

Chapter 7 Methodology – WRNF

This section describes the methodology implemented to evaluate eligible segments for suitability where the WRNF process differs from the BLM process described in Chapter 2 (Part I). The criteria used to evaluate eligible river and stream segments are those described in Forest Service Handbook 1909.12 – *Land Management Planning Handbook*, Chapter 80 – Wild and Scenic River Evaluation (Forest Service 2006) and recommendations from the Interagency Wild and Scenic Rivers Coordinating Council (1999).

7.1 Suitability Criteria Used to Evaluate River and Stream Segments

The following 13 suitability criteria, as described in Forest Service Handbook 1909.12, Chapter 80 (Forest Service 2006), were applied to each eligible river segment:

1. Characteristics that do or do not make the area a worthy addition to the National System;
2. The current status of land ownership and use in the area;
3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System;
4. The federal agency that would administer the area should it be added to the National System;
5. The extent to which the agency proposes that administration of the river, including the costs thereof, be shared by state and local agencies;
6. The estimated cost to the United States of acquiring necessary lands and interests in land and of administering the area should it be added to the National System;
7. A determination of the degree to which the state or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the National System;
8. An evaluation of the adequacy of local zoning and other land use controls in protecting the river's ORVs by preventing incompatible development;
9. The state and local governments' ability to manage and protect the ORVs on nonfederal lands. This factor requires an evaluation of the river protection mechanisms available through the authority of state and local governments. Such mechanisms may include statewide programs related to population growth management, vegetation management, water quantity or quality, or protection of river-related values, such as open space and historic areas;

10. Support or opposition to designation. Assessment of this factor will define the political context. What should be taken into consideration are the interest in designation or nondesignation by federal agencies, state, local and tribal governments, national and local publics, and the state’s Congressional delegation;
11. The consistency of designation with other agency plans, programs, or policies and in meeting regional objectives. Designation may help or impede the goals of tribal governments or other federal, state, or local agencies. For example, designating a river may contribute to state or regional protection objectives for fish and wildlife resources. Similarly, adding a river that includes a limited recreation activity or setting to the National System may help meet statewide recreation goals. However, designation might limit irrigation or flood control measures in a manner inconsistent with regional socioeconomic goals.
12. The contribution to river system or basin integrity. This factor reflects the benefits of a “systems” approach, for example, expanding the designated portion of a river in the National System or developing a legislative proposal for an entire river system (headwaters to mouth) or watershed. Numerous benefits may result from managing an entire river or watershed, including the ability to design a holistic protection strategy in partnership with other agencies and the public.
13. The potential for water resources development. The intent of the *WSR Act* is to preserve selected rivers from the harmful effects of water resources projects. Designation will limit development of water resources projects as diverse as irrigation and flood control measures, hydropower facilities, dredging, diversion, and channelization.

7.2 Data Sources and Methodology

The Forest Service relied on several sources, including geographic information systems data, White River National Forest resource specialists, informational sources, other agencies, and public input. The result was a compilation of data applicable to the suitability criteria. This data was then used to determine the suitability of a particular segment.

7.2.1 Geographic Information Systems

Geographic information systems data prepared for the White River LRMP was used to identify the study boundaries considered when assessing segment suitability. Forest Service and US Geological Survey data were used to identify land ownership status within the WSR study corridors.

7.2.1.1 *Forest Service Resource Interdisciplinary Team*

The Forest Service interdisciplinary team consisted of 10 resource specialists. The interdisciplinary team provided information pertaining to the suitability criteria factors and also reviewed data from additional sources, such as agency and public input, for accuracy. Once all available data were compiled, the team evaluated each segment and made a suitability determination.

7.2.1.2 *Informational Sources*

The Forest Service used a number of informational sources and publications to evaluate segments for suitability. These sources included:

- Forest Service Land Management Planning Handbook (FSH 1909.12), Chapter 80
- US Geological Survey Minerals Maps
- US Geological Survey stream gage data;
- Land Status Maps;
- Agreements with other agencies;
- Water Stakeholders
- Other Agency management plans;
- Land use planning and zoning documents for local and county governments;
- Descriptions of current and proposed water projects provided by water management agencies;
- Published books;
- River guides;
- Tabulations of water rights; and
- Input from Cooperating Agencies.

7.2.1.3 *Other Agencies*

Additional information was gathered from other federal and state agencies from scoping letters, stakeholder outreach, and existing documents. The following other agencies were contacted in order to assess suitability:

- Colorado Department of Natural Resources, Colorado Department of Transportation (CDOT), Colorado Division of Wildlife (CDOW) databases;
- BLM, where segments originate or continue onto BLM land;
- Environmental organizations;
- Water user agencies; and
- Counties

7.3 Public Input

Public involvement for the eligibility phase was conducted as part of the White River National Forest 2002 Land and Resource Management Plan revision. Refer to the *BLM Final RMP/EIS for the 2002 WRNF LRMP Revision* (Forest Service 2002) for more information.

On October 31, 2008, the Forest Service mailed letters to potential stakeholders, including individuals from the public, federal, state, local, and county governments, water conservancy districts, elected officials, and organizations. The letters provided readers with information about the WSR study process, open houses, and various ways to submit public comments. Each letter also included three fact sheets: one on the difference between eligibility and suitability, one containing the Forest Service suitability criteria, and a third with questions and answers regarding the WSR analysis and water rights/water projects. The letter gave the public various alternative methods to submit their comments, including a fax number, the WRNF, Dillon Ranger District postal address to mail comments, and a dedicated e-mail address (wrnf_scoping_comments@fs.fed.us).

The formal public scoping process for the WRNF WSR Suitability Study and associated Environmental Impact Statement began on November 7, 2008, with the publication of the Notice of Intent in the *Federal Register*. The Notice of Intent began the public scoping process and notified the public of the Forest Service intent to complete a Wild and Scenic River Suitability Study on four stream segments within the WRNF that previously had been found to be eligible. The Forest Service also issued a news release on November 13, 2008. The public comment period ended on December 2, 2008.

In November 2008, scoping open houses were held in Glenwood Springs and Eagle, Colorado (Table 7-1). An open house format was chosen over the more formal public meeting format to encourage broader participation, to allow attendees to learn about the project at their own pace, and to enable them to ask questions of the Forest Service representatives in an informal one-on-one setting. A packet of fact sheets and handouts about the project and a map of the study segments were provided. The WSR study process, Forest Service suitability criteria, and a map of the study segments were displayed.

Table 7-1 Open House Schedule and Attendance

Venue	Location	Date	Attendance
Glenwood Springs Community Center	Glenwood Springs	November 21	4
United Methodist Church of Eagle Valley	Eagle	November 24	3
Total			7

Note: One person attended both open houses and is counted twice in this table, but only six different individuals attended the two open houses.

The Forest Service presented the results of its initial inventory efforts, provided educational materials about the WSR process, and solicited comments from the public and government agencies. Both formal (written) and informal (verbal) comments were accepted during the open house meetings, but no comments were received. Meetings were held from 4:30 PM until 6:30 PM, and a total of six people attended.

A total of six written submissions were received during the public comment period ([Appendix A](#)). Five commenters are from Colorado, and one is from Arizona. All comments were received by e-mail at wrnf_scoping_comments@fs.fed.us, the e-mail address created for this public comment process. Written submissions were received from the following agencies and groups:

- Colorado Wild, Colorado Environmental Coalition, and Wilderness Workshop;
- Colorado River Water Conservation District;
- Colorado Springs Utilities;
- City of Aurora;
- Porzak Browning & Bushong LLP, on behalf of Clinton Ditch and Reservoir Company and the Eagle Park Reservoir Company; and
- Irrigation and Electrical Districts Association of Arizona.

7.3.1.1 *Out of Scope Comments*

A number of comments received are considered out of scope or do not apply to this process. This includes comments on eligibility, the suitability of other streams found eligible in the 2002 Land and Resource Management Plan revision, and the study corridor area. While the Forest Service was soliciting comments on the suitability phase of the WSR study, one comment was received on the eligibility phase. It is outside the scope of this effort and is not addressed in the suitability study.

With respect to the comment regarding the study corridor area, if designated as part of the NWSRS, the agency charged administering each component of the NWSRS shall, within one year from the date of designation of such component, establish boundaries that average no more than 320 acres of land per mile, measured from the ordinary high water mark (16 USC 1274[b]). Currently, the management area boundaries include an area greater than 320 acres per mile. If designated, the boundaries would need to be resized, unless Congress permits them to stay as is. This is considered outside the scope of this effort and is not addressed in the suitability study.

7.3.1.2 Substantive Comments

Most of the comments received pertained to suitability of the Colorado River segments. One submission from Colorado Wild, Colorado Environmental Coalition, and Wilderness Workshop urged the Forest Service to find all four study segments suitable for inclusion in the NWSRS. The remaining submissions supported a finding of not suitable, or the commenter's suggested that alternative management methods could provide the same or better protection of the ORVs.

In addition to opinions on the suitability or nonsuitability of the segments, the comments pertained to the following major categories:

- Data and commentary on the 13 WSR suitability criteria used to evaluate eligible segments;
- Data on relevant water development projects;
- Instream flow requirements; and
- Stakeholder Group alternative management plan for the Colorado River (Stakeholder Group 2011).

7.4 Suitability Determinations

Two eligible segments located on Deep Creek were evaluated to assess whether or not they would be suitable for inclusion in the NWSRS. The suitability determination was made based on the criteria factors described previously. The WRNF elected to defer any suitability determination for Colorado River segments (1 and 2) and those segments will remain eligible. The Forest Service evaluated and chose to adopt the Management Plan proposed by the Upper Colorado River Wild and Scenic Stakeholders Group for the Colorado River segments 1 and 2 in Glenwood Canyon.

7.5 Interim Management of Suitable Segments

Forest Service guidance requires that interim management be developed and followed to protect the free-flowing nature, ORVs, and recommended classification of suitable segments until congressional action regarding designation is taken. Forest Service guidance also requires the same interim protection for eligible segments. Interim protections for eligible and suitable segments are provided administratively by the management agency. Legislative protection is provided only by formal designation by Congress.

The 2002 *WRNF LRMP* revision prescribed a management area direction that was designed to meet its obligations under the *WSR Act* by protecting eligible and suitable river segments free-flowing nature, ORVs, and water quality within its administrative authority. Management area direction (1.5, 3.4, 4.4) prescribed that eligible and suitable river segments are to be managed to “protect and perpetuate eligible and designated” segments at the tentative classification level identified in the planning process (ie. wild, scenic, recreation).

The current management direction would continue to provide a long-term beneficial impact on the characteristics associated with WSR’s for the two Deep Creek segments found suitable in this EIS. The current management direction would also continue to provide for long –term protection for the two eligible USFS Colorado River segments (1 and 2) in Glenwood Canyon. The management standards and guidelines as prescribed in the 2002 *WRNF LRMP* for the segments mentioned above can be found in Appendix B.

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