

Comment Subject	Comment	Year Received
<i>Comments Related Specifically to Fees: General Comments, Fee Amount, and Fee Structure</i>		
Fee (General)	The section of river in question is a relatively easy float. There is a need for sections of rivers that do not require permits and/or fees. It is how the general public becomes acquainted with river running. Permits and fees limit easy access for many people. Without free sections of rivers to float, like the Green River below Flaming Gorge, river running is frustrating to many people and becomes the purvey of more elite people. Had it not been for free river segments, I would have most likely not have begun river running forty years ago. (duplicate with permit comment)	2009
Fee (General)	At the public meetings with the BLM during establishment of McInnis Canyons N.C.A. I specifically asked Representative Scott McInnis AND the BLM official if fees or permits would ever be instituted. Their answer was no.	2009
Fee (General)	I believe requiring payment for campsites will significantly reduce the problem of people taking campsites without signing up for them. Some people think that if it's free, not using the reservation book is a trivial issue. If sites require payment, they know they are stealing, and it is no longer a trivial issue.	2009
Fee (General)	I am a 14-year private rafter...I believe it is time to institute a fee system (not sure whether that should be a per-trip, per-user or per-day fee.) I would like to see those fees used to provide a greater ranger presence at the parking and ramp areas and along the river corridor to enforce assigned campsites and be sure required equipment such as groovers and firepans are actually being used.	2009
Fee (General)	Second, a non-limited permit system, such as is in place for the Gunnison Gorge, would not place too much burden on the users. A reasonable fee (\$5?) per person per day is acceptable, although I feel it may be simpler and more reasonable to charge per group(\$30-\$35), as is done for Cataract Canyon in Canyonlands NP, and countless other group campsites available on BLM, Forest Service, and other public lands. This type of system would generate revenue for management of the corridor, allow accurate counts, and allow users the flexibility we currently enjoy.	2009

Fee (General)	<p>If a fee is charged for overnight camping (which I support) then I would like to see something for my money. Opening of new areas for camping. Increasing the total number of camping areas. Extra campsites may provide opportunities for rotation of campsites for rehabilitation. Maintaining existing camping sites, clearing brush and noxious weeds, reducing potential fire growth, removal of non native trees (Russian Olive as an example), good signage of camping spots, providing fire rings in lieu of fire pans, are all things I would expect to observe if designated camping areas and a camping fee is established. Any fees collected should be placed back into river management, not placed in general accounting funds.</p>	2009
Fee (General)	<p>Comments: As a private boater, who typically runs Westwater canyon 1 a year, we have always tried to extend our trip by including Ruby-Horsethief canyons as part of our trip. In commenting on the proposed changes to the current system, I am very much in favor of imposing fees on camping use.</p>	2010
Fee (General)	<p>I believe that the proposed fee structure does not accurately reflect revenue versus impact. In other words, the fee structures actually encourages larger parties so that the higher costs can be shared by all; ultimately bringing the per person cost down as you add more and more people. I have six people, so why not invite up to 14 so that I can reduce my costs while also increasing the impact on the canyon corridor. Not too mention, there is a big difference between 15 and 25 people and the impact that each size group would have on the canyon. I'm just not quite sure why the new plan would encourage people to have larger groups in order cut down on permitting costs if the aim of the plan is to offset impact by using the revenue gained. It just doesn't make sense. I would be in favor of a per person fee of \$5 - \$7 per night in the canyon, which alternative C seems to incorporate.</p>	2010
Fee (General)	<p>Consider a trial period of fee collection that would only charge for high use periods, ie Friday and Saturday nights. If this is an option it may help to disperse use throughout the weekdays, taking pressure off of the area during the weekends and reducing visitor encounters by spreading use out into lighter use periods.</p>	2010

Fee (General)	<p>Page 24 -Camping Fees (3.2.3): That BLM spends more on one management activity than another is an invalid comparison. First of all, the government determines which costs are included to "manage an activity. How much does BLM recover from ranchers to issue and permit one AUM? How much does BLM expend per AUM in its grazing program? Similarly, how much does BLM recover from Oil & Gas exploration relative to the net value of that resource? It appears that you have picked a fee out of a hat in one management area and used that figure for the area in question. The explanation of camping fees is shallow, anecdotal and needs a thorough rewrite. The Recreation Fee Demonstration Area reference in this section is fully invalid as there has been no thorough and complete study to determine if additional facilities and staff are needed The Draft totally overlooks "out-of-the-box' processes that might solve use problems. It is as if the solution has been pre-determined and any anecdotal or verbal topic that reinforced that predetermined decision has been "thrown" into The Draft.</p>	2010
Fee (General)	<p>The best option would be to use a launch based system, either flat fee per launch or per person launch fee. The proposed action of using a tiered approach to assessing camping fees is objectionable for commercial operations. Please keep in mind that we budget and price a trip typically 12-14 months in advance of an actual trip. We figure in fixed costs regardless of group size and then add variable or per person costs. In most of the permit systems that CFI works with (BLM, Navajo Nation) the launch or camping fees are either PER PERSON or we have a flat fee per group (of any size) for a campsite (USFS) or entry fee (U of U Range Creek, Musuem entry.) For the latter, we then include the flat fee as a known fixed cost. The tiered system you proposed is a) entirely different than what is done in our region by other agencies (why invent another wheel....).and b) difficult to budget for in advance. It may work for private boaters who generally know a group size but not exactly until just before a trip; it does NOT work well for our advance planning and pricing done by commercial outfitter.</p> <p>If you do not go to a launch based per person fee, then please RETURN to your original proposal of \$7per person flat fee per night rate structure. This is NOT TOO MUCH in comparison to fees for other river stretches (actually matches the launch fee nearby Westwater... again you have a close at hand, proven, familiar example and precedent to use in selecting your fee system!!)</p>	2011
Fee (General)	<p>your tiered formula actually ENCOURAGES LARGER GROUPS which makes for more impact and less money collected to manage it. As an example, second tier "medium" group size for 15-25 people is at a flat fee of \$100 campsite. If a group goes with 15 people that is \$6.67 per person. If they build up their group to 25 people, the per person rate drops to \$4/person. It seems this system is counterintuitive to several of the plan objectives, notably having people "pay their</p>	2011

way.” Once again, a PER PERSON fee system would be straightforward “impact” to cost recovery.

Fee (General)	What happens if a group size jumps from 14 to 15 people? Is this allowed? Can the permit holder pay the jump in fee (in this example it would be an extra \$50 to add one person because they end up in the large group category). I suppose the alternative would be that they would purchase another campsite permit but then that doesn't make sense either when they only wanted to add one more person. Now they are taking up two campsites which the group probably doesn't even want either.	2011
Fee (General)	What do you plan to do with revenue generated by the fees? I'd like to see a clear accounting for this on an annual basis and each upcoming year.	2011
Fee (General)	<p>Thank you for all the work you have done on managing this wonderful resource. I am a long way from Ruby-Horsethief (southern Arizona) and don't fit the main user demographic. I have run it four times, mainly to access the lovely side canyons. All of my trips have been during the weekdays and off-season.</p> <p>I fully support your plans to put the river corridor under permit, but I have a few comments. I like alternative C, and I'm willing to pay \$7 a day to support more local rangers. It was not clear to me how this would work relative to section 4.2.7, \$20 per night per campsite. I am very low impact and have run this solo, in a group of two, a group of three, and a group of five. \$20 per night for a solo or two person trip seems a bit steep. Can't you do it on a per-person basis for small groups and a lump fee for larger ones? All I need is a ledge big enough for my sleeping pad.</p>	2011
Fee (General)	I am supportive of the proposed action for the RHRP. As a frequent user of Ruby-Horsethief, I enjoy the boating opportunities and outstanding scenery. Like most users, weekends are the most convenient times for me to float the river. I understand and support the need for a permit system and designated campsites. I also appreciate the freedom offered for weekday users who do not want to call ahead for a permit. I like the tiered fee structure and have wondered for years how the BLM manages use without fees! I think the proposed action offers a good balance between protection of resources and continued opportunities for many people to float the river and experience the great outdoors (875 is a lot of people per day!).	2011

Fee (General)	Second concern: I support the creation of an affordable fee structure for river stewardship and maintenance costs. However, for a single or two-person trip, the proposed fee structure is quite expensive! For fourteen people sharing a \$50 campsite, the cost is only \$3.50/person--however, for a single, low impact paddler, the cost of a small campsite is a full \$20/person! That is quite expensive and a tremendous disparity, especially considering that small parties are often quiet, low-impact, flexible river users, and good stewards of the river. Please adjust the fee structure to equalize the per-person cost.	2011
Fee (General)	In my opinion the fee is not too much. We 'Boaters' have very expensive rigs and spend heaps of money of food, gas, and beer to float on the river. A fee of 100.00 for a group size of 25.00 is great. 5.00/person is more than reasonable. But this does raise a question: 4) What if all the small group sites are taken, and I have only 2 people and I want a small site, will I be charged a large or medium camp fee if that is all that is available?	2011
Fee (General)	I am a private boater and would like to comment on the proposed Ruby-Horsethief recreation plan. I am all for permits for the section as proposed. I am however concerned with the proposed fee schedule. It makes it very expensive for a couple of families to go on a weekend float, especially if they choose to bring a dog. Dogs should not be counted. I could understand if dogs are a problem after the permit system is in place to change that in the future, however, I believe many problems will be resolved by having the permit in place. I would encourage you to look at the management of the Green River Sections A, B and C. It is a very high use area and they just charge \$14 per night for a campsite. I think a fee system of this nature would be much better. You could charge more for larger campsites.	2011
Fee (General)	Overall - it looks good and I agree with the need and proposed alternatives except: please simplify the fee structure so we know how much cash to bring and/or take credit cards by phone	2011
Fee (General)	I definitely think it's time for a permit/fee system on Ruby Horsethief to pay for Rangers to regulate what's going on at the Loma launch and with the developed campsites. I think everyone should pay some kind of launch area usage fee - a reasonable per person fee is probably the fairest way to do it. You could possibly use some kind of honor registration/pay system for launches at non-peak times. People who use the launch beach to swim or fish or hang out should pay the fee, as well, which means that a fee station could be set up above the parking area, which might help with some problems.	2011
Fee (General)	You should NOT price camping permits beyond the reach of local families who want to recreate in their own back yard - we treasure this area and want to use it frequently	2011

Fee (General)	You should consider charging more for using the developed campsites at Black Rocks than for other sites.	2011
Fee (General)	Please don't price the permits so high that small parties are discouraged from using the river. (Perhaps you should consider the number of people on the river, instead of the number of parties on the river?) High permit fees will mean more large parties, which have much more impact on the environment than small ones.	2011
Fee (General)	I just read the proposal for the 2012 Ruby Horsethief Recreation Area management plan. While I agree the current system is not working effectively, I believe the proposal needs to be amended in several areas. First, the fee schedule is too high. I believe it will encourage people to request smaller sites and overpopulate them to avoid the excessive charge of a larger site. It would be mostly unenforceable.	2011
Fees (General)	Camping fees: I agree with charging overnight users a fee to camp and I feel fees should be focused to user during peak visitation May- September and NO FEE during the rest of the year. I feel this will allow all economic classes to be able to afford a river trip down Rudy Horse-thief (average cost proposed per trip \$56 per night camping 8 people * \$7 each without rentals). According to your daft of RHRA spends \$60,000 to \$80,000 on management of RHRA. On what? It's not visitor contacts, boat ramps, trails, bathrooms, picnic tables, or campsites. With that being said, RHRA had 17,020 camping nights which "approximately \$3-\$4 per user day". Why does the BLM want to charge \$7 dollars per night when it costs \$3-\$4 per night. When did the government get in the business to make profit, charging double! What are you going to do the rest of the money? I would like to see fees applied to overnight user only \$3-\$5 per night. Also What about hiking and camping in one of the side canyons? Do I need to pay a fee to camp up Mee or Knowles Canyon	2010
Fee (General)	I have floated Ruby/ Horsethief many times. Most recently with my 2 young kids as a 1 night on the river. I am in favor of a fee system instead of a permit system. I usually try to camp at Black Rocks and have not had any negative encounters with others at campsites, but it is a fear of mine now that I am traveling on the River with my 2 little ones. I would be happy to pay a per person fee to have a campsite assigned to me and know that my site will be clean of waste when arriving there. If this fee was used to have someone assigning campsites on the weekends and making sure that other river users were using firepans, groovers & packing out trash. I like having the flexibility to plan my trip a few days before after checking the weather, flows, etc...., so I am not in support of having to pull a permit 6 weeks ahead of time. I do not feel like too many people are on the river, just that too many are trying to camp at the same sites. Thanks!	2010

Fee (General)	We support the current group size limit remaining at 25, a per person/night fee (to be used to improve the resource) \$7/person seems reasonable (but for a family of four is \$28 reasonable for a camping permit?),	2010
Fee (Amount)	My comments are based on my personal experiences on this river, and as leader of groups (groups size of 15 or less) of Boy Scouts. A fee for camping would be appropriate. Can you consider a greatly reduced fee for minors?	2010
Fee (Amount)	The \$7 / person campsite fee is too high given the quality of the camping experience. Downstream users are asked to pay that same amount and are guaranteed a 'wilderness' camp with far fewer users nearby.	2010
Fee (Amount)	We suggest a flat fee either to match Westwater \$7/per/launch or slightly higher.	2010
Fee (Amount)	Our response to the CO River Ruby-Horsethief section camping permitting proposals. 1.) Add the fees but reduce them to \$5 per person, all days of the week. Use a maximum of some multiple of the fee for groups?	2010
Fee (Amount)	The \$7 camp fee is too much for the kind of camps found in Ruby Canyon. When camps are stacked together and the ability to find privacy is extremely limited the fee is out of line. The camps we have 'downstream' in Westwater canyon are all very separate. The ability to present a wilderness experience is always available. The fee for a camp reservation system is unfair to camp users. A fee should be for all using the area, those that are floating through on a day basis, those that are biking, hiking, four wheeling and every other recreational opportunity occurring in McInnis Canyons. \$7 is too much for a reservation system, the fact is, those camping on the river would be subsidizing law enforcement and other management actions in the Conservation Area. I believe river runners are being singled out for excessive fees in the DRAFT plan. The \$7 camp fee does not include the many of the camping service commonly provided on public land camps. Rafters will be providing their own water, portable toilet and trash removal. My read of the current DRAFT does not even include fees going toward the Westwater Ranger Station and its associated boat ramp. Currently there is no fee in the Moab district for camping at the Westwater Ranger Station, in this 'camp' water and toilet facilities are provided. A camp in Colorado National Monument provides all of the services mentioned here and would cost users MUCH less than half the presented fee in all cases except for groups of 3 or less.	2010
Fee (Amount)	About the fees - we pay more for gas than these fees.	2010

Fee (Amount)	While I have seen “assumptions” on campsite rates on Mountain buzz, \$50 for midsized sites and \$100 for large sites (15-25), I hope you at the BLM are considering lower rates! As I said earlier, we typically travel with 1-2 other families with young children. The young children make Ruby-Horsethief such an attractive float and has always been affordable to budget minded families. I don’t mind paying a small fee such as the Green River Section ‘B’ (\$14/night) so I would encourage you to ensure Ruby-Horsethief is kept an affordable option to families.	2011
Fee (Structure)	My comments are based on my personal experiences on this river, and as leader of groups (groups size of 15 or less) of Boy Scouts. A fee for camping all year, for each day is appropriate. This fee pays for the camping resource and facilities and is not for the purpose of limiting use	2010
Fee (Structure)	Unless these concerns can be addressed and answered I would recommend; Alternative A No Action. Alternative C (partial office) could be acceptable when these areas of concern are addressed. (1) A fee per camp site rather than a per person fee will be easier to manage and prevent abuse of the system. Large camp sites could be charged at a higher rate than small sites.	2010
<i>Preference Comments (Comments preferring one option over another, both supported and unsupported pure preference)</i>		
	Stop telling the public that you are considering a “permit” system for Ruby-Horsethief Canyons. Clearly this is not what you are considering. A permit system implies limiting the number of people on the river. This type of permit strikes fear in the heart of the most fearless river runner. Tell the public you are considering a Camping Access Management Plan (CAMP) for Ruby-Horsethief.	2009
	It is good to see an evolving plan for this valuable river-resource.	2010
	I would like to see a ban on jet skis and dogs. As a canoeist, would like to see WAG bag systems to be an acceptable method of waste removal. Would recommend a ban on campfires, except for emergencies.	2011
For (supported)	I would have no problem with having to contact the BLM office in advance for a permit to camp on this section of river...and as long as the fee was comparable to other stretches of river that are similar...I would have no problem paying the fee. I consider it a small price to pay to keep these areas free of eyesores and traffic...as well as helping ensure a balance to the surrounding environment.	2009

I have lived in Grand Junction for 30 years. I have been boating Ruby/Horsethief for 20 years as well as other sections on the Colorado and Green Rivers in both Colorado, Utah and Arizona. I worked as a commercial river guide for 6 years with two local Grand Junction river outfitters. I am now a private boater and do Ruby about 5 times per year. I have seen first hand the conflicts that arise due to the over crowdedness and lack of camps. This section of river simply cannot accommodate the type of numbers that is seeing currently and it seems that numbers increase every year. The Ruby/Horsethief section of the river is simply overused and undermanaged, and I have been suggesting that the section be permitted for several years. I think that all overnight trips from May through September be required to have a permit with assigned camps.

For (supported) 2009

We have been boating this stretch of river for probably 20 years. As the Sentinel article mentioned, the quality of the experience has changed dramatically in recent years. Last year, for example, a small group of us set off down the river after signing up for a campsite, only to get to Black Rocks and find our campsite was difficult to find because the sign was under a bunch of bushes and the bank was very steep. Nevertheless, we stayed there and waited for the next day and took a better campsite next to us. The ranger came down and we asked him if we would be okay there and he said that campsites are not reserved and we could stay there.

Of course, that afternoon, after we'd moved some of our camp, a large family group came down and wanted "their" site. We compromised and moved back to our small site. Even after doing that, there was a lot hostility from that group, which made it uncomfortable for us to be there. They also had a dog that they did not control and it was constantly in our camp. They had small children climbing on the rocks by the river without supervision and it was a very disheartening experience for all of us.

I remember quiet, enjoyable times on R/H with friends in years past, and would hope that a permit system would alleviate the overcrowding and restore this experience for all boaters. We are in favor of a permit system during heavy use, and I think a ranger or volunteers need to be present at the boat launch every day, even during the week, to tally how many folks are putting on so you can get a better idea of when "heavy use" occurs. You might also consider that some people float down from launches above Loma. I would be willing to pay a fee for use and camping. We already do that for the San Juan, Green and other portions of the Colorado. I think it's time to save Ruby Horsethief.

For (supported) 2009

For (supported)	<p>I have been down this stretch of the Colorado many times, and have always enjoyed the pristine beauty and solitude of the is special place. Now apparently, it has become over-run by people with little regard for both safety and preserving it's natural beauty.</p> <p>Although I would be saddened to have to apply for a permit to experience Ruby & Horsethief, if this is what has to be done to protect it from the less appreciative crowds, then so be it.</p> <p>This area deserves to be protected for future generations, so my five year old daughter can experience what I experienced years ago. Please do whatever it takes to ensure Ruby & Horsethief remains the beautiful place it always has been.</p>	2009
For (supported)	<p>I regret that I must support adding Ruby Horsethief Canyon to the list of permitted rivers. The environment simply can't support the number of people floating the canyon, particularly those who travel in large packs, with their pets, perhaps with guns (I'm not kidding), and without sanitation facilities or firepans. A permit system may cut down the chance of boating into a nasty situation. Please consider a permit system for Ruby Horsethief</p>	2009
For (supported)	<p>I am a private boater who has enjoyed the Ruby/ Horsethief section of the Colorado river for many years. I am in FULL favor of granting permits for this section of river. As a private boater I am very familiar with the permit system and think it works very well. I feel that the permit system requires users to have the required equipment (groover, firepan, lifejackets) and it helps keep the area cleaner.</p>	2009
For (supported)	<p>As a local rafter who has enjoyed the section of river for years, it is very apparent that the current situation is not working. Unfortunately, a permit system is the only way to make it better. So far, I have been fortunate enough to find my campsite unoccupied every time I have showed up, although I try not to register for the Black Rock camps for that very reason. But I have seen the effects of people not having firepans, groovers, and packing out their trash.</p>	2009
For (supported)	<p>I am a 14-year private rafter, who used to enjoy floating Ruby-Horsethief. In recent years, the weekend overcrowding, drunk floaters, conflicts over campsites, vehicle break-ins at the put-in, and resource damage (including careless fires, trash, human waste disposal, etc.) seems to have become the norm. I will not float it on a weekend anymore. While part of me dislikes fees and permits, I dislike what is happening there even more.</p>	2009

For (supported)	<p>I think permitting on the weekends would be a good idea for the Ruby- Horsethief section of the Colorado. Several times I have pulled in to the Blackrocks camp ground area and found a coffee can with poop in it that someone forgot to take out with them. Also you never know where it's safe to put your sleeping bag down, knowing that someone could have pooped there and just buried it.</p> <p>I know there is no guarantee that permitting will insure that ALL boaters will comply with the groover regs , but maybe paying a small fee for the permit would enable the BLM to hire a ranger to enforce this .</p> <p>Lets try it for the weekends and if it works then carry it over to the whole week.</p> <p>Thanks for all your good work on that beautiful section of our river. I love the new cottonwood plantings.</p>	2009
For (supported)	<p>As a responsible river runner, I actually support a permit system on ruby-horsethief canyons. I have encountered some of the most irresponsible and disrespectful groups that I have ever dealt with on this section and I believe instituting (and enforcing) a permit system will greatly alleviate the issues of trash, improper fire management, human waste management and campsite crowding / competition. I do have several concerns with the permit system however.</p>	2009
For (supported)	<p>I think I have floated that stretch four or five times when I'm up from my southern Arizona home to visit the canyonlands. I really love that stretch and every time I have done it has been with novice boaters, usually new to the Canyon Country. The fabulous side hikes and easy water make it a great intro to remote desert floats and the run deserves to be protected, but also to be easily accessed by responsible users.</p> <p>My trips have been mid-week in autumn and I always found the solitude to be excellent. The trash and crowded campsite problems that I read about on the Utah Rafter's web site have never been a problem in the off-season, at least mid-week. I can see how summer weekends would be a problem.</p> <p>I'm also different from many river users in that I don't - and can't - plan trips very far in advance. I am self employed and my work schedule is volatile. Applying for permits isn't very practical when you never know when you will have free time.</p> <p>If crowding and poor camping behavior are only a problem in the summer, do a permit season as so many rivers do. Paid permits in peak season, self-permitting the rest of the year. Perhaps permits only on weekends except from Memorial Day through Labor Day?</p>	2009
For (supported)	<p>Camping may be better managed on the river. There is an increased use of the river and this use is having an impact on the riparian environment. I do support a camping fee, dedicated camping areas, use of fire pans (if fire rings are not provided by BLM) a requirement that you bring your</p>	2009

own firewood and portable toilets on the river.

Comments: I support Alternative C for management of the Ruby Horsethief river corridor. I have been boating the stretch for 20 years and in that time noticed not only the significant increase in traffic but the increased conflict between users as well. Alternative A and B will not solve the underlying issue of limited capacity to meet the demand. Alternative C provides an acceptable compromise in moving from a "hands off" management approach to a more active role for the BLM in controlling access. Should Alternative C prove to be inadequate either in the near term or long term, a move to a more complete management approach as delineated by Alternative D would not be difficult.

For (supported)

2010

I have spoken with many private boaters about this section particularly in regards to the current management of the campsites (voluntary signup). We recognize that during high use season weekends, the voluntary camp signup system does not work well. In order to keep this letter as succinct as possible we have summarized our issues by "Support, Do not Support (propose a change) and Additional Requests/Concerns" below.

Support:

- Unrestricted day use with no fees
- Assigned campsites with fees during high season use (on weekends only)
- No fee for camping Oct 1-April 30th
- May Flat campsite use for those that miss their reserved camp
- Ratio of commercial to private camping use.
- Limiting (to one night) camping at Black Rocks Fri and Sat nights.
- Support no early signups on Sun-Thurs self issue permits (this is a current problem). How do you propose to solve this?

For (supported)

2011

I am supportive of the proposed action for the RHRP. As a frequent user of Ruby-Horsethief, I enjoy the boating opportunities and outstanding scenery. Like most users, weekends are the most convenient times for me to float the river. I understand and support the need for a permit system and designated campsites. I also appreciate the freedom offered for weekday users who do not want to call ahead for a permit. I like the tiered fee structure and have wondered for years how the BLM manages use without fees! I think the proposed action offers a good balance between protection of resources and continued opportunities for many people to float the river and experience the great outdoors (875 is a lot of people per day!).

For (supported)

2011

Prefer Alt B	<p>I would support Alternative B on the proposed Ruby Horsethief Recreation Area Management Plan. I think this alternative allows users the freedom to enjoy the river at their leisure and camp where spots are available. If this area is going to be enjoyed by all then they shouldn't be on a "schedule" to travel to a spot in a certain time frame. Maybe they want to have the freedom to take pictures of unique landscapes, pause and enjoy a break. If they are so wrapped up in finding the one and only perfect camp site then they can Hustle on down the river and find that perfect spot to claim and just hang out there. There is some structure in Alternative B but not a lot of expensive people hours necessary for recreation to occur. Let The land managers do their work and let the recreationists have a fun time. Don't add rules. Expect people to learn courtesy and share the river, the camping, and protect the scenic area as a matter of public pride.</p> <p>Don't create more paper work for more employees to fill more man hours on an already stretched BLM Budget. Use the office contacts to remind all users about the pack it in pack it out rules. I would support fines for abusers. Leaving trash and waste has become a huge human fault on all lands, private and public.</p>	2010
Prefer Alt B	<p>I started river running in the early 1980s and have grown ever more frustrated with a permit system that limits access to our rivers to a level that makes it difficult to "go float". RH has been a pressure relief valve for the hassle of most other river areas. I read your plan and can support Alternative B. I think the current system is flawed by not all parties realizing the voluntary campsite registration is just that: voluntary. Conflicts arise when people think it is mandatory. First come first serve will reduce conflicts. I can't endorse other more restrictive measures that limit access.</p>	2010
Prefer Alt C	<p>I am glad to see the BLM is managing its land. After reviewing RHRAMP and what is proposed I feel Alternative C is the best option however I have some questions, concerns and recommendations to the management of RHRA Alternative C.</p> <p>I did Rudy trip 3 times last summer with my wife and never saw any BLM or Ranger presents. I'm glad to hear the BLM hired an additional river ranger and I believe this is needed. I feel more of a presents on peak time is critical to reduce conflict and show a presents @ loma boat launch. According to the draft of RHRAMA your contact rate is 10-11% of total visitors, I had that many in my three trips!!! I want more bang for my buck, more of a presents please!</p>	2010

	<p>I am an avid private river user who canoes most of the western Colorado and eastern Utah rivers and have done so for the last 20 years. I have travelled down the Colorado River in the RHRA many times and also have grave concerns for the health of the surrounding land and the river itself. I am in hopes when all is said and done the new regulations will help restore this area to it's earlier beauty and lower the impact than it currently sees. (and this will be none to soon)</p> <p>Having seen and reviewed the comparative to the various options on regulations I am in favor of either the alternate 'C' or even alternate 'D' if need be to insure a healthier recreation area. I note the following comments:</p>	
Prefer Alt C	No fees should be levied on private camping (yes for larger groups)	2010
Prefer Alt C	<p>Comments: I support Alternative C. However, it's essential to enable people to make their reservation by phone or online. Going to the office to make a reservation or pick up a permit is simply not practical for those coming from the Front Range.</p>	2010
Prefer Alt C	<p>I have been running this stretch of river since about 1993. I won't even go there in the period May-Sept anymore. I'd ather weather the occasional march storm than the summer weekend crowds.</p> <p>Alternative C preserves spontaneous trips, but tries to get a handle on the weekend crowds. Unfortunately, I think that will lead to enough more mid-week trips that in 5 years, you'll permit the river 7 days/week. But in the meanwhile, Alt C is the best compromise.</p>	2010
Prefer Alt C	<p>Though it is certainly nice to have a river for which permits are not needed I understand that use is increasing dramatically in the Ruby-Horsethief stretch and the subsequent impact to both natural resources and social experiences may require changes in management. The alternative that I prefer is Alternative C, with some comments. I think Alternative C is a good alternative at this time because it will limit the number of users during peak use periods to the number of campsites in the area and will also assign campsites, thus preventing competition and confrontation between users. It still allows for some flexibility in visitors planning their trips, keeping some of the more spontaneous river opportunities in place during the lighter use weekday time periods. Additionally, I believe it may voluntarily move some weekend use to weekdays for those who do not want to obtain a permit several weeks ahead of time.</p>	2010

I applaud your efforts at addressing the issues of river recreation in Ruby-Horsethief Canyons of the Colorado River. As a longtime Grand Junction resident, I have grown to very much appreciate this backyard river running treasure.

It seems to me that Alternative C: Camping Permits (partial office) (5/1-9/30) is a reasonable response to the growing pressures here and I support it. Please keep in mind the situation of rule-abiding locals such as I with a sudden opportunity to go boating. I hope the permit system you establish will be as responsive as possible. For example we could telephone your office and receive same-day approval if available. Or you could establish an interactive web-based system.

Prefer Alt C

2010

River Runners for Wilderness (RRFW) is a national grassroots organization of 2500 members. Additionally, through our website (www.rrfw.org), sales of river-related gear, Riverwire alert service, and our listserver, we have considerable outreach to many more river lovers. Our primary thrust since our inception is to advocate for the eventual Congressional designation of the proposed wilderness in Grand Canyon's river and backcountry and the institution of an allocation-free permitting system there. Our constituents also take a keen interest in what happens on the Colorado River section through Ruby and Horsethief Canyons.

The section of river in Ruby and Horsethief Canyons is unique in its opportunities for novice river runners to hone their skills. It is prized for its beauty and accessibility, fun campsites, the wildness of its scenery despite the railroad, and because of the possibility of linking to a Westwater Canyon permit for a longer multi-day trip.

It appears river runners are headed for yet another loss of freedom to launch a trip without administrative hassles. We mourn that loss.

Despite assurances, we fear that after formal permitting is instituted, the commercial sector will pressure for and eventually win a greater share of use, irrespective of relative commercial demand.

Although we would prefer to see the Ruby-Horsethief system remain as it is, it appears that this is not realistic given the increased crowding, conflict and resource degradation.

We endorse Alternative C—Partially Office Issued Camping Permits. This alternative rightly addresses only the specific time and season causing a problem—leaving the remainder as free as possible. This solution leaves room to expand the high-use rules if it becomes necessary to do

Prefer Alt C

so.

2010

	<p>I am in favor of alternative C for river management.</p> <p>Brief background: I and my family float Loma to Westwater at least once a year; I sometimes float it two or three times a year. I have made these trips every year for the past twenty two years, so I have seen the changes with increased use.</p> <p>The campsites at Mee Canyon were full of wild grasses in the first years I floated it, then the careless camper's accident led to the fire that destroyed that and allowed all the cheatgrass to take over that site. The same goes for the lone majestic cottonwood upriver that was always full of bees that burned to nothing. Further uncontrolled overuse may soon destroy more of the beauty of this special river trip.</p> <p>Having to race down the river to secure a Friday or Saturday night campsite at the Black Rock destroys some valuable elements of the trip. Being able to reserve (or even to know that you missed being able to reserve) a site six weeks in advance would be a benefit, for those Fridays and Saturdays between May and September.</p> <p>Preserving the opportunity to camp Sunday nights through Thursdays nights in summer without the six week advance permit is a good idea and a good compromise, as is the ability to need NO permit between September and May 1.</p>	2010
Prefer Alt C		
	<p>Of the proposed alternatives, I support Alternative D. Alternative C would also be helpful, except that sometimes we have launch dates that would span the permit nights--it might just be easier to require a permit whenever people launch. I support a per person/per night camping fee, but I would like at least part of the funding to go to an increased BLM presence at both Loma and Westwater (see below).</p>	2010
Prefer Alt D		
	<p>As a Grand Junction resident and frequent user of Ruby/Horsethief canyons for several decades, I fully support the permitting of the canyon. I would recommend Alternative D instead of the preferred Alternative C however. Self-Issuing of permits during the week will only lead to over-use and campsite conflicts during weekday periods. Boaters will begin to schedule trips during the weekdays to avoid having to get permits for the weekends. System C will eventually fail and System D will have to be adopted in the future. I am of the strong opinion that system D should be implemented now in order to avoid future planning processes and bureaucratic red tape issues. Alternative D is one that will ultimately provide the best system for the long-term protection of the river corridor. Alternative C is simply a short-term solution that allows the problem to shift to different periods.</p>	2011
Prefer Alt D		
	<p>I also would like to see the permit system implemented all week long, as long as it is more affordable than proposed. Please think of families when discussing the fees. Thanks for your great work to help save this wonderful area and make it a better place to bring my family!</p>	2011
Prefer Alt D		

Prefer Alt D	I like the idea of Alternative C but think it is just kicking the can down the road. It will result in conflict as use grows. Alternative D will happen eventually, so let's just do it now. Thanks for the opportunity to comment.	2011
Against (Supported)	The section of river in question is a relatively easy float. There is a need for sections of rivers that do not require permits and/or fees. It is how the general public becomes acquainted with river running. Permits and fees limit easy access for many people. Without free sections of rivers to float, like the Green River below Flaming Gorge, river running is frustrating to many people and becomes the purvey of more elite people. Had it not been for free river segments, I would have most likely not have begun river running forty years ago.	2009
Against (Supported)	Many river runners launch at Loma and run through Westwater Canyon, which requires a BLM permit. The combination of Horsethief, Ruby and Westwater Canyons allow a trip longer than one or two days. It also allows for a relaxing "layover" day before running the rapids or Westwater Canyon. Because Horsethief and Ruby Canyons are administered by another BLM office (indeed another state) it will be complex if not impossible to secure a permit that allows a run-through of both river segments.	2009
Against (Supported)	The driving issue is that BLM is using requiring permits is based on resource damage, overcrowding and user conflict. Quite simply, people need to learn to get along on the river. They need to learn HOW to be gentle on the resource. Requirements to limit use do not solve the underlying issues of resource damage and user conflict. Fees and permits are only one tool to correct user conflict and resource damage, and one that bureaucrats favor because of its seeming ease of administration. In addition fees usually increase over time and permit restrictions tighten. For example, most BLM river offices (customer service????) do not answer their phones after noon. Because this is such an easy section of river it would be a more effective measure to have rangers AT the Loma Boat Ramp to educate and control users. My current experience is that Rangers spend very little time at the boat ramp, and prefer to "patrol" the river. I have observed rangers leaving a crowded ramp in turmoil because they didn't want to deal with the people there. River patrol is a good way to solve conflict and resource damage, but it does not presently seem to be emphasized as Rangers spend little time intermingling with groups. In addition, because the Black Rocks section seems to be a place of major conflict it would seem wise to have a ranger there during the hours that groups come into camp. Communication with the Ranger at Loma would be quite simple: USE A RADIO!	2009

Against (Supported)	<p>People who use the river need to learn to get along and to take reasonable actions to protect the river environment. My experience is that the people who will secure a permit or pay a fee are least in need of controls. The people who need the education, mostly local novice river runners, will not use the area if permits or fees are instituted. Thus the agency will lose the opportunity to educate them and modify their behavior...I am familiar with the effectiveness of educational tools in changing behavior. Perhaps the BLM officials who are proposing these preposterous regulations should read the writings of Freeman Tilden and take courses in behavioral sciences.</p>	2009
Against (Supported)	<p>It isn't the number of people on the river, it's the trash they leave behind for somebody else to clean up. You folks don't have either the manpower nor the money to clean and/or police this 25 miles.</p> <p>I would do this: I would, in big letters, post signs at both ends stating "THIS 25 MILES OF RIVER WILL STAY OPEN FOR YOUR USE UNTIL IT IS COMPLETELY FILLED UP WITH TRASH. THEN IT WILL BE BE CLOSED FOR USE PERMANENTLY . IT IS UP TO YOU".</p>	2009
Against (Supported)	<p>I have been a long time canoe user of the Western Rivers in Colorado and Eastern Utah. I have been averaging about 5-6 per year for the past 20 years and usually go with either my partner, children or myself or with licensed outfitters. While I appreciate the effort to remove those who cannot nor will not respect the land which is all of ours (I have more than once asked the trash folks to clean up or move along as they are a nuisance and a 'downer'). While attention must be paid to monitor and exclude those type folks I urge you not to close the door for those of us who get the urge pack up our gear our groovers and our canoes and head to the beautiful river ways of Colorado and Utah as the inspiration moves us and we come to commune with the gifts of this great land.</p>	2009
Against (Supported)	<p>I prefer alternative A or B, where campsites are not assigned. My husband and I have enjoyed floating the Loma to Westwater corridor in a canoe. We like to beach the canoe in an unused area and backpack up the side canyons for several days at a time.</p>	2010

Against (Supported)	<p>After review of the draft management plan, the Private Boaters Coalition (www.privateboaters.org) and Pikes Peak River Runners club (www.ppr.org) has several comments we are submitting for consideration. Many private boaters use this recreational area either as a standalone family/dog river trip or in conjunction with a Westwater permit in the summer. Many of our members come from the Front Range of Colorado to enjoy this stretch of river. Generally, we are opposed to permitting the river mainly because this is usually a government reaction to selected capacity issues. In particular, we do not experience “on river” congestion on this section of river. In general, we support less drastic methods to support sustainable use of river canyons for the self-outfitted public (which we consider ourselves) such as education, voluntary camp assignment, leave no trace or dealing with river access issues more productively. In this stretch of river, crowding within the Black Rocks area is most noticeable. However, it is much less noticeable at the other camps (outside of the Black Rocks area) within the corridor. On the river, boaters tend to space themselves out and actual on river use does not give a sense of crowding. Many times, boaters can go hours without seeing another group floating. Obviously on summer holiday weekends use increases.</p>	2010
Against (Supported)	<p>We recognize that the current system of signing up for campsites voluntarily has not worked. Most of our trips find that at least one group does not camp in the location that they signed up for (for many reasons) which results in a cascade of (usually negative) changes up and down the river corridor. Clearly this relates to expectations set at Loma when groups sign up for and expect to “get” a specific camp. Based on these past experiences it would be helpful to have assigned permitted camps- particularly in the Black Rocks area. The other camps outside of the immediate Black Rocks area don’t seem as pressured by this situation.</p>	2010
Against (Supported)	<p>Overall, we want to see this river corridor accessible to a diverse user group and do not see the need for user capacity limits at this time or in the near future.</p>	2010
Against (Supported)	<p>Alternative D appears to be the most regulated option and seems extreme in functionality. One of the nicest aspects of this section of river is the flexibility it presents for boaters that want a non-rigid relaxed float. Alternative D does not appear to support the historically relaxed nature and flexibility of use established in this section of river corridor. We do not support Alternative D.</p>	2010

Against (Supported)	<p>Option B would be the second most preferred option and is the most flexible for all involved. At least with this option, boaters would have the expectation that their preferred campsite might be taken but they can personally take that risk by not counting on any camp down river. As stated in the introduction of these comments, we support a fee/person/night to support the river corridor, etc.... This money could be used to increase boater education and improve the resource</p>	2010
Against (Supported)	<p>I do not support Alternative B, since it's impractical for people coming from the Front Range (ex. Fort Collins) to do "first come, first serve." It would discriminate against non-locals.</p> <p>1) An Alternative E is needed, which would be to manage NOT BY CAMPING NIGHTS/RESERVATIONS but by a true LAUNCH BASED PERMIT SYSTEM. We feel it is a serious oversight not to include this as an option/alternative in the DRAFT Plan. In this Alternative E, there would be a limit placed on the number of multiday groups allowed to launch. If there are indeed 35 camps at most water levels, then limit the number of total groups to LESS than 35 such as 30. The launch allocation would be split between commercial and private, giving larger share to private based on your historic use data. We are most supportive of a launch system with maximum group size. Limit the number of groups so that there are plenty of campsites and thus a campsite reservation system is not needed. OR match the Westwater system and still limit launches and group size but assign camps with a ranger at the put-in.</p>	2010
New Alternative		2010

	<p>If I had to choose one of the listed alternatives with no changes, I would choose Alternative B, Alternative C would be my second choice, however I think both of these could be improved upon. If I could suggest my own alternative it would be as follows: Self---Issued permits in off---season & Sunday---Wednesday, \$7 per person, no limit on days, just \$7 to launch. This \$7 fee would be in effect year round. Rangers on site to check for required gear during weekends of busy season, & at other random times. Also a few patrols to get the word that Ruby Horsethief is being regulated. I would not like the heavy handed ranger presence like Dinosaur National Park has. Stiff penalties for no fire pans or groover usage. I have had the Westwater ranger check my Groover after I mentioned that I was on Ruby Horsethief for 3 days. This was fine as I always use a groover. This could be a cheap option? Dogs are allowed. If there has to be a limit 5 or 6 would be fine for a 25 person trip</p>	
New Alternative	Allow commercial use as before. Allow motorized use in accordance with CO/UT law.	2011
For (Unsupported)	I support a permit system on Ruby-Horsethief. I am a long time river runner and have run RH many times.	2009
For (Unsupported)	I vote for Alternative C!!!! Sounds like the best way to handle it.	2010
For (Unsupported)	I think C is the best option. Thanks.	2010
Against (Unsupported)	Wasting high fees on more un-needed infrastructure will only bring more ill-equipped tourists and destruction of yet another sacred natural resource in Colorado. Bureaucratic interest should never be considered in the destruction of what makes Southern Colorado a national treasure.	2011
Comments addressing the "mechanics" of the fee or permit system		
Mechanics of System	As a local rafter who has enjoyed the section of river for years.....If and when a permit system is implemented, I do have some suggestions.....Require permits only for overnight trips. The real problems all stem from camping (fires, campsite registration, etc). Living in Fruita, it is very nice to be able to spontaneously jump on the river at high flows and get through the canyon in one day. This kind of use has little to no impact on the canyon, as usually we don't even stop once all day.	2009
Mechanics of System	<ul style="list-style-type: none"> · Permit weekends only. · Hold some camps open for short notice trips. · Allow trips of 6 or less people to camp on undesignated beach 	2009

Mechanics of System	Reserve 3 large camps for exclusive use of Commercial trips that are isolated, not the best ones. (I assume there would most likely only be 3 commercial trips on a given night, you have the stats.) · No charge for day trips and no limit on numbers for day Trips. (This should be self-limiting due to trip length)	2009
Mechanics of System	My concern with a permit system is that it very well could limit access to a number of people who would otherwise normally be able to run this stretch on short notice. If a camping permit system is to be implemented, then the question of implementation comes into play. Will it be online, with easy access for someone to call and reserve a campsite on the date they would like?	2010
Mechanics of System	2)Carrying Capacity: I believe a carrying capacity should be established for both seasonal use (impacts to resources) and for daily use (social experiences). A group size of 25 people with up to 35 groups (up to 875 people) on the river at one time could lead to a tremendous amount of impact to natural resources in high use areas, to trails, and to social experiences. Consider lowering maximum group size (possibly for private parties only) and also trying to spread use out to lower use periods during the weekdays (through no weekday fees, not constructing an additional 7 campsites) to reduce both the resource and social impacts.	2010
Mechanics of System	Though many folks are enjoying the river as an interactive social experience with their group and with other groups, many others are seeking a level of solitude and remoteness from the wilderness aspects of Ruby and Horsethief Canyons. By managing the area with flexibility in permit processes, fee structure, campsite options, reasonable group sizes, and numbers of groups, both of these recreational opportunities can exist for a diversity of users.	2010
Mechanics of System	My qualifications to comment include 27 years with Canyonlands Field Institute as permittee, Director and Naturalist-River Guide, 36 years of private boating and four years as seasonal river ranger Utah BLM in the early 1980's. I have been involved on the water and giving feedback to the BLM for Ruby-Horsethief management throughout this time. Overall, I support the efforts outlined in the Plan to make for a safe, enjoyable visitor experience and to help recoup some costs in management through a fee system. You have chosen to use a camping based permit system. I think this falls short of what is really needed i.e. a true permit system that manages "use" through limiting numbers of launches each day and collects fees based on launches rather than nights camping. I urge you to reconsider a true permit system in the near future.	2011

Mechanics of System	Unless these concerns can be addressed and answered I would recommend; Alternative A No Action. Alternative C (partial office) could be acceptable when these areas of concern are addressed. If camping permits are not used by private trips will they be available for use by the outfitted public? or vice versa?	2010
Coordination with Westwater	Make it easy to sign up for online and allow West-Water permits and Ruby permits coincide with each other	2009
Coordination with Westwater	Westwater Permit holders should be able to combine with Horse thief Ruby stretch easily. The permit systems must be coordinated, Possibly one permit system for the entire stretch from Loma to Cisco.	2009
Coordination with Westwater	If a R-H permit system is implemented could 2 or 3 permits be reserved for those continuing through Westwater? One way to do this would be to have the call in date for R-H two days after the call in date for Westwater. Another would be to simply set aside a set number of R-H permits for WW boaters.	2009
Coordination with Westwater	<p>I have almost always run Ruby-Horsethief as part of a 3-day trip, combined with Westwater Canyon downstream. This is one of the most spectacular short overnight trips possible on the Colorado River system. As you are probably aware, Westwater has a very competitive permit system. Getting a permit on a busy weekend is very difficult. If there is substantial competition for permits for Ruby-Horsethief canyons, getting a permit to line up with a Westwater canyon permit will be almost impossible. Please attempt to preserve this wonderful trip! There are several ways to do this:</p> <ul style="list-style-type: none"> -Hand out permits for any particular date after the Westwater permits have become available and give priority to Westwater permit holders for obtaining a Ruby-Horsethief permits -Set aside a certain percentage of permits for Westwater permit holders, which are released if they are not filled. -Automatically allow Westwater permit holders to launch on Ruby-Horsethief one day before their Westwater launch date. 	2009

Coordination with Westwater	<p>Another important consideration for an advanced reservation, limited permitting system is that many users, myself included, only run Ruby/Horsetheif as a prelude to Westwater Canyon. If I were to draw a Westwater permit, but not a Ruby permit, or vice versa, I would probably not do either trip alone. It is too much work loading, unloading, rigging, derigging and driving to come to the river only for 20 miles. Putting these two stretches together creates a much more desirable trip than either section alone. How to coordinate two permit offices would be challenging. One option would be to allow those who have secured a Westwater permit to call in for a Ruby/Horsethief permit a day earlier than the general public. I think this is probably the best option. Another option would be to treat the two sections as one, although I think that this would unfairly limit the number of permits available to those who want to run only Ruby/Horsethief.</p>	2009
Coordination with Westwater	<p>If a R-H permit system is implemented could 2 or 3 permits be reserved for those continuing through Westwater? One way to do this would be to have the call in date for R-H two days after the call in date for Westwater. Another would be to simply set aside a set number of R-H permits for WW boaters.</p>	2009
Coordination with Westwater	<p>We have taken the time and reviewed the BLM's draft recreational management plan for the Ruby Horsethief area. Listed below are comments that we believe need to be added to the draft that would effect Utah.</p> <p>Page six 1.7.2 Rules</p> <ul style="list-style-type: none"> - Utah State Parks and Recreation Boating laws and rules (2010) - Utah State Parks and Recreation - Carrying Passengers for Hire Laws and Rules Page twenty one 2.4.5 Commercial Use - Commercial outfitters operating into Utah via Westwater Canyon shall follow Utah State Parks and Recreation Carrying Passengers Carrying Passengers for Hire laws and rules 	2010

Coordination with Westwater	In addition, we suggest considering consolidating the BLM administrative efforts between the Grand Junction and Moab offices with regards to river permit (Westwater) and camping permits (Ruby/Horsethief) in order to reduce costs.	2010
Coordination with Westwater	If you do not accommodate the existing Westwater Management Plan calendar users downstream your DRAFT plan will cost the local economy jobs and you will not be serving the outfitted public that has used a Ruby-Horsethief-Westwater rafting trip for over 40 years.	2010
Coordination with Westwater	2) The initial Plan states at “direct allocation of river use will only be undertaken after all indirect measures are taken.” CFI has been critical of this “wait and see” philosophy, urging some type of private boater management be instituted sooner rather than later. As noted in the document, many other western river stretches already have a permit system in place. It is most unfortunate that BLM Grand Junction has waited so long, meanwhile visitor conflicts, especially on weekends, have escalated to a point that as an educational commercial outfitter, we now avoid weekends in Ruby even though many of our assigned Westwater launch dates are on Sundays. CFI primarily conducts two and three night educational trips in order to have adequate time for hikes and study activities. These trips are designed to start at Loma in order to have enough nights out (Westwater Canyon allowing only one night). We schedule our Loma launches to match our assigned Westwater launches. The high use and campsite crowding on Fridays and Saturdays has virtually destroyed the value our Sunday Westwater launches for multiple day trips. On page 20, statistics presented indicated that only 13% of groups currently float through to Westwater. We can state for a fact that CFI would have contributed “more” if the conditions on weekends in Ruby-Horsethief were not so difficult. We have purposefully displaced school and adult seminar groups to other rivers or more seriously had to cancel our Sunday Westwater dates because we can’t run a quality educational trip given the current management situation.	2010

Coordination with Westwater	2) It is imperative for commercial permittees holding both Ruby-Horsethief and Westwater launch dates to have assigned launch access to match or allow a float through OR to create a system with 11-12 months notice. There is no specific treatment in the Draft Plan on the "float through" operations for outfitters that hold permits in Ruby-Horsethief and Westwater. It is not clear in the DRAFT how campsite or launch assignment would work in a practical manner for our business environments.	2010
Coordination with Westwater	Given the resources shared with Moab BLM in terms of ramp use and associated visitor services and the float through feature, we urge you to parallel the Westwater system for private and commercial as much as possible. Please include several outfitters in your discussions as you work out the final decisions so that procedures are truly practical and supportive of "doing business" as well as fair to other users.	2010
Coordination with Westwater	1.8.3 Westwater Take Out - the last sentence... na limited number of private launches. Private permits are required year round. There are 18 commercial outfitters on this allocated segment of the Colorado River. _____ (I am not in the office, is it 9 ?) of the 18 outfitters are also permitted in Ruby Horsethief.	
Coordination with Westwater	1.9.4 Westwater Boat Ramp - there are only two vault toilets, not three	2010
Coordination with Westwater	I have heard talk of implementing a permit system for ruby-horsethief. Has this been done yet? I am floating Westwater March 13th and would like to like it with ruby-horsethief? How dow I secure a permit? Has there been any talk of a limited number of combined Ruby-horsethief + Westwaer permits?	2010
Coordination with Westwater	I also note that in this and other sections ofthe Draft the Colorado State Parks and Colorado Boating Regulations are frequently noted. There is no reference to the Utah Department ofNatural resources and the Utah Boating Regulations in the document. As this river segment traverses Utah I would seem appropriate to include reference to the Utah regulations.	2010
Coordination with Westwater	Page 27 -(BLM -Moab): How much does BLM Grand Junction provide BLM Moab and for what specific purposes?	2010
Coordination with Westwater	It is stated that commercial operators in Ruby-Horsethief must follow Colorado State Boating Regulations. And if they hold Westwater permits, then must meet Utah State Park regulations as well. Would not any commercial operator who crosses the Utah state line on the Ruby stretch also be required to meet Utah law?(specifically this would include carrying passenger for hire requirements including having a Utah Outfitter License, BLM permit and appropriate insurance?)	2011

Coordination with Westwater	3) How will Westwater permits be included: If I have a Sunday Westwater Permit, will I be guaranteed a Saturday permit for Ruby?	2011
Coordination with Westwater	When Westwater permits are issued the person should have the option of attaching a Horsethief permit at that time. When one travels a great distance to run Westwater it is only reasonable to have a %100 ability to combine the trips when obtaining the Westwater permit. It would cause added fees which would discourage no show for Hosethief section.	2011
Coordination with Westwater	We are concerned that the RHRA plan will not allow long time existing outfitters that operate both in Ruby and downstream in Westwater canyons the ability to continue offering multi-day combination trips that utilize both canyons. The existing Westwater and Ruby outfitters have not been given priority access to just enough Ruby launches to match the equivalent Westwater launches downstream. For four decades Westwater's river management plan has established a reoccurring effectively permanent outfitter launch calendar. Ruby's plan does not acknowledge the need to coordinate launches at Loma one day ahead of the existing downstream Westwater commercial launch calendar. By not doing so the Ruby plan will force the extinction of the 30+ year old offering of commercial Ruby/Westwater multi day trips. Every effort should be made within the plan to grand father in this existing historical use.	2011
Timing	I am a 14-year private rafter...If there is to be a limit on the number of overnight trips, I would suggest that it be started just on high-season weekends and perhaps some spots be set aside for call-in with a week or less notice for "last-minute" floaters or that fees be refunded if the permit is given up within a couple weeks of the date, so spots don't go unused and people don't always have to plan weeks or months ahead.	2009
Timing	If it is necessary to limit use through a permit system, I think it is highly important to limit use only during peak seasons- June-August, for instance. Shoulder seasons should be self-registration, and not limited- if, of course, it is truly a shoulder season with minimal use.	2009
Dogs	As a local rafter who has enjoyed the section of river for years.....If and when a permit system is implemented, I do have some suggestions..... Have a leash law at the put-in. I am not against people having dogs on the river, and many times take my own through the canyon. But when I do, I leave him in the truck until it is time to go. There is nothing worse than having a wet dog run on you gear and splash you with cold water at 8:00 am while their owner laughs and thinks it is cute.	2009

Dogs	<p>Another potentially damaging user is our pet population. I understand that some users who bring dogs on the river allow them to defecate anywhere and don't clean up after their pets. I believe that the number of people being responsible for their animals- watching them or having them on a leash at all times and picking up after them- outweighs those who let their dogs run all over creation and "go" where ever they want. I think strict regulations with consequences are in order to protect the rights of responsible pet owners and other users. Don't ban the dogs, just fine the daylighters out of those who are caught not picking up after their dogs. Perhaps a lifetime (or shorter) ban on individuals caught violating littering statutes 3 times would mitigate dog waste left about. This type of ban could also apply to users violating any regulations. It is unfair to blame and punish all users for the acts of few.</p>	2009
Dogs	<p>I have a concern with allowing dogs on this stretch of the river for anything but legal hunting. This is a limited riparian area that is critical to wildlife. I have observed dog tracks all over these areas. I have observed rafters floating the shore while allowing their dogs to run the banks. I have NEVER observed a dog secured at a camp. If it is not possible to eliminate dogs then some tight restrictions need to be in place and enforced to control the dog problem. I believe BLM has an obligation to protect wildlife interests along the riparian area. I have seen a decrease in the number of deer, waterfowl, turkeys, doves, rabbits, quail, and desert bighorn along the river that I attribute to dogs and not people. The Bald Eagle is the only animal I have seen that is not affected by the increased use and the dogs. Additionally I am tired of dogs jumping on me at the ramp, having to step around dog feces, and dogs urinating on my river gear.</p>	2009
Dogs	<p>Dogs: My biggest problem with dogs is they are out of control with no owner is sight to control them. I have been harassed many times on Rudy horse thief by dogs. I have seen aggressive banking, dog fights, aggressive dogs running freely, dog poop all over and dogs chasing / harassing wildlife. I feel that dogs should be BANNED from this area or at least charged double to help clean up after them</p>	2010

	I am an avid private river user who canoes most of the western Colorado and eastern Utah rivers and have done so for the last 20 years. I have travelled down the Colorado River in the RHRA many times and also have grave concerns for the health of the surrounding land and the river itself. I am in hopes when all is said and done the new regulations will help restore this area to it's earlier beauty and lower the impact than it currently sees. (and this will be none to soon)	
Dogs	Having seen and reviewed the comparative to the various options on regulations I am in favor of either the alternate 'C' or even alternate 'D' if need be to insure a healthier recreation area. I note the following comments: while I comment the efforts to control dogs and there waste I have never seen 100% participation by pet owners anywhere to handle there pets waste so I world actually ban dogs on this section. If not then somehow enforcement will have to be dealt with (good luck).	2010
Dogs	The fee associated with bringing dogs is completely appropriate but should not be limited to two dogs per group. As long as pet-owners leash and pick up after pets, we do not believe that a limit of two dogs per group is necessary. We are unsure what a dog limit would be- is 4 too many or 6? A better way to limit dog "pack" size could be to make this part of the 25 group size which somewhat limits itself. We were unclear if this was described that way in the alternatives proposed. If the dog regulation needs to change, it can be changed at a later date based on analysis.	2010
Dogs	3.2.11 Dogs – We concur dogs are a problem and support management as part of party size and payment, continued education about picking up waste or elimination of dogs altogether.	2010
Dogs	5) Support counting dogs in the spots for a trip i.e. permit for 8 then allow 6 people and 2 dogs and permittee must pay for each of the spots on a launch basis (not camp nights.)	2010
Dogs	P.S. Totally agree with limiting dogs int he canyon to two per group. I actually love the idea of charging people a fee to bring their dogs, dogs actually have the greatest impact on the canyon. As we all know, most owners let them run free and shit wherever they please. Personally, I would prohibit dogs, but Westwater allows them so the run through Ruby should also adhere to these regulations. But when you start charging people for their dogs and limiting how many per group, I bet they will think twice about bringing them.	2010
Dogs	6.) Limit dogs to two per group. Charge the fee for each. Require clean-up.(We always leave our two at home. They can't poop in the Pett, yet.)	2010
Dogs	1)Dogs: Dogs are often more of a negative social impact than an additional person in a group; some folks recreate to get away from the normal routine at home, including caring for or being	2010

	around animals. When misbehaving or noisy dogs are encountered it often has a negative impact on people's recreational experiences. I would recommend allowing dogs on the river for a trial period with monitoring of visitor perceptions for 2-3 seasons. Many rivers do not allow dogs and that option should be kept open for a monitoring period before a final decision is made.	
Dogs	Page 27 -Dogs (3.2.11): If BLM has authority to require human waste carry out, fire pans, etc. then why should it not better regulate pets? The statement under "voice command or leash in high use areas" is preposterous. Who determines the effectiveness of a voice command? Do Rangers have Dog Whispering training?	2010
Dogs	Page 33 -Dogs & Pets (4.2.8): As in other management areas, in which you quote in the draft, ALL pets MUST be under physical restraint at all times. How in the world, for fees or other purposes, do you equate a pet with a human?	2010
Dogs	The plan proposes allowing two dogs per campsite/night. Please no dogs. Period. Most dog owners fail to follow leash laws, voice control and fail to pick up poop. A –two-dog-barking-all night is the same as a three-dog-barking-all night. Provide local kennel options with your permits.	2011
Dogs	Do Not Support (but propose a change): <ul style="list-style-type: none"> • Restriction of 2 dogs per group and charging a fee for each group. Consider no dog limit (it tends to self-limit in most cases) and do not include a per dog fee that contributes to group size. An option could be to develop an education effort with the “dog” groups around proper behavior, poop cleanup and wandering issues. Enlist local dog groups to sponsor dog cleanup trips (similar to current weed eradication or watering or tree/willow planting trips). • Personal water craft not limited, ban them from this section. They are noisy and annoy all the other users. These should be used on lakes (even then they are annoying) not rivers. Fishing boats tend to go up and down once, personal watercraft users tend to buzz around aimlessly. 	2011
Dogs	Do Not Support (but propose a change): <ul style="list-style-type: none"> • Restriction of 2 dogs per group and charging a fee for each group. Consider no dog limit (it tends to self-limit in most cases) and do not include a per dog fee that contributes to group size. An option could be to develop an education effort with the “dog” groups around proper behavior, poop cleanup and wandering issues. Enlist local dog groups to sponsor dog cleanup trips (similar to current weed eradication or watering or tree/willow planting trips). 	2011
Dogs	Dogs: if dogs are on trips, consider requiring dog wag bags on trips (just like firepan, ashcan and groovers).	2011

Dogs	Overall - it looks good and I agree with the need and proposed alternatives except:I am not in favor of dogs in the river corridor	2011
Dogs	<p>I have been enjoying RHRA for many years, usually twice per year. I have experienced several of the issues that have led to the proposed management plan and I support the permit and fee plan with the hope that it will allow the area to be better preserved. My only concerns are with the following:</p> <p>1. Requiring dogs to be on a leash at the primary campsites. This is acceptable to a point, but I see many dogs enjoying a swim with their humans, all get out, run back up river and splash back down again (myself & my dog included). Is there some sort of allowance for this free running play time? I see many kids & dogs doing this at Black Rocks and it would be a shame to prevent that kind of fun.</p>	2011
Reservations	2.) Camping permits only for the weekends, Friday, Saturday and Sunday nights. Current system for weekdays, Monday thru Thursday nights.	2010
Reservations	<p>If permitting is instituted, permits should be offered in a universal permitting system, where a trip leader reserves the permit for his or her group via a single common system, whether the group is noncommercial, commercial, or nonprofit. This system should be available via several methods: online, phone and fax to accommodate those with different technological skills. Safeguards can be instituted to ensure trip leaders have a defined group of participants beforehand. This system is in place and is working well to distribute high demand permits in such places as the backcountry at Grand Canyon National Park and Boundary Waters Canoe Area. Please see our Boundary Waters White Paper, attached.</p>	2010
Reservations	Page 30 -Camping Fees (4.2): That self-issued camping permits will solve the problem of overcrowding and use is hard to believe. It is more realistic to expect BLM like Orobus the worm that eats its tail, to develop a bureaucracy, only available from 8 a.m. till noon to accommodate issuing of permits. When you state customer service as a tenant of a management issue –I do not know of a business that does not answer its telephones after noon, on weekends or holidays. This same problem is applicable to issuing of any permits in the proposed action.	2010

	<p>I am a rafter and am neither in favor or opposed to permit systems to access Western US rivers. Some are good, some are bad. Westwater is currently one of the worst. Relatively, there are a lot of permits available, but they are a pain to get due to the call-in process.</p> <p>My request is simple. If a permit system is implemented, then have an online reservation system! The Westwater reservation system is AWFUL! I highly recommend the recreation.gov implementation that the permit rivers in Idaho have adopted: http://www.recreation.gov/permitFacilityList.do?contractCode=NRSO&topTabIndex=Permits</p> <p>I was just on the Selway river in Idaho and the USFS rangers there love the ease the new recreation.gov permit system offers. I love it as a user too. It is easy to go online and pick up cancellations in just a few clicks. Recreation.gov can support a first-come-first-serve type system or a lottery type system and both are easy to use/implement. Just make it simple, cheap, and online.</p> <p>Change Westwater permits to recreation.gov reservations while you are at it.</p> <p>Give Nancy a call at the North Fork Ranger District in Darby, MT for her take on how recreation.gov has helped the Selway permit process @ (208) 476-4541.</p>	2011
Reservations		
	<p>I would also suggest that if Ruby becomes fully regulated, & spur of the moment trips are not possible then the problems occurring with Ruby Horsethief will move somewhere else, Likely the Gunnison River, or below Cisco.</p> <p>I Truly feel that there are enough rivers with strict permit controls, we need to have a few left that accommodate last minute trips.</p>	2011
Reservations		
	<p>I would encourage you to look at the management of the Green River Sections A, B and C. It is a very high use area and they just charge \$14 per night for a campsite. I think a fee system of this nature would be much better. You could charge more for larger campsites. They also have an online registration system for some of the campsites.</p>	2011
Reservations		
	<p>Overall - it looks good and I agree with the need and proposed alternatives except: put the permit calendar online for ease of access and so we can see potential crowding issues</p>	2011
Reservations		
	<p>Overall - it looks good and I agree with the need and proposed alternatives except: make permits available by phone in advance or on site (so we don't have to go to GJ first)</p>	2011
Reservations		

	I am in full support of the BLM implementing whatever fees you deem necessary to protect this stretch. But would like to voice my opinion on the fact this is a backyard run for many of us Western Slope and Utah locals, and would like to see the permit system implemented in a way that the opportunity to the float this stretch still be reasonable (ie the number of launches / days on the river). I am not too concerned about the \$\$ to attain the permit assuming that the they would be similar to other rivers like the Rio Chama or San Juan, ect. for instance, but more about being able to attain one. Will the system be lottery or on a call in basis? Will I need to plan a Ruby-Horsethief trip like a plan a Desolation trip where I apply for a permit in February only to get rejected and then have to call in and pry for a cancellation? I really hope not.	
Reservations	Bottom line, something needs to be done, and I for one am in full support of the new system	2011
Reservations	While I would have liked to see the voluntary sign-up sheet work, it is apparent it has not because of a few. I bring my family from a few hours away and typically plan a weekend with 1-2 other families so I would be in favor of a permit system that allows us to book a site. This way we know we can make the drive over to Loma, put in and enjoy our day on the river knowing we have a campsite already confirmed.	2011
Cancellations	It would seem the in order to make the system work best, reservations would have to be paid at the time the reservation is made. Last minute cancellations would cause campsites to likely go "unused" because a willing group would not be able to obtain a permit, as the campsites would all be booked. An "open" permit with a somewhat "higher" user fee, that is non-refundable, along with a "compulsory" campsite signup, would reduce a majority of the conflicts and issues that have occurred with the current voluntary signup in the past. By failing to signup for a campsite, groups take the risk of being asked to vacate a campsite which a subsequent group saw as available and signed up for. This allows for flexibility in campsite choices at the put-in. This is also more akin to a first come-first serve system, yet would discourage groups from signing up for multiple campsites, if they have to provide a unique, valid, permit number ad part of the compulsory signup.	2010
Cancellations	Another concern is the proposed ability to cancel permits at any time with no penalty. This encourages last minute permit hoarding which really inhibits other groups from picking up a cancelled permit. We suggest requiring cancellations to occur at least 2 weeks ahead of their permit date and if not cancelled before that date, they would be penalized. A penalty could be that they can't pick up a permit for the remainder of the current and next season if cancelled less than 2 weeks or no refund in fees?	2010

Cancellations	What are the penalties for no-shows? Are fees 100% refundable if cancelled? By what date? How do cancelled camping permits get reissued?	2010
Cancellations	As the current proposal reads- you have NO incentive for those who paid for campsites to cancel if their plans change. It would be a selfish waste of a camp if someone reserved a camp and did not show up. PROPOSAL for consideration: An incentive to cancel by a certain number of days before their date to free up that camp for other users. Make it a sliding scale. For example.... 50% fee refund if cancelled 3 weeks before their date, 25% fee refund if 2 weeks before their date, 0% refund if less than 1 week before their date, ...	2011
Reference Model	Look at Flaming Gorge's system. The Green River below Flaming Gorge does not require a permit to float the river, same as Ruby-Horsethief. Demand for campsites on the upper section of the Green River is high enough that they need a reservation system to prevent conflicts. Their reservation system uses both a reservation board at Little Hole and an online reservation system through www.recreation.gov .	2009
Reference Model	(re: Flaming Gorge's system)To use sites from March 15 to October 15, campers must register the day of use at Little Hole or reserve them on-line. Campsites are on a first come/first served basis the rest of the year. At Little Hole there is a board that shows which campsites are taken or reserved and a strong box for registration envelopes and money. It looks to me like only Cottonwood Camp and Big Pine sites can be reserved online through www.recreation.gov . Their brochure lists a total of 37 campsites, but I believe only about 16 of these sites appear to be in high enough demand that they are on the board at Little Hole and must be paid for. The rest are free and available on a first come basis. The scarcity of campsites in Ruby-Horsethief would require that all campsites appear on the board at Loma.	2009
Reference Model	I do not think day trips should require a permit, however they should be required to carry Groovers. I would suggest a permit system similar to the one used by Utah BLM for Westwater Canyon. It is a first come, first serve system that requires people to call up to 60 days in advance to obtain a permit. I think it should be limited to 4 private launches per day, and 4 commercial launches per day with a maximum group size of 25 people. I would limit the trip length to a maximum of 4 days/3 nights.	2009

Reference Model	I have lived in Grand Junction for 30 years. I have been boating Ruby/Horsethief for 20 years as well as other sections on the Colorado and Green Rivers in both Colorado, Utah and Arizona. I worked as a commercial river guide for 6 years with two local Grand Junction river outfitters. I am now a private boater and do Ruby about 5 times per year. I have seen first hand the conflicts that arise due to the over crowdedness and lack of camps. I would suggest a permit system similar to the one used by Utah BLM for Westwater Canyon. It is a first come, first serve system that requires people to call up to 60 days in advance to obtain a permit. I think it should be limited to 4 private launches per day, and 4 commercial launches per day with a maximum group size of 25 people. I would limit the trip length to a maximum of 4 days/3 nights.	2009
Reference Model	I am a private boater who has enjoyed the Ruby/ Horsethief section of the Colorado river for many years. I do believe it should be an EASY permit to get- similar to the way West-Water permits are issued- 30 days in advance or even less time, like a week in advance.	2009
Reference Model	As a local rafter who has enjoyed the section of river for years.....If and when a permit system is implemented, I do have some suggestions..... Implement the permit system much like the Westwater Canyon system, where you do not have to get a permit six months in advance. Instead, you can plan you trip a little closer to the time of launch by calling 60 days in advance. A shorter period may even be better and eliminate the risk of people getting permits and not using them.	2009
Reference Model	I know that means some sort of permit, but I hope it doesn't become as hard to get a HR trip on the books as it is for Dinosaur where I'm 0 for 10 tries in the lottery. Maybe something like the call-in permit for the Gateway-Dewey section of the Dolores?	2009
Reference Model	Look at the system on the the Green River below Flaming Gorge for ideas.	2009
Reference Model	I think I have floated that stretch four or five times when I'm up from my southern Arizona home to visit the canyonlands. I really love that stretch and every time I have done it has been with novice boaters, usually new to the Canyon Country. I like the way Cat Canyon, Westwater, and the San Juan work. I can look at an on-line calendar, see if there are openings, and just go right to the managing agency and fill out the forms as I pass through town.	2009

Reference Model	I think I have floated that stretch four or five times when I'm up from my southern Arizona home to visit the canyonlands. I really love that stretch and every time I have done it has been with novice boaters, usually new to the Canyon Country. On the Rogue (a while ago, don't know if it is still that way) they metered the number of users, not launches, so if a solo or two person party showed up looking for a slot, it was "first come, first served" every morning if spots were open. I usually boat in very small groups (two or three, often solo) and am willing to take any ledge big enough for a bivy sack. I don't need a big beach to camp on. Please consider a system that permits users, not campsites. I guess what I'm saying is that if I'm doing a two canoe, three person trip and all the big camps are already booked, there should still be some flexibility for people who are willing to camp small.	2009
Reference Model	The San Juan and Desolation Canyon (Green River) currently have a permit system which allows camping anywhere and do not assign campsites. This spreads out the use, and allows smaller groups to camp at smaller sites when and where they wish to stop. I hope similar allowances will be made on the Ruby Horsethief sections, and also along the lower Green River.	2010
Camping System	Remember that things happen with camps: i) some people miss their camps, ii) some people run out of day-light and need to camp higher, and iii) some people simply don't know the system.	2009
Camping System	Allowing online reservations would be helpful to folks coming from distant locations.	2009
Camping System	While I generally dislike permitting systems, I see the need to implement some kind of limitations on the use of the resources during peak usage. I would like to address a few points that I think are important issues regarding this section of river and permitting systems. First of all, I have problems with assigning campsites before a trip begins, as happens for Westwater Canyon. In 10 years boating, I have had serious campsite issues only once. It is true that I have tried for campsites that were taken before I got there, but that is the nature of the activity, and we moved on to the next site. Furthermore, what happens when there is an on-river issue that a group needs to deal with? Suppose the not uncommon hurricane force winds pick up early, 5 miles from an Agency assigned site. Should I be forced not to stop early for the day, but continue down flat water in 50 mph winds? Or suppose someone on the trip misses the eddy. Would the Trip Leader be liable for the group camping at a lower site if the assigned site gets missed? For these reasons I think it is important to maintain flexibility in campsite selection, even if it is absolutely necessary to create a limited permit system. Yampa Canyon, for instance, is highly permitted, but campsites are first-come, first-served. The Grand Canyon is this way, as well.	2009

Camping System	<p>If it is determined that the number of people should be limited on a daily basis, I hope this will be done without limiting camping areas and without assigning camp sites. Perhaps layover days could be allowed anywhere except Black Rocks, where the use is heavier. I hope camping several nights in a row will not be limited in other areas. I would prefer first come, first served camping. The voluntary campsite system is just that, and can cause conflicts when boaters choose to camp in an area that others have signed up for.</p>	2010
Camping System	<p>My comments are based on my personal experiences on this river, and as leader of groups (groups size of 15 or less) of Boy Scouts. Camp sites to be assigned at time of permit and payment. Camp sites not-assigned can then be available at the boat launch, with payment made into a lock box at that time.</p> <p>I realize this essentially requires a ranger to be at Loma each day. So is not likely a good plan. But still a good objective.</p>	2010
Camping System	<p>My comments are based on my personal experiences on this river, and as leader of groups (groups size of 15 or less) of Boy Scouts. Can the big rock at Black Rocks be made a day-use area? (there are really 2 of these)</p> <p>Then, perhaps, this resource would be available to more persons. Also, this camp site is now very impacted.</p>	2010
Camping System	<p>Alternative C is a good option but consolidates all river campsites into this rigid process. We would propose supporting Option C contingent on excluding the campsites outside of the most popular Black Rocks area. For example, Black Rocks camps would be reserved by camping permits, all other campsites would be first come/first served being selected by boaters as they float downriver.</p>	2010
Camping System	<p>Alternative C could be adjusted to include more campsites as needed over time if further analysis indicates a need to add them into the reserved status (as opposed to “first come first serve”). By focusing on just permitting the Black Rocks area, this also allows for a smaller pilot implementation process and greater learning curve to see if this helps the resource and reduce congestion at this particular area.</p>	2010

Camping System	Chapter 3: 3.2.3 Camping fees, page 24. This document cites several other permit/fee systems in place. We request that Grand Junction BLM be consistent with Moab BLM- Westwater and nearby San Juan and Desolation BLM systems and use a LAUNCH based fee rather than a camping fee per night. We request you learn from their experience plus making it "match" will greatly ease our training of office staff, commercial trip advertising, booking and logistical concerns. Working with two different systems particularly for float through trips, will be very awkward especially as you have outlined in more detail in the Alternatives. Overall we oppose future management of Ruby-Horsethief using the "camping night" approach.	2010
Camping System	1)Please allow requests for specific campsites when people are calling in to obtain permits or signing in at the put-in. Those who have a strong interest in camping in a specific site as part of their itinerary (favorite site, hiking opportunities, schedule, etc) can make it a point to call in as early as possibly to try to obtain specific sites.	2010
Camping System	3)I would advocate designating more small camps with limits of 12 people (more than just Rattlesnake and Knowles 2). If these small capacity sites could be located in more remote stretches of the river visitor experience for these small groups may be enhanced by the solitude.	2010
Camping System	Page 31 -Camping : providing opportunity to "lay over' at Black Rocks, or anywhere else is a very positive management action. Referring to several of the previous social preferences, laying over provides the opportunity to relax, hike and explore, and better appreciate an area.	2010
Camping System	4.2.9 Camping stay limits. Limiting to one night at Black Rocks is fine for Friday and Saturday nights. If we would want to plan on having a layover day we could select a different site.	2011
Camping System	How do you propose to note which campsites are taken on the self-serve campsite permits?	2011
Camping System	You should think about NOT allowing parties to camp for more than one night at Black Rocks during peak times, so that more people get to experience that unique area.	2011
Mechanics-Method	Most BLM permitting systems favor local populations over those from far away. Westwater Canyon, for example, issues permits only sixty days before a launch. If one lives far away, how can they plan a trip, get people, take leave from their jobs and travel on such a short turnaround? It is obvious that the new system "favors" Moab, Grand Junction, and other nearby populations. One effect of this permit system is that it limits the business who rent river equipment to groups, mostly from far away. In addition commercial outfitters will most likely be given some form of favored status.	2009

Mechanics-Method	I think I have floated that stretch four or five times when I'm up from my southern Arizona home to visit the canyonlands. I really love that stretch and every time I have done it has been with novice boaters, usually new to the Canyon Country. Almost everyone going to R-H will be coming through either Grand Junction or Moab. It would be great if I could pick up a permit at the BLM office on my way through Moab rather than having to drive into GJ.	2009
Mechanics-Method	I think I have floated that stretch four or five times when I'm up from my southern Arizona home to visit the canyonlands. I really love that stretch and every time I have done it has been with novice boaters, usually new to the Canyon Country. Please make it so I can just drop into the BLM office and fill out the paper work, hand over ten or twenty bucks, and be on my way, not an on-line, pay by CC only system. The offices are staffed anyway; please make the permits available on a walk-in basis.	2009
Mechanics-Method	How would cancellations be handled?	2010
Mechanics-Method	Reservations – currently all call in. PLEASE- consider making it online so folks can pick up cancellations electronically.	2011
Mechanics-Method	Reservations- allow more than one alternate trip leader or allow permit holder to transfer to anyone on his/her trip.	2011
Day Use	I strongly oppose limiting day use. I strongly oppose any effort to control the access to this area by sportsmen who are fishing or hunting. However sportsmen should have to comply with all camping regulations. I strongly oppose any attempt to regulate the motorized boat traffic on this river if the boat is in compliance with state laws. I am aware that the Loma boat ramp is a sportsman access ramp paid for by DOW license fees that is jointly managed and maintained with BLM. But do not lose sight of the fact of how this boat ramp property was acquired and for what purpose it was intended.	2009
Day Use	Support not limiting day use BUT object to day users not having to get a simple self-issue permit and pay launch fees. You have chosen a camping based system but in doing so you are not addressing all management, launch and takeout costs (ranger labor, trash service, infrastructure needs.) At some point you will need to ask all users to pay a share of cost.	2011
Day Use	1) How will day floats be affected? 2) Will there be a charge for day floats?	2011

Operations: Day-to-day management, including camping, signs ,enforcement, and facilities

Operations (General)	Is the permit telephone number toll free? Will someone answer it during all business hours (8-noon) Mon-Fri? Not always the case on other river permit offices due to limited labor resources. Can permits be done online instead? Can the permit be transferred to someone other than the trip leader and alternate? Can the permit holder pay for just one person or have to pay for all at once? When are the remaining fees due?	2010
Operations (General)	How does permit issuing occur at the put-in?	2010
Operations (General)	7) We urge you to limit number of groups launching from one or at most two locations. Do not allow launch access points to proliferate- you will lose control and educational contact.	2010
Operations (General)	Page 32 -Campfires (4.2.6): How will BLM know if a group without a fire pan is going to have a campfire or not? Other management areas require carrying of a firepan irregardless of the user's intentions to build a fire. The same should hold true for Ruby/Horsthief.	2010
Operations (General)	Develop clear watering instructions for cottonwood and willow watering projects and include in every permit receipt packet. Many boaters do not know what to do with the big orange barrels. Bucket's are obvious, barrels are not so obvious.	2011
Operations (General)	Thank you for all the work you have done on managing this wonderful resource. I am a long way from Ruby-Horsethief (southern Arizona) and don't fit the main user demographic. I have run it four times, mainly to access the lovely side canyons. All of my trips have been during the weekdays and off-season. Finally, I don't have a credit card. A pay box at the put-in such as you find at any drive-in campground, or the ability to pay at the Moab office would save me a lot of driving since I come up from the SW.	2011
	Lastly, I am not clear from the proposal if the self-issued permits (Sunday-Thursday) have the same stipulations as the Field Office permits. Initially, I was under the belief that the permits would be for the busy weekends but would be relaxed for less hectic times. This should include the fees and limitations when unnecessary.	
Operations (General)	The people who recreate in the RHRA, in general, recognize the need to develop a management plan. The current proposal needs to be simplified to encourage compliance. The fees need to be reduced and layover days at Black Rocks needs to be an option for the initial permit holder. Permit fees should only apply to the Field Office issued (Friday-Saturday) permits. Please consider these recommendations.	2011
Camping Ops	Continue to facilitate camp sites (plant posts and work the sites – consider volunteer efforts).	2009

Camping Ops	The online reservations would require that the ranger at Loma keep it current with info he gets via cell phone or laptop with wireless internet access.	2009
Camping Ops	We support limiting overnight camping to one night within Black Rocks per group (Fri/Sat), not limiting day use, requiring firepans, ash removal, portable toilets, packing out trash and carrying out dog waste.	2010
Camping Ops	6) The "overflow" i.e. missed -my -campsite option at May Flat should not be necessary if fewer groups are allowed to launch each day and if campsites continue to be assigned in advance or at the launch point.	2010
Camping Ops	4.) One night restriction at Black Rocks, all days of the week. 5.) Only established campsites, always. Consider adding new campsite locations.	2010
Camping Ops	I strongly support the development of additional campsites, and elimination of shared sites. With respect to assigned sites, I have mixed feelings. In some cases, high water makes it difficult to "catch" your assigned site (particularly with the currents at Black Rocks, but also at sites with a steep bank and fast current). Also, we were floating through Black Rocks the day that Knowles caught on fire, and seeing the smoke, we elected to stop at the last Black Rocks space rather than proceed around the corner into a wildfire. (We worked out a sharing arrangement with the group that had signed up for that site.) I'm not sure where May Flat is, but it would be nice to have a designated overflow area somewhere within the canyon, and not down in the farmland near Westwater.	2010
Camping Ops	Finally, the requirement to camp only in designated sites should only apply upstream from Knowles. We once camped on an island downstream from there that had cattle on it--if cows can use the beach, people should be able to as well. We normally have a very small group, and always use a firepan and groover, so we have a small impact--certainly smaller than cows.	2010
Camping Ops	Regardless of whether campsites are assigned or not, I would like BLM to provide information (both at the launch, and on your website) describing the sites. It would be helpful to know whether sites have a beach or bank landing, which sites have a useable landing at high water, and which sites have shade. (Even after 20 years, I can't remember all of them.) On our trip last week, we signed up for Knowles 2, only to find that it had a steep muddy bank with sharp sticks and a snag immediately downstream, and since the current was strong, this would be a dangerous place for anyone to slip into the water.	2010
Camping Ops	Please develop a comprehensive map of this corridor to include assigned campsites (size, availability at different water levels, etc...). This will help lessen confusion on where camps are located and hopefully minimize the fallback use of May Flat campsite.	2011

Camping Ops	I desire the opportunity to camp at smaller, more isolated sites. RH is popular with large groups who like to have big fires, drink some beers, and tell stories and laugh late into the night. I am glad that they can do so; however, for a small group seeking a quiet outdoor experience, it is hard to find a suitable camp. Most camps host two or more groups, and single camps often fill early. Camping at Black Rocks or Cottonwood, it is almost a guarantee that another group will have off-leash dogs, screaming kids or waterfights, or will want to party late into the night. I would like to request the creation of several small, single camps to support quiet recreation.	2011
Camping Ops	The "I call dibbs on a camp site" system doesn't work because so many people have no respect for it. I have arrived at my registered campsite early in the afternoon to find others there and, unfortunately, they often have a nasty attitude. The system has broken down into one of bullying - the rule breakers get what they want and those trying to do it right suffer, which is never a good thing and leads to more people going over to the dark side. I have often camped in iffy places in the Black Rocks area and watched really nice sites site empty because they were reserved by people who did not use them. I would gladly pay to use the launch area and to reserve a campsite just to avoid these issues.	2011
Camping Ops	You might consider designating a few more campsites below Black Rocks, since camping in that area is sparse and could be attractive to those who are traveling through Westwater Canyon.	2011
Camping Ops	Perhaps more small campsites should be designated for small parties so that they do not occupy the large group campsites.	2011
Camping Ops	It's scary to me to think that you might restrict usage of Ruby Horsethief to only the number of developed campsites along that stretch. (The number I hear rumored is 35.) While the Black Rocks area gets crowded, I don't think the rest of that stretch of river is over-used at all.	2011
Camping Ops	Second, the plan does not allow for layover days at Black Rocks. Again, this will lead to noncompliance as groups will attach different names to the permits to allow them to stay two nights. Layover days are very desirable as they allow for relaxation and exploration and should not be discouraged.	2011
Camping Ops	To reserve the developed campsites, I think: Large parties need much more regulation than smaller ones, but they should probably get dibbs on the larger campsites	2011

Sign Ops	There needs to be a simple somewhat large sign on river right above the Loma boat ramp: Pull In Here - Pay Fee, Campers - Reserve Camp Site Fire Pan and Groover Required.	2009
Sign Ops	The sign-in board needs to clearly show camp sites and state the regulations. Supply hand-outs on trash, fire pan and groover usage (this is a training ground for new boaters – communicate at a 3rd grade level). Have a fee drop box for when the ranger is not present (there will be some who don't pay, but the majority will – we must accept this and not get to crazy about it).	2009
Sign Ops	Page 28 -"Wilderness": I am curious to learn how camp site signs are an accepted practice in designated Wilderness or WSA 's.? My above comments are relevant to the alternatives listed in Section #4.	2010
Takeout	If there were any management actions that should be considered for this section of river, it is the creation of an additional take out ramp (not just the single additional lane) at the Westwater Boat Ramp).	2009
Takeout	I run this section regularly - usually in July. The issues I see are the campsite reservations (lack of) and general goofy floating behavior by "private boaters" that use air mattresses and jet skis, etc... not the "real private boaters". The put in can be congested but probably more so, sharing the takeout/putin at Westwater is awful. We really need a separate takeout upstream of the WW put-in and this would solve a lot of issues.	2009
Takeout	PLEASE, use fees to defray the costs associated with creating a new Ruby/Horsethief takeout above the current Westwater Ramp. Separate the traffic coming off the Ruby/Horsethief run from those putting in at Westwater and this could greatly improve congestion at this small takeout area.	2010
Takeout	I strongly support another takeout at Westwater, along with action by rangers to keep moving people along. We arrived at Westwater very early last weekend, to find the ramp clogged with private rafts waiting for their shuttle. The BLM employee on site didn't lift a finger to get the group to move their boats off the ramp while we were there (however, he was very good at playing guitar in the shade). We managed to clear out one slot to take out our two rafts, but we were competing with two large commercial groups that were trying to launch on schedule. So another ramp on the north end of the parking lot, designated for takeouts only, would be very helpful.	2010

Takeout	Page 8 -Westwater Take Out (1.8.3): There is no substantiation for the figures quoted here. Does the 85% figure include private and commercial outfitters'?	2010
Takeout	Develop an additional (& dedicated) takeout ramp for Ruby/Horsethief boaters above the current Westwater put-in to relieve congestion. Please, please , please... This has been an issue for decades. Maybe this is where the fee revenues can go to begin with .	2011
Enforcement	I couldn't think of a better way to raise awareness of peoples own actions then to invoke some sort of permit system...and giving the BLM officers (if possible) and the Rangers the ability to write tickets for infractions.	2009
Enforcement	I wanted to take a minute to give my feedback on the Ruby Horse thief section of the river since I do run it 2-3 times a summer with my family. I'm not in favor of a formal permit process as this is a river that we enjoy always being able to do a multi-day trip on and can do it without months of advance planning. I would however be in favor of rangers having the option of fining parties that do not sign up for camp grounds or end up stealing other groups camps sites. I have had this issue happen to me several times on the river and it is definitely not great to find someone in your camp site. I would also be in favor of having rangers check groups for appropriate gear like fire pans and groovers so the camp areas will remain a high quality.	2009
Enforcement	I am a 14-year private rafter... this is a good place to learn to row a raft and was one of the places I first rowed, but just because it doesn't have Class IV rapids doesn't mean it's Disneyland. Proper equipment is a must and should be enforced, due to the difficulty of quickly getting help. There have been many rescues of in-town floaters on an innertube or Walmart "raft" and/or without a PFD who can reach help with a cell phone or by road pretty quickly, but this is not the case in RH .	2009
Enforcement	I'm a past volunteer ranger for BLM for Westwater. I realize the juggling act you are managing with this process for the Horsethief-Ruby corridor. I think we need an enforcable system like we had at Westwater where the ranger can turn folks away if they don't have the right equipment or limit overnight groups to insure managed camping.	2009
Enforcement	Stiff fines for toilet and fire pan violations	2009
Enforcement	When we are on the river, I never feel crowded. The push for a permitting system to fix behavior problems does not make sense to me. Requiring firepan, groover and campsite selection before launching seems like a good idea. That could be done just like following rules on any public lands are handled- enforcement at the put-in. Not sure how restricting capacity got set into the mix of a permit system other than crowding at the takeout.	2009

Enforcement	<p>It is not acceptable for BLM to make regulations they cannot or will not enforce. I have seen a decline in BLM law enforcement in favor of administrative support on this river section for years. How many full time and seasonal persons are used on the river as compared to how many law enforcement rangers are dedicated for the area? Not just the river, but also the entire BLM regional area. Please hear me, I am tired of this.</p>	2009
Enforcement	<p>Overall enforcement of regulations is a major concern of mine. BLM historically makes new regulations in an attempt to manage the land. Most people are compliant with the existing rules, regulations, and laws. It is a small percentage of the public who openly refuse to follow any of these regulations. BLM makes more regulations to correct the few that don't comply. These regulations cause me additional restrictions. If BLM does not include LAW ENFORCEMENT of existing regulations and proposed new regulations I will oppose any changes that BLM suggests</p>	2009
Enforcement	<p>My second area for concern involves "river etiquette" or lack thereof. I feel the higher traffic numbers on the river in recent years have produced a breed of boater that has little regard for others. It seems the few have ruined it for the many. On page 13 of your proposal, you list the following benefits...</p> <p>Individual Benefits – psychological and physiological (most significant)</p> <ul style="list-style-type: none"> • 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 <p>Alcohol and drug abuse, loud music from boom boxes, nudity and foul language hardly "increase the quality of life" as mentioned in bullet #5 listed above. The seventh bullet above might be the key to solving this problem by distributing a pamphlet at the Loma launch site educating people about river etiquette. I realize that this is a tough problem to solve and that some people can't be educated. Perhaps enforcing stiffer penalties to violators might help.</p>	2010

Enforcement	I also believe there does need to be tighter control over the requirements for toilet systems, firepans, etc. It has been my experience that a large number of the private users who run only this stretch of the river typically do not outfit themselves in the same manner that most multi-day users do. There are also typical issues with commercial outfitter customers who do not have the vested interest in insuring that the quality of the Canyons remains for others. They are there for a single trip and have no plans to return. While it is up to the outfitters to insure that their customers follow the regulations, it is often impossible for guides to keep an eye on everyone all the time.	2010
Enforcement	Option B would be the second most preferred option and is the most flexible for all involved. Unfortunately first come/first serve camping could inspire camp grabbing (sending one boat/kayak down river to grab a campsite first). Camp grabbing should be prohibited and monitored by the rangers as with any other regulation- it is usually fairly obvious.	2010
Enforcement	For boaters continuing through Westwater, do they pay \$14 on their transition day? Or do they get a credit on their last day instead of paying twice?	2010
Enforcement	Who enforces the camping permits? What happens when one group decides not to move out of "their" non-assigned campsite?	2010
Enforcement	Please use fees to defray the costs associated with increasing ranger patrols on the river to educate boaters. Particularly concerning firepan, toilet and leave no trace camping guidelines.	2010
Enforcement	Meaningful enforcement of the existing toilet and firepan regulations, especially during high season, is the single most important thing BLM can and should do to protect the resource.	2010
Enforcement	Now there will be a Ranger on-duty on the weekends, with the fee enforcement, will the Ranger require to see a groover, firepan, and all the necessary equipment to keep the area safe and clean?	2011
Enforcement	The crowding and chaos have gotten much worse at the launch area, especially on the weekends. But once people get out on the river, the groups really spread out and the experience is very pleasant. There are a lot of people at the put in who do not respect the fact that others want to use the ramp area, too. It's not unusual for people to spread their boats out across the waterline and sit there for 1.5 hours or longer while they run their shuttle. Dogs run wild, as do small children that no one seems to be watching as others are driving vehicles around and backing trailers in. A little official direction and etiquette education could go a long way in preventing a lot of the problems.	2011

Motors	In my opinion, one of the most detrimental uses of Ruby/Horsethief Canyons is power fishing boats. The management objective of the RMP that users should be able to enjoy a "naturally-appearing red-walled river canyon" is not served by allowing loud motors and fast boats. Wakes, and their associated wave propagation, promote significant erosion of banks and beaches. Furthermore, the type of users who engage in motorized boating, are often less inclined to protect the resources and treat the environment with respect. (I realize that this is a stereotype and that not all motor-boaters litter, just as not all floaters are respectful of the environment.) If motors must be allowed, I believe that at least upstream travel should be prohibited. There are numerous other options for motor boats in the area, including Blue Mesa Reservoir, the largest body of water in the state, around 2 hours away, and the Colorado River between Cisco and Moab, not to mention the numerous smaller reservoirs in Western Colorado.	2009
Motors	I suggest that BLM could reduce the number of people on this section of river by broadening their management plan for providing river access and takeouts that are trailer friendly along the Gunnison River and the upper DeBeque Colorado River Canyon area. People do not use these sections as much as the lower Colorado simply because access is nonexistent, not accessible with trailers or are in poor condition. Diversify the river experience by providing more access within Mesa County.	2009
Motors	I am an avid private river user who canoes most of the western Colorado and eastern Utah rivers and have done so for the last 20 years. I have travelled down the Colorado River in the RHRA many times and also have grave concerns for the health of the surrounding land and the river itself. I am in hopes when all is said and done the new regulations will help restore this area to it's earlier beauty and lower the impact than it currently sees. (and this will be none to soon) Having seen and reviewed the comparative to the various options on regulations I am in favor of either the alternate 'C' or even alternate 'D' if need be to insure a healthier recreation area. I note the following comments: While they are allowed now I am in favor of NO MOTORIZED WATER CRAFT of any kind other than BLM on this stretch of river	2010
Motors	Please eliminate jet ski's from the Ruby/Horsethief river corridor- they are very obnoxious (both in behavior and noise). They go up and down continuously (not like a power boat that passes at most twice). Kind of like a chainsaw running in the background of such a peaceful canyon.	2010
Motors	We support current management allowing downstream motors and jet boats as long as education at permit issuance and the ramp continues as to group encounter protocol. We oppose continued use of jet skis.	2010

Motors	Page 21 -Motorized Use (2.4.3): Given the behavior of some groups, which appear to be primarily from the local community, it is hard to believe that motors are the "primary" noise complaint generator. What statistics support this statement?	2010
Motors	Page 76 -Motorized Boating (3.2.7): If there is an issue that needs control within Ruby and Horsethief Canyons it is the use of personal water craft. The users of personal water craft do not carry human waste systems, garbage containers, fire pans and other items required of river runners. This issue (personal water craft) needs a more thorough treatment in The Draft.	2010
Motors	Page 32 -Personal Watercraft: In this entire document you focus on rules and regulation of rafters and canoers. BLM seems to be able to manipulate and regulate those users, yet is impotent to implement rules and regulations for jet skiis. Why is that not part of the plan? Do they not infringe upon the resource of visitor experience?	2010
Motors	Do Not Support (but propose a change): Personal water craft not limited, ban them from this section. They are noisy and annoy all the other users. These should be used on lakes (even then they are annoying) not rivers. Fishing boats tend to go up and down once, personal watercraft users tend to buzz around aimlessly.	2011
Motors	Thank you for all the work you have done on managing this wonderful resource. I am a long way from Ruby-Horsethief (southern Arizona) and don't fit the main user demographic. I have run it four times, mainly to access the lovely side canyons. All of my trips have been during the weekdays and off-season. I fully support your plans to put the river corridor under permit, but I have a few comments. Motorized use of any kind is objectionable. Yes, I know there is a railroad. Still... mechanized access to an area like this, especially by Personal Watercraft, is almost sacreligious. They already have access to so much. Can't we keep a little for oars and paddles? At the least, a limit on speed and horsepower?	2011
Motors	I support the new permit system for Ruby-Horsethief. Weekends in late spring have become ridiculously overloaded and the resource is clearly suffering. We've stopped doing weekend trips because of it. It's time to limit the number of users on weekends. My concern extends to motor traffic on the river. Is it possible to restrict motor traffic?	2011

Other operations	Why not take advantage of the users in providing manpower for various maintenance/improvement measures? For instance, offer advance reservations or increase permit availability to groups that are willing to work with the Agency to remove invasive species after the Agency has treated them. Or assign a campsite for a group to "rehab" by removing partially burned wood/coins from beaches, removing trash, and closing social trails for revegetation. We are out here and we want to help!! Even if such a program were limited only to times when Agency crews are on site and able to supervise and direct activities, such manpower as the boating public can provide would be an invaluable resource.	2009
Other operations	To see out funds used more efficiently it is time for the BLM to give up the motorized rafts for routine daily use. It takes extra manpower and vehicles to provide the daily shuttle. Significant time is spent traversing the canyon by this means. You are in need of a motorized jet boat for patrol, fire fighting, education, rescue and conservation. I would like to see my dollars used more efficiently to provide services. The riverboat(s) will save money and increase effectiveness and work product.	2009
Other operations	Page 27 & 28-Physical and Social Monitoring (3.2.17): The details of the physical and social monitoring program are only listed as basic goals and objectives. In order to properly review and comment on this segment the parameters of this "study" need to be provided to determine its validity.	2010
Other operations	2. Consider publishing a list of places at which the porta-potties can be emptied (Fruita welcome center) and where dog feces can be safely discarded.	2011
Group Size	Group sizes should be limited; yet a few limited areas should be made available for people/outfitters that get special permitting for oversize groups. There is a legitimate use for large groups on the river. They should be accommodated by special permit and possibly extra fees.	2009
Group Size	Also, small groups can camp in undesignated sites without impacting the large sites, and with minimal impact. One of the nice things about this stretch of river is the freedom to stop where one wants to and explore areas that may not be as impacted as the areas the hoardes of people prefer to use.	2010
Group Size	Groups: In general, I feel more groups with less people is preferred. I have encountered church groups, with large float-tillas / duckies blocking the river with lots of dogs. Making the trip no so enjoyable.	2010

Group Size	Group size is not clearly stated in the DRAFT plan. It should be compatible with the long standing plan downstream in Westwater as 25 guests + crew.	2010
Group Size	<p>Some type of permit system for the private sector in particular during the peak season of use is long overdue. 1) CFI disagrees with the initial prescription of reducing impacts on resources and experiences by limiting group size to 25. We strongly support FUTURE prescriptions and the final plan allow for 25 PLUS guides for commercial groups for two reasons:</p> <p>a) Our primary clients are school students, middle school through college in age. It is necessary to have this group size because most of the groups come as a classroom of about this size and they wish to travel and study as a unit. The 25 passengers includes the teachers/chaperones in the count (usually 2-3 chaperones with 20-22 students.) The larger group size is necessary to keep the trip fees affordable for most students.</p> <p>If you reduce to 25 total, that will eliminate Ruby-Horsethief as an option for many school groups willing to use a licensed outfitter. On page 20, statistics are presented showing average commercial group is 16. While this may be the average, we urge you to consider the nature of the various audiences served by the commercial sector, and in this instance, the need for schools to have larger group opportunities.</p> <p>b) BLM Moab Field office manages your downstream neighboring canyon, Westwater, for group size of 25 plus guides for commercial groups. For the sake of consistency in planning and selling “float through” trips it makes the most sense to match Westwater’s already established (and tested) system.</p>	2010
Group Size	3) Group size to be 25 private or for commercial, 25 PLUS guides. Please match Moab BLM/Westwater policy here. Limit on guides/staff can be created following Moab BLM language for Westwater on this matter.	2010
Group Size	<p>I think group size of 25 is way too high. One of the main reasons that the river feels like a zoo is that there are lots of big groups. Smaller groups on the river would simply be less zoo-like than big groups.</p> <p>In my observation over the last 12 years, the huge increase in number of people on the river is primarily due to two factors: 1) the big increase in raft ownership (10 years ago it was mostly canoes on this river) and 2) email – which has enabled people, particularly families, to organize trips of large groups. These logistical and social changes call for new group-size limits.</p> <p>I’d suggest 6-10 as the group size limit. If that’s a business issue for commercial groups, perhaps they could be allowed up to 15-18.</p>	2010

Group Size	The only additional, but significant comment is to please keep the commercial group size at 25 people, not including guides.	2010	
Group Size	Unless these concerns can be addressed and answered I would recommend; Alternative A No Action. Alternative C (partial office) could be acceptable when these areas of concern are addressed. (2) Language should be changed to reflect a group size of 25 plus guides for commercial trips.	2010	
Group Size	The way the EA reads now is that groups will be charged by the campsite they occupy and not group size. By charging by campsite size, you effectively exclude small groups from staying at a camp that offers a particular hike they may want to take. This also comes into play when you have many small/medium groups applying for a permit. If someone calls for a medium size permit and one isn't available, are you going to make them pay for a large group permit instead even if space is available? The size of each camp needs to be included in the EA to fully address this issue. The fees you propose seem in line with other BLM managed rivers in the area on a per person basis, but I would recommend that you permit based on group size. Let camp usage get figured out at the put in.	2011	2011
Group Size	My other comment is that guides should be included in the 25 person limit. The river management plan limits the group size to 25 people for a reason, to limit the impact on resources and other users. Guides are not gods that float around on a cloud making no impact. They will have tents adding to the campsite footprint, make noise, congest the put in, walk and make the the same social trails as anyone else. Why would you deviate from the original plan just for guides? The impact of adding another 4-5+ people to commercial groups, making the sizes 29-30+ people, should be analyzed in the EA and a reasonable justification should be made as to why they get special treatment.	2011	
Facilities	Please use fees to defray the costs associated with enlarging the parking area at Loma to support more shuttle vehicles with trailers	2010	
Facilities	3) Current plans state "BLM will increase on-site presence at the put-ins." Elsewhere it is proposed to upgrade the Fruita launch site and consider additional launch sites. From our experience in working with establishing a pilot and final private permit system for Labyrinth Canyon on the Green River, we learned that having multiple launch sites is more a curse than blessing in terms of meeting administrative objectives of limiting use, visitor education and fee collection. Several times in outfitter meetings with State Parks and BLM, it was determined that stricter limits on use or campsite assignments/enforcement would have been easier if there was once launch site for Labyrinth. More sites means more cost and likely greater difficulty in meeting administrative goals.	2010	

Facilities	Page 32 -Improving the Loma Boat Ramp: This is a part of the oxymoron in the draft. Improving the Loma Boat Ramp will INCREASE the ease of use and thus INCREASE the number of users. A great example of this was the improvement of the access roads to and from Westwater. Prior to improvement one had to consider the weather and road conditions to access and leave the river. When the roads were improved there was all associated increase in use. Consideration should be given to NOT improve the Loma boat ramp.	2010
Facilities	3.2.8 Access. I strongly recommend against developing additional boat ramps. You are increasing administrative costs and creating administrative nightmares for permit management if you do so.	2011
<i>Other: Comments addressing a specific concern, or those that do not fit into another category</i>		
Other	And please, no lottery or restricted permitting should ever be considered.	2009
Other	The Colorado River is NOT part of the McInnis Canyons National Conservation Area. It was specifically exempted from the legislation creating the conservation area. Everything to the 100-year flood plane is exempted. This includes the camping areas in question.	2009
Other	The Colorado River is a navigable waterway used for interstate commerce. Be aware of Colorado State law on this.	2009
Other	Please do not manage this river as a wilderness experience. This is a multi-use river with a freight train track along it. It is not a wilderness. Manage this area as a recreational area with scenic qualities. It is an access point for a wilderness area much like a road is. Don't try to artificially create something that doesn't exist.	2009

Colorado Discover Ability (CDA) would like the BLM to implement a pilot program that provides a user-day allocation for access to the Colorado River in the Ruby -Horsethief Recreation Area for people with disabilities. Although CDA currently has a Special Recreation Permit (SRP) issued by the BLM and is thus is a licensed commercial river outfitter for this stretch of river, there are many non-profit organizations (typically with 501c3 tax status) which provide educational and therapeutic services to people with disabilities (typically referred to as "adaptive sports organizations") that already do not have fair access to eight (and if Ruby-Horsethief use is limited, to nine) stretches of river managed by the BLM. These adaptive sports organizations do not qualify for private permits under current federal regulations and their only access is through select organizations that own Special Recreation Permits.

We envision this pilot program to be similar to the pilot program established by Dinosaur National Monument thirty years ago, but limited to people with disabilities. The reason for this limitation is not because that population is served in particular by adaptive organizations, but because the US Congress passed the Americans with Disabilities Act in 1990 and other populations have not been given protection from discrimination under federal law. The pilot program should be flexible enough to accommodate fair access to a limited resource. A fair percentage based on the current used days data should be reserved for organizations that provide educational or therapeutic services to people with disabilities. If this pilot program is successful, it will serve as a model for fair access for the disabled to other restricted access river segments managed by the BLM. We believe that such a program could be deployed within existing management plans.

It has been well documented in the public literature that when people with a disability learn a sport (not necessarily an outdoor sport), several very beneficial things happen to them. This includes but is not limited to improvements in their health, self-confidence, and life skills. As a result their interest in learning and the likelihood of getting a job also improve. The cost of teaching people with disabilities any sport is largely borne by donations to tax exempt organization such as ours.

Other

2010

There are several reasons we believe such pilot program would be viable under proposed Ruby-Horsethief Recreation Area Management Plan :

1. Seeing what has already happened on other, BLM-managed, allocated rivers, it is clear that the few companies with Special Recreation Permits that can provide trips for people with disabilities do not meet the demand and/or do not meet the care requirements provided by the adaptive organizations. Such pilot program would allow for increased demand by people with disabilities and would prevent creation of commercial-outfitter-only monopolies.
2. Adaptive river outfitters focus on educational and therapeutic river trips for the disabled and can better satisfy the demand.
3. The existing commercial river outfitters that would like this business don't have the resources to focus on river trips that provide therapeutic benefits and don't meet such demand.
4. Most commercial river outfitters must charge a much higher fee for their services than organizations such as CDA, which are powered by volunteers, donated river equipment, donated transportation equipment, and receive donations for administrative costs. The typical commercial cost is up to 200% greater than the cost for most adaptive sports organizations. As a result, in order for non-profit adaptive organizations to provide educational and therapeutic services to their clients on rivers where BLM regulations force them to buy trips from an existing vendor, adaptive organizations must reduce the number of clients they can serve by 50% or more.
5. Adaptive, non-profit organizations concentrate their efforts on specialized, adaptive trips, to include development of such trips, underwriting the cost, and marketing to appropriate audiences. We would like to make sure that any proposed plan does not create a situation where adaptive groups must buy trips from existing permit holders in order to float through Ruby-Horsethief. A Resource Management Plan that would not accommodate unique dynamics of the adaptive organizations and that would prevent them from running their own trips without a commercial SRP, would take away the incentives for investing in the development and operation of adaptive river trips. As with most companies, adaptive organizations develop and fund their programs based on ownership of those programs. BLM should prevent the permit holders from viewing the adaptive organizations mainly as their booking agents and as a means for providing administrative overhead, developing the client base, and a funding source for commercial operators that have no obligation to reinvest or invest into programs for people with disabilities.

Other

2010

Other	Currently, the BLM has a provision for anyone to apply for a Special Recreation Permit for most land areas and many river segments that are not fully allocated and these are one-at-a-time SRPs. Currently BLM issues SRPs for annual use with multiple entries for river segments with limited commercial access, which is very different from the one-at-a-time SRP. We would suggest that the pilot program begins by issuing one-at-a-time SRPs to adaptive sports organizations, perhaps on a lottery basis if demand exceeds capacity. The details can be worked out in consultation with interested adaptive sports organizations. If BLM chooses to model its pilot program on NPS's Dinosaur National Monument program, we would like to provide a set of suggestions on how to modify and update that model to turn it into a truly viable opportunity for adaptive river outfitters and for people with disabilities that rely on them.	2010
Resource Concerns	I am NOT in favor of limiting travel upon the river because of perceived wildlife issues not based on study, fact and public input. The closure of upstream travel after the Utah State Line is an example of creating closures that concern me. I realize this is Utah BLM's directive and not Grand Junction's BLM closure. But as a sportsman I will be carefully monitoring any such travel/wildlife restrictions that may be proposed within Colorado.	2009
Resource Concerns	Lastly I am concerned with the Quagga Mussel and the Zebra Mussel threat to our waterways. Is it not time to start considering inspection of equipment entering the Colorado River? The State is taking a proactive approach. It would be nice to see BLM cooperate along those same lines, especially with all the out of area craft that visit this area	2009
<i>Comments addressing commercial outfitting, including the commercial-private split</i>		
Commercial Outfitting (General)	5) Additional comments on Commercial Use (page 21). We support careful issuing of new outfitter permits as may be warranted. However, we oppose the creation of an "in between" new category later outlined for "educational groups." We are an established educational outfitter who meets all state and federal licensing and permit requirements including insurance that co-insures these agencies. We have long invested in a business model that includes fundraising to help underwrite youth fees and offer scholarships. We have a curriculum that matches Utah and Colorado science standards and train our guides not only in river skills but to be effective outdoor educators. We oppose the periodic issuing of "educational" permits to groups that are in fact commercial i.e. faculty being paid but yet are not meeting requirements of Utah and Colorado State Parks as commercial outfitters.	2010
Commercial Outfitting (General)	4) No new "inbetween" category be created for educational groups. Keep with purely private in nature or commercial. Direct inquiring schools, youth group or other special population groups to EXISTING commercial permittees, or consider issuing a few new commercial permits to those serving these groups.	2010

Commercial Outfitting (General)	<p>I, unfortunately, support only alternative 4.11 A- No Action at this time. 1) The 'action' alternatives all constrain Outfitters to a historical number based on the last five river seasons. Not only is it patently unfair to constrain 20% of the users (public outfitters), but it is simply meaningless when 80% of the users do not have this kind of restriction. This is also a period of time when we here at Adventure Bound have pulled away from camping in Ruby Canyon because the experience was becoming more and more overrun and did not meet the standards we work toward and have the ability to provide in Westwater Canyon, Canyonlands National Park, Desolation Canyon and Dinosaur National Monument.</p> <p>2) The defined group size implies that Outfitters will be held to a group size of 25 including guides. This will cost our company jobs and will be a detriment to the resource. The plan needs to acknowledge the need to have a full staff to provide quality care to the public and to best protect the resource.</p> <p>3) The plan fails to sort out the details concerning how the camps will be divided between outfitters. Adventure Bound does hold a BLM Special Use permit in Westwater Canyon, no consideration was made in the plan concerning the coordination of the launches we hold 'downstream'.</p>	2010
Commercial Outfitting (General)	<p>1.2 Purpose and Need states that that commercial outfitters were capped at 34 in 1998 and down to 30 in 2009. Later in 2.4.5 it states that there are currently 21 commercial outfitters permitted in RHRA. I am curious as to the difference in number, what happened to the 9 outfitters that were formerly permitted? "The limit was set to achieve XXX goals" (what does the 'XXX' represent)?</p>	2010
Commercial Outfitting (General)	<p>Unless these concerns can be addressed and answered I would recommend; Alternative A No Action. Alternative C (partial office) could be acceptable when these areas of concern are addressed. (4) Clarification of how commercial use will be allotted between outfitters.</p>	2010
Commercial Outfitting (General)	<p>In this section it is noted that the relinquishing of commercial permits is an unfair decision. It is difficult to understand why one of the user components who have the least impact upon the Canyons should be the portion of users to be discriminated against. This is especially as (page 23 -3.2.2) your statistics indicate that there is already a decrease in the percentage of commercial use.</p>	2010

Commercial Outfitting (General)	no where in the Proposed plan could I find reference to how commercial training trips will be managed i.e. will these count against one of our trips allowed per year? Or just if the trip falls between May1-September 30? (for example if CFI's allocation is six trips, will we need to use of these slots for a training trip?) Will campsite reservations and payment be required for these training trips for trainees as well as guide/trainers? In a trip that is mixed commercial customers and trainees and guide/trainers, how will trainees be counted and assessed?	2011
Commercial Outfitting (General)	Commercial outfitters should NOT get any preference or special allotment of camping permits, they should pay considerably more than private boaters for camping and launching permits (they are using our public lands to make a profit!), and they should NOT receive camping permits for summer weekends, when the demand for camping is at it's peak.	2011
Commercial-Timing	I have only two areas to comment on. The first is a possible December 15, deadline to submit trip dates. Granted, I should have my following season schedule complete by then but schedule changes may occur as late as May or June. A Dec. 15, deadline would remove a lot of flexibility to satisfy customers that arrange their trips later in the spring.	2010
Commercial-Timing	Comments: While we welcome a management plan for the Ruby-Horsethief Recreation area the DRAFT Plan alternatives do not accommodate existing long term outfitted public use. None of the DRAFT Alternatives offer an annual launch calendar with three launches/camps per day that are synchronized with the Westwater management plan's launch calendar. This downstream plan has been in place for nearly 4 decades and the eighteen outfitters and their public have long established use patterns than should be acknowledged by this upstream late comer. In the current DRAFT plan alternatives 3 of the 7 proposed Commercial camps should be dedicated to this calendared launch system for the downstream Westwater Permit holders and their public. With this calendar in place there is no need for user day averaging or placing other limits on commercial allocation. The 3 launch/camp per day Ruby/Westwater outfitter Calendar becomes the use control for that group.	2010
Commercial-Timing	December requests for February decisions are far too late in terms of knowing what DATES the trip will start and end. We create trips to be sold for the following year starting in August with the lion's share of bookings by schools completed by Thanksgiving for the following spring-summer season. Having some flexibility as to the actual campsite as the trip gets closer is preferable as final group size may vary.	2010

Commercial-Timing	Commercial Outfitter permits – Friday and Saturday nights. We oppose making January the month in which outfitters can request campsites. CFI sets our schedule of trips for the following year in August and September of the previous year. I believe we are typical of most outfitters. We begin our planning for this stretch of the Colorado when the Moab BLM issues their “next year” launch calendar August 1 (i.e. August 1 2011 they will release the calendar for 2012.) In this month of August, we would like to be able to CONFIRM that we will have a campsite in Ruby! How can we in good faith schedule, advertise and sell a trip to a school or family group in September, 2011 for specific dates at a specific length and cost for 2012 “hoping” that we get the campsites in January? This method you propose is not practical for our business purposes. Please consider making the campsites available in August of previous year to match Moab BLM Westwater calendar release. Alternatively consider a preference/assignment of camps for those holding Westwater launch dates on Saturdays and Sundays and require a hefty cancellation requirement/penalty (such as 60 or 30 days prior if not going to use and penalty if no notice; see BLM Price, Utah Desolation Canyon management.)	2011
Commercial-Private Split	In addition, we support the distribution of private use to commercial use (80%/20%) and limiting commercial companies use.	2010
Commercial-Private Split	4) The current Plans states “To promote the achievement of targeted benefits, limit the number of commercial float outfitters to current levels and do not issue additional permits if existing outfitters relinquish their permit.” We question whether research backing up formulation of the new plan alternatives clearly indicates that problems (resource damage, camping at “non reserved” campsite, issues with dogs, taking space and time at the ramps, etc) are stemming from commercial or private groups? From our company experience, as well as experience as a private boater, most of these difficulties appear to be coming from the private sector.	2010
Commercial-Private Split	80% of permits to private, 20% to commercial. No new commercial outfitters.	2010
Commercial-Private Split	Unless these concerns can be addressed and answered I would recommend; Alternative A No Action. Alternative C (partial office) could be acceptable when these areas of concern are addressed. (3) Historic commercial use should be based on an average percentage going back further than 5 years.	2010

Commercial-Private Split	<p>Another concern is that, as so often happens in permitted sections, the commercial sector will expand greatly and soon have a disproportionate influence over recreation policy. From the presentation of July 16, 2009, it appears to be a foregone conclusion that a permit system will require a split allocation for commercial versus private permits. We are certain that this will, if not now than certainly in the future, be a source of contention that can be avoided. The split is always randomly determined and cannot be a true reflection of relative demand between commercial and noncommercial users.</p> <p>As a result, commercial outfitters press for, and often win, a disproportionate share of access and eventually come to view it as a property right. This makes downward adjustment of commercial allocation politically impossible and the split proportion becomes hotly contested, as has happened many times before.</p> <p>If permitting is instituted, permits should be offered in a universal permitting system, where a trip leader reserves the permit for his or her group via a single common system, whether the group is noncommercial, commercial, or nonprofit.</p>	2010
Commercial-Private Split	<p>Please take a look at several assumptions in your Plan and proposed actions that will pose serious problems for “doing business” as commercial outfitters, in particular those of us with Westwater launch dates. Several other concerns have to do with customer service and safety. I will summarize my support, questions and suggestions by section of the Plan:</p> <p>Chapter Two</p> <p>2.3.8 Ruby-Horsethief visitors. The Plan cites a 13% float through statistic using data from 2009. CFI’s assigned launches in Westwater Canyon are mostly Sundays in July and August. We do pick up additional launches for our spring guide training and school trips. We run two and three night trips from Loma to Cisco to support educational purposes and rarely do a “1 day” Westwater trip. In 2005, due to extreme problems with crowding on Saturday nights in Ruby Canyon, we decided to AVOID this stretch for summer trips as much as possible and sell trips elsewhere. This greatly “crimped” our ability to use our Sunday Westwater launches and certainly affected our (and the total commercial) use statistics you are using as basis.</p> <p>I am sure we are not alone among the outfitters, choosing to avoid Ruby or speed through avoiding camping conflicts. Please note this effect and compromise to the use statistics.</p>	2011

Commercial-Private Split	Allocations and historical use. Please note that Canyonlands Field Institute has greatly reduced our use of Ruby-Horsethief canyons in the last six years due to crowding on summer weekends (lack of effective permit system.) In particular we found it very stressful for guides, poor customer service and a borderline safety problem, to sign in for a campsite at the launch then find our campsite “taken” and having to go miles downstream late in the day to find a site (or in some cases camping in unofficial island or bench sites due to lack of campsites.) Once or twice we had unpleasant interactions with campers in “our” spot or unwilling to share in emergency. We would anticipate returning to earlier levels of use once the numbers are controlled on this stretch AND IF a workable (10-12 months in advance) campsite reservation system is implemented. We object to the most recent five years being used to calibrate historic use and determine future allocations in light of deteriorated conditions stemming from (lack of) proper management on the BLM’s part.	2011
Commercial-Private Split	Consider adding unused commercial allotment into the private pool on weekends where private use maxes out.	2011
<i>Comments relating to Process, including those determined to be outside the scope of this analysis</i>		
Outside the Scope	The Plan lists a number of objectives to reduce visitor conflict, protect resources, support businesses. etc. Although the BLM appears not to have authority to manage the water within the Canyons on the Colordao River, to overlook the effect of dams. excess withdrawals. and diversions above and within the Canyons certainly will have an impact upon recreation and natural resources is an oversight. There have been. and are multiple plans to dam. withdraw and divert water above and within the Canyons. The Management Plan MUST include the affects of dams and water withdrawals. That statement MUST clearly state the negative effects dams and withdrawals will have on the recreational use. local economy, and natural resources.	2010
Outside the Scope	Within the plan the BLM MUST include a firm and conclusive statement on achieving Scenic River Status for Wild and Scenic River Status.	2010

Outside the Scope	<p>Page 6 -Management Authority (1.7): The authorities quoted in this section are meager at best. While they include some Federal and State adjudications and legal decisions they do not include some of the most important, which leads one to suspect that either the draft has not been thoroughly reviewed by a solicitor or there are ulterior motives for overlooking those decisions. Some of the more important decisions are:</p> <p>-43 CFR Beneficial Use of Colorado River Water -CWBB recent recognition and decisions for instream flows required for resources other than fish (Merriman & Janicki) -California v US 438 U.S. 645 -Cappaert v Nevada & United States v Nevada June 7, 1976 -Federal Water Rights task force Summary -Justice Hobbs on Colorado water Law -Winters v Montana #158 -Solicitor's opinion HM-36914, June 25, 1979 -United States v Kansas File #PN Oll. February 1988. Fort Larned. KS.</p> <p>The oversight of these decisions and opinions and the lack of a strong statement in the Draft Management Plan indicates that the BLM is not willing to fight for protection of all Resources (water) within Ruby Horsethief Canyons. The final Plan MUST include a complete solicitor's review and statement concerning the requirement to maintain a free-flowing river and basic flows through Ruby and Horstchief Canyons. It is very obvious that you want to manage people, but not water.</p>	2010
Outside the Scope	<p>Page 12-14 -Ruby Canyon-Black Ridge Resource Management Plan (2.2.2): The inclusion of this information is meaningless to the public for comment unless some form of more specific weighting is included. As an aside, as one who has traversed these Canyons for over 35 years, the one use that seems to have been overlooked is consumption of alcoholic beverages. It seems to be a rather large part of the users of this resource, yet the draft makes no mention of that activity and how it interweaves into the management plan. Were questions about alcohol consumption asked to river users?</p>	2010
Process	<p>Given the National interests of recreational boaters on this river segment the review and comment period is much too short. I have contacted over twenty private boaters from beyond the region and they were unaware of the ongoing process even though they have run Ruby & Horstchief Canyons during the past two years. In addition the timing on the comment period is during the peak of the commercial river running season which does not allow for commercial outfitters to completely digest and thoroughly comment upon the Draft. The comment period should be extended for 90 days.</p>	2010

Process	Page4-5 –Planning Process Overview (1.5): I have personally observed the Loma Boat Ramp at many times during the past year. During my many visits I occasionally observed a BLM Ranger at the Loma Ramp in the morning. I did not ever observe a BLM Ranger at the Loma Launch in the afternoons or evenings. That leads me to believe the BLM public survey is suspect as to its stratification. The formal visitor survey of public attitudes and use, including the stratification plan MUST be included in the final plan for public review and comment.	2010
Process	Page II -Benefits Based Management (2.1 .2): (paragraph #3) Given the apparent lack of stratification, including the methodology of disseminating questionnaires to people, this paragraph and the resulting conclusions are extremely suspect. If you are going to base a long-term management decision partially, on public input the methodology and statistical results must be provided in the DRAFT Management Plan in order to be thoroughly considered by the public. Therefore the Draft Management Plan should be rewritten and the period for public review and comment extended.	2010
Process	Page 14 -Service Delivery Systems -Administrative Setting: While this section is heavy on monitoring and contact it completely overlooks the infrastructure of launch and take out points. In this regard one needs to know whether (see page 11 -2.1.2 Changing Bl.;M Management Methodology) any improvement of access and facilities will harm the resources, including the public experience. A complete and thorough study of these actions MUST be a part of the draft which is deficit in this regard. It should be noted that improved access and facilities brings ease of use and thus more people which then promulgates agency rules and regulations from the associated problems this document professes to mitigate.	2010
Process	Page 14& 15- Benefits: What is the basis and quantifying of the "benefits" included in this section under the McInnis Canyons Canyon Area RMP?	2010
Process	Page 16 -Recreational Use Statistics and Trends (2.3): The information provided here, without documentation, is anecdotal at best. It is no way a solid basis for such a long term plan. Visitor Use and Statistics, to be valid must be a complete plan (probably under an established academic mentor) that is stratified and completely looks at all forms of users and their opinions. Vehicle counters, sign in sheets, personal ranger contacts and such management actions are hardly the methodology to base a management plan on. What form of statistical checks were used in compiling visitor use statistics validity? The recent MMS Categorical exclusion for oil and gas leases and the incident in the Gulf of Mexico should be a warning to the BLM of the folly of such simplistic management decisions.	2010

Process	Page 31 -Monitoring Standards: Not that it would make any difference, but monitoring standards should be sent out for review by the public.	2010
Process	<p>Page 34-35 -Carrying Capacity (4.2.10 ...): Any instituted study that will be used to determine management actions must be put out for public view prior to its acceptance as a BLM management tool.</p> <p>I have not located how the permit and camping system for Ruby/Horsethief Canyons will mesh with those who want to extend their Westwater trip below the management area. Many groups launch at Loma, often layover, and then camp in Westwater. The draft must include a proposal to accommodate this use.</p> <p>Very little of this document appears to be based of scientific data that has been collected and analysed by standardly accepted methodology. How many calls to law enforcement to ameliorate conflicts will the plan reduce? How many acres of microbiotic soil or cottonwoods will it protect and/or improve? Those are a few of the obvious issues that are not quantified in the document.</p>	2010
Process	At a minimum the public comment period for this draft MUST be extended for another 90 days. Given the recent review of environmental and planning documents related to the oil spill/drilling operations in the Gulf of Mexico I would think that BLM would want to do a more thorough job in all of its planning documents... especially those that have potential for such significant long term affect. I believe the entire alternative section needs to be rewritten and thought out more thoroughly. Integral to that as Federal budgets wane with the obvious affect of deficits the draft should be looking at ways to reduce federal facilities and staffing requirements.	2010

“Year received” allows consideration of how the comment factored into the NEPA analysis for the project: Comments received in 2009 were scoping comments, which were considered in designing the system. Comments received in 2010 were associated with review of a draft plan, and were considered in refining the system. Comments received in 2011 occurred during the final opportunity for public review, provided just before the decision was made.