintain the prescribed physical and social setting characteristics within RHRA.

Many popular recreational rivers in the western United States operate under some type of permit system and a wide variety of options have been selected for administration of these systems. Some rivers have a limited number of launches. Some have limits on the number of people or groups in the permitted area at one time. Others have limits on the number of people or groups camping in an area. Because each river is unique, it is unreasonable to adopt a permit system already in place in other areas, but it is possible to learn from management strategies and tactics from other rivers to develop a reasonable permitting system for Ruby-Horsethief. Many other rivers have been studied during the development of this plan and the public and commercial outfitters have been included in this process from its inception in March, 2009.

3.2 Management issues

There are a variety of issues that need to be addressed in a new recreation management plan for the Ruby-Horsethief Recreation Area.

3.2.1 Overnight capacity

Overnight use in Ruby-Horsethief has never been limited. As use has increased over the past ten years, overcrowding of certain campsites and camp areas has become more of a problem. This overuse has led to significant visitor conflict and serious resource impacts in some areas as shown by physical and social monitoring data gathered over the past five years. The new plan will focus on managing overnight use to reduce visitor conflict and physical impacts associated with camping.

3.2.2 Private and commercial allocations

The 1998 RC-BR IRMP limited the number of commercial outfitters to the use levels at that time. The 2004 MCNCA RMP modified that position and allowed BLM to issue new commercial permits if it was deemed appropriate after a capacity analysis has been conducted. When commercial permits were limited in 1998, commercial use represented approximately 13% of all use (based on the number of groups) within Ruby-Horsethief. Since that time, commercial use has decreased slightly while private use has grown. In 2010, commercial use represented approximately 8% of all groups in RHRA.

3.2.3 Camping fees

There is currently no fee for either day or overnight use of the Ruby-Horsethief Recreation Area. The Grand Junction Field Office and McInnis Canyons National Conservation Area spend between \$60,000 and \$80,000 per year managing RHRA (approximately \$3-\$4 per user day). By comparison, BLM spends roughly \$0.40 per user day to manage the popular Mack Ridge-Kokopelli Trail mountain biking area. This comparison illustrates the higher relative cost of managing the river corridor to maintain the physical and social setting character required by the two relevant land use plans.

Many popular recreational rivers in this region charge either a day use or camping fee. Boaters in the Gunnison Gorge National Conservation Area pay \$5 per day, \$10 for one night of camping, and \$15 for two nights of camping. Boaters on the Colorado River through Westwater Canyon (just downriver from RHRA) pay \$7 per person for the trip that is most commonly done as a two day, one night trip. Boaters on the San Juan River pay \$6, \$12, or \$18 to float that river depending on the length of their trip.

The Federal Lands Recreation Enhancement Act (FLREA) was enacted by Congress and signed into law by President Bush on December 8, 2004. This authority addresses public concerns about previous fee programs by limiting fees to sites that have a specified minimum level of development and meet other specific criteria. Additional provisions require the consultation of Recreation Resource Advisory Committees and specific requirements to provide the public with information about fees and how fee revenues will be used. The Act provides agencies with recreation fee authority for 10 years, which will allow the agencies to improve the efficiency of the program, provide better facilities and services to the visitors, employ greater use of technology, and enter into more fee management agreements with counties and other entities to provide additional services to visitors, and monitor the efficacy of fee programs.

Under the recreation fee program, visitors to certain federal recreation sites pay fees which are retained by the collecting site and used to improve the quality of the visitor experiences at those sites. More and more people recreate on our federal lands every year, and meeting the needs of these visitors, delivering quality recreation, heritage and wilderness opportunities, and protecting our natural resources is a challenge. Congress recognized the need to provide additional resources to address the backlog of maintenance on federal lands when it authorized the Recreation Fee Demonstration Program in 1996 and FLREA in 2005.

BLM recognizes that there is legitimate debate about the extent to which recreation fees should cover the cost of recreation activities. The majority of the cost of recreation activities on federal lands is paid through tax revenues. However, recreation fees, the use of volunteers, partnerships, and concessionaires, provide important contributions to providing quality recreational facilities and services to visitors. A rationale behind recreation fees and other types of user fees is that those who use particular services and facilities should pay for a larger portion of the costs, rather than requiring other taxpayers who do not use the amenities to pay the entire bill. Congress recognized the responsibility of visitors to bear a greater portion of the cost when it established broad recreation fee authority in 1965

under the Land and Water Conservation Fund Act, in 1996 under the Fee Demo program, and in 2005 under the Federal Lands Recreation Enhancement Act.

3.2.4 Group size limits and overall capacity

The 1998 RC-BR IRMP established a group size limit of 25 people for the Ruby-Horsethief Recreation Management Zone (RMZ) and the 2004 MCNCA RMP maintained that group size limit for the Colorado River Corridor RMZ. Based upon 2009 visitor use data, the average group size in Ruby-Horsethief is 8 people. There is a wide variety in group sizes, however, as most private groups are below 8 while the larger commercial outfitters in RHRA commonly have groups of more than 20 people (although several commercial outfitters cater more to individuals or small groups).

The 1998 RC-BR plan did not deal at all with overall capacities while the 2004 NCA RMP dealt with this issue on a very broad scale, identifying a social setting prescription of “15-29 encounters per day and eventually in the 30+ range during the peak use times” (p. 2-51). The 2004 RMP did not differentiate between day use and overnight use so it is not as useful in determining a specific carrying capacity. The plan also did not assume all groups would be 25 people so simply multiplying the numbers mentioned (30 groups *25 people per group = 750 people in the river corridor at one time) does not give a firm capacity to use as an overall limit.

3.2.5 Camping stay limits

Not all campsites are created equally. Due to a variety of factors including location on the river corridor, scenic quality, and size and accessibility of beaches, some sites are much more popular than others. For example, the Black Rocks camping area is the most popular camping area within RHRA. There are currently 9 campsites in this area and these 9 sites are among the most popular 12 campsites anywhere within the river corridor. Black Rocks is popular due to its outstanding scenic and geologic resources but also due to its location slightly more than halfway down the river between Loma and Westwater (16 miles down the 25 mile stretch). Due to these factors, the majority of campsite conflict occurs in the Black Rocks area. Much of this conflict would be resolved with the implementation of a permit system in which only a certain number of groups would be permitted to camp at Black Rocks, but the problem of unmet demand would continue to exist, especially on weekends when more groups want to camp there than the number of campsites will allow.

3.2.6 Day use

Day use of the Ruby-Horsethief corridor is popular among various local groups. During early-season high water, many non-motorized boaters enjoying making the Ruby-Horsethief run as a day trip while some boaters enjoy this all season in spite of lower flows and longer trips towards the end of the season. Motorized boaters are also common on this segment of the river and enjoy day trips for hunting, fishing, hiking, picnicking, photography, and wildlife viewing.

3.2.7 Motorized boating

Motorized boating has been a traditional use in RHRA for many years. Jet boating comprises the majority of motorized use within the river corridor but rafts with small motors are also seen in RHRA and are regularly used for BLM patrols. Jet boats are commonly used by hunters and fishermen but are also used for emergency response by the Mesa County Sheriff and Mesa County Search and Rescue.

The use of personal watercraft within RHRA has increased over the past few years. Unlike other motorized boats, the presence of personal watercraft is one of the most common complaints BLM receives from visitors to RHRA. The Colorado Division of Wildlife prohibits the launching of personal watercraft from the Loma boat launch but they can be launched further upstream. Personal watercraft are not commonly used for hunting, fishing, hiking, or camping in the area.

3.2.8 Access

The Loma boat launch was acquired by the Colorado Division of Wildlife to improve hunter and fisherman access to Ruby-Horsethief and today is the primary access point for all boaters (motorized and non-motorized) entering RHRA. Access to the Loma boat launch is via mixed ownership. The beach and boat launch area is CDOW property while the county road that accesses the beach crosses BLM and private land which surrounds the boat launch area.

The Westwater boat ramp is managed by the BLM-Moab Field Office. The Westwater ramp is narrow and frequently backed up due to heavy traffic getting off the river after running Ruby-Horsethief competing with permitted boats getting on the river to run Westwater Canyon. The Moab Field Office has recently acquired additional property upstream from the existing ramp and plans to build a second ramp to help alleviate congestion at the existing ramp.

BLM-Grand Junction works with both CDOW and BLM-Moab to manage these boat ramps. BLM-Grand Junction has two large information kiosks, two interpretive signs, and two visitor registers at the Loma boat launch and cleans and maintains the toilet at Loma. BLM-Grand Junction also provides financial assistance to BLM-Moab for maintenance and supplies for the Westwater boat ramp and is committed to cooperating with them to help improve the Westwater ramp either via land acquisition or improvement of the existing ramp.

The 1998 RC-BR IRMP directed BLM to work with Colorado State Parks to improve the Fruita Recreation Site (now known as the James M. Robb Colorado River State Park – Fruita section) and to “continue to evaluate other additional access sites to the river” (p. 5-32). BLM maintains an information kiosk at the Fruita state park and is evaluating potential new access points.

3.2.9 Campfires

The 1998 RC-BR IRMP encourages “Leave-No-Trace” camping and hiking within the river corridor while the 2004 NCA RMP requires all open fires to be contained in a fire pan. Most boaters follow this requirement, but the impacts of campfires in rock fire rings (or no fire ring) continue to exist. Fire pans help to reduce direct impacts such as scarring and localized vegetation loss, as well as reducing the likelihood of a campfire spreading out of control as has happened on Mee Bench and at the mouth of Knowles Canyon in the past five years when more than 200 acres were burned and more than 50 cottonwood trees were killed.

3.2.10 Human waste and trash

Despite recommending use of portable toilet systems for the past 15 years, human waste continues to be a problem in the Ruby-Horsethief corridor, especially in the Black Rocks area. Compliance with this recommendation is fairly high, but this is an issue where a small minority can have a significant adverse impact on visitor health and safety. In addition to human waste, dog waste is also increasing as a problem in the area. The Ruby-Horsethief corridor has always had a “pack it in, pack it out” recommendation for all other trash items and this policy is more successful than the recommendation that all floaters carry and use a portable toilet system.

3.2.11 Dogs

While many visitors enjoy bringing their dogs with them to RHRA, dogs also lead to significant issues and complaints from other visitors. Currently, owners are required to have their dogs under “voice command” or on a leash in high-use areas. Many dog owners refuse to leash their pets and do not prevent their dogs from harassing other groups. Dogs run freely at the Loma boat launch during almost all peak use periods and dog owners either do not understand or ignore the “voice command” requirement. In addition, many dog owners do not pick up their dog’s waste at the launch or at campsites.

3.2.12 Physical and social monitoring

In 2008, BLM developed a physical and social monitoring program for the Colorado River corridor. The monitoring program includes goals and desired conditions for the river corridor which provide the framework to develop appropriate indicators of the social and environmental conditions along the river corridor. Indicators are conditions and measurements used to monitor the impacts on an area. For each indicator a standard (or limit to the amount of acceptable change) was developed as a trigger for corrective action to be taken, because the social or environmental condition of the river corridor has degraded beyond an acceptable limit. These indicators are then monitored, through the protocols defined in that plan, for compliance with the standard and if standards are exceeded, management actions are initiated to mitigate the problem. Overall this process is to maintain the river corridor at or below its “carrying capacity.” The goal was to develop a rigorous and adaptable framework to allow for

well-informed decisions to be made by managers and to maintain a balance between recreation and environmental concerns. For the most part, it is too early to draw firm conclusions from these two seasons of data (2008 and 2009); however, the monitoring data did notice show a substantial increase in ground disturbance and site size at shared group sites.

3.2.13 Black Ridge Canyons and Black Ridge Canyons West/Wrigley Mesa/Jones Canyon Wilderness Study Areas

The Federal Land Policy and Management Act of 1976 directed BLM to inventory its land for wilderness character and to make recommendations to the President as to each area's suitability or non-suitability for designation as wilderness. The President then makes recommendations to Congress who determines if an area should be designated as wilderness or released for other uses.

BLM-Colorado completed its inventory in 1980 and recommended the Black Ridge Canyons Wilderness Study Area (WSA) and the Black Ridge Canyons West/Wrigley Mesa/Jones Canyon WSA as suitable for designation as wilderness. In 2000, Congress combined these two WSAs into the Black Ridge Canyons Wilderness when it created the Colorado (McInnis) Canyons National Conservation Area. Congress established the northern boundary of the BRCW as the 100 year high water mark along the Colorado River through Horsethief and Ruby Canyons. The boundaries of the two existing WSAs extended beyond the boundary of the designated wilderness area to the south bank of the river. Because Congress did not release these lands from WSA status, they remain classified as wilderness study areas and are to be managed "in a manner so as not to impair the suitability of such areas for preservation as wilderness" (FLPMA, Sec. 603c).

Chapter 4 – Overview of Initial Alternatives and the Proposed Action

4.1 Introduction and overview of alternatives

The RHRA planning process began in July, 2009 with a public presentation to the McInnis Canyons NCA Advisory Council (now known as the Northwest RAC Subgroup) and BLM has been working with the public and accepting comments since that time. As a result of that extensive collaboration, BLM developed four initial alternatives for the management of the Ruby-Horsethief Recreation Area. These alternatives were released to the public as part of the draft RHRA Management Plan in 2010. After a public comment period, public meetings with the Northwest Colorado Resource Advisory Council's McInnis Canyons NCA subgroup, and discussions with permitted commercial outfitters, a proposed action was developed for analysis under the National Environmental Policy Act (NEPA).

4.1.1 Alternative A – No Action

Under this alternative, no changes would be made to recreation management of the Ruby-Horsethief Recreation Area. Camping would not be limited to designated sites and campers would continue to have the option of using the voluntary campsite registration system. No permits or fees would be required. No additional campsites would be designated. Firepans and portable toilet systems would continue to be required.

Under this alternative, no new commercial permits would be issued. Overnight use by existing commercial permittees would not be limited. Commercial groups would obtain campsites on a first-come, first-served basis.

4.1.2 Alternative B – First come, first served camping

Under this alternative, the voluntary campsite registration system would be eliminated and visitors would occupy a campsite on a first-come, first served basis. No overnight capacity would be established. Visitors would be required to obtain a self-issued permit for use of RHRA and a \$7 per person, per night camping fee would be charged for overnight use. The existing group size limit of 25 would be maintained.

Under this alternative, no new commercial permittees would be authorized. Commercial use by existing permittees would not be limited and permitted outfitters would also obtain campsites on a first-come, first-served basis.

4.1.3 Alternative C – Camping permits (partially office-issued)

This is the preferred alternative. Under this alternative, camping permits would be required for overnight use within RHRA. Permits for Sunday through Thursday nights between May 1st and September 30th would be self-issued at the Loma boat launch. Permits for Friday and Saturday nights between May 1st and September 30th would be issued by the Grand Junction Field Office up to six weeks before the trip with campsites assigned at that time. Permits for all camping between October 1st and April 30th would be self-issued at the Loma boat launch. A camping fee of \$7 per person, per night would be charged for all overnight use within RHRA. Free, self-issued permits would be required for day use within RHRA.

4.1.4 Alternative D – Camping permits (fully office-issued)

Under this alternative, camping permits would be required for overnight use within RHRA. Permits for camping between May 1st and September 30th would be issued by the Grand Junction Field Office up to six weeks before the trip with campsites assigned at that time. Permits for all camping between October 1st and April 30th would be self-issued at the Loma boat launch. A camping fee of \$7 per person, per night would be charged for all overnight use within RHRA. Free, self-issued permits would be required for day use within RHRA.

4.2 Proposed action

Under the proposed action, BLM would select Alternative C with minor modifications. This alternative would establish an overnight visitor capacity and implement a limited-use permit system to manage overnight use within RHRA.

4.2.1 Establishment of overnight capacity

- 35 campsites (28 existing, 7 new) would be designated within RHRA and would be available via a permit system
- Camping would be limited to designated sites only
- An additional camping area would be established at May Flat that may only be used by permitted groups that miss their assigned campsite upriver
- Permits would be issued through the Grand Junction Field Office (GJFO) for Friday and Saturday night use
- Permits for Sunday through Thursday night would be self-issued at the Loma boat launch unless it became necessary (because of high use, abuse of the system, or other reasons) to issue them only through the GJFO

4.2.2 Private group camping permits – Friday and Saturday nights

- 83% of overnight permits (29) would be allocated to private groups
- Permits would be issued on a first call, first served basis beginning on Monday six weeks before the weekend of use
- Friday and Saturday permits would be available Monday through Friday from 8am until 12pm by phone or in person at the Grand Junction Field office
- Fee would be due at the time the permit is issued
- Permits would be issued to a trip leader and an alternate trip leader
- Fees would not be refunded after the permit is issued
- A permit availability calendar would be posted to the Grand Junction Field Office website each afternoon, Monday through Friday

4.2.3 Private group camping permits – Sunday through Thursday nights

- Overnight camping permits would be available on a first come, first served basis at the Loma boat launch
- Overnight camping permits would be self-issued and a campsite selected when the permit is filled out
- Only 35 groups would be permitted to camp in RHRA each night
- There would be no private/commercial allocation on Sunday through Thursday nights
- Groups would not be able to sign up for a permit before the day their trip begins

4.2.4 Commercial outfitter camping permits – Friday and Saturday nights

- 17% of overnight camping permits (6) would be allocated to commercial groups
- Permits would be allocated based on the historic percentage of overnight use of each commercial permittee
- Permits would be issued for the upcoming season (May 1st to September 30th) by January

4.2.5 Commercial outfitter camping permits – Sunday through Thursday nights

- Overnight camping permits would be available on a first come, first served basis at the Loma boat launch
- Overnight camping permits would be self-issued and a campsite selected when the permit is filled out
- Only 35 groups would be permitted to camp in RHRA each night
- There would be no private/commercial allocation on Sunday through Thursday nights

- Groups would not be able to sign up for a permit before the day their trip begins

4.2.6 Alternative camping for groups that miss their assigned campsite

- A camping area would be designated at May Flat (two miles upriver from the Colorado-Utah border). This area would only be available for camping for groups that had a permit for an upriver campsite but missed their assigned site
- Groups that miss their assigned campsite would not be permitted to camp anywhere other than May Flat

4.2.7 Camping fees

- A small group (1-5 people) occupying a campsite would be charged \$20 per campsite, per night
- A medium group (6-14 people) occupying a campsite would be charged \$50 per campsite, per night
- A large group (15-25 people) occupying a campsite would be charged \$100 per campsite, per night
- There would be no fee for camping between October 1st and April 30th
- BLM will establish sizes for each campsite by 2015. At that time, fees will be charged for a specific campsite (ex: Black Rocks 9 would be a “large” site and would cost \$100 per night, regardless of group size)

4.2.8 Group size limits

- Private groups would be limited to 25 people
- Commercial groups would be limited to 25 people plus guides

4.2.9 Camping stay limits

- Camping at Black Rocks would be limited to one night per group on Friday and Saturday nights
- Exceptions to the camping stay limit would require approval of the McInnis Canyons NCA manager
- Camping on consecutive nights in other campsites would not be limited

4.2.10 Day use

- Day use would not be limited
- Day users would be required to obtain a free, non-limited, self-issued permit at the Loma boat launch

4.2.11 Motorized boating

- Motorized boating would not be limited
- Personal watercraft use would not be limited unless monitoring shows that activity was interfering with the attainment of targeted beneficial outcomes identified by the 1998 RCBR-IRMP and 2004 MCNCA RMP

4.2.12 Campfires

- All camp and cook fires would be required to be contained in a fire pan
- All groups would be required to pack out all ash and debris from camp and cook fires

4.2.13 Human waste and trash

- Portable human waste containment systems would be required for all groups
- All groups would be required to pack out their trash and solid human waste

4.2.14 Dogs

- Dogs would be limited to two per camp group, and count towards the overall group size for permit and fee purposes
- The Loma boat launch, Mee campsites, Black Rocks campsites, and the Westwater take out would be designated as 'high-use' areas and dogs would be required to be on a leash at all times while in these areas
- All groups would be required to pack out all solid dog waste
- All dogs would be prohibited from the RHRA if human-dog conflicts and dog waste issues continue to occur

4.3 Changes between the Draft and Proposed Plan

Several changes were made to the draft plan based on public involvement from meetings, open houses, and discussions with the Northwest Resource Advisory Council's McInnis Canyons NCA subgroup and the Northwest Resource Advisory Council itself.

4.3.1 Camping fees

In the draft plan, a proposed \$7 per person, per night camping fee was common to all alternatives. The majority of public comments received indicated that they believed this fee was too high and BLM began to evaluate reducing the fee to \$5 per person per night. During discussions with the NWRAC McInnis Canyons NCA subgroup, it was suggested that a fee be charged based on the use of campsite rather than the individual size of the group. As a result of these discussions, the proposed action includes a fee based on group size rather than the number of people in a group. This change will provide more flexibility to overnight visitors while making administration of the fee system easier and more efficient.

In the draft plan, private permits could be cancelled and refunded minus a \$20 fee. This option was eliminated in the proposed plan and permits will be non-refundable. Permits would be able to be transferred to another trip leader or cancelled, but refunds will not be given.

4.3.2 Group size limits

The 2004 MCNCA RMP established a group size limit of 25 people for both private and commercial groups, and this limit was carried over in the draft plan. However, all commercial permits issued by the Grand Junction, Uncompahgre and Moab Field Offices allow group sizes of 25 not counting guides. To promote consistency within permit procedures, the group size for commercial groups will be 25 plus guides. The McInnis Canyons RMP will be updated to reflect this guideline.

4.3.3 Private-commercial allocations (Friday and Saturday nights)

The draft plan proposed a private-commercial split of 80%-20%. This percentage was based on the number of people camping, and was found to be confusing when the change was made to base the entire campsite permit system on the number of groups rather than the number of people in the group. The proposed plan now relies wholly upon the number of groups and the private-commercial allocation in the proposed plan is now 83%-17%. This more accurately reflects historic use patterns while allowing commercial operators the room to increase their use to historic levels (no new commercial permits have been issued since 1998 while private use has not been limited at all.)

4.4 Future modifications to the Ruby-Horsethief Recreation Area Management Plan

The Ruby-Horsethief Recreation Area Management Plan is designed to protect the physical and social resources of the river corridor while maintaining as much flexibility as possible for recreational visitors.

4.4.1 Addition of additional nights to the office-issued permit system

A common comment received throughout this planning process has been that visitors enjoy the opportunity for spontaneous trips down Ruby-Horsethief. The overnight camping permit system is designed to preserve this opportunity for spontaneity and flexibility on less busy nights from Sunday through Thursday. If use increases on any of these nights it may be necessary to modify the system to require office-issued permits for any of those nights. If monitoring indicates an increase in use leading to an increase in visitor conflict or resource impacts, additional nights will be added to the office-issued permit system.

Additionally, the price of preserving the flexibility that visitors enjoy is utilizing a permit system that provides opportunities for people to take advantage of it. By having a system where visitors self-issue permits and pay fees on site. If the self-issued permit system does not provide the opportunity for visitors to attain the target beneficial outcomes or if the fee payment system is tampered with, the permit system will be modified so that all nights of the week fall under the office-issued system described in the proposed action.

4.4.2 Camping Fees

The draft plan proposed charging a per person, per night camping fee. Based upon public comment and a recommendation from the NWRAC McInnis Canyons NCA subgroup, this proposal was changed to charge a fee based on the size of a group as well as to reduce the fee. In 2012, fees will be charged based on the number of people in a group. The NWRAC recommended that BLM go a step further and make specific size determinations for each individual campsite and charge fees based on the campsite. For example, Black Rocks 9 would be a “large” campsite and would cost \$100, regardless of the size of the group occupying that site. BLM agrees with this recommendation but believes it would be too difficult to implement in 2012. Therefore, by 2015, BLM will establish specific sizes for each site and will transition the permit system to charge a fee based on the campsite, not the group size.

Chapter 5 – Monitoring

5.1 Colorado River Corridor Monitoring Program

The Colorado River Corridor Monitoring Program was begun in 2008. The monitoring plan includes measures for recreation site impacts as well as visitor satisfaction. Many of the social setting standards and indicators will be incorporated into the Ruby-Horsethief Management Plan Monitoring Program. The 2008 River Corridor Monitoring Program also established a formal protocol for measuring physical impacts associated with recreational use of the river corridor.

BLM conducted a baseline inventory of all established campsites in 2008. In 2009, eight campsites were monitored and in 2010, ten campsites were monitored. The six campsites along Mee Bench are monitored each year; approximately six other campsites are monitored each year with the expectation of each campsite being monitored at least once every three years.

5.1.1 Campsite impact monitoring

Indicator: campsite and day use area size and condition		
Standard	Monitoring Tools	Potential Management Actions
<p>No more than 10% increase in core area or total site size</p> <p>Satellite sizes limited by capacity (small = 4, medium=6, large=8)</p> <p>No significant increase in impact rating from prior year</p>	<ul style="list-style-type: none"> • Fall survey of at least 10 designated campsites per year with measurements including: <ul style="list-style-type: none"> ○ Bare ground/core area/tent pads per site ○ Tree damage indicators ○ Count of social trails over camp area ○ Size of landing (difference from normal condition) 	<ul style="list-style-type: none"> • Defined campsite and tent pad boundaries with natural materials • Defined campsite and tent pad boundaries with post and cable • Re-vegetation closures • Recovery of satellite sites
Indicator: number of damaged trees (trunk and root exposure)		
Standard	Monitoring Tools	Potential Management Actions
<p>No more than one visitor-damaged Cottonwood per site</p> <p>No more than two minor non-Cottonwood occurrences per site</p>	<ul style="list-style-type: none"> • Ranger patrols • Campsite monitoring • Boater reports 	<ul style="list-style-type: none"> • Increased protection of Cottonwood trees (wire and/or French drain) • Increased ranger presence at Loma boat launch (checking to make sure groups have

		firewood) <ul style="list-style-type: none"> • Increased law enforcement presence on the river
Indicator: non-designated social trails leading from each campsite		
Standard	Monitoring Tools	Potential Management Actions
No more than three primary social trails in a small campsite No more than four primary social trails in a medium campsite No more than six primary social trails in a large campsite ** campsite sizes to be determined in 2012-2013	<ul style="list-style-type: none"> • Campsite monitoring 	<ul style="list-style-type: none"> • Close and rehab undesignated social trails • Increase ranger discussion of social trails during standard visitor contact
Indicator: evidence of fire (wood, fire ring, scorched earth, ashes)		
Standard	Monitoring Tools	Potential Management Actions
No more than one occurrence of illegal fire per week	<ul style="list-style-type: none"> • Ranger patrols 	<ul style="list-style-type: none"> • Increased overnight presence of river rangers and/or law enforcement • Year round fire ban
Indicator: evidence of dog/human waste		
Standard	Monitoring Tools	Potential Management Actions
No more than one dog or human waste occurrence per week	<ul style="list-style-type: none"> • Ranger patrols • Visitor reports 	<ul style="list-style-type: none"> • Increased education at boat launch and during river contacts about human and dog waste rules • Increased law enforcement presence • Prohibition of dogs in the river corridor
Indicator: dog/human or dog/wildlife conflicts		
Standard	Monitoring Tools	Potential Management Actions
No more than three dog/human or dog/wildlife incidents per year	<ul style="list-style-type: none"> • Ranger patrols • Visitor reports 	<ul style="list-style-type: none"> • Prohibition of dogs in the river corridor

5.2 Ruby-Horsethief Recreation Area Management Plan Monitoring

The Ruby-Horsethief Recreation Area Management Plan will be monitored to evaluate its effectiveness, and changes will be made if the management plan is not meeting the objectives that were established in Section 1.4 of the plan.

5.2.1 Effectiveness of the Ruby-Horsethief Recreation Area Management Plan to meet established Resource Management Plan objectives

Indicator: opportunities for visitors to engage in overnight flat-water boating for social and family affiliation in a naturally-appearing red-walled river canyon		
Standard	Monitoring Tools	Potential Management Actions
At least 75% of visitors and affected community residents achieve at least a “moderate” realization of RMP-identified benefits (i.e. 3.0 on a probability scale where 1=not at all, 2=somewhat, 3=moderate, and 4=total realization.	<ul style="list-style-type: none"> • Formal visitor survey • River ranger contacts • Visitor comment card 	<ul style="list-style-type: none"> • Adjust physical, social, and administrative setting character as needed to allow visitors the opportunity to attain targeted benefits identified in 2004 MCNCA RMP (p. 2-50)

5.2.2 Effectiveness of the self-issued camping permit system

Indicator: ability of self-issued permit system to manage visitor use		
Standard	Monitoring Tools	Potential Management Actions
<p>The self-issued camping permit system fails due to heavy use no more than once a month</p> <p>*“failure” defined as system ineffectiveness due to high use; does not include groups purposefully attempting to circumvent the intent of system</p>	<ul style="list-style-type: none"> • Ranger patrols • Campsite register • Visitor reports or complaints • Visitor satisfaction cards 	<ul style="list-style-type: none"> • Increase ranger presence at the Loma boat launch • Increase river ranger presence on the river, including overnight stays in high use areas • Increase law enforcement presence on the river • Expand office-issued permit system to seven nights a week
Indicator: ability of self-issued permit system to manage visitor use		
Standards	Monitoring Tools	Potential Management Actions
<p>No more than five weeknights a season with more than 28 permitted groups camping</p> <p>No more than five weeknights a season with Black Rocks campsite occupancy of 90 percent or greater</p>	<ul style="list-style-type: none"> • Permit data • Ranger patrols 	<ul style="list-style-type: none"> • Expand office-issued permit system to seven nights a week
Indicator: visitor compliance with the self-issued permit system		
Standard	Monitoring Tools	Potential Management Actions
<p>No more than one group purposefully attempts to circumvent the intent of the permit system per month</p>	<ul style="list-style-type: none"> • Ranger patrols • Visitor reports or complaints 	<ul style="list-style-type: none"> • Increase ranger presence at the Loma boat launch • Increase river ranger presence on the river, including overnight stays in high use areas • Increase law enforcement presence on the river • Expand office-issued permit system to seven nights a week

Indicator: number of times unpermitted groups are found camping within RHRA		
Standard	Monitoring Tools	Potential Management Actions
No more than one unpermitted group found camping in RHRA per month	<ul style="list-style-type: none"> • Ranger patrols • Visitor reports or complaints 	<ul style="list-style-type: none"> • Increase ranger presence at the Loma boat launch • Increase river ranger presence on the river, including overnight stays in high use areas • Increase law enforcement presence on the river • Expand office-issued permit system to seven nights a week
Indicator: number of times the Loma fee tube is tampered with		
Standard	Monitoring Tools	Potential Management Actions
No more than three vandalism attempts per year	<ul style="list-style-type: none"> • Ranger patrols • Law enforcement reports 	<ul style="list-style-type: none"> • Increase ranger presence at the Loma boat launch • Discontinue collecting fees at the Loma boat launch and expand office-issued permit system to seven nights a week

5.2.3 Effectiveness of the office-issued private camping permit system

Indicator: number of conflicts between permitted camp groups		
Standard	Monitoring Tools	Potential Management Actions
No more than two reported conflicts between permitted camp groups per month	<ul style="list-style-type: none"> • Visitor reports or complaints • Ranger patrols • Law enforcement patrols 	<ul style="list-style-type: none"> • Increase ranger presence at the Loma boat launch • Increase river ranger presence on the river, including overnight stays in high use areas • Increase law enforcement presence on the river
Indicator: number of conflicts between permitted and unpermitted groups		
Standard	Monitoring Tools	Potential Management Actions
No more than one reported conflict between a permitted camp group and a group without an overnight camping permit per month	<ul style="list-style-type: none"> • Visitor reports or complaints • Ranger patrols • Law enforcement patrols 	<ul style="list-style-type: none"> • Increase ranger presence at the Loma boat launch • Increase river ranger presence on the river, including overnight stays in high use areas • Increase law enforcement presence on the river
Indicator: number of times a permitted group does not utilize their camping permit		
Standard	Monitoring Tools	Potential Management Actions
No more than one permitted group does not use their camping permit per weekend night	<ul style="list-style-type: none"> • Visitor reports • Ranger patrols • Law enforcement patrols 	<ul style="list-style-type: none"> • Modify camping permit system to allow permit holders to cancel permits and release them back into the available pool • Modify camping permit system to include penalties for groups that obtain a camping permit but do not use it

5.2.4 Effectiveness of the office-issued commercial camping permit system

Indicator: number of nights requested by commercial outfitters that were not granted		
Standard	Monitoring Tools	Potential Management Actions
<p>Number of nights requested by commercial outfitters that were not granted (exact standard to be determined after commercial allocation procedure is finalized in Summer 2011)</p>	<ul style="list-style-type: none"> • Permit program manager report • Commercial outfitter comments 	<ul style="list-style-type: none"> • Modify commercial allocation system to improve outfitter's ability to get requested dates, if possible
Indicator: number of nights requested by commercial outfitters that were not granted		
Standard	Monitoring Tools	Potential Management Actions
<p>Number of nights cancelled by commercial outfitters between January 1st and April 30th</p> <p>* exact standard to be determined after commercial allocation procedure is finalized in Summer 2011</p>	<ul style="list-style-type: none"> • Permit program manager report 	<ul style="list-style-type: none"> • Modify commercial allocation system to reduce the need for permit cancellations, if possible
Indicator: availability of unused commercial permits for other outfitters		
Standard	Monitoring Tools	Potential Management Actions
<p>Number of overnight camping permits cancelled by commercial outfitters within two weeks of the permit date</p> <p>*exact standard to be determined after commercial allocation procedure is finalized in Summer 2011</p>	<ul style="list-style-type: none"> • Permit program manager report 	<ul style="list-style-type: none"> • Increase penalties for cancellations within two weeks of permit date