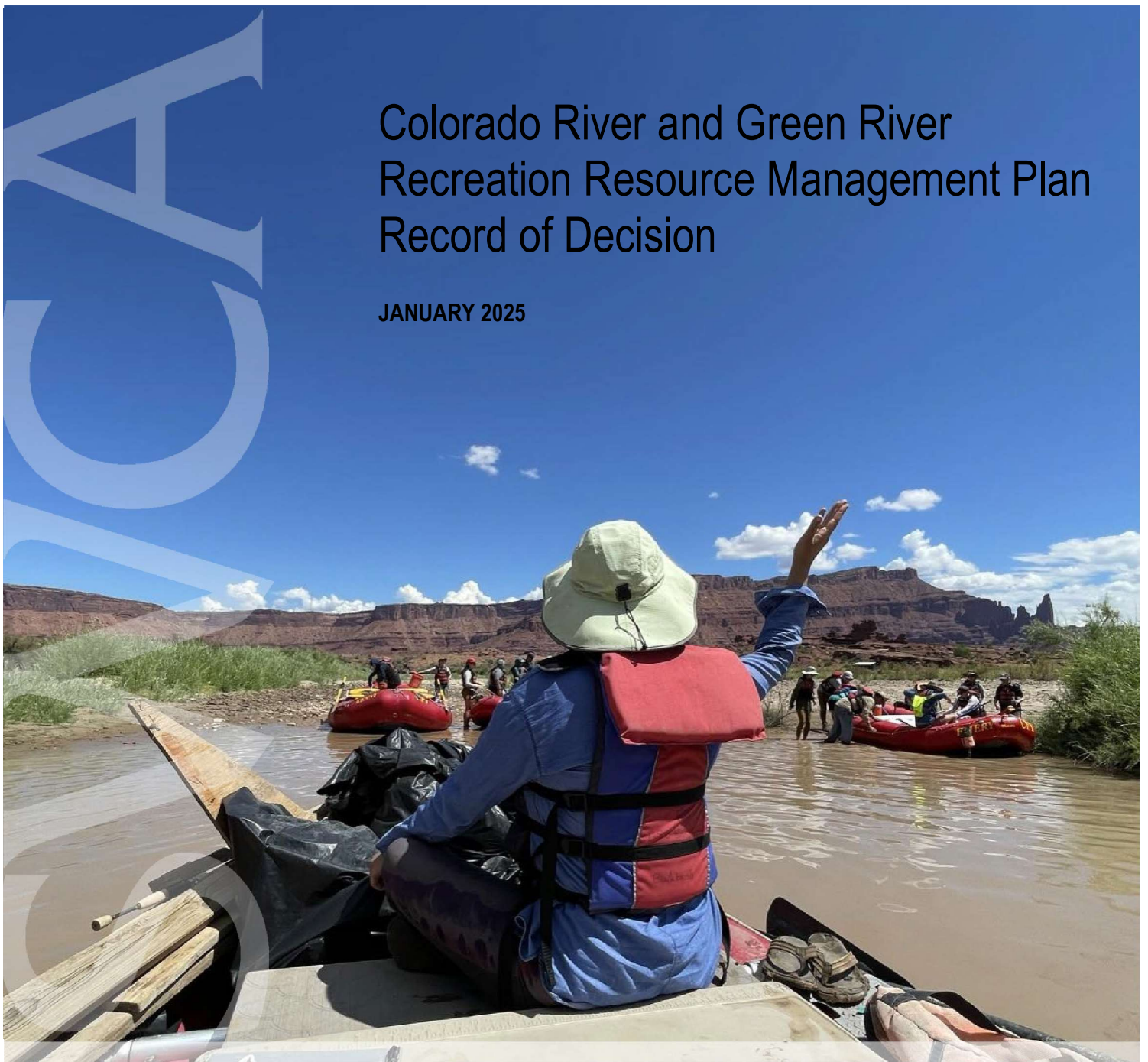


Colorado River and Green River Recreation Resource Management Plan Record of Decision

JANUARY 2025



PREPARED FOR

**Utah Department of Natural Resources,
Division of Forestry, Fire & State Lands**

PREPARED BY

SWCA Environmental Consultants

**COLORADO RIVER AND GREEN RIVER
RECREATION RESOURCE MANAGEMENT PLAN
RECORD OF DECISION**

Prepared for

**Utah Department of Natural Resources
Utah Division of Forestry, Fire & State Lands**
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SWCA Project No. 63447

Record Number: 25-0521-GRCRRMP

May 21st, 2025

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Exhibits

- Exhibit A. Resource Development Coordinating Committee Documentation
- Exhibit B. Notice to Interested Parties (Colorado River and Green River Recreation Resource Management Plan current lessees and adjacent landowners mailing list)
- Exhibit C. Green & Colorado Rivers Recreation Resource Management Plan Text

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1 INTRODUCTION

Pursuant to Utah Code 65A-2-2 and 65A-2-4 and the implementing regulations of Utah Administrative Code (UAC) R652-90, the Utah Division of Forestry, Fire & State Lands (FFSL or the Division) is empowered to prepare and adopt resource management plans for sovereign lands and their resources. Given this direction, FFSL initiated the *Colorado River and Green River Recreation Resource Management Plan* (RMP) planning process with interagency cooperation and collaboration and with open public participation. The RMP describes FFSL’s management framework for recreation opportunities on Colorado River and Green River sovereign lands, which were initially laid out in the Final Colorado River Comprehensive Management Plan (CMP) (2020),¹ the Final Green River CMP (2020),² and Sovereign Lands Withdrawal No. 999-00212 (2017 and 2020). The withdrawal did not apply to uses associated with improvements of public access and trails or activities involving the protection and enhancement of endangered species.

The vision for the RMP planning process was to facilitate diverse and compatible recreational uses on four sovereign land river segments of the Colorado and Green Rivers while protecting navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality. The primary purpose of the RMP is to guide FFSL, permittees, lessees, and applicants, along with adjacent landowners and other local, state, and federal partners, in managing and appropriately using the Colorado and Green Rivers’ recreational values and opportunities. The RMP outlines an adaptive management framework that establishes indicators and thresholds related to desired conditions and directs FFSL to take defined management actions to achieve desired conditions.

In compliance with policy, procedures, rules, and statutes for sovereign lands management planning, FFSL has completed the RMP for the recreation resource planning area (planning area). Therefore, FFSL issues this record of decision for the RMP.

2 DESCRIPTION OF LANDS DIRECTLY EFFECTED

The Utah State Legislature defines sovereign land as “those lands lying below the ordinary high-water mark of navigable bodies of water at the date of statehood and owned by the state by virtue of its sovereignty” (Utah Code 65A-1-1). Eight sovereign land river segments were defined in the 2020 Colorado River and Green River CMPs. At the beginning of the RMP planning process, the planning area was limited to The Moab Daily, Meander Canyon, Green River Valley, and Labyrinth Canyon river segments. Each of the river segments is considered a management unit in the RMP. This planning area was chosen for the RMP based on concentrations of recreational use, frequency of reported user conflict, and available material resources.

3 PROPOSED ACTION

The proposed action associated with this record of decision is the adoption and implementation of the 2025 RMP.

¹ SWCA Environmental Consultants, CRSA Architecture, River Science Institute, Inc., J. Schmidt, and A. Walker. 2020. *Colorado River Comprehensive Management Plan*. Salt Lake City, Utah: SWCA Environmental Consultants.

² ———. 2020. *Green River Comprehensive Management Plan*. Salt Lake City, Utah: SWCA Environmental Consultants.

4 RELEVANT FACTUAL BACKGROUND

4.1 Background

The RMP is the first recreation resource management plan that FFSL has initiated and prepared. The Colorado River CMP and the Green River CMP were adopted in 2020. The preparation and adoption of the RMP implements direction provided in the 2020 CMPs, which identified recreation conflicts and knowledge and data gaps in FFSL's understanding of visitor use experiences.

In March 2020, the Utah State Legislature appropriated a one-time lapsing sum of funds to FFSL for the development and completion of the RMP. In October 2020, FFSL and the Utah Division of Purchasing and General Services issued a request for proposals under Solicitation No. AS21-59. SWCA Environmental Consultants (SWCA) was awarded the contract, and the RMP planning process began in October 2020 with the execution of State of Utah Contract No. 216161. SWCA engaged Utah State University's Institute of Outdoor Recreation and Tourism (IORT) to assist in data collection efforts for the RMP. IORT collected data through on-site river user surveys in the planning area during 2021 and 2022. The purpose of the data collection effort was to 1) provide an accurate characterization of how recreationists were using the rivers; 2) characterize the types of on-river encounters between river users; and 3) assess river users' preferences for potential management actions. A public draft RMP summarizing the results of the data collection and presenting a management framework was released on May 1, 2024.

4.2 Public Outreach

A project website was developed and updated throughout the RMP planning process (<http://bit.ly/CGRRRMP>).

Public involvement consisted of two stages: 1) project kickoff and information gathering and 2) draft RMP review, which are detailed below:

- One virtual public meeting (kickoff meeting) was held, which presented information about the RMP process and sought public participation on March 11, 2021, from 5:30 to 7:30 p.m.
- An open public information gathering period occurred from February 2021 until the release of the draft RMP (May 1, 2024). Comments could be submitted during this period on the project website or by email.
- An IORT data collection effort was implemented during two river seasons in 2021 and 2022.
- A 36-day draft RMP federal partner agency comment period occurred from November 7, 2023, through December 13, 2023.
- A 90-day draft RMP public comment period occurred from May 1, 2024, through July 29, 2024. Comments could be submitted during this period to cgrrmp@swca.com or by postal mail.
- Three draft RMP public meetings were held, as described in Table 1.

Table 1. Dates, Times, and Locations for Draft Resource Management Plan Public Meetings

Date	Time	City, County, and State	Location and Address
June 20, 2024	6:00–8:00 p.m.	Moab, Grand County, Utah	Grand Center 182 North 500 West
June 21, 2024	6:00–8:00 p.m.	Green River, Emery County, Utah	Green River Public Safety Building 570 Main Street
June 27, 2024	6:00–7:00 p.m.	Virtual	Virtual

The final announcement of this record of decision was sent by postcard to approximately 242 addresses (Exhibit A) and email to approximately 122 email addresses.

4.2.1 Meeting Design

The 2021 virtual public meeting about the RMP process and the 2024 virtual public meeting after the release of the draft RMP were held using Zoom webinar, a cloud-based video meeting platform. Registration information was provided to the public in meeting advertising materials and on the project website. At the beginning of the virtual meetings, FFSL presented a Microsoft PowerPoint overview about either the RMP planning process (2021) or the draft RMP (2024). Both presentations included information on how to participate in the planning process and the planning schedule. After each presentation, participants were able to submit questions through the Q&A feature on Zoom.

The 2024 in-person draft RMP public meetings combined formal presentation and open house formats. Attendees were greeted; asked to sign in; provided information about the meeting format; and given the option of taking a business card with the RMP website (<http://bit.ly/CGRRRMP>) and information on how to comment. At the beginning of the meetings, FFSL presented a Microsoft PowerPoint overview of the draft RMP, including data collection results and the proposed management framework. Information on how to comment on the draft RMP and the schedule was also provided. Following this overview, FFSL staff answered questions and responded to comments in an open house format. Seven display boards providing draft RMP information were arranged around the meeting rooms for both in-person meetings.

At all meetings, attendees were informed about ways to follow the planning process and encouraged to provide information and submit comments.

4.2.2 Meeting Advertising

A list of planning process participants was developed based on the Colorado River CMP and Green River CMP outreach process, the FFSL sovereign lands coordinator’s local stakeholder knowledge, individuals or organizations holding an FFSL authorization, landowners adjacent to the planning area sovereign lands, and recreation management partners. The list was updated throughout the planning process.

Pursuant to FFSL requirements, public meetings were advertised in a variety of formats before their scheduled dates. In each format, the advertisements provided logistics; explained the purpose of the meetings; gave the public comment period schedule if applicable; outlined methods to comment; and provided ways to obtain more information. Methods of communicating with the public, stakeholders, adjacent landowners, lessees, counties, and federal agencies consisted of direct emails, direct mail postcards, the project website, the FFSL website, newspaper notices, and notices with the Resource Development Coordinating Committee (RDCC). All meeting and participation information was posted on the project website.

4.2.2.1 PROJECT KICKOFF AND INFORMATION GATHERING

The following invitations were sent to inform interested participants of the RMP planning process and virtual public kickoff meeting:

- Emails sent on February 18 and March 4, 2021, to approximately 151 addresses
- Postcards sent to current lessees and adjacent landowners on February 24, 2021, to approximately 242 addresses

Formal legal newspaper notices for the RMP planning process and public meeting were submitted and requested to be posted on the following dates in 2021:

- *Salt Lake Tribune* (Salt Lake County): February 28, March 5 (online edition), and March 7
- *Deseret News* (Salt Lake County): February 26 and March 5
- *Uintah Basin Standard* (Uintah County): weeks of February 22 and March 1
- *Vernal Express* (Uintah County): weeks of February 22 and March 1
- *Southern Utah News* (Kane County): weeks of February 22 and March 1
- *The Insider* (Garfield and Wayne Counties): weeks of February 22 and March 1
- *ETV News* (Emery County): weeks of February 22 and March 1
- *The Times-Independent* (Grand County): weeks of February 22 and March 1
- *Moab Sun News* (Grand County): submitted online in February
- *San Juan Record* (San Juan County): February 22 and March 1

4.2.2.2 DRAFT RESOURCE MANAGEMENT PLAN REVIEW

The following invitations were sent to inform interested participants of the release of the draft RMP and associated public meetings:

- Emails sent on May 1 and June 12, 2024, to approximately 107 addresses
- Postcards sent to current lessees and adjacent landowners on May 1, 2024, to approximately 242 addresses

Formal legal newspaper notices for the release of the draft RMP and associated public meetings were submitted and requested to be posted on the following dates in 2024:

- *Salt Lake Tribune* (Salt Lake County): May 1–8 and June 5
- *ETV News* (Emery County): May 1 and June 5
- *The Times-Independent* (Grand County): April 25, May 2, and June 6

4.2.3 Public Comment

As previously outlined, the public had multiple opportunities to contribute to the RMP planning process, and many did. As required by UAC R652-90-500, the RDCC was notified about the planning process. The project was made available for public comment on the Project Management System website (Exhibit B). However, no comments were received via the RDCC during the planning process.

Fifteen comment letters were received through the project website or via email to FFSL during the information gathering phase. These comments were summarized internally in a table and carefully considered when developing the RMP content.

The formal 90-day public comment period for the draft RMP began on May 1, 2024, and ended on July 29, 2024. The public comment period followed the release of the draft RMP and coincided with three public meetings. Comments were accepted by email (cgrrmp@swca.com) and by postal mail.

FFSL received 108 separate written submissions commenting on the draft RMP. Comments made during the public meetings were also noted. Written comments pertained to subjects such as multiple use, commercial motorized use, commercial use, river experience, education and enforcement, private motorized use, key terms, camping, the RMP process and purpose, desired conditions, use limitations, general motorized use, thresholds, permits, wildlife, survey methodology, monitoring, indicators, the management framework, and river stewardship. From the written submissions, approximately 170 individual comments were extracted. Comments on the draft RMP were acknowledged and addressed, as appropriate, by FFSL. As required by UAC R652-90-600 (1) (b-d) and Utah Code 65-A-2-4, comment responses are provided in Appendix A of the final RMP.

5 CONSTITUTIONAL PROVISIONS, STATUTES, AND ADMINISTRATIVE RULES

5.1 Utah Constitution Article XX, Section 1

The Utah Constitution Article XX, Section 1 states the following:

All lands of the State that have been, or may hereafter be granted to the State by Congress, and all lands acquired by gift, grant or devise, from any person or corporation, or that may otherwise be acquired, are hereby accepted, and . . . are declared to be the public lands of the State; and shall be held in trust for the people, to be disposed of as may be provided by law, for the respective purposes for which they have been or may be granted, devised or otherwise acquired.

5.2 Utah Code 65A-2-1. Administration of State Lands – Multiple-Use Sustained Yield Management

Utah Code 65A-2-1 states the following:

The division shall administer state lands under comprehensive land management programs using multiple-use sustained yield principles.

5.3 Utah Code 65A-2-2. State Land Management Planning Procedures for Natural and Cultural Resources – Assistance from Other State Agencies – Division Action

Utah Code 65A-2-2 states the following:

- The division:
 - shall develop planning procedures for natural and cultural resources on state lands; and
 - may request other state agencies to generate technical data or other management support services for the development and implementation of state land management plans.

5.4 Utah Code 65A-2-4. State Land Management Plans – Division to Adopt Rules for Notifying and Consulting with Interested Parties

Utah Code 65A-2-4 states the following:

- The division shall adopt rules for notifying and consulting with interested parties including the general public, resources users, and federal, state, and local agencies on state land management plans.
- Division rules shall provide:
 - for reasonable notice and comment periods; and
 - that the division respond to all commenting parties and give the rationale for the acceptance or nonacceptance of the comments.

5.5 Utah Code 65A-10-1. Authority of Division to Manage Sovereign Lands

Utah Code 65A-10-1 states the following:

The division is the management authority for sovereign lands, and may exchange, sell, or lease sovereign lands but only in the quantities and for the purposes as serve the public interest and do not interfere with the public trust.

5.6 Utah Administrative Code R652-2-200. Sovereign Land Management Objectives

UAC R652-2-200 states the following:

The state of Utah recognizes and declares that the beds of navigable waters within the state are owned by the state and are among the basic resources of the state, and that there exists, and has existed since statehood, a public trust over and upon the beds of these waters. It is also recognized that the public health, interest, safety, and welfare require that all uses on, beneath or above the beds of navigable lakes and streams of the state be regulated, so that the protection of navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality will be given due consideration and

balanced against the navigational or economic necessity or justification for, or benefit to be derived from, any proposed use.

5.7 Utah Administrative Code R652-90-300. Initiation of Planning Process

UAC R652-90-300 states the following:

Resource Management planning is initiated by the division's identification and determination that there is a need for such a plan.

5.8 Utah Administrative Code R652-90-500. Notification and Public Comment

UAC R652-90-500 states the following:

- Once a planning unit is designated, notice shall be sent to the RDCC through the project management system.
- Notice that a site-specific or resource planning effort is under way shall be given to:
 - affected parties as required by rule for exchange, or lease;
 - adjacent landowners, lessees of record, and
 - the RDCC through the Project Management System

5.9 Utah Administrative Code R652-90-600. Public Review

UAC R652-90-600 states the following:

- Resource plans shall be published and made available upon request.
 - Persons wishing to comment on these plans may do so at any time during the planning process.
 - The division shall acknowledge all written comments.
- Upon completion of any comprehensive management plan, resource management plan, or site-specific plan for 20 acres or more of sovereign land, the Record of Decision or other document summarizing final division action and relevant facts shall be published on the Division website and provided to the RDCC.
- The Division shall provide a copy of the Record of Decision or other document summarizing final Division action in electronic format to any person upon request.

6 FINDINGS OF FACT

1. As described herein, FFSL notified the public and local, federal, and state agencies, including the RDCC, of the RMP planning effort.
2. As described herein, FFSL conducted public meetings in conjunction with the RMP planning effort.

3. As described herein, FFSL published a draft of the RMP and accepted comments from the public and other government entities and responded to all comments properly submitted.
4. FFSL considered and implemented legislative directives concerning the content of the RMP.

7 CONCLUSIONS OF LAW

1. FFSL properly initiated the planning process for a resource management plan by designating the planning unit and planning priorities established by FFSL.
2. FFSL fulfilled its notification requirements to lessees, to local governments, and to the RDCC when the planning process was initiated. FFSL went beyond its required notification by also notifying adjacent landowners and other stakeholders and by extending comment periods at the request of federal agency partners and stakeholders.
3. The notification requirements for the public meetings have been met or exceeded.
4. The public review requirements have been met or exceeded.
5. FFSL properly responded to comments received in compliance with the applicable law.
6. The RMP fulfills the requirements of applicable statutes, rules, policies, and legal doctrines.
7. The planning process and subsequent RMP comply with the legal requirements for a resource management plan.

8 DECISION AND ORDER

Based on the foregoing, FFSL hereby adopts the RMP (Exhibit C), which satisfies the requirements of applicable statutes, rules, and policies. The RMP becomes the management plan that guides recreation-focused decision making for the sovereign lands of the planning area. The RMP supersedes any and all previous recreation resource management plans—adopted, draft, or otherwise—and represents the official position of FFSL.

Dated this 21 day of May, 2025.


9 ADMINISTRATIVE APPEALS

Parties having an interest in this action may file a petition for consistency review by the division pursuant to UAC R652-9. Said petition must be in writing and shall contain


1. the statute, rule, or policy with which the division action is alleged to be inconsistent;
2. the nature of the inconsistency of the division action with the statute, rule, or policy;
3. the action the petitioner feels would be consistent under the circumstances with statute, rule, or policy; and
4. the injury realized by the party that is specific to the party arising from division action. If the injury identified by the petition is not peculiar to the petitioner as a result of the division action, the director will decline to undertake consistency review.

Said petition must be received by the division by 5:00 p.m. on July 1, 2025.

APPROVED BY:


Jamie Barnes (May 21, 2025 09:20 MDT)
Jamie Barnes, Division Director
Division of Forestry, Fire & State Lands

REVIEWED BY:


Ben Stireman (Apr 23, 2025 16:58 MDT)
Ben Stireman, Deputy Director
Division of Forestry, Fire & State Lands

PREPARED BY:


Tony Mancuso, Program Manager
Division of Forestry, Fire & State Lands

APPROVED AT TO FORM
ATTORNEY GENERAL
DEREK BROWN


By: 
Emma Whittaker (Apr 1, 2025 08:51 MDT)
Emma Whittaker
Assistant Attorney General

EXHIBIT A

Notice to Interested Parties (Colorado River and Green River Recreation Resource Management Plan current lessees and adjacent landowners mailing list)

**The following names and addresses were retrieved
from County Records records.**

Lessees

Adesta Communications Inc 70 West 500 South Provo, UT 84601	Adventure Bound Inc 2392 H Road Grand Junction, CO 81505	Adventure Bound, Inc. River Expeditions 2392 H Road Grand Junction, CO 81505	American Adventure Productions, Inc. 314 South Second St Aspen, CO 81611	American River Touring Association, Inc. 24000 Casa Loma Rd Groveland, CA 95321
Andover Partners 1001 Fannin Suite 2000 Houston, TX 77002	Armstrong Resources, LLC 1421 Blake Street Denver, CO 80202	Aurora Gathering, LLC. 1401 -- 17Th St, Suite 700 Denver, CO 80202	Belco Development Corp PO Box 1188 Houston, TX 77251	Blue Heron Outfitters, Inc. PO Box 1520 Moab, UT 84532
Bureau of Land Management, Grand Resource Area PO Box 970 Moab, UT 84532	Cabot Oil & Gas Production Cor PO Box 4544 Houston, TX 77210- 4544	Calais Resources Inc 202 Spring St PO Box 310 Morrison, CO 84065	Calais Resources Inc PO Box 310 Morrison, CO 84065	Canyon River Company 1914 South Cross Hollow Dr Cedar City, UT 84720
Canyon Voyages PO Box 416 Moab, UT 84532	Canyonlands by Night P.O Box 328 Moab, UT 84532	Canyonlands Field Institute Ft Duchesne Moab, UT 84532	Centennial Canoe Outfitters 1623 Juniper Ct. Grand Junction, CO 81505	Chapoose Canyon Adventures PO Box 766 Ft Duchesne, UT 84026
Chevron USA Inc PO Box 36366 Houston, TX 77236	Chevron USA Inc PO Box 1635 Houston, TX 77251	Chris Sammartano Productions 68 Jeffreys Neck Rd Ipswich, MA 1938	Colorado Outward Bound 16 Ranch Road Moab, UT 84532	Colorado River & Trail Expeditions 5058 South 300 West Salt Lake City, UT 84107-4708
Colorado River And Trail Exped 5058 South 300 West Salt Lake City, UT 84107-4708	Compass Minerals Ogden Inc 765 North 10500 West Ogden, UT 84404	Construction Company, Inc 166 East 14000 South Suite 200 Draper, UT 84020	Corporate Helicopters PO Box 296 Moab, UT 84532	Deer Hill Expeditions PO Box 180 Mancos, CO 81328
Desert Highlights PO Box 1342 Moab, UT 84532	Div of Parks And Recreation 1594 West North Temple Ste 116 Salt Lake City, UT 84114-6001	Dominion Exploration & Product 1450 Poydras Street New Orleans, LA 70112-6000	Don Hatch River Expeditions, Inc. PO Box 67 Angels Camp, UT 95222	Dunham Land & Livestock PO Box F Green River, UT 84525
El Paso Production Oil& Gas Co 1099 - 18Th St Suite 1900 Denver, CO 80202	Encana Oil & Gas (USA) Inc 950 17th Street Suite 2600 Denver, CO 80202	Enron Oil & Gas Company 1625 Broadway Suite 1300 Denver, CO 80202	Enterprise Products PO Box 4324 Houston, TX 77210- 4324	EOG Resources Inc PO Box 4362 Houston, TX 72210- 4362
EP Operating Company Ltd PO Box 2649 Dallas, TX 75221-2649	Finley Resources PO Box 2200 Fort Worth, TX 76113	Gasco Production Company 8 Inverness Dr East Ste 100 Englewood, CO 80112-5625	Grand County 125 East Center Street Moab, UT 84532	Gravity Play Sports Marketing 11536 Cr250 Durango, CO 81301

Great Iguana Filmworks 17623 Bullock St Encino, CA 91316	Green River Companies 124 South 400 East Salt Lake City, UT 84111	Green River Development Associates, Inc. PO Box 570 Green River, UT 84525	Green River Diversion Dam Cooperation 460 East Main Green River, UT 84525	Group Publishing, Inc. 1515 Cascade Avenue Loveland, CO 80538
GW&E LC 580 West 1261 North Orem, UT 84058	Hiko Bell Mining & Oil Co PO Box 1845 Vernal, UT 84078	Holiday River Expeditions 544 East 3900 South Salt Lake City, UT 84107	Hunt Petroleum (Aec), Inc PO Box 1350 Houston, TX 77251- 1350	Hunt Petroleum (Aec), Inc PO Box 1350 Houston, TX 77251- 1350
Impossible Pictures 12 Great Portland Street London W1W 8QN UK	International Adventure Tours 420 Kane Cr Blvd Moab, UT 84532	International Petroleum, LLC. 4834 So Highland Dr #200 Salt Lake City, UT 84117	Intrepid Oil & Gas, LLC. 700 17Th Street Suite 1700 Denver, CO 80202	Jet Enterprises 2429 E 73rd Place Tulsa, OK 74136
JHCRPN, LLC 5910 Emigration Canyon Salt Lake City, UT 84108	Kerr-Mcgee Oil & Gas Onshore L PO Box 4995 The Woodlands, TX 77387-4995	King Land & Livestock PO Box 326 Green River, UT 84525	Lakeside School 14050 First Avenue Ne Seattle, WA 98125	Lakeside School Outdoor Program 14050 First Avenue Ne Seattle, WA 98125
Land Rover G'4s Challenge 1 Farnham Road Guildford GU2 4RG UK	Lomax Exploration Co 475 Seventeenth St Suite 1500 Denver, CO 80202	Moab BLM 2370 South 2300 West Salt Lake City, UT 84119	Moab City 217 E. Center Street Moab, UT 84532	Moab Gas Pipeline LLC 1801 Broadway, Suite 800 Denver, CO 80202
Moab Salt Inc PO Box 1208 Moab, UT 84532	Mountain Island Ranch PO Box 57 Glade Park, CO 81523	Myke Hughes, Inc 378 N Main Moab, UT 84532	National Ability Center 1000 Ability Way Park City, UT 84060	National Outdoor Leadership Schools PO Box 1304 Vernal, UT 84078
Navtec Expeditions PO Box 1267 Moab, UT 84532-1267	Newfield Production 1001 17Th Street Suite 2000 Denver, CO 80202	Nichol's Expeditions 497 North Main St Moab, UT 84532	North American River Expeditions PO Box 68 Angels Camp, CA 95222	Northwest Pipeline Corp PO Box 58900 Salt Lake City, UT 84158-0900
NTCH- Colorado, Inc 1600 Ute Avenue Ste 10 Grand Junction, CO 81501	Oars Canyonlands Inc PO Box 67 Angels Camp, CA 95222	Onshore Offshore Explorations PO Box 178 Durango, CO 81302- 0178	Ouray National Wildlife Refuge 1680 W Hwy 40 #112C Vernal, UT 84078	PacifiCorp 825 Ne Multnomah Suite 1000 Portland, OR 97232
Pan Oklahoma Corporation PO Box 371 Riverton, UT 84065	Parallel Petroleum Corp PO Drawer 10587 Midland, TX 79700	Provo Canyon School 4501 North University Ave Provo, UT 84604	QEP Energy Company 1050 17Th Street, Suite 500 Denver, CO 80265	QEP Field Services Company 160 East 100 South / Pob 45433 Salt Lake City, UT 84145-0433

QEP Uintah Basin, Inc 1050 17Th Street Suite 500 Denver, CO 80265	Questar Explor & Prod Co 1050 17Th Street, Suite 500 Denver, CO 80265	Red Cliffs Adventure Lodge 550 South Main Moab, UT 84532	Renegade 83 121 W Lexington Dr Bldg 413 Glendale, CA 91203- 2203	RGMB, LLC 3926 S Lake Ln Moab, UT 84532
Robert L. Bayless, Producer, LLC. 621 17Th Street, Suite 2300 Denver, CO 80293- 2023	Rocky Mountain Power 710 North Main Street Richfield, UT 84701	RSA-USA, Inc. 634 North Lapeer Dr West Hollywood, CA 90069	Salt Lake Pipeline Co 2875 So Decker Lake Dr, # 150 Salt Lake City, UT 84119	Sheri Griffith Expeditions 2231 South Hwy 191 Moab, UT 84532
Shoshone Environmental Nomination 770 E South Temple Salt Lake City, UT 84102	Sierra South 11300 Kernville Rd PO Box 1909 Kernville, CA 93238	SOCO 1979 Acreage Program 1801 California St #3500 Denver, CO 80202	SOCO 1979 Acreage Program 1801 California St #3500 Denver, CO 80202	Solacium New Haven LLC 2096 East 7200 South Spanish Fork, UT 84660
State Road Commission State Capitol Building Salt Lake City, UT 84103	Tex's Riverways PO Box 67 Moab, UT 84532	The Standard Oil Company 200 Public Square Cleveland, OH 44144	Tour West PO Box 333 Orem, UT 84059-0333	Trachyte Oil Company PO Box 11206 Salt Lake City, UT 84147
U.S. Department of the Interior Bureau of Land Management, Moab Field Office 82 East Dogwood Ave Moab, UT 84532	Uintah Water Conservancy District 78 West 3325 North Vernal, UT 84078	UPL Three River Holdings 304 Inverness Way South Suite 295 Englewood, CO 80112	US Department of Energy 200 Grand Ave Grand Junction, CO 81501	US Fish & Wildlife Service 2155 West Forest St Brigham City, UT 84302
Utah Department of Transportation 4501 South 2700 West Salt Lake City, UT 84119	Utah Geological Survey 1594 W North Temple Salt Lake City, UT 84114-6100	Utah National Guard PO Box 1776 Draper, UT 84020	Utah Power & Light 825 Ne Multnomah Suite 1000 Portland, OR 97232	Vastar Resources Inc 15375 Memorial Drive Houston, TX 77079
Western River Expeditions 7258 Racquet Club Drive Ste A Salt Lake City, UT 84121-4599	Wilderness Inquiry 808 14Th Avenue Se Minneapolis, MN 55414	World Wide River Expeditions 625 Riversands Rd Moab, UT 84532	Wyoming Interstate Company Ltd. PO Box 1087 Colorado Springs, CO 80944	XTO Energy Inc 810 Houston Street Fort Worth, TX 76102- 6298

Adjacent Landowners

ANNALEE HOWLAND 375 S 1780 E GREEN RIVER, UT 84525	BASE CAMP ADVENTURE LODGE PO BOX 37 MOAB, UT 34532	BINGHAM MARC C PO BOX 185 OREM, UT 84059	BOSYDABA HOLDINGS LLC 21 W 900 S MONA, UT 84645	BRENNAN JOSEPH E TRUSTEE 1120 EASTRIDGE WAY LAS VEGAS, NV 89110
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EXHIBIT B

Notice to Governmental Entities via Resource Development Coordinating Committee

The initiation of this planning process and corresponding 90-day public comment period were advertised with the Resource Development Coordinating Committee under RDCC Project No. 86009.

Upon execution by the Division Director, this Record of Decision will be advertised with the Resource Development Coordinating Committee for an additional 45 days; in addition to other public notices as required by Utah Admin Rule R652-90.

EXHIBIT C

Green & Colorado Rivers Recreation Resource Management Plan Text

Final Colorado River and Green River Recreation Resource Management Plan

JANUARY 2025

PREPARED FOR

**Utah Department of Natural Resources,
Utah Division of Forestry, Fire & State Lands**

PREPARED BY

SWCA Environmental Consultants

FINAL COLORADO RIVER AND GREEN RIVER RECREATION RESOURCE MANAGEMENT PLAN

Prepared for

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January 2025

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CHAPTER 1. OVERVIEW

1.1 PURPOSE AND VISION

1.1.1 Introduction

The Utah Department of Natural Resources, Division of Forestry, Fire & State Lands (FFSL) has developed the 2025 *Colorado River and Green River Recreation Resource Management Plan* (RMP) for four sovereign land river segments on the Colorado and Green Rivers in Grand, Emery, and San Juan Counties, Utah. The RMP process included stakeholder input and two seasons of recreational use data collection to help FFSL better understand recreational uses and recreation conflicts on the sovereign land river segments. Based on stakeholder input and the results of the data collection and analysis, FFSL developed a management framework to address recreation issues on the four river segments.

FFSL is the executive authority for the management of Utah sovereign lands (Utah Code 65A-1-4) and is required to develop planning procedures for natural and cultural resources on state sovereign lands (Utah Code 65A-2-2). FFSL may implement one or more of the following types of plans for each sovereign land resource: comprehensive management plans (CMPs), resource management plans, or site-specific plans (Utah Administrative Code [UAC] R652-90-200). Resource management planning is initiated by FFSL's identification and determination that there is a need for such a plan (UAC R652-90-300).

State lands are administered by FFSL using multiple-use, sustained-yield principles, as required by Utah Code 65A-2-1 and UAC R652-90-800 (see Section 1.3.3). The RMP recognizes that protection of navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality must be given due consideration and balanced with the benefits to be derived from any proposed use, pursuant to UAC R652-2-200.

1.1.2 Background and Purpose

FFSL completed the Colorado River CMP and the Green River CMP for sovereign land river segments of the Colorado and Green Rivers in Utah in January 2020 (SWCA Environmental Consultants et al. 2020a, 2020b) (Figure 1-1).¹ These plans cover five river segments of the Colorado River (Above Westwater, Westwater Canyon Wilderness Study Area, The Moab Daily, Meander Canyon, Glen Canyon) and three river segments of the Green River (Uinta Basin, Green River Valley, Labyrinth Canyon). Each plan evaluates existing river conditions for ecosystem, water, community, and other resources and prescribes management goals and objectives for the resources. Development of both CMPs relied on feedback from a planning team of state agencies, as well as from the public, counties, municipalities, federal agencies, and other stakeholders. The CMPs can be found here: <https://ffsl.utah.gov/state-lands/>.

¹ The Colorado River and Green River CMPs are referred to frequently throughout the RMP; therefore, the author-date citations are provided here at first mention only.



Figure 1-1. The Colorado River Comprehensive Management Plan and Green River Comprehensive Management Plan.

During the CMP planning process, FFSL determined that detailed recreational use data for some of the sovereign land river segments were needed to fully understand and more effectively manage recreation on those segments. The RMP has been developed in response to this need and to the recreation management goals of reducing recreation conflicts described in the CMPs. The purpose of the RMP is to establish a specific recreational use management framework for the applicable sovereign land river segments of the Colorado and Green Rivers. The RMP functions as a supplement to both the Colorado River and Green River CMPs.

1.1.3 Vision and Goals

FFSL’s vision for the RMP planning process is described in Figure 1-2.

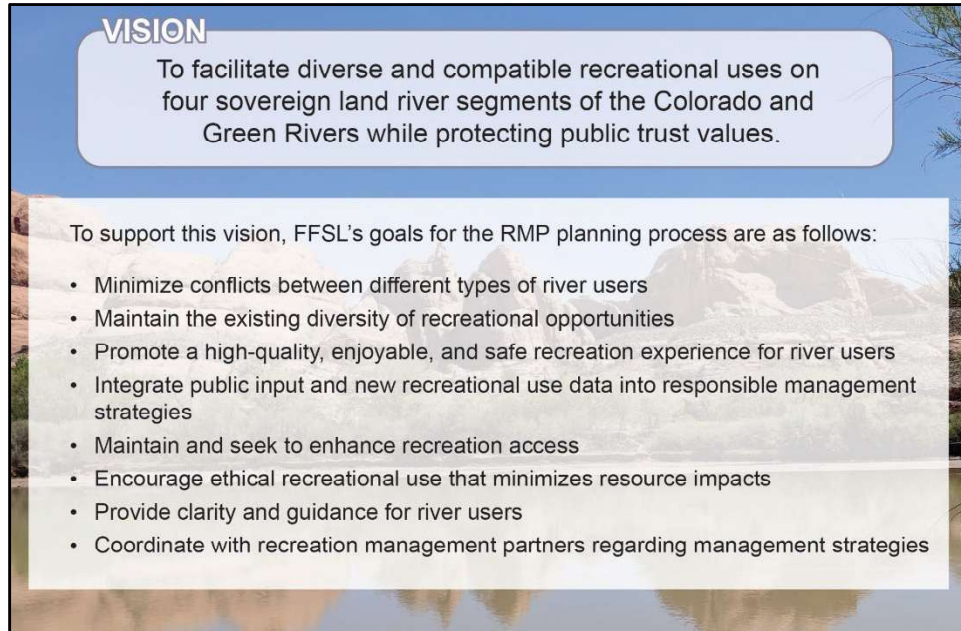


Figure 1-2. Utah Division of Forestry, Fire & State Lands' vision for the Colorado River and Green River Recreation Resource Management Plan planning process.

1.2 PLANNING AREA

The planning area (Figure 1-3) for the RMP consists of four sovereign land river segments that currently have recreation conflicts and crowding or the potential for recreation conflicts and crowding. These river segments consist of The Moab Daily and Meander Canyon on the Colorado River and Green River Valley and Labyrinth Canyon on the Green River.

1.2.1 River Segments and River Mile System

The four river segments of the planning area and associated river miles (RMs) are described in Table 1-1 and are shown on Figures 1-4 and 1-5. The use of RMs as reference points is a method of identifying features along rivers. The RMs used in the RMP are based on the *Guide to the Colorado & Green Rivers in the Canyonlands of Utah & Colorado* (Martin and Whitis 2016). At The Confluence of the Colorado and Green Rivers in Canyonlands National Park (hereafter referred to as The Confluence), RM numbering starts at 0 and increases in the upstream direction on both the Colorado River and the Green River. RMs in the plan may be slightly edited from Martin and Whitis (2016) for continuity between river segments. Where applicable (and except for Table 1-1), RMs are rounded to the nearest 0.5 mile.

Table 1-1. Recreation Resource Management Plan River Segments and Associated River Miles

River	River Segment	RMs	Description
Colorado	The Moab Daily	113 to 47.3	Bald Eagle Camp to the Potash boater access point (65.7 miles)
Colorado	Meander Canyon	47.3 to 31	Potash boater access point to the border of Canyonlands National Park (16.3 miles)
Green	Green River Valley	132.2 to 120.1	Swasey's Rapid to Green River State Park (12.1 miles)
Green	Labyrinth Canyon	120.1 to 46.7	Green River State Park to the border of Canyonlands National Park (73.4 miles)

Note: RM references are for management purposes only and may not represent precisely the ownership interests and/or fee title claimed by the State of Utah. They are not meant to delineate legal sovereign land boundaries and are general geographic markers to help the reader identify the river segments.

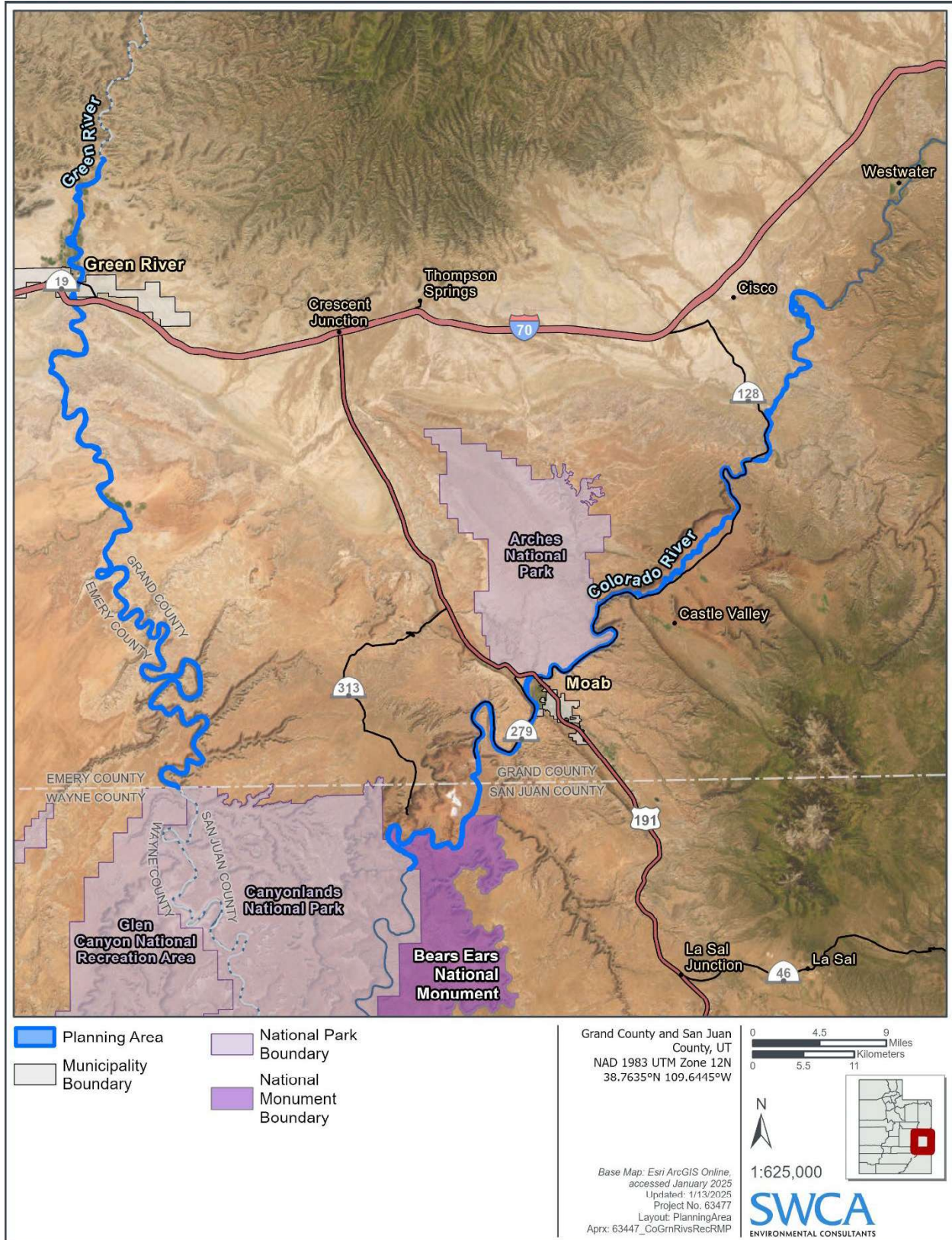


Figure 1-3. The planning area.

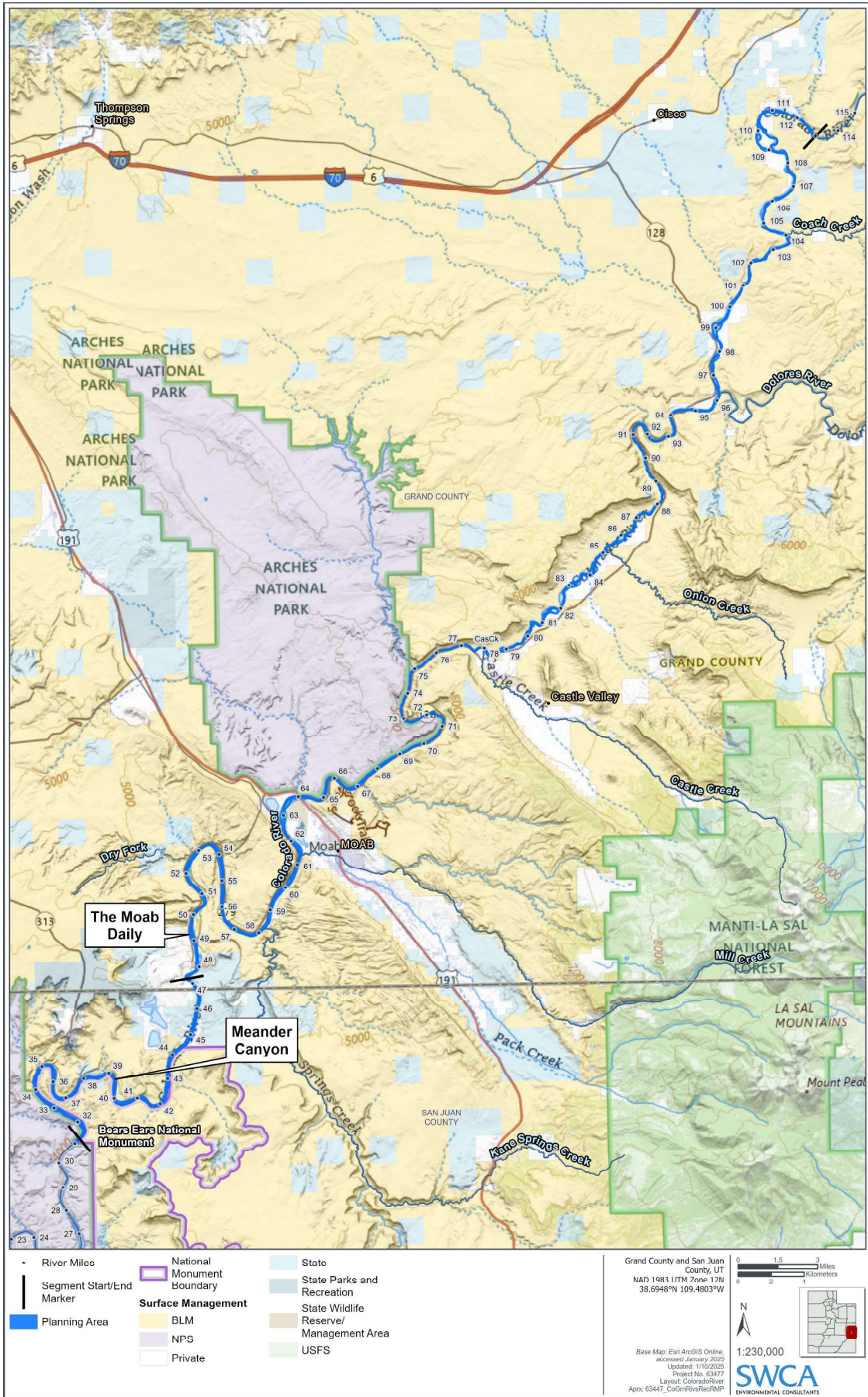


Figure 1-4. The Moab Daily and Meander Canyon river segments on the Colorado River.

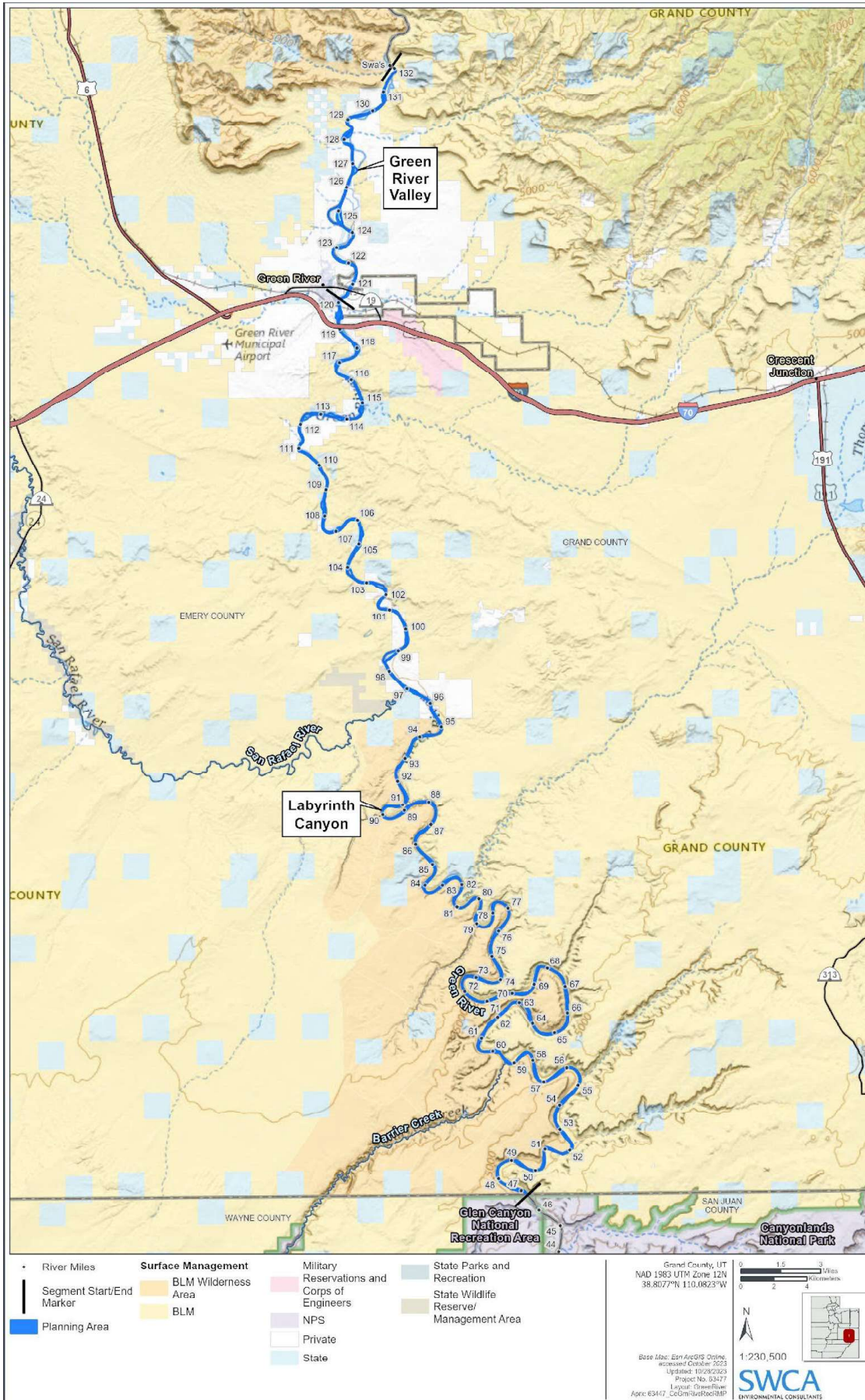


Figure 1-5. Green River Valley and Labyrinth Canyon river segments on the Green River.

1.2.2 River Use Classes

According to UAC R652-70-200, sovereign lands should be classified based on their current and planned uses. River use classes were assigned to sovereign land river segments of the Colorado and Green Rivers during development of the CMPs for each river. Table 1-2 lists and describes the river use classes applied to sovereign lands and provides an example in the RMP planning area. These classes guide FFSL’s management and use decisions.

Table 1-2. River Use Classes

River Use Class*	Description*	Example
Class 1	Manage to protect existing resource development uses	Tusher Diversion Dam area on the Green River Valley river segment.
Class 2	Manage to protect potential resource development options	Class 2 was not applied to the RMP planning area.
Class 3	Manage as open for consideration of any use	Area adjacent to Sorrel River Ranch Resort on The Moab Daily river segment.
Class 4	Manage for resource inventory and analysis	Class 4 was not used for river segments in the CMPs because no resource inventory and analysis was needed.
Class 5	Manage to protect potential resource preservation options	Portions of the Labyrinth Canyon river segment south of the San Rafael River.
Class 6	Manage to protect existing resource preservation users	Area adjacent to Arches National Park on The Moab Daily river segment.

* Data from UAC R652-70-200.

Table 1-3 describes what each river use class means for FFSL’s management of community resources, including recreation. Additional information on river use classes and river use classification maps can be found in the Colorado River and Green River CMPs.

Table 1-3. River Use Classes and Recreation

River Use Class	What the Use Class Means for Community Resources Such as Recreation*
Class 1	Clustering of community resources, such as infrastructure and recreation facilities, may exist or occur in this class with concern for safety, practicality, conflicting uses, and resource degradation. Cultural resources may have been disturbed or damaged by existing infrastructure. More infrastructure and recreation structures are allowed than in Classes 5 and 6.
Class 2	Clustering of community resources, such as infrastructure and recreation facilities, may occur in this class with concern for safety, practicality, conflicting uses, and resource degradation. Higher potential for disturbance or damage to cultural resources from new authorizations and uses. More infrastructure and recreation structures are allowed than in Classes 5 and 6.
Class 3	Appropriate class for clustering of community resources, such as infrastructure and recreation facilities, but with an emphasis on mitigation to avoid impacts to ecosystem, water, and cultural resources. Moderate potential for disturbance or damage to cultural resources from new authorizations and uses.
Class 5	Preference for authorizations and uses maintaining current agricultural activities and the potential for future resource preservation and restoration; mitigation is heavily emphasized. Lower potential for disturbance or damage to cultural resources from new authorizations and uses. Certain authorizations and uses require more review than in Classes 1–3 (e.g., pedestrian bridges, boat docks).

River Use Class	What the Use Class Means for Community Resources Such as Recreation*
Class 6	Preference for authorizations and uses consistent with existing resource protections. Fewer infrastructure and recreation structure options than in other classes; some authorizations and uses require more review. Lower potential for disturbance or damage to cultural resources from new authorizations and uses. New authorizations and uses may have to adhere to mitigation standards and regulations associated with conditions of conservation easements, deed restrictions, and other state or federal laws.

* Text is from the Colorado River and Green River CMPs.

1.3 OWNERSHIP, REGULATORY, AND MANAGEMENT CONTEXT

Because segments of the Colorado and Green Rivers were navigable at statehood in 1896, the State of Utah claims fee title ownership to the bed and banks of those river segments by virtue of the Equal Footing Doctrine (Slade et al. 1997). Exceptions may exist in certain locations where unique title issues are present, and nothing in the plan is intended to represent an adjudication of ownership of any particular tract.

1.3.1 Sovereign Land Boundaries

The State of Utah considers the bed and banks of the Colorado and Green Rivers as “sovereign land.” Sovereign land is defined as “those lands lying below the ordinary high water mark [OHWM] of navigable bodies of water at the date of statehood and owned by the state by virtue of its sovereignty” (Utah Code 65A-1-1). As noted in this definition, the state’s ownership extends to the OHWM; however, knowing exactly where the OHWM was located at statehood is challenging. Because of this, FFSL generally manages the Colorado and Green Rivers from the top of the bank to the top of the opposite bank. State jurisdiction over the riverbed generally follows the movement of the river over time as it naturally meanders because of erosion, reliction, and accretion processes.²

Portions of the Colorado River have been adjudicated in federal court to determine navigability for title purposes and ownership of the submerged lands constituting the bed of the river, but a significant stretch of the Colorado River remains unadjudicated in terms of title. Specifically, “the Colorado river from the mouth of Castle creek (about 14 miles above the town of Moab) to the boundary line between Utah and Arizona, 296 miles (including the portion of the Colorado river above the mouth of the Green river which had formerly been known as the Grand river)” was adjudicated and held navigable for title purposes by the Supreme Court of the United States in 1931 in *United States v. Utah*.³ In other words, the Supreme Court of the United States determined that the State of Utah has title to the bed of the Colorado River in this segment. The remaining portion (referred to in this discussion as the unadjudicated segment), which consists of the Colorado River as it enters Utah from Colorado and flows south to Castle Creek, has not been adjudicated in terms of riverbed ownership.

Because this section of the Colorado River has not yet been adjudicated, interim management of the riverbed will be accomplished through cooperation with the federal government. FFSL will use this RMP as a guidance document to develop interim management agreements with the Bureau of Land Management (BLM) along the unadjudicated segment of the river. The longitudinal scope and extent of Utah’s ownership of the bed of the Green River were formally adjudicated in decisions issued by the

² *Reliction* = gradual recession of water, leaving land permanently uncovered; *accretion* = the gradual deposition of sediment along the edge of a channel.

³ *United States v. Utah*, 283 U.S. 64 (1931)

Supreme Court of the United States in 1931⁴ and 1965.⁵ The Green River CMP provides more information on the Green River title adjudication.

1.3.2 The Public Trust

The Public Trust Doctrine is a legal principle derived from English common law. It provides that sovereign lands, otherwise known as submerged lands, in a state are held by the state in trust for the benefit of all people (Slade et al. 1997). The doctrine establishes the right of the public to use public trust assets and also establishes the responsibilities of the states when managing public trust assets.

The roots of the Public Trust Doctrine date back to Roman civil law, under which the air, sea, shores of the sea, and running waters were held in common by all citizens. The rights of fishing, navigation, and public use of the banks of a river or shore were common to all (Slade et al. 1997). These principles of Roman civil law were adopted, for the most part, by English common law, which recognized public rights in all tidewaters (i.e., navigable waters) and the lands beneath. English common law, in turn, became the law of the 13 original states (Slade et al. 1997). The Equal Footing Doctrine is the principle of U.S. constitutional law that mandates that new states be admitted to the Union as equals to the original 13 states. The Equal Footing Doctrine perpetuated the Public Trust Doctrine from the 13 original states to each of the 37 new states. As each new state entered the Union, it received in trust those lands beneath navigable waters for the citizens of the new state (Slade et al. 1997).

The State of Utah has recognized and declared that the bed and banks of navigable waters within the state are owned by the state and are among the basic resources of the state and that there exists, and has existed since statehood, a public trust over and upon these lands (UAC R652-2-200; see also Utah Constitution Article XX, section 1). Segments of the Colorado and Green Rivers are included in this category of navigable waters, and the beds and banks of these rivers are managed by FFSL for public benefit consistent with the Public Trust Doctrine.

Historically, the common law rights in public trust lands were directly related to navigation, fishing, and commerce. The State of Utah's Public Trust Doctrine is founded on these fundamental public trust values. Additionally, in both statutes and rules, the state also recognizes important public interests that FFSL must consider when managing sovereign lands. The public interest values that FFSL must consider are found in the following text from UAC R652-2:

It is also recognized that the public health, interest, safety, and welfare require that all uses on, beneath or above the beds of navigable lakes and streams of the state be regulated, so that the protection of navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality will be given due consideration.

1.3.3 Multiple-Use Approach

FFSL administers sovereign lands under comprehensive land management programs using multiple-use, sustained-yield principles in accordance with Utah Code 65A-2-1, Utah Code 65A-10-1, and UAC R652-90-800. Multiple use is defined as “the management of various surface and subsurface resources in a manner that will best meet the present and future needs of the people of this state” and sustained yield is defined as “the achievement and maintenance of high level annual or periodic output of the various renewable resources of land without impairment of the productivity of the land” (Utah Code 65A-1-1). There is no particular hierarchy of uses on sovereign lands except when those uses interfere with the public trust (Utah Code 65A-10-1).

⁴ *United States v. State of Utah*, 283 U.S. 801 (1931)

⁵ Civil No. C-201-62 (D. Ut. 1965) (unpublished decision)

The State of Utah recognizes that protection of navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality must be given due consideration and balanced against the navigational or economic necessity or justification for, or benefit to be derived from, any proposed use (UAC R652-2-200). Implementation of multiple-use policies must avoid interference with the public trust. FFSL strives for an appropriate balance among compatible and competing uses on the Colorado and Green Rivers. This RMP focuses on management of navigation and public recreation in the planning area.

FFSL supports partnerships and collaborations with other entities that have jurisdiction and/or management authority for recreation on the Colorado and Green Rivers (see Section 1.4), as well as with interested stakeholders, to improve overall management and decision making.

1.3.4 Adjacent Landownership

FFSL generally manages the Colorado and Green Rivers from the top of the bank to the top of the opposite bank, as discussed in Section 1.3.1. Adjacent landowners along the four river segments consist of the BLM, the National Park Service (NPS), the State of Utah, and private landowners (see Figures 1-4 and 1-5). Figure 1-6 shows the percentage of landownership along each river segment in the planning area.

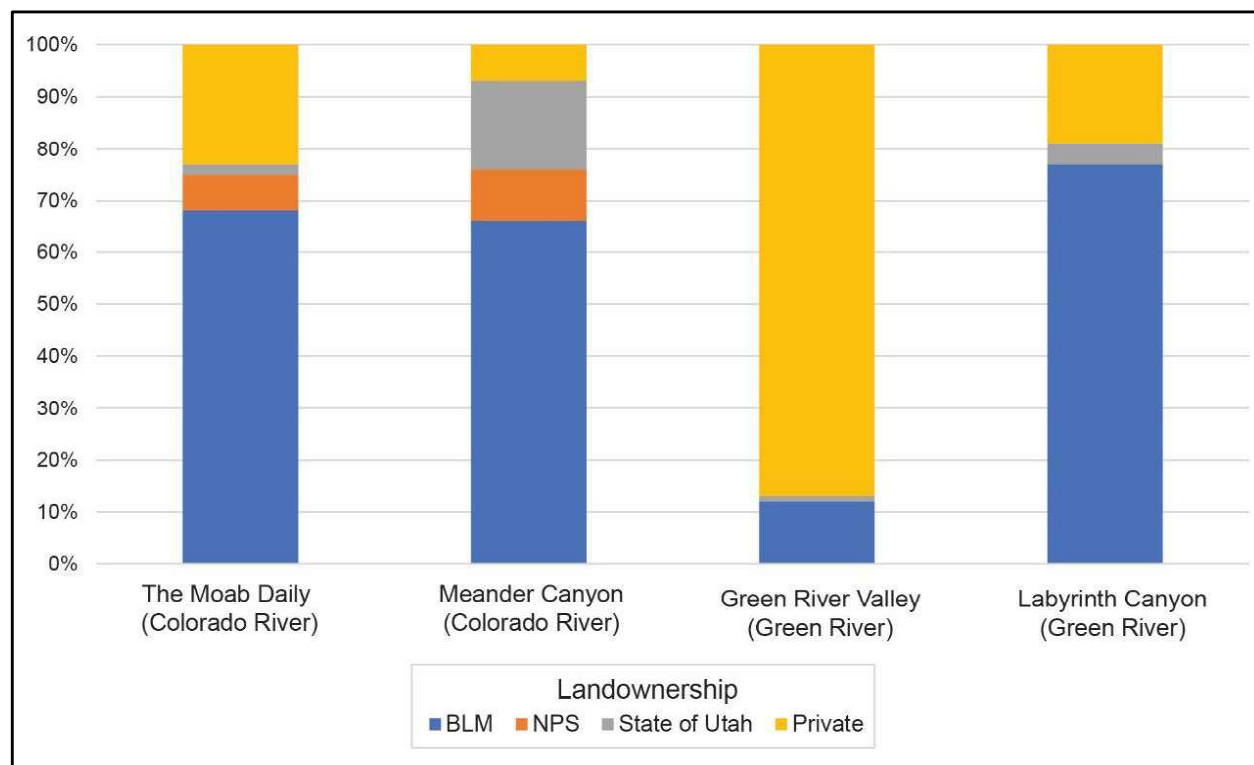


Figure 1-6. Landownership along the four river segments in the planning area.

Additional information on landownership, agency management responsibilities, tribal connections, county and municipal zoning, and collaborative management groups can be found in the Colorado River and Green River CMPs.

1.3.5 Special Designations

The Wild and Scenic Rivers Act (WSRA) of 1968 established a policy that “certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations” (16 United States Code [USC] 1271 et seq.; Public Law [PL] 90-542). There are two ways to designate a river as wild and scenic under the National Wild and Scenic Rivers System. The first (and most common) way is through congressional action. Landownership is first determined, after which a wild and scenic river study is authorized by Congress and completed by one of the four federal agencies responsible for the management of wild and scenic rivers. The study process consists of two steps: rivers must first be determined to be *eligible* (“free-flowing” with one or more “outstandingly remarkable values”) and then evaluated for *suitability* (e.g., should the river's values be protected or are there conflicting river uses, is designation is the best way to manage or protect the eligible river corridor). After the study is completed, the findings are provided to Congress for deliberation and a designation decision. In the past, Congress has acted to designate a river without a study and similarly has chosen not to act in cases when a study is complete and a river has met the criteria for designation. The second way a river can be designated is through the Secretary of the Interior. Section 2(a)(ii) of the WSRA allows the Secretary of the Interior to designate a river if a state governor requests the designation and the river qualifies for the National Wild and Scenic Rivers System.

Designations need not include the entire river. In addition, designation does not prohibit development or give the federal agency absolute control over state or private property. Uses such as recreation, agriculture, and residential development may continue within a designated area. Wild and scenic rivers are managed with the goal of protecting and enhancing the values for which they were designated. Protection is typically provided through voluntary stewardship by landowners and river users and through regulation and programs of federal, state, local, or tribal governments (U.S. Fish and Wildlife Service [USFWS] 2024).

Depending on the type and degree of human development associated with the river and adjacent lands, rivers are preliminarily classified as wild, scenic, or recreational during eligibility determinations:

- **Wild:** Free of impoundments and generally inaccessible except by trail, with the watershed or shorelines essentially primitive and waters unpolluted.
- **Scenic:** Free of impoundments, with the watershed and shorelines still largely primitive and shorelines largely undeveloped, but accessible in places by roads.
- **Recreational:** Readily accessible by road or railroad and may have some development along shorelines; may have undergone some impoundment or diversion in the past.

A river authorized for an eligibility and suitability study by Congress receives statutory protection under PL 90-542 Section 7(b), water resources projects; Section 8(b), land disposition; and Section 9(b), mining and mineral leasing. A river identified for study by a federal agency, such as the BLM, is not protected under the WSRA. Rather, protection of its outstanding remarkable values and other characteristics occurs through other agency decisions.

The Moab Daily and Meander Canyon river segments are part of a larger stretch of the Colorado River that has been identified by the BLM as suitable for recommendation into the National Wild and Scenic Rivers System, with classifications of wild, scenic, and recreational. The Moab Daily river segment is classified as follows:

- Scenic from approximately RM 47.5 to RM 50.5

- Recreational from approximately RM 50.5 to RM 100
- Scenic from approximately RM 100 to RM 112.5
- Wild from approximately RM 112.5 to RM 113

The entire Meander Canyon segment is classified as scenic, except for a small stretch between approximately RM 37.5 to RM 39. These suitable segments of The Moab Daily and Meander Canyon have not yet been designated as wild and scenic rivers, but the BLM manages the upland river corridor to protect the river's free-flowing condition and outstanding remarkable values and to maintain their tentative classification within 0.25 or 0.33 mile from the OHWM on each bank of the river (not to exceed 320 acres per mile) (BLM 2008a, 2008b).

The John D. Dingell, Jr. Conservation, Management, and Recreation Act (Dingell Act) was signed into law in March 2019, which incorporated the Emery County Public Land Management Act of 2018. The Emery County Public Land Management Act amends the WSRA by designating the following portions of the Green River as wild and scenic:

- An approximately 49-mile segment from Bull Bottom south to the county line between Emery and Wayne Counties, designated as scenic.
- An approximately 8.5-mile segment from the Nefertiti boater access point south to the Swasey's Landing boater access point, designated as recreational.

These wild and scenic river designations include BLM lands adjacent to the Green River in the RMP planning area's Labyrinth Canyon segment from approximately RM 47 to RM 95.5. The BLM's scenic Green River area is adjacent to adjudicated sovereign lands that the Supreme Court of the United States determined to be owned by the State of Utah. The 2019 Dingell Act designations create implications for FFSL management of the waters of the Green River, especially in the Labyrinth Canyon segment; however, the Dingell Act did not change or exchange the ownership of the beds and banks of the Green River, and FFSL remains the administrative authority over these lands. This RMP is being developed in consideration of BLM priorities for the scenic and recreational river corridor, and the agencies continue to cooperate in the interest of their shared responsibilities and goals.

1.4 RECREATION MANAGEMENT PARTNERS

Multiple entities have recreation management authority in or adjacent to the planning area. Key recreation management partners for the planning area are summarized below.

1.4.1 Utah Division of Forestry, Fire & State Lands

FFSL is responsible for promoting forest health, responding to wildland fires, and managing sovereign lands in Utah. The State of Utah claims fee title ownership of the sovereign lands lying below segments of the Colorado and Green Rivers. FFSL has management jurisdiction over lands lying below the OHWM at the time of statehood and manages those lands under the Public Trust Doctrine for public use and enjoyment. To effectively implement Utah's required multiple-use approach, FFSL strives to assure public access to navigable waters for commerce, navigation, and fishing, while also working to preserve the ecological and cultural values of both rivers. Other sovereign lands managed by FFSL include the beds of Great Salt Lake, Utah Lake, a portion of Bear Lake, the Jordan River, Moab Exchange Lands, and portions of the Bear River. The Moab Exchange Lands consist of the Dalton Wells parcel (approximately 10 miles north of Moab, Utah, along U.S. Route 191) and the Prairie Dog Haven parcel (near the intersection of U.S. Route 191 and Interstate 70).

1.4.2 Bureau of Land Management

The BLM manages one in every 10 acres of land in the United States. These BLM lands are in every state and encompass forests, mountains, rangelands, deserts, and tundra (BLM 2024a). The mission of the BLM is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations. The guiding principles of the BLM include improving the health and productivity of the land to support the agency’s multiple-use mission and cultivating community-based conservation, citizen-centered stewardship, and partnership through consultation, cooperation, and communication (BLM 2024b). Public lands are managed by the BLM for uses such as energy development, livestock grazing, recreation, mining, and timber harvesting. The BLM is an adjacent landowner along Colorado River and Green River sovereign lands in the planning area.

1.4.3 National Park Service

The NPS is the management agency for the National Park System and is dedicated to conserving unimpaired the natural and cultural resources and values of the park system for the enjoyment, education, and inspiration of current and future generations (NPS 2024). Two national park units are adjacent to the planning area: Arches National Park along a portion of The Moab Daily segment and Canyonlands National Park at the end of the Meander Canyon segment. In addition, the Labyrinth Canyon segment ends at Canyonlands National Park and the Glen Canyon National Recreation Area (also managed by the NPS).

Canyonlands National Park developed a general management plan in 1978 (NPS 1978) and is working on a rivers management plan, which includes a wild and scenic rivers eligibility assessment.

NPS foundation documents developed for both parks and the Glen Canyon National Recreation Area outline the purpose and significance of each park unit, interpretive themes, fundamental resources and values, and assess planning and data needs. No specific guidance for the planning area is identified in these documents; however, boating trips on the Meander Canyon and Labyrinth Canyon segments often end in Canyonlands National Park. The NPS requires permits for trips in Canyonlands National Park and provides detailed online information for boating in the park.

1.4.4 Utah Division of State Parks

Title 79-4 of the Utah Code establishes the Utah Division of State Parks (UDSP) as the state parks authority for Utah. UDSP works to improve and protect the state park system and develops management plans for each park (UDSP 2024). UDSP may lease or rent concessions in state parks and has jurisdiction over and responsibility for state park service roads, parking areas, campground loops, and related facilities. UDSP also protects state parks and park property from misuse or damage and preserves peace within state parks. Green River State Park is along the Green River Valley segment of the planning area and provides public access to the river. No management plan was identified for Green River State Park.

In addition, under Utah Code 79-4-802, UDSP has the discretion to give grants to local governments and state agencies for riverway enhancement projects with funds appropriated by the state legislature for that purpose. Grants for riverway enhancement projects must be for rivers or streams that are impacted by high-density populations or are prone to flooding, and these grants must include a plan to provide employment opportunities for youth, including at-risk youth.

1.4.5 Utah Division of Outdoor Recreation

Outdoor recreation in Utah contributes more than \$8.1 billion to the economy and employs more than 72,000 people. In 2022, the Utah State Legislature created the Utah Division of Outdoor Recreation (DOR) due to the growing importance of the outdoors to Utah’s prosperity and quality of life (DOR 2024). Title 79-7 of the Utah Code tasks the DOR with providing, maintaining, and coordinating motorized and non-motorized recreation in the state. The DOR also is required to administer and enforce the State Boating Act (Utah Code 73-18), which includes duties such as ensuring the safety of vessels and persons on the water, registering boats, disseminating vessel navigation and steering regulations, and regulating outfitting companies. The DOR oversees the State Boating Act in the planning area.

1.4.6 Counties and Municipalities

The Moab Daily, Meander Canyon, Green River Valley, and Labyrinth Canyon segments of the planning area fall within or border Grand County, Utah. The Green River Valley and Labyrinth Canyon segments also border Emery County, Utah. Most of the Meander Canyon segment is in San Juan County, Utah. Counties, and their municipalities, such as Moab and Green River, can authorize land uses adjacent to the planning area within their jurisdiction (up to the OHWM).⁶ Land use zoning is often designated by counties and municipalities to guide such development. Local government also performs functions related to public safety, education, recreation, tourism, and weed management.

FFSL recognizes that local governments need to provide services (e.g., transportation, utilities, recreation infrastructure) to their constituents that may impact the natural environment adjacent to sovereign lands. In addition, management decisions made by FFSL for the planning area will affect land uses and activities on adjacent lands. Therefore, counties and municipalities with jurisdiction over lands adjacent to the planning area have important management responsibilities, are river stakeholders, and are partners with FFSL in ongoing and future projects.

1.5 CONNECTED MANAGEMENT PLANS WITH RECREATION GUIDANCE

Interagency coordination and communication are essential to ensure the effectiveness of the management framework in the RMP. The following section describes management plans connected with the RMP and summarizes key recreation guidance.

1.5.1 Bureau of Land Management Resource Management Plans

The Federal Land Policy and Management Act of 1976 instructs the BLM to develop and periodically revise their resource management plans to manage BLM-administered lands consistent with multiple-use and sustained yield principles. Three BLM field offices have resource management plans that cover the planning area: the Moab Field Office resource management plan (BLM 2008a), the Monticello Field Office resource management plan (BLM 2008b), and the Price Field Office resource management plan (BLM 2008c).

1.5.1.1 Moab Field Office Resource Management Plan

The BLM Moab Field Office resource management plan covers The Moab Daily segment, most of the Meander Canyon segment, and the east half of the Green River Valley and Labyrinth Canyon segments.

⁶ The RMP and FFSL have no authority over regulations on any lands adjacent to the river.

Management decisions in the resource management plan include limiting or controlling activities where unacceptable damage to natural or cultural resources from recreational use is observed or anticipated (BLM 2008a). Limits or controls may include managing the nature and extent of the activity or providing site improvements that make the activity more sustainable, or a combination of both. Management decisions also include providing visitor information and outreach programs that emphasize the value of public land resources and low impact recreation techniques, while providing information about recreation opportunities. The BLM Moab Field Office also coordinates management of recreational use with other agencies, state and local governments, and tribes. Recreation rules for overnight river trip camping, boating permits, and motorized boat travel are provided in an appendix to the Moab Field Office resource management plan (BLM 2008a).

Three Special Recreation Management Areas (SRMAs) are described in the Moab Field Office resource management plan: Colorado Riverway SRMA, Two Rivers SRMA, and Labyrinth Rims/Gemini Bridges SRMA (BLM 2008a). SRMAs are distinct public land areas that are subject to special management to maintain and enhance unique recreational opportunities, either existing or desired, that occur within them. The Moab Daily and Meander Canyon segments both cross the Colorado Riverway SRMA (89,936 acres in size), which was established to promote improvements to sites to facilitate recreational use and provide protection for scenic and other resource values. Camping, boating, river access, trails, and interpretive facilities are managed in popular areas along or near the river in the Colorado Riverway SRMA to protect resource values (BLM 2008a). The north shore of the Colorado River in the SRMA is managed to provide quality undeveloped, designated camping sites; the south shore contains designated campgrounds. From Dewey Bridge to Castle Creek, the SRMA is managed for scenic, mild whitewater boating with no restrictions on private use unless unacceptable impacts to resources begin to occur (commercial use is limited to 22 permits) (BLM 2008a).

The Moab Daily segment also falls within the Two Rivers SRMA (29,839 acres in size), a destination SRMA established to provide distinct, high-quality opportunities for recreational boating and camping and to protect outstanding resource values. For this SRMA, launch systems and campsites can be used to reduce interparty contacts or conflicts. From the Cisco boater access point to Dewey Bridge, the SRMA is managed to provide scenic flatwater boating or an extension of Westwater Canyon boating trips; no restrictions on the amount of private use are allowed (commercial use is limited to 22 permits) (BLM 2008a).

Much of the Labyrinth Canyon segment is in the Labyrinth Rims/Gemini Bridges SRMA (300,650 acres in size). The BLM (both the Moab and Price Field Offices) manages private boating in Labyrinth Canyon in conjunction with UDSP/DOR and FFSL under the terms of a cooperative agreement. The agreement establishes an interagency river permit system and coordinates implementation of river protection rules (e.g., group size, use of portable toilets) (BLM 2008a). The BLM also issues permits for shoreline use by commercial river trips and manages the Mineral Bottom boater access point in the SRMA. The BLM plans to continue issuing permits for private and commercial users and would consider extending the cooperative agreement to include the management of commercial river use. If future use levels warrant, the BLM would consider relocating the Mineral Bottom boater access point to a more suitable location and initiating cooperative site operations with the NPS (BLM 2008a).

1.5.1.2 Monticello Field Office Resource Management Plan

The BLM Monticello Field Office resource management plan covers a portion of the Meander Canyon segment. Recreation decisions in the resource management plan include managing the BLM portion of the Colorado River in coordination with Canyonlands National Park and the Moab Field Office; limiting or controlling activities where long-term damage from recreational use is observed or anticipated through tools, such as designated campsites, permits, area closures, and user limitations; coordinating with federal

and state agencies in recreation planning; implementing management methods to protect resources and to maintain the quality of experience for user groups; and implementing management methods to maintain or enhance recreation opportunities (e.g., camping controls, fees, limitation of visitor numbers). The Monticello Field Office resource management plan also indicates that camping in riparian areas should be avoided and that users of public land should practice responsible stewardship ethics (BLM 2008b).

1.5.1.3 Price Field Office Resource Management Plan

The BLM Price Field Office resource management plan includes the west half of the Green River Valley and Labyrinth Canyon segments. Recreation goals in the plan include establishing management that provides necessary public services, offers authentic recreation experiences, minimizes user conflicts, and maintains healthy ecosystems and settings. The resource management plan designates the Labyrinth Canyon SRMA, which is managed to maintain the natural character of the canyon while protecting cultural resources and stressing Leave No Trace principles. Approximately half of the Labyrinth Canyon segment of the planning area is in the Labyrinth Canyon SRMA. Boating use in the SRMA is managed by the Moab and Price Field Offices through a memorandum of agreement (see Section 1.5.1.1). The resource management plan indicates that the BLM will continue to work with FFSL and UDSP/DOR to promote river access and visitor use through education about safety and resource protection (BLM 2008c).

1.5.1.4 Bears Ears National Monument Resource Management Plan

The BLM and the U.S. Forest Service have issued the *Bears Ears National Monument Proposed Resource Management Plan and Final Environmental Impact Statement* in San Juan County, Utah (BLM and U.S. Forest Service 2024). The monument borders the south side of the Meander Canyon segment. The Record of Decision for this plan was not signed at the time of this writing.

1.5.2 Business Plan for Westwater Canyon of the Colorado River

The *Business Plan for the Westwater Canyon of the Colorado River* (BLM 2012) covers The Moab Daily segment and was prepared by the BLM to meet the requirements of the Federal Lands Recreation Enhancement Act of 2004. This act allows special recreation permit fees and special area fees collected by the BLM to be retained locally and directs the ways such revenue may be used. The business plan assists the BLM Moab Field Office in meeting river-based recreation and visitor service goals and covers both commercial river outfitters and private boaters. The business plan estimates future expenditures for site improvements along The Moab Daily segment.

1.5.3 Utah's Statewide Comprehensive Outdoor Recreation Plan

Development of *Utah's Outdoor Recreation Plan – 2019: Utah's Statewide Comprehensive Outdoor Recreation Plan 2019–2023* (SCORP) (Utah Department of Natural Resources and Utah Division of Parks and Recreation 2019) is required by Section 6(d) of the Land and Waters Conservation Fund Act of 1965, as amended (54 USC 200301 et seq.). Every 5 years, the SCORP reports on statewide recreation supply and demand levels based on surveys of state residents and Utah recreation professionals. The SCORP uses the results of the surveys to identify recreation issues and needs, sets goals and strategies to address those needs, and ultimately provides guidance to allow entities to make informed decisions about best practices for recreational development in the state. SCORP goals include providing funding and support for the development of new quality outdoor public recreation and renovating existing public outdoor recreation facilities; the plan summarizes available grant and assistance programs that can be used to address recreation needs.

1.5.4 Grand County General Plan

The *Grand County Utah General Plan 2012* (Grand County and RPI Consulting 2012) establishes the county’s goals and policy direction for decisions affecting land use and development, open space preservation, transportation, economic growth, partnerships, and the expansion of public facilities and services. Recreation tourism is a substantial economic driver for Grand County, and the maintenance and enhancement of recreational amenities are key economic strategies in the general plan. Other goals and strategies in the plan include supporting balanced and responsible natural resource development that benefits the public and generates revenues to help pay for public infrastructure, preserving riparian habitats, minimizing the impacts of development on scenic resources, and identifying priority riparian public trail corridors. Public land policies in the general plan include encouraging land management agencies to continue to work to resolve conflicts between user groups with the guiding principle that residents and visitors have a right to enjoy and use public lands but need to minimize impacts to the land and each other. In addition, the general plan’s public land policies promote cooperation with federal and state agencies to identify and implement appropriate management of high-use and special-value areas (e.g., State Route 128 corridor) and encourage public lands agencies to implement measures to protect natural quiet and to coordinate with the county on proposed campground development and expansion.

The River Road Corridor, which extends along the length of State Route 128, has unique characteristics for which specific planning occurred in 1998. Many of the policies identified during the 1998 planning effort were later implemented in the Grand County land use code and the general plan (Grand County and RPI Consulting 2012). Additional considerations in the general plan for the River Road Corridor, which borders much of The Moab Daily segment, are as follows:

- New development should be clustered to protect critical canyon attributes, such as agricultural fields, roadless areas, 100-year floodplain areas, wildlife and wildlife habitats, native vegetation, the night sky, and the natural appearance of steep slopes.
- Additional campgrounds and campground expansion should be discouraged.
- New proposed uses should not generate excessive traffic.
- The tree canopy along the Colorado River should be protected.
- Consider establishing a minimum setback from the Colorado River for new development.
- Promote nonnative plant removal and river corridor restoration.

The general plan also recommends adopting a scenic corridor overlay to protect corridors along major highways with high scenic value and areas visible from high-use areas in Arches National Park (Grand County and RPI Consulting 2012).

1.5.5 County Resource Management Plans

Utah Code 17-27a-401 requires counties to include county resource management plans for public lands as part of their general plans. County resource management plans must address 28 topics or resources, including recreation. County resource management plans establish findings pertaining to each topic or resource, describe defined objectives, and outline general policies and guidelines on how to accomplish objectives. County resource management plans have been developed for the three counties containing the planning area.

1.5.5.1 Grand County Resource Management Plan

The *Grand County Resource Management Plan* (Grand County and Rural Community Consultants 2017) is closely tied to the Grand County General Plan (some of the policies described in Section 1.5.4 of this RMP are included in the *Grand County Resource Management Plan*). For recreation and tourism, Grand County’s policies include maintaining the quality of all resources, maintaining the quality of the visitor experience, and preserving some areas of limited accessibility when making decisions about recreation infrastructure. For land use policies, Grand County encourages public land management agencies to continue to resolve conflicts between user groups while minimizing impacts and allowing enjoyable experiences on public lands, as well as cooperating with federal and state agencies to identify and implement appropriate management of high-use and special-value areas. The resource management plan also emphasizes the importance of riparian zones and encourages their preservation and restoration. The Moab Daily, a small portion of Meander Canyon, Green River Valley, and Labyrinth Canyon segments fall within or border Grand County, Utah.

1.5.5.2 Emery County General Plan (with resource management plan)

The *Emery County General Plan* (Emery County 2016) contains the county’s resource management plan. For public land management, the county supports responsible use and protection of public land resources and continued access and development of state lands. The general plan states that the county will continue to implement promotional and infrastructure practices that mitigate recreational impacts and will consider policies to address impacts as they occur. To mitigate the negative impacts of tourism, Emery County proposes using actions such as guiding people to areas of least impact and designating camping areas. The general plan recognizes that there will be unavoidable impacts and conflicts as visitation increases but indicates that plans and policies will be developed to minimize conflicts while promoting tourism. The Green River Valley and Labyrinth Canyon segments border Emery County, Utah.

1.5.5.3 San Juan County Resource Management Plan

Key policies in the *San Juan County Resource Management Plan* (San Juan County, Rural Community Consultants, and Bio-West Consultants 2022) for recreation and tourism include supporting and promoting the development of recreation and tourism in partnership with agencies, entities, individuals, and interest groups, and actively participating with public land management agencies to manage resources to protect sensitive resources, enhance economies, enhance the overall quality of life, and enhance the recreational experience of county residents and visitors. Other policies in the resource management plan support vigorously pursuing multiple-use management policies on public lands; managing public lands to provide opportunities for a range of motorized and non-motorized recreation experiences while protecting or minimizing impacts to resources and minimizing user conflicts; and protecting healthy riparian areas for their ecological, biological, and aesthetic values. Most of the Meander Canyon segment is in San Juan County, Utah.

1.5.6 Grand County Scenic Byways Corridor Management Plan

The *Grand County Scenic Byways Corridor Management Plan* (Jorgen 2008) covers three designated Utah scenic byways, including State Route 128 from Moab to its junction with Interstate 70. State Route 128 parallels part of The Moab Daily segment. The corridor management plan was developed to provide an opportunity for community members and land managers to look at scenic byway corridors as a whole and generate goals and strategies for their futures. The corridor management plan is a reference for issues and opportunities facing the byways and is an advisory plan only. For visitor services and facilities, the

corridor management plan suggests providing necessary and appropriate facilities to facilitate tourism in a rustic setting. For resource protection, the corridor management plan includes goals of preserving open space and scenic integrity, preserving the pastoral character of the byway corridors, promoting recreation practices compatible with resource management and byway character goals, preserving and restoring native ecosystems, protecting dark night skies and natural soundscapes, and promoting quality visitor experiences. The corridor management plan also recommends placing a high priority on the preservation of riparian and other critical wildlife habitats and suggests educating visitors about safe and responsible recreation use and the byways' intrinsic resources.

CHAPTER 2. CURRENT RECREATIONAL CONDITIONS

Chapter 2 presents the current recreational conditions in the planning area. It defines key terms, briefly describes the planning area’s regional setting and river resources, discusses each river segment, and summarizes the results of FFSL’s 2-year data collection effort. Descriptions of key terms were created after consultation with stakeholder groups, subject matter experts, Utah boating law enforcement, and 46 USC 1 (Coast Guard). This chapter also provides information on river regulations and summarizes recreation issues identified through the public outreach processes for the Colorado River and Green River CMPs and the RMP (Appendix A).

2.1 KEY TERMS

Key terms for this chapter are described below.

- Private use, boater, or visitor: A member of the general public using the river in a noncommercial capacity.
- Commercial use, outfitter, or operator: Any licensed business entity carrying passengers for hire.
- Boater access points: Put-ins, take-outs, boat ramps, and boat launches where commercial or private boaters can launch and remove their watercraft from rivers.
- International Scale of River Difficulty classes: Whitewater rapid ratings. Rapids are rated on a subjective scale of I (easy) to VI (extreme and exploratory) based on their combination of difficulty and danger (American Whitewater 2005) (Figure 2-1).

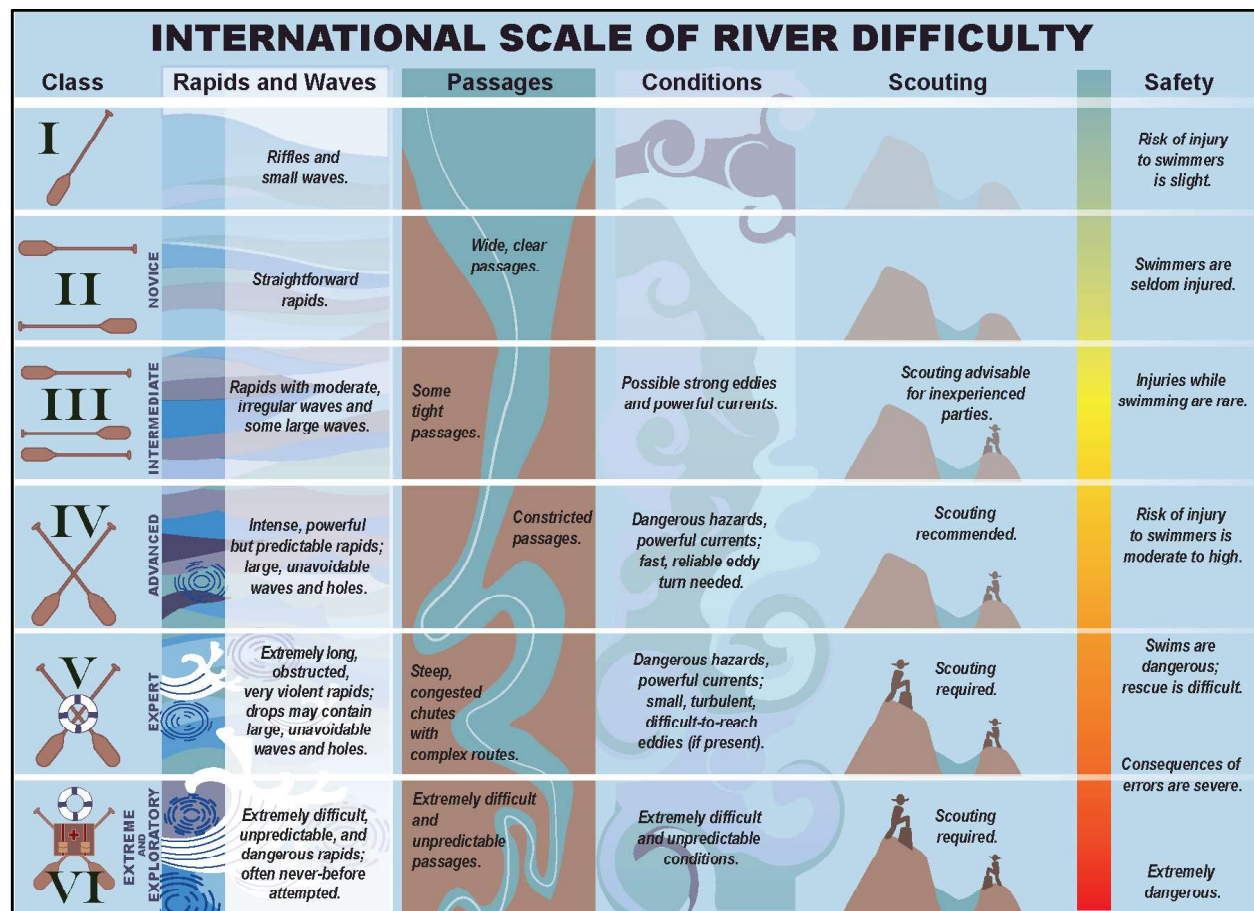


Figure 2-1. International Scale of River Difficulty.

2.2 REGIONAL SETTING AND RIVER RESOURCES

The Colorado River forms the heart of the Colorado Plateau physiographic province, which is centered on the Four Corners region of the southwestern United States and includes much of Utah, Arizona, Colorado, and New Mexico. The Colorado River basin spans approximately 246,000 square miles and drains watersheds from seven western states (U.S. Geological Survey 2018). In Utah, the Colorado River runs in a southwesterly direction and has two major tributaries, the Green and San Juan Rivers, with smaller sources, such as the Dolores and Dirty Devil Rivers, flowing in from the east and west, respectively. The Colorado River and its tributaries supply water to nearly 40 million people, irrigate almost 5.5 million acres of agricultural lands, and help meet the energy needs of the western United States with hydropower. In addition, the Colorado River is of key importance to at least 22 federally recognized tribes (Bureau of Reclamation 2012). It is the lifeblood of seven national wildlife refuges, four national recreation areas, and 11 national parks and monuments, and supports a diversity of wildlife species and habitats.

The Green River is the largest tributary to the Colorado River, beginning on the slopes of Wyoming’s Wind River Range. It flows into Utah at Flaming Gorge Reservoir, loops through northwestern Colorado, returns to Utah through Whirlpool Canyon in Dinosaur National Monument, then merges with the Colorado River in Canyonlands National Park. The Green River basin covers parts of Wyoming, Utah, and Colorado, and it drains the entire northeast corner of Utah (Webb 1994). Approximately 450 miles of the river’s 730-mile length is in Utah. Major tributaries of the Green River in Utah are the Duchesne, White, and San Rafael Rivers. Precontact peoples of the Fremont and Ancestral Puebloan cultures

inhabited the Green River area, and it is important to today’s tribes, including the Ute Indian Tribe of the Uintah and Ouray Reservation. The river provides water for thousands of acres of irrigated land, hydropower to communities, and habitat for fish and wildlife.

In addition to water supply and irrigation uses, the Colorado and Green Rivers are renowned for their natural, cultural, and recreational resources. Natural resources of the rivers include wildlife and wildlife habitat, scenery, geology, and paleontology. Cultural resources of the rivers include prehistoric, protohistoric, and historic sites. The Colorado River and Green River CMPs provide more detailed information on the natural and cultural resources in the planning area (<https://ffsl.utah.gov/state-lands/>). The Colorado and Green Rivers also offer some of Utah’s most outstanding river-based outdoor recreation opportunities. Both rivers provide opportunities for recreationists to float through the characteristic red rock desert that defines much of the Colorado Plateau. Recreational opportunities in other jurisdictions upland of the planning area include camping, fishing, hunting, hiking, climbing, mountain and road biking, wildlife watching, interpreting the Colorado Plateau landscape (e.g., geology, cultural resources, paleontology), photography, and viewing the scenic beauty of the landscape.

2.3 RIVER SEGMENT (MANAGEMENT UNIT) DESCRIPTIONS

This section provides descriptions of the four river segments in the planning area. Each of the river segments is considered a management unit for the purposes of this RMP.

2.3.1 Colorado River Management Units

2.3.1.1 *The Moab Daily*

The Moab Daily Management Unit runs from RM 113 to RM 47.5 and is defined in the Colorado River CMP as the reach that runs from the Bald Eagle Camp to the Potash boater access point, for a total of approximately 65.5 RMs (Figure 2-2).

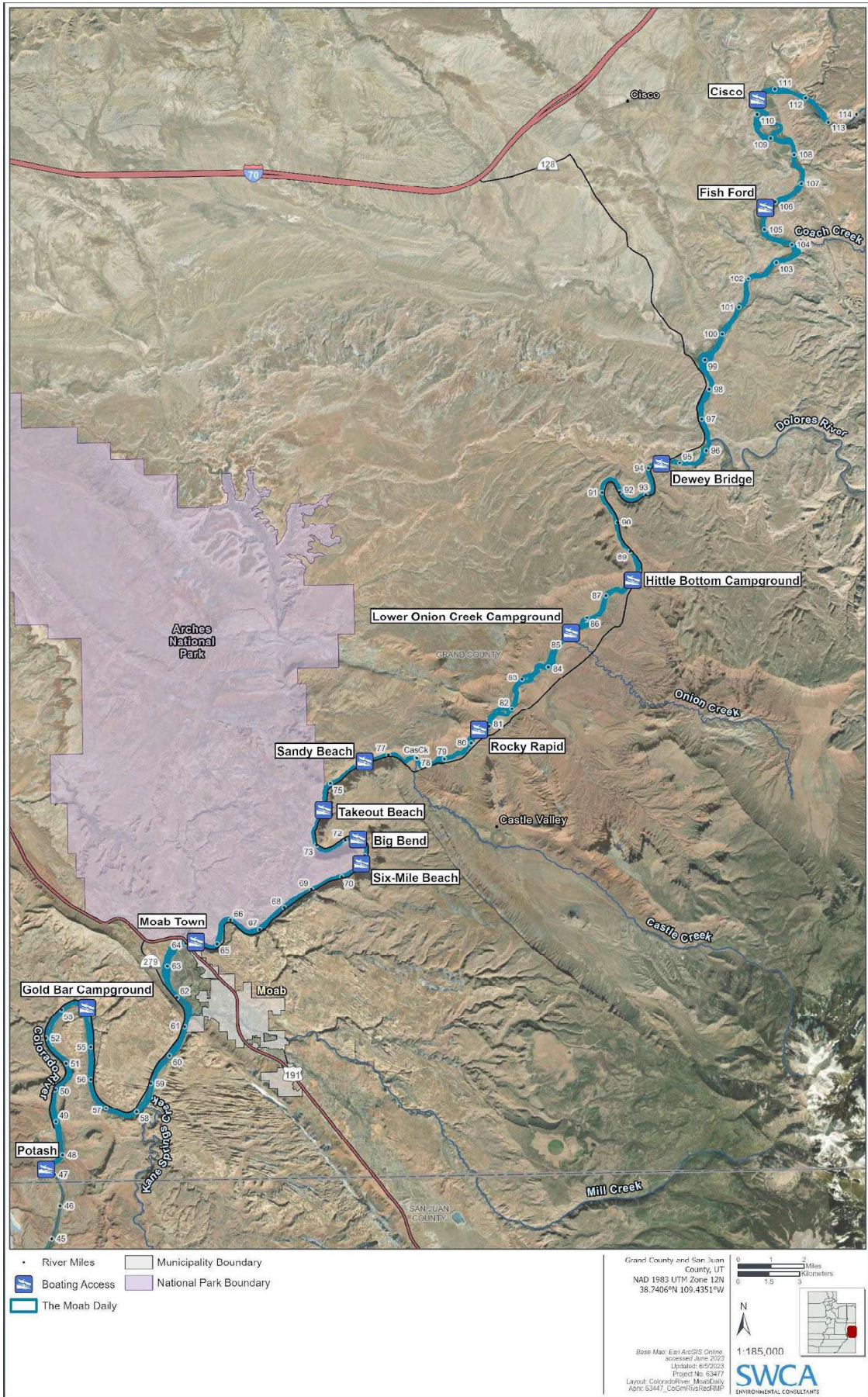


Figure 2-2. The Moab Daily Management Unit of the Colorado River.

Most river users refer to the Moab Daily proper as the section between Hittle Bottom and Takeout Beach. This section is one of the most popular river trips in Utah and hosted an average of approximately 55,000 commercial passengers per year from 2018 to 2022 (Murdock 2023). It attracts boaters of all skill levels and is frequented by commercial whitewater rafting trips. Boaters can choose to raft a single section or multiple combined sections in The Moab Daily Management Unit, as follows (sections begin and end at boater access points) (Grand County Economic Development 2022):

- Cisco to Fish Ford (approximately 5.0 miles): flat water
- Fish Ford to Dewey Bridge (approximately 11.0 miles): flat water
- Dewey Bridge to Hittle Bottom (approximately 6.5 miles): flat water
- Hittle Bottom to Onion Creek (approximately 2.5 miles): flat water
- Onion Creek to Rocky Rapid (approximately 5.0 miles): Class II–III rapids
- Rocky Rapid to Sandy Beach (approximately 4.5 miles): Class II–III rapids
- Sandy Beach to Takeout Beach (approximately 2.0 miles): one Class II rapid
- Takeout Beach to Big Bend or Six-Mile Beach (approximately 2.0–3.5 miles): one Class II rapid
- Big Bend or Six-Mile Beach to Moab Town (approximately 6.0–7.5 miles): flat water
- Moab Town to Gold Bar Campground (approximately 10.5 miles): flat water
- Gold Bar Campground to Potash (approximately 6.5 miles): flat water

Most boater access points in this management unit are maintained by the BLM’s Moab Field Office. Figure 2-3 is a photograph of The Moab Daily Management Unit. Figure 2-4 provides an example of historical recreation use in The Moab Daily Management Unit.



Figure 2-3. Representative stretch of The Moab Daily Management Unit.





Figure 2-4. Georgie White, of Georgie’s Royal River Rats, in the captain’s bay of her G-rig “Woman of the River” near Gold Bar in The Moab Daily Management Unit, as work crews blast the road cut for the Potash Road near Moab, Utah.

Credit: George Rathbun, private collection, Moab, 1958.

All private use is allowed in The Moab Daily Management Unit. Commercial motorized tour permits have historically been issued only in the reach from Canyonlands National Park (in the Meander Canyon Management Unit) upstream to Red Cliffs Lodge (in The Moab Daily Management Unit).

The BLM Moab Field Office manages most camping and recreation above the Colorado River’s OHWM in The Moab Daily Management Unit. Public boater access points in The Moab Daily Management Unit and nearby restrooms are summarized in Table 2-1.

Table 2-1. Public Boater Access Points in The Moab Daily Management Unit

Recreational Amenity (approximate RM)	Boater Access Point 	Restrooms 
Cisco (110.5)	X	X
Fish Ford (105.5)	X	X
Dewey Bridge (94.5)	X	X
Hittle Bottom (88)	X	X
Lower Onion Creek (85.5)	X	X
Rocky Rapid (80.5)	X	X
Sandy Beach (76)	X	X
Takeout Beach (74)	X	X
Big Bend (71.5)	X	X
Six-Mile Beach (70.5)	X	
Moab Town (64.5)	X	
Gold Bar Campground (54)	X	X
Potash (47.5) (privately owned but public use allowed)	X	X

In 2023, FFSL issued 28 commercial river tour permits throughout The Moab Daily Management Unit and three commercial motorized tour permits in the reach from Canyonlands National Park upstream to Red Cliffs Lodge. In addition to commercial outfitters, educational institutions, 501(c)(3) organizations, special events, and commercial film productions also obtain permitting for use of the river.

BLM special recreation permit and trip data for The Moab Daily Management Unit are provided in Appendix B.

2.3.1.2 Meander Canyon

The Meander Canyon Management Unit is an approximately 16.5-mile reach of the Colorado River that runs from RM 47.5 to RM 31 (Figure 2-5). It begins at the Potash boater access point and ends at the border of Canyonlands National Park. Meander Canyon contains Class I water bounded by dramatic sandstone cliffs and is the beginning of a multi-day float trip through Canyonlands National Park. Figure 2-6 is a photograph of the Meander Canyon Management Unit.

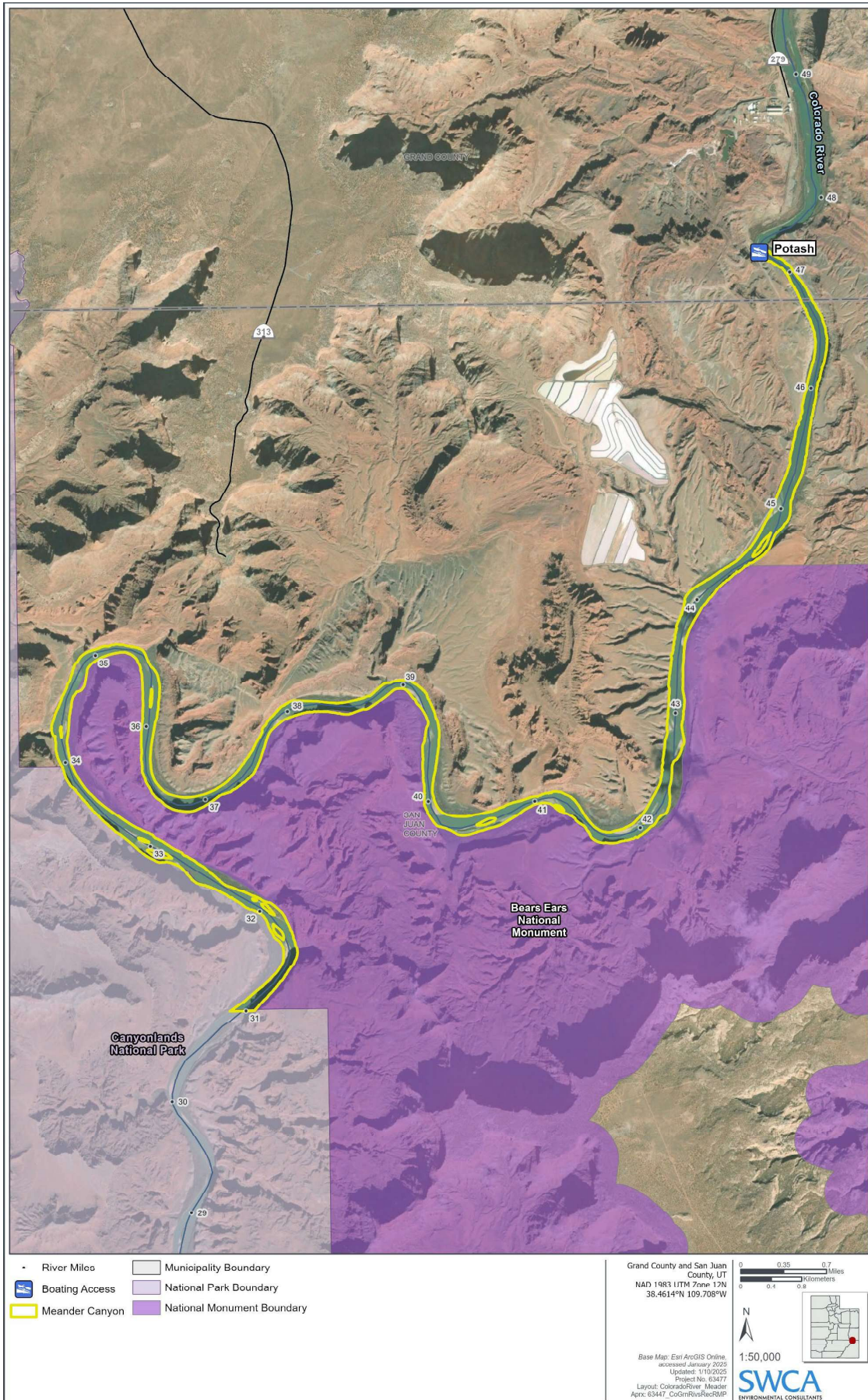


Figure 2-5. Meander Canyon Management Unit of the Colorado River.



Figure 2-6. View of the Meander Canyon Management Unit from Dead Horse Point State Park.

Photograph by Roy Luck. No changes made to this photograph. License available at: <https://creativecommons.org/licenses/by/4.0/>.

The Meander Canyon Management Unit is directly downriver of The Moab Daily Management Unit. There is only one boater access point in this river reach, as shown in Table 2-2.

Table 2-2. Public Boater Access Points in the Meander Canyon Management Unit

Recreational Amenity (approximate RM)	Boater Access Point 	Restrooms 
Potash (47.5) (privately owned but public use allowed)	X	X

In 2023, FFSL issued 22 commercial river tour permits throughout the Meander Canyon Management Unit and three commercial motorized tour permits from Canyonlands National Park upstream to Red Cliffs Lodge. Of the 22 commercial river tour outfitters, 20 are the same outfitters permitted for The Moab Daily Management Unit. Two of the three commercial motorized tour outfitters (the same three outfitters as are permitted upstream) are Canyonlands National Park concessionaires.

NPS visitor data for river segments in Canyonlands National Park (which include the segment below Meander Canyon) are provided in Appendix B.

2.3.2 Green River Management Units

2.3.2.1 Green River Valley

The Green River Valley Management Unit is an approximately 12.5-mile reach of the Green River that runs from RM 132.5 to RM 120 (Figure 2-7). This segment of the river can be floated by itself as a day trip or can be combined with Labyrinth Canyon for a multi-day trip. The Green River Valley Management Unit is characterized by slow-moving, flat water with a single Class III rapid and is mostly bordered by irrigated agricultural lands. Figure 2-8 is a photograph of the Green River Valley Management Unit.

The Green River Valley Management Unit begins at the Swasey’s Landing boater access point and ends at the Green River State Park boater access point. Swasey’s Beach Campground, a BLM fee area, is just upstream of the Swasey’s Landing boater access point. The Green River State Park boater access point is at Green River State Park, which is operated by UDSP. A Utah State Parks pass is required to use this boater access point.

Approximately 4 miles downstream from the start of the Green River Valley reach is the Tusher Diversion Dam. The dam is owned and operated by the Green River Canal Company and regulated by FFSL, the Utah Division of Water Rights, and the Utah Department of Agriculture and Food. The dam has a central boat passage designed to be fully functioning at flows of at least 1,300 cubic feet per second; it may be more difficult to navigate or impassable at lower flows (Bowen Collins & Associates, Inc. 2016). High visibility signage, a portage trail, and an emergency boat landing are located upstream of the dam on river left. Boaters are encouraged to scout the boat passage from the portage trail before continuing downstream.

The short length of the Green River Valley Management Unit, together with adjacent private land and a lack of designated upland camping opportunities, makes overnight trips uncommon. Private use of motorized and non-motorized watercraft is allowed in this management unit, but only certain commercial uses have been permitted.

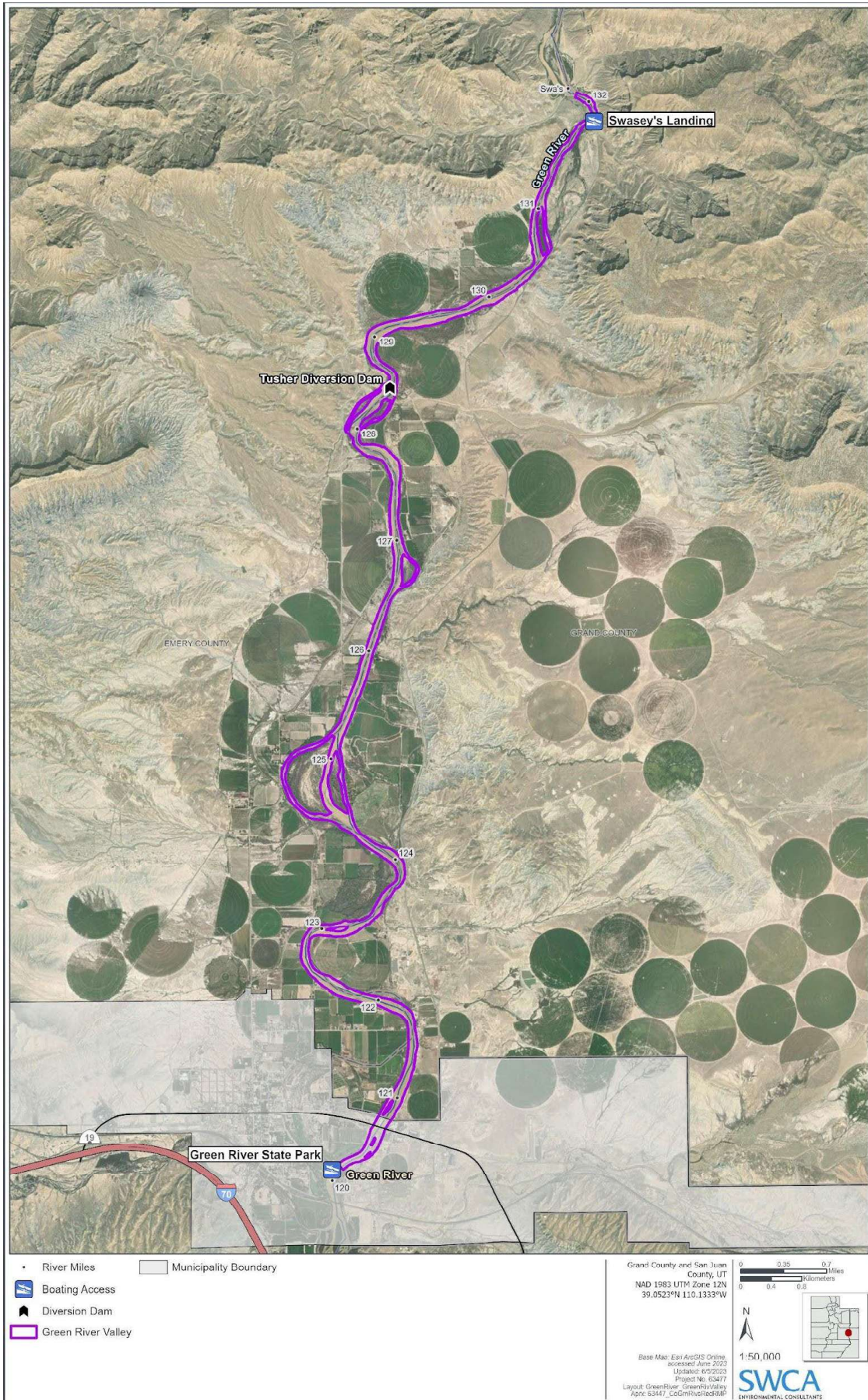




Figure 2-7. Green River Valley Management Unit of the Green River.



Figure 2-8. Representative stretch of the Green River Valley Management Unit.

Public boater access points in the Green River Valley Management Unit and nearby restrooms are shown in Table 2-3.

Table 2-3. Public Boater Access Points in the Green River Valley Management Unit

Recreational Amenity (approximate RM)	Boater Access Point 	Restrooms 
Swasey's Landing (131.5)	X	X
Green River State Park (120)	X	X

In 2023, FFSL issued 36 commercial river tour permits for the Green River (including both Green River Valley and Labyrinth Canyon Management Units).

2.3.2.2 Labyrinth Canyon

The Labyrinth Canyon Management Unit runs from approximately RM 120 to RM 47, from Green River State Park to the boundary of Canyonlands National Park (Figure 2-9). This river reach begins in the city of Green River and is remote except for the first 10 miles. Downstream of the mouth of Red Wash, desert sandstone cliffs rise as boaters travel toward Mineral Bottom. The total length of the reach is approximately 73.5 RMs. Figure 2-10 is a photograph of a typical Labyrinth Canyon scene.

The Labyrinth Canyon reach contains flatwater (Class I) boating opportunities. Boaters usually engage in multi-day float trips, although some groups plan day trips between boater access points at Green River State Park, Crystal Geysers, and Ruby Ranch. Multi-day trips typically cover 15 to 20 miles per day during



high water and 10 to 15 miles per day during low water. Some multi-day boaters continue past the Mineral Bottom boater access point into Stillwater Canyon in Canyonlands National Park.

Crystal Geyser, approximately 4.5 RMs downstream of Green River State Park, offers a primitive pedestrian boater access point. The Ruby Ranch boater access point is on private land, approximately 23 RMs downstream of Green River State Park, and requires user fees. The Mineral Bottom boater access point, at the south end of the Labyrinth Canyon reach, contains a boat ramp, a primitive designated campsite, and vault toilets. All three of these boat ramps are constructed with unimproved native soil surfaces. Sandbar campsites are abundant in Labyrinth Canyon; however, they are absent during periods of high water in the spring.

All types of private watercraft have historically been allowed, but only certain types of commercial use have been permitted in Labyrinth Canyon. An interagency agreement between FFSL, the BLM, and UDSP/DOR requires private boaters to acquire a free permit for all trips between Green River State Park and the boundary of Canyonlands National Park. This free permit is used as a tool to educate visitors regarding river regulations and helps agencies estimate traffic volumes in the river corridor. The permit is available online at the BLM Moab Field Office website. This permit system does not limit the number of users.

Public boater access points in the Labyrinth Canyon Management Unit and nearby restrooms are shown in Table 2-4.

Table 2-4. Public Boater Access Points in the Labyrinth Canyon Management Unit

Recreational Amenity (approximate RM)	Boater Access Point 	Restrooms 
Green River State Park (120)	X	X
Crystal Geyser (115.5)	X	
Ruby Ranch (97)	X	
Mineral Bottom (52)	X	X

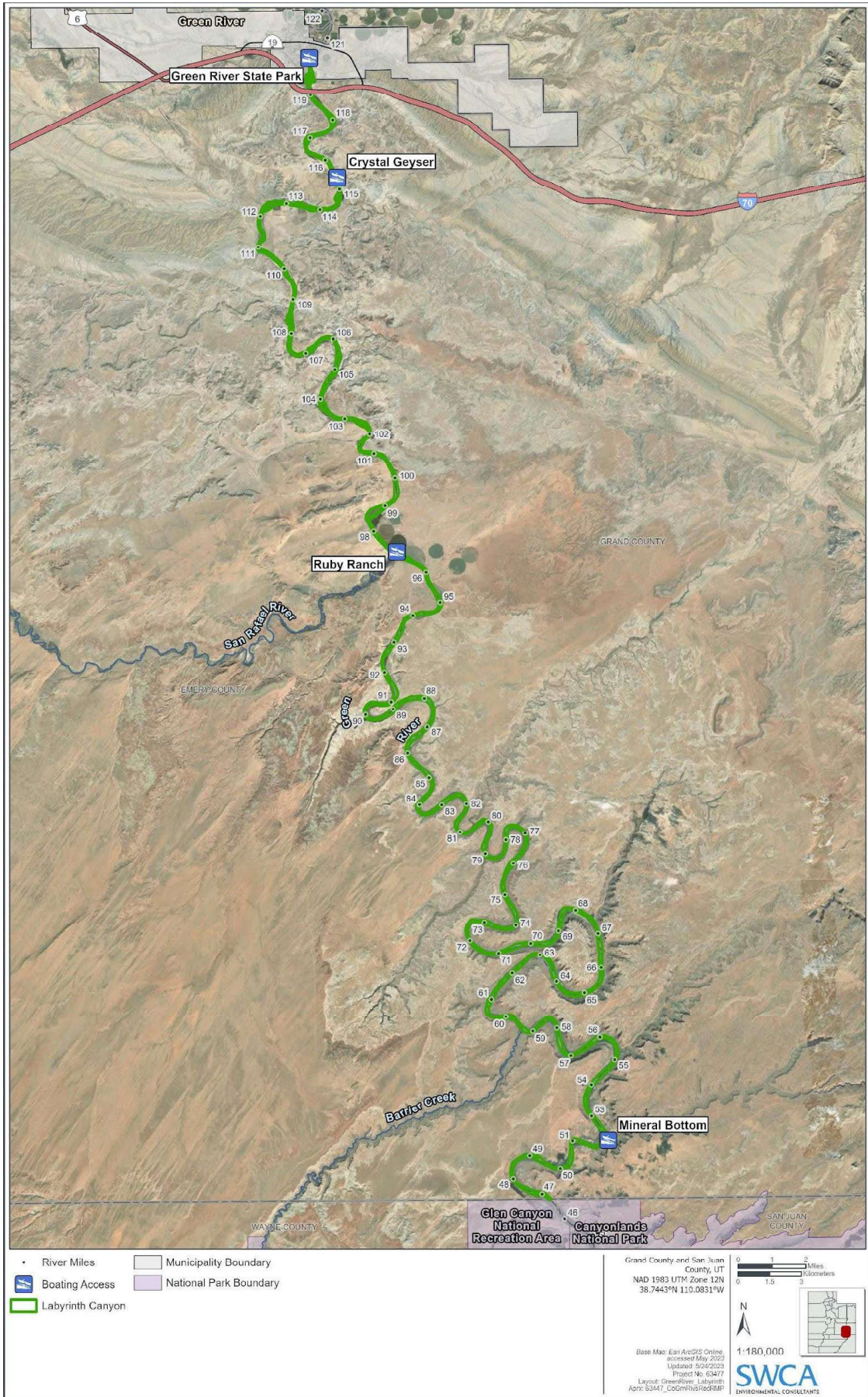


Figure 2-9. Labyrinth Canyon Management Unit of the Green River.



Figure 2-10. Representative stretch of the Labyrinth Canyon Management Unit.

Commercial river permit data for the Labyrinth Canyon Management Unit are discussed in Section 2.3.2.1 (Labyrinth Canyon Management Unit data are combined with Green River Valley Management Unit data). BLM visitor data for the Labyrinth Canyon segment are provided in Appendix B.

2.4 RIVER REGULATIONS

2.4.1 State Boating Act

Utah's State Boating Act requires all motorized boats to be properly registered with the Utah Division of Motor Vehicles (Utah Code 73-18-7) and to carry liability insurance while operating on Utah waters (Utah Code 73-18c) (motorboats with engines less than 50 horsepower, not including personal watercraft, are exempt from the insurance requirement).

The State Boating Act also requires all boats, including paddleboards, kayaks, and canoes, to have at least one wearable, approved personal flotation device (PFD) (life jacket) for each person on board. Children under 13 years of age are required to wear a life jacket whenever a boat is in operation. Life jackets are also required for water skiers and wake surfers; people driving personal watercraft (jet skis); and people on rivers on any vessel, including inner tubes.

Additional statutory guidance for PFDs is described below.

- On whitewater rivers, a vessel operator shall carry Type I or Type III PFDs on board the vessel and shall ensure all PFDs are used according to the approval conditions on their labels (UAC R650-215-5).
- Requirements for wearing PFDs (UAC R650-215-6):
 - An inflatable PFD may not be used to meet PFD requirements.
 - All persons on board a personal watercraft shall wear a PFD.
 - The operator of a vessel under 19 feet in length shall ensure each passenger 12 years of age or younger wears a PFD at all times. This rule is also applicable to vessels 19 feet or more in length, except when the child is inside the cabin area.
 - On every river, every person on board a vessel must wear a PFD, except PFDs may be loosened or removed by persons 13 years of age or older on designated flatwater river sections. Designated flatwater sections in the planning area consist of the Green River from the Tusher Diversion Dam to the confluence with the Colorado River, and the Colorado River from Big Hole Canyon in Westwater Canyon to Onion Creek and from Drinks Canyon to the confluence with the Green River (UAC R650-215-7).
- All PFDs must be used according to the conditions or restrictions listed on the U.S. Coast Guard approval label (UAC R650-215-8).

Boats less than 21 feet long must have at least one spare paddle, oar, or motor on board. All boats that are not self bailing must carry a bail bucket or bilge pump (DOR 2023).

Utah's State Boating Act also provides vessel navigation and steering laws for avoiding collisions, passing, overtaking another vessel, driving in narrow channels, sailboats, and persons riding on the bow of a boat. For motorized boats, the following regulations on wakeless speed are provided in the boating act (Utah Code 73-18-15.1(10)):

The operator of any vessel may not exceed a wakeless speed when within 150 feet of the following:

- Another vessel
- A person in or floating on the water
- A water skier being towed by another boat
- A water skier being towed behind the operator's vessel unless the skier is still surfing or riding in an upright stance on the wake created by the vessel
- A water skier being towed behind another vessel, and the skier is still surfing or riding in an upright stance on the wake created by the other vessel
- A shore fisherman
- A launching ramp
- A dock
- A designated swimming area

The operator of a motorized boat is responsible for any damage or injury caused by the wake produced by the boat (Utah Code 73-18-15.1(11)).

The DOR administers the State Boating Act and has primary responsibility for boating safety and enforcement in the planning area.

2.4.2 Use Types

Table 2-5 summarizes use types historically allowed or permitted in the planning area’s management units.

Table 2-5. Historical Use in the Planning Area

River	Management Unit	Type of Use Allowed or Permitted
Colorado	The Moab Daily	Private motorized use allowed throughout. Commercial motorized use permitted in designated reaches. Open to both private and commercial non-motorized use.
Colorado	Meander Canyon	Open to commercial and private motorized and non-motorized use.
Green	Green River Valley	Open to private motorized use; only certain commercial uses have been permitted. Open to both private and commercial non-motorized use.
Green	Labyrinth Canyon	Open to private motorized use; only certain commercial uses have been permitted. Open to both private and commercial non-motorized use.

Note: All commercial users must obtain a right-of-entry permit from FFSL (UAC R652-41-200) and other federal, state, and local authorizations as may be applicable.

2.4.3 Utah Division of Forestry, Fire & State Lands and Bureau of Land Management Rules

FFSL and BLM rules for the management units in the planning area are summarized in Table 2-6.

Table 2-6. Utah Division of Forestry, Fire & State Lands and Bureau of Land Management Rules in the Planning Area by Management Unit

Management Unit	FFSL Recreational Use Rules*	BLM Recreational Use Rules†
All units	<p>The maximum group size for overnight river trips is limited to 25 persons. Two or more groups may not camp together if the resulting group size exceeds 25 persons at a campsite.</p> <p>Groups on overnight river trips are required to use a washable, reusable toilet system for disposal of solid human waste through an authorized sewage system.</p> <p>All garbage, human waste, and pet waste must be carried off the river and disposed of properly.</p> <p>Groups on overnight river trips must use a durable metal fire pan at least 12 inches wide, with a lip of at least 1.5 inches around its outer edge, to contain campfires.</p> <p>Only driftwood may be used as firewood. No cutting of firewood is allowed except in designated areas. Ashes and charcoal accumulated during a trip must be carried out and disposed of properly.</p> <p>Commercial river trips must obtain a right-of-entry permit from FFSL and a special recreation permit from the federal agency managing the land through which the river flows.</p>	<p>Campers on all overnight river trips must carry out all solid human waste, campfire ash, and charcoal and dispose of them properly. All overnight river trips must possess a durable metal fire pan at least 12 inches wide with a 1.5-inch lip, and all fires are restricted to the fire pan. Collection of firewood is prohibited except for driftwood.</p>
Labyrinth Canyon	<p>Each noncommercial group floating the river must have a valid interagency noncommercial river trip permit in their possession and shall abide by its terms.</p>	–

Management Unit	FFSL Recreational Use Rules*	BLM Recreational Use Rules†
	Interagency Noncommercial Permit Stipulations	
	Maximum group size is 25 people.	
	Groups are required to use a washable, leak-proof, reusable toilet system that allows for the carry-out and disposal of human feces via an authorized sewage system. The toilet must be of adequate size for the group size and trip length. Disposable bags may be used but must be contained in a washable, reusable container.	
	Groups are required to use a durable metal fire pan at least 12 inches wide with at least a 1.5-inch lip around the outer edge and of sufficient size to contain a fire and its remains. Fire pans must be carried on all overnight trips.	
	Each person shall have a proper-size, serviceable Type I, II, III, or V PFD (life jacket) readily available. Persons 12 years and under must wear their PFD at all times on the water.	
	Each vessel shall have a spare means of propulsion. Low-capacity vessels under 16 feet in length (i.e., kayaks, canoes, inflatable kayaks) must carry spare paddles as follows: one to three vessels require one spare paddle, four to six vessels require two spare paddles, seven to nine vessels require three spare paddles, etc.	
	Each vessel shall have a bailing bucket or bilge pump (does not apply to self-bailing boats, kayaks with spray skirts, and inflatable kayaks).	
	Each boat 16 feet long or longer must have immediately available a Type IV throwable PFD or a commercially made river throw bag with a minimum 40 feet of line.	
	Groups must adhere to Utah’s State Boating Act (Utah Code 73-18), including registration of motorized boats, required equipment, and operational requirements.	
	All trip participants must carry all charcoal, fire ash, garbage, trash, and human and pet feces out of the canyon. Leaving human or pet feces in the canyon or dumping them in restrooms or trash receptacles at public facilities is prohibited. Gray water, strained free of solids, and urine should be discharged into the main stream of the river.	
	All trip participants must launch, travel (stay in visual contact), and camp together as a group. Groups launching separately may not camp together if it would result in more than 25 persons occupying a camp.	
	All trip participants must limit firewood gathering to river driftwood only and keep fully contained fires in the fire pan.	
	Trip participants must not remove, damage, or destroy archaeological, historical, or ecological resources or mark or deface any rock surface, tree, or other vegetation.	

Note: River users must obtain a permit from the NPS for trips continuing past the Meander Canyon or Labyrinth Canyon Management Units into Canyonlands National Park. Canyonlands National Park may have different regulations and requirements for river users.

* Data from UAC R652-70-2400; BLM and FFSL (2017).

† Data from BLM (2008a); BLM and FFSL (2017).

2.5 RECREATION ISSUES

FFSL’s visitor use surveys indicate that the majority of visitors who come to the planning area are satisfied with their experience; however, in instances when visitors are unaware of or encounter conditions that they do not expect, they have strong negative feelings (see Section 2.6). Recreation management concerns have arisen in the planning area primarily because of the popularity of river reaches, such as The Moab Daily and Labyrinth Canyon, and the variety of watercraft on the rivers.

Different types of watercraft have different freeboard, which is the distance between the waterline and the top of a watercraft’s sides or deck. Freeboard measures the distance from the waterline to the point on the watercraft most susceptible to taking on water. High freeboard means the sides and deck of the watercraft are high above the waterline; it offers more protection from spray, especially on choppy water. Low freeboard means the sides and deck of the watercraft are low above the waterline. Low freeboard watercraft are often flat bottomed and have a shallow draft, allowing access to shallow, nearshore areas (e.g., kayaks). Wakes from motorized watercraft can be problematic for low freeboard watercraft.

Crowding in some management units, freeboard differences, and the fact that non-motorized users typically travel downstream, whereas motorized users typically travel upstream and downstream, may be factors contributing to user conflicts.

Key recreation issues identified through the public outreach processes of the 2020 Colorado River and Green River CMPs and the RMP are summarized below. Additional information on recreation-related public comments can be found in Appendix C.

2.5.1 Colorado River Management Units

Key recreation issues along the Colorado River include the following:

- Conflicts between motorized and non-motorized use, primarily on the Colorado River.
- Conflicts from increased recreational use and crowding on the river.
- Needed improvements to existing boater access points and facilities (e.g., ramps, restrooms, trash receptacles). Boater access points specifically mentioned by the public for improvement include Fish Ford, Dewey Bridge, Hittle Bottom, Takeout Beach, Moab Town, and Potash.
- Creation of new boater access points. Potential new boater access points requested by the public include a small ramp upstream of Sandy Beach, a ramp near the Lions Park Transit Hub for small craft like paddleboards (or downstream of Grandstaff), and a pedestrian-only access at the Moab Town Ramp Restoration Site.
- Congestion at heavily used boater access points, such as the Moab Town ramp.

Conflicts between motorized and non-motorized users were the most common public concerns (see Appendix C). Commenters who dislike motorized use (e.g., jet boats, jet skis) indicated that this type of use is noisy; disrupts peace and solitude; presents perceived safety issues; causes bank erosion; contributes to pollution; disrupts camping; and overall diminishes the visitor experience. They stated that they believe motorized boat use has increased in recent years and boats are now larger and faster. Commenters suggested prohibiting motorized use in certain areas or limiting motorized use in some way. Conversely, commenters also supported multiple-use (motorized and non-motorized use) and indicated that motorized boats provide a recreational opportunity for people with different interests. In addition, they stated that motorized boats provide options for disabled people and the elderly to experience the river. Commenters also indicated that motorized users were respectful, considerate, and helpful in emergency situations. Several commenters stated that with some additional management and education, motorized and non-motorized users could coexist in positive ways.

Both the Green and Colorado Rivers may have low flows requiring motorized boats to stay on plane so they do not run aground, as well as limited channel width to maneuver. This condition, called “restricted draft” can make it difficult or impossible to adhere to more commonly understood inland navigation rules, such as proximity and wakeless speed regulations (see Section 2.4.1). This condition may be contributing to some of the identified issues between motorized and non-motorized users.

2.5.2 Green River Management Units

Key recreation issues along the Green River include the following:

- Heavy use of the Labyrinth Canyon Management Unit.
- Some users are not aware they need a permit.

- Needed improvements to existing boater access points, such as Mineral Bottom.
- Creation of new boater access points. Specific locations mentioned by the public include near Irvine Ranch Road and near Fossil Point Road.
- Conflicts between motorized and non-motorized use.

Similar comments about motorized and non-motorized use as those described in Section 2.5.1 were submitted for the Green River management units; however, there were fewer comments overall.

2.6 RECREATIONAL USE AND EXPERIENCE DATA

FFSL implemented a 2-year data collection effort to better understand recreation issues and to inform management in the planning area. The purpose of the data collection effort was to 1) provide an accurate characterization of how recreationists are using the rivers, 2) characterize the types of on-river encounters between river users, and 3) assess river users' preferences for potential management actions. The results of the data collection effort were used to help develop the management goals and objectives in Chapter 3.

2.6.1 Methods

The sampling design was created to capture a representative sample of the users at public boater access points, including private boaters and commercial outfitters. Data were collected through the administration of on-site surveys to recreationists on the four river management units in the planning area. Nine public boater access points were selected for surveys to capture a representative sample of river users. Users at private boater access points, such as those at Canyonlands by Night and Red Cliffs Lodge, were not surveyed. The survey results therefore do not capture the data points, preferences, and perceptions of river users who only use these private points (e.g., motorized users at Canyonlands by Night). However, one private boater access point was sampled on the Labyrinth Canyon Management Unit (Ruby Ranch) because of the lack of public boater access points to survey in this reach.

The 2021 data collection effort focused on The Moab Daily Management Unit of the Colorado River. The 2022 data collection effort focused on the Meander Canyon Management Unit of the Colorado River and the Green River Valley and Labyrinth Canyon Management Units of the Green River. Surveys were conducted primarily on weekends (Friday through Sunday), when the highest river use typically occurs. Sampling locations and years are shown in Table 2-7.

Table 2-7. Sampling Locations and Years

Management Unit	Sampling Location	Year Sampled
The Moab Daily	Dewey Bridge	2021
	Hittle Bottom Campground	2021
	Lower Onion Creek Campground	2021
	Takeout Beach	2021
	Six-Mile Beach	2021
	Moab Town	2021
Meander Canyon	Potash	2022
Green River Valley	Green River State Park	2022
Labyrinth Canyon	Ruby Ranch	2022
	Mineral Bottom	2022

The initial survey protocol included two sampling time frames, one in the morning (8:00 a.m. to 2:00 p.m.) and one in the afternoon (12:00 p.m. to 6:00 p.m.); however, the morning time frame yielded very few, if any, river users coming off the river. Consequently, the protocol was adjusted to include only the afternoon sampling time frame. River users were approached by a survey technician shortly after they came off the water to gather information about their experience on the river. The surveys were administered as close to the water's edge as possible to avoid contacting other recreationists who might be participating in an activity around, but not on, the river (e.g., campers, walkers). The survey technician informed river users that they were collecting information about river users' experiences on the river to help develop the RMP. The survey technician asked for only one visitor from each group, the one with the most recent birthday, to take the survey. If the potential respondents agreed to complete the survey, the technician handed them an iPad tablet computer and stood nearby to answer any questions. All surveys were completed using a Qualtrics survey administration application.

The survey contained the following sections:

- Trip characteristics: The river user's primary recreational activity, types of watercraft used, duration of the trip, group size, put-in location, and intermittent stops taken along the river
- Encounters: Types, numbers, and proximity of other watercraft encountered on the river; expectations and perceptions of encounters
- Support for management actions: Strength of river users' preferences for several potential management actions
- Respondent characteristics: Basic sociodemographic characteristics of the river user

2.6.2 Results

2.6.2.1 Survey Days and Response Rates

Data were collected during 47 site-days at the sampling locations on both rivers between April 10, 2021, and October 10, 2022. The total number of contacts made, completed surveys, and response rates are shown in Table 2-8 by sampling location. In total, 358 contacts with river users were made (291 on the Colorado River and 67 on the Green River), and 306 completed surveys were received (252 on the

Colorado River and 54 on the Green River). The overall response rate was 85.5%, which is a more-than-acceptable rate for in-person surveys (Dillman et al. 2008).

Table 2-8. Survey Days, Contacts, and Response Rates

Management Unit	Sampling Location	Number of Site-Days	Number of Contacts	Number of Completed Surveys	Percent Response Rate
The Moab Daily	Dewey Bridge	1	2	2	100.0%
	Hittle Bottom Campground	2	16	15	93.8%
	Lower Onion Creek Campground	1	2	2	100.0%
	Takeout Beach	10	157	138	87.9%
	Six-Mile Beach	3	16	13	81.3%
	Moab Town	5	51	41	80.4%
Meander Canyon	Potash	9	47	41	87.2%
Colorado River total		31	291	252	86.6%
Green River Valley	Green River State Park	2	4	1	25.0%
Labyrinth Canyon	Ruby Ranch	3	10	8	80.0%
	Mineral Bottom	11	53	45	84.9%
Green River total		16	67	54	80.6%
Total		47	358	306	85.5%

2.6.2.2 Trip Characteristics

The type and number of watercraft used on all four management units in the planning area are shown in Table 2-9, as well as mean group size.

Table 2-9. Watercraft Types, Watercraft Numbers, and Group Size—All Management Units

Watercraft Type	Percentage of Sampled Groups	Mean Number of Watercraft Per Group, If Used	Mean Group Size
Inflatable raft	51.3%	2.7	10.6
Kayak	30.4%	2.6	11.8
Paddleboard	24.5%	2.3	5.5
Canoe	13.7%	3.0	6.2
Inflatable raft with outboard motor	4.2%	1.7	5.7
Motorized boat (commercial)	3.3%	1.5	6.9
Inner tube	2.3%	2.0	6.7
Motorized boat (private)	1.0%	1.0	1.7
Other	0.3%	3.0	N/A

Note: N/A = not applicable.

Inflatable rafts were the most common type of watercraft in the planning area, followed by kayaks, paddleboards, and canoes. Less than 5% of groups reported using inflatable rafts with outboard motors, motorboats (either commercial or private), or inner tubes. Group size tended to be between two and three watercraft, but a small portion of groups reported using many watercraft (e.g., 15 inflatable rafts or 13 canoes). Although there was relative consistency in the number of watercraft used per group, group sizes differed notably. The mean group size for inflatable raft users (10.6) and kayakers (11.8) was notably higher than that of river users in other types of watercraft.

Nearly two-thirds (74.4%) of all river trips were less than 1 day (Table 2-10). Of those, the average (mean) time spent on the river was reported to be 4 hours. The length of day trips was fairly consistent across all groups, regardless of the type of watercraft used. For those taking overnight trips on the river (25.6% of all groups), the average trip length was 3.9 days.

Table 2-10. River Trip Length By Type of Watercraft Used—All Management Units

Watercraft Type	Mean Hours (if less than 1 day)	Mean Days (if greater than 1 day)
Inflatable raft with outboard motor	5.0	4.0
Inflatable raft	4.3	2.5
Canoe	4.3	6.1
Motorized boat (private)	4.0	N/A
Kayak	3.7	3.1
Paddleboard	3.4	3.6
Other	3.0	N/A
Motorized boat (commercial)	2.3	4.5
Inner tube	1.6	5.0
All watercraft types	4.0	3.9

Note: N/A = not applicable.

River users were asked about the boater access point they used to start their trip and if they made intermittent stops during their trip. On the Colorado River, the most common put-in location was Rocky Rapid, with just over one-fifth of river users reporting they put in at this location (Table 2-11). Approximately one-third (31.1%) of river users reported not stopping on their trips (other than the put-in and take-out locations). Of the river users who did make intermittent stops, the most common stop was Sandy Beach; 14.4% of river users reported stopping at Sandy Beach. On the Green River, over half of the river users put in at Ruby Ranch (53.9%), with approximately 30.8% putting in at Green River State Park. The most common intermittent stop was Crystal Geyser (40% of river users reported stopping at this location).

Table 2-11. Trip Put-Ins and Intermittent Stops—All Management Units

Management Unit	Location (boater access point, campground)	Percentage of River Users Putting in at this Location	Percentage of River Users Stopping at this Location
Colorado River			
The Moab Daily	Rocky Rapid	20.5%	7.7%
The Moab Daily	Hittle Bottom Campground	16.4%	6.2%
The Moab Daily	Dewey Bridge	15.8%	2.9%
The Moab Daily	Lower Onion Creek Campground	15.8%	8.6%
The Moab Daily	Sandy Beach	9.9%	14.4%
The Moab Daily	Other	8.8%	4.8%
The Moab Daily	Takeout Beach	2.3%	4.3%
Meander Canyon	Potash	2.3%	0%
The Moab Daily	Cisco	1.8%	1%
The Moab Daily	Moab Town	0.6%	3.8%
The Moab Daily	Big Bend	0%	5.3%
The Moab Daily	Six-Mile Beach	0%	2.9%
The Moab Daily	Grandstaff	0%	2.9%
The Moab Daily	Upper Big Bend	0%	1.4%
The Moab Daily	Red Cliffs Lodge	0%	1.9%
The Moab Daily	Goose Island	0%	1.0%
Green River			
Labyrinth Canyon	Ruby Ranch	53.9%	20.0%
Labyrinth Canyon	Green River State Park	30.8%	0%
Labyrinth Canyon	Crystal Geyser	15.4%	40.0%
Labyrinth Canyon	Mineral Bottom	5.9%	0%

2.6.2.3 *On-River Encounters and Recreational Experiences*

Just over one-third (37.1%) of river users reported that they did not encounter another watercraft while on the river. Of the 63% of river users who did encounter another group, they saw approximately five other watercraft (mean = 4.8).

When river users met another group, just over one-quarter (28.6%) reported encountering groups using inflatable rafts, followed by groups using kayaks (22.1%), paddleboards (16.0%), and commercial motorized boats (12.4%). If river users encountered an inflatable raft, they reported seeing an average of approximately 6.7 rafts. Table 2-12 and Figure 2-11 show the percentage of river users encountering other watercraft.

Table 2-12. Type and Number of Watercraft Encountered—All Management Units

Watercraft Type	Percentage of Sampled Groups Encountering Each Type of Watercraft	Mean Number of Watercraft Encountered
Inflatable raft	28.6%	6.7
Kayak	22.1%	1.2
Paddleboard	16.0%	4.7
Motorized boat (commercial)	12.4%	3.9
Canoe	6.5%	4.2
Inflatable raft with outboard motor	5.5%	8.7
Inner tube	4.6%	2.2
Motorized boat (private)	3.4%	1.3
Other	1.0%	2.6

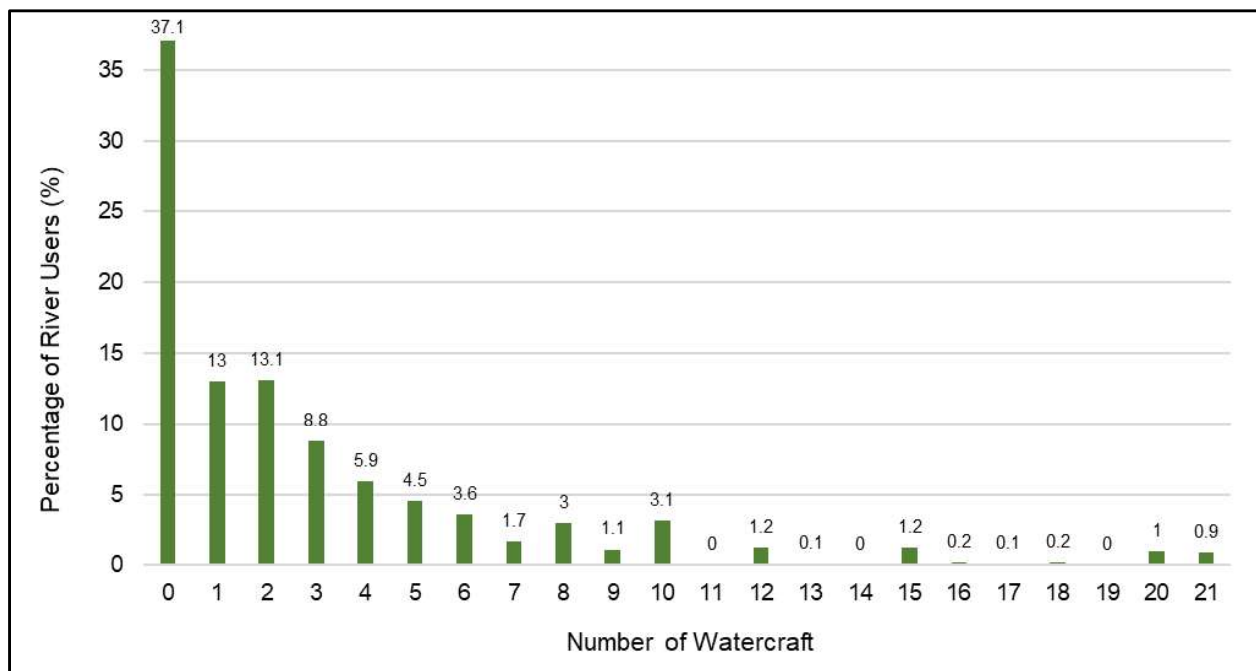


Figure 2-11. Percentage of river users encountering other watercraft.

The survey asked whether watercraft encounters were consistent with the river user’s expectations. More than half (55.0%) of respondents noted that the number of private motorized boats they saw was either “a little more” or “a lot more” than expected (Table 2-13, Figure 2-12). Approximately one-third (30.0%) of respondents indicated the number of inflatable rafts with outboard motors was either “a little more” or “a lot more” than expected. Almost one-third (30.4%) of respondents indicated the number of kayaks they saw was either “a little less” or “a lot less” than expected. This percentage was similar for canoes (30.6%) and inflatable rafts (27.1%). For all other watercraft, there was a relative balance between the percentage of respondents who indicated the number of other watercraft they saw was either more or less than expected (see Figure 2-12).

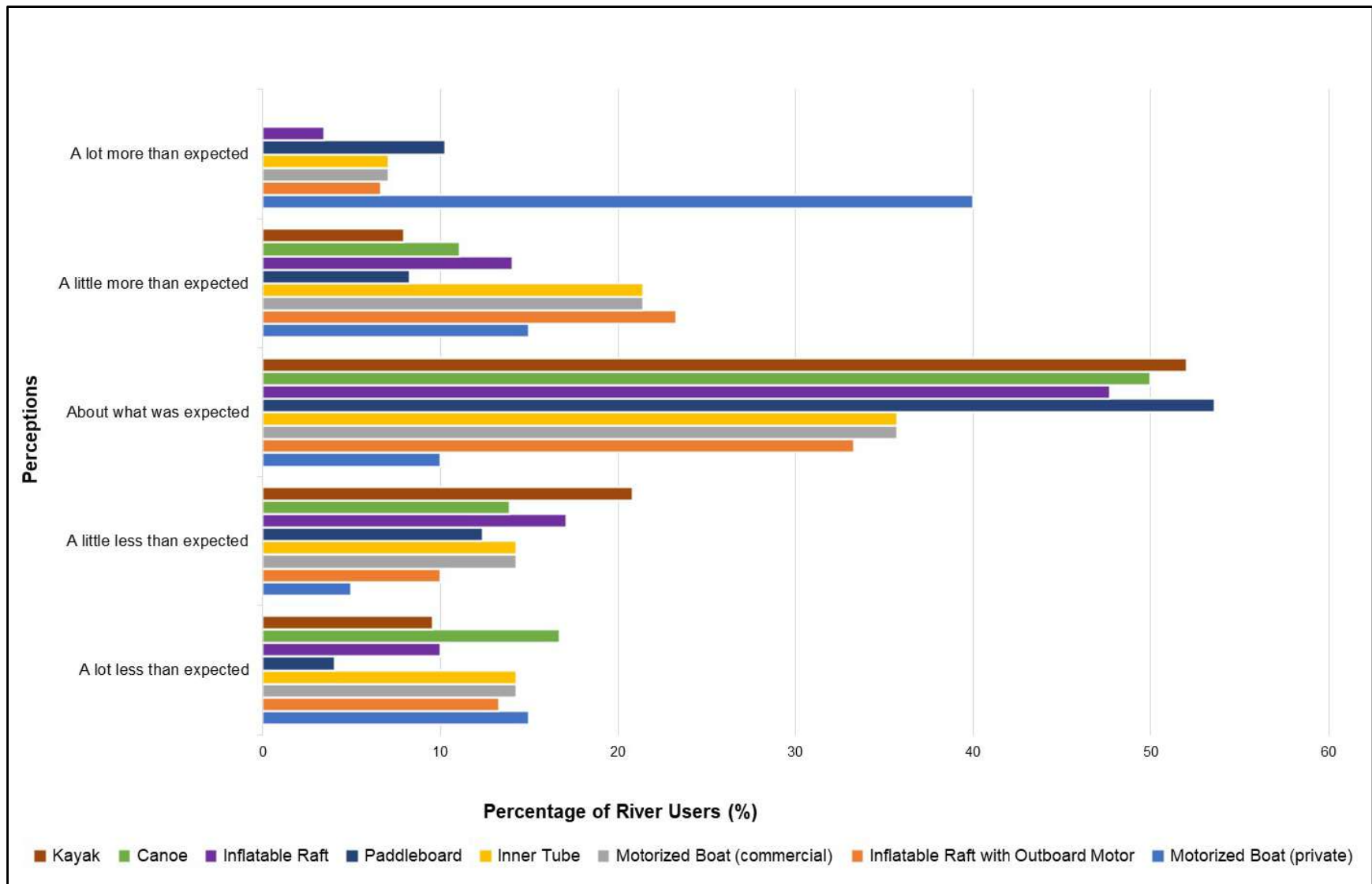


Figure 2-12. River users' perceptions of the number of watercraft encountered.

Table 2-13. Perceptions of the Number of Watercraft Encountered—All Management Units

Watercraft Type	A Lot Less Than Expected (%)	A Little Less Than Expected (%)	About What Was Expected (%)	A Little More Than Expected (%)	A Lot More Than Expected (%)	No Expectations (%)
Motorized boat (private)	15.0%	5.0%	10.0%	15.0%	40.0%	15.0%
Inflatable raft with outboard motor	13.3%	10.0%	33.3%	23.3%	6.7%	13.3%
Motorized boat (commercial)	14.3%	14.3%	35.7%	21.4%	7.1%	7.1%
Inner tube	14.3%	14.3%	35.7%	21.4%	7.1%	7.1%
Paddleboard	4.1%	12.4%	53.6%	8.3%	10.3%	11.3%
Inflatable raft	10.0%	17.1%	47.7%	14.1%	3.5%	7.7%
Canoe	16.7%	13.9%	50.0%	11.1%	0.0%	8.3%
Kayak	9.6%	20.8%	52.0%	8.0%	0.0%	9.6%

The proximity between groups using different watercraft is shown in Table 2-14 and Figure 2-13. Of the river users who encountered other watercraft, 44.4% of respondents reported coming within 150 feet or less of another group using an inner tube during their trip. Nearly as many respondents reported coming within 150 feet of other groups using inflatable rafts (41.2%) or kayaks (40.5%). Of those who did encounter a commercial motorized boat, 15.6% reported coming within less than 50 feet of it. Of those who encountered a private motorized boat, 22.2% reported coming within less than 50 feet of it.

Table 2-14. Distance of Encounters with Other Watercraft—All Management Units

Watercraft Type	Not Close At All (more than 500 feet) (%)	Not Very Close (less than 500 feet) (%)	Moderately Close (less than 300 feet) (%)	Very Close (less than 150 feet) (%)	Extremely Close (less than 50 feet) (%)
Inner tube	14.8%	11.1%	29.6%	25.9%	18.5%
Inflatable raft	12.9%	22.4%	23.5%	16.5%	24.7%
Kayak	14.1%	22.3%	23.1%	15.7%	24.8%
Motorized boat (private)	33.3%	16.7%	16.7%	11.1%	22.2%
Paddleboard	19.0%	23.2%	29.5%	14.7%	13.7%
Canoe	23.7%	26.3%	23.7%	10.5%	15.8%
Motorized boat (commercial)	18.8%	25.0%	31.3%	9.4%	15.6%
Inflatable raft with outboard motor	26.7%	23.3%	33.3%	10.0%	6.7%

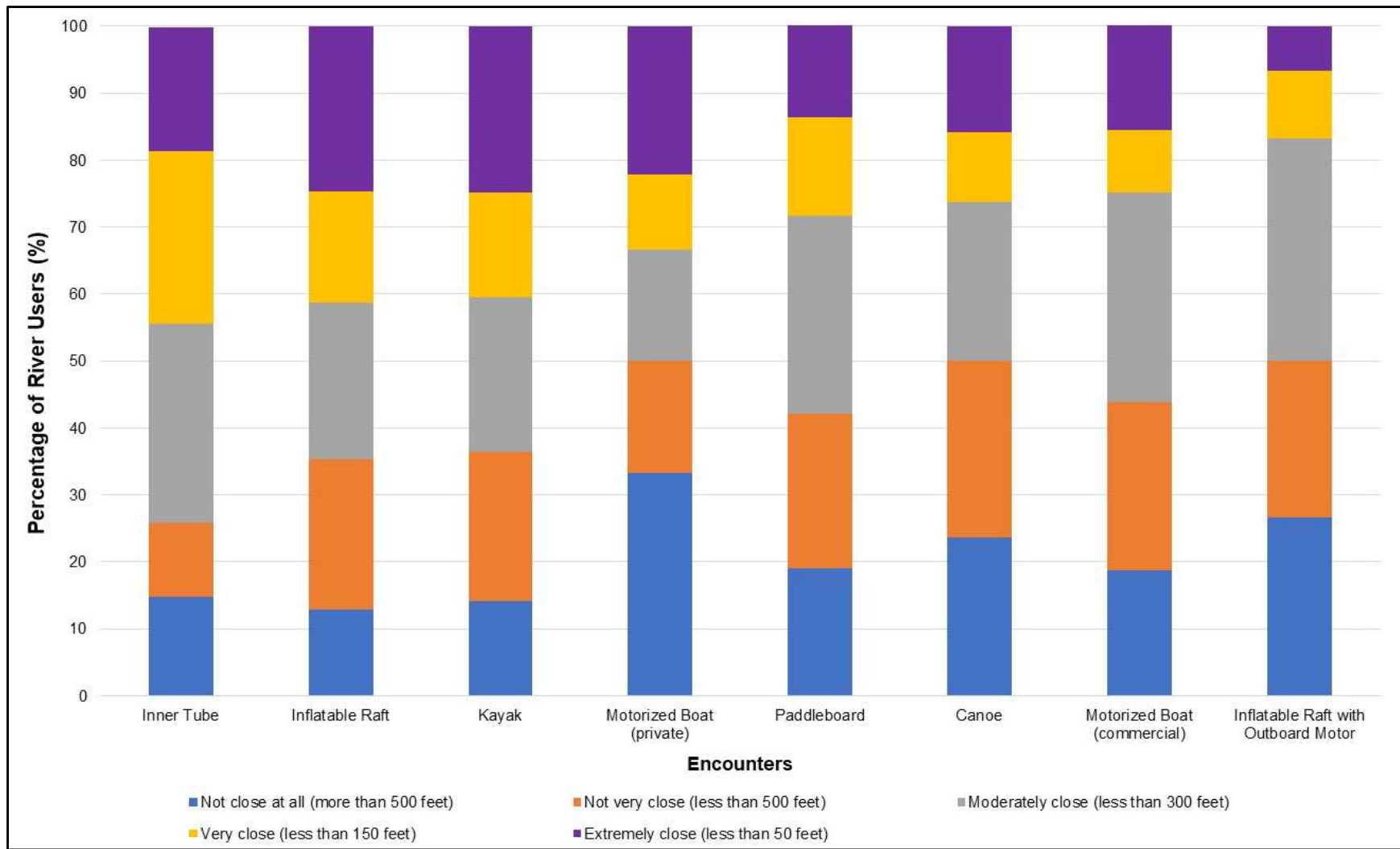


Figure 2-13. Distance of river users' encounters with different watercraft.

Half of all respondents indicated that their encounter with private motorized boats either “somewhat” or “greatly” detracted from their experience (Figure 2-14, Table 2-15). Nearly the same percentage (44.2%) said their encounters with commercial motorized boats detracted from their experience. One quarter of respondents indicated inflatable rafts with outboard motors “somewhat” detracted from the experience; however, no respondents reported that inflatable rafts with outboard motors “greatly” detracted from the experience. Fewer respondents indicated that encounters with any other watercraft detracted from their experience: less than 12% for inner tubes, less than 9% for inflatable rafts, less than 6% for canoes, less than 5% for kayaks, and 1% for paddleboards.

Table 2-15. Perceptions of Encounters with Other Watercraft—All Management Units

Watercraft Type	Greatly Improved the Experience (%)	Somewhat Improved the Experience (%)	Had No Effect on the Experience (%)	Somewhat Detracted From the Experience (%)	Greatly Detracted From the Experience (%)
Motorized boat (private)	0.0%	15.0%	35.0%	35.0%	15.0%
Motorized boat (commercial)	5.9%	8.8%	41.2%	26.5%	17.7%
Inflatable raft with outboard motor	15.6%	6.3%	53.1%	25.0%	0.0%
Inner tube	7.4%	22.2%	59.3%	3.7%	7.4%
Inflatable raft	13.0%	14.8%	63.9%	7.7%	0.6%
Canoe	16.7%	11.1%	66.7%	2.8%	2.8%
Kayak	11.4%	18.7%	65.9%	4.1%	0.0%
Paddleboard	8.3%	15.6%	75.0%	1.0%	0.0%

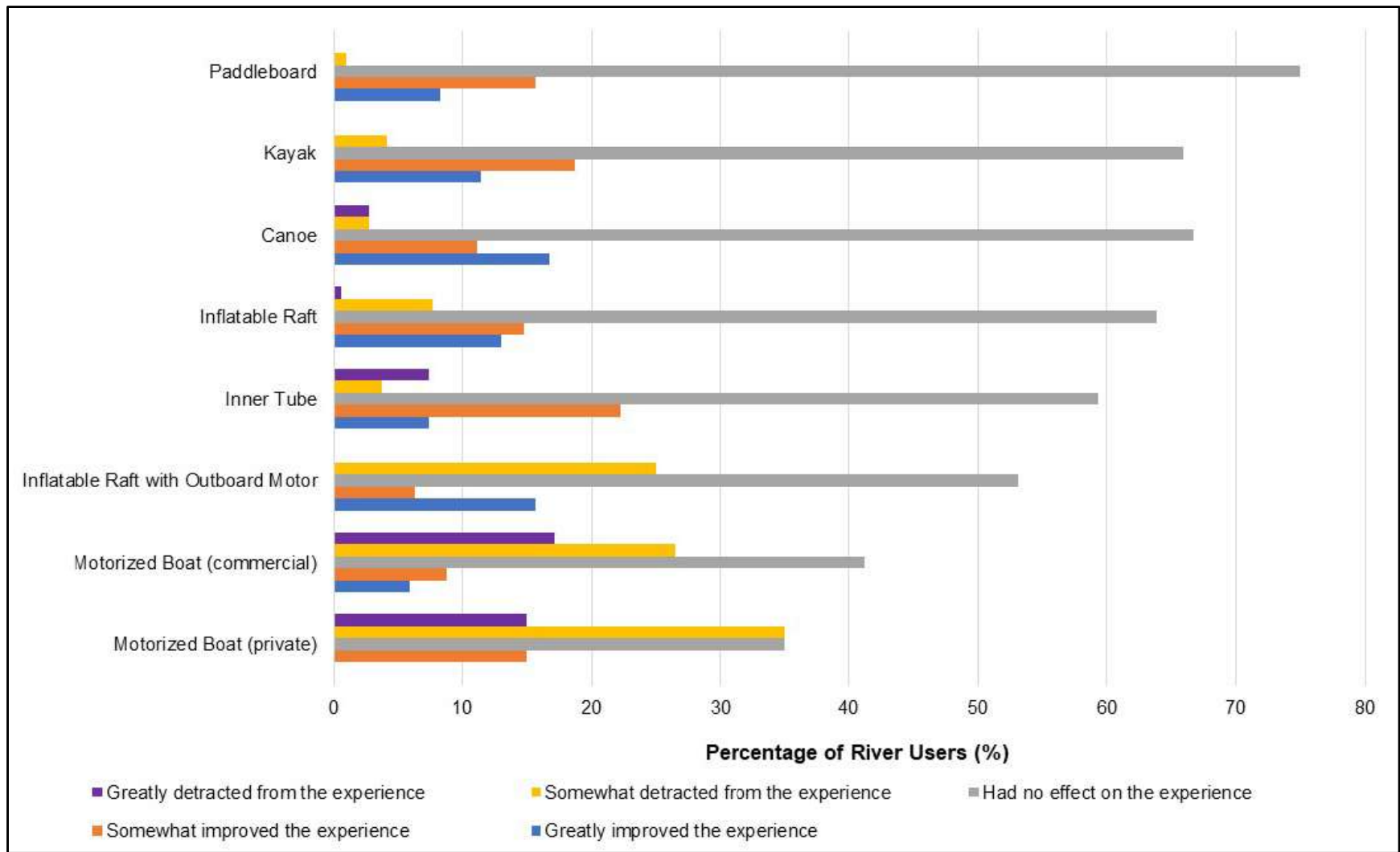


Figure 2-14. Perceptions of encounters with other watercraft on river users' experience.

2.6.2.4 Support for Management Actions

River users were asked the extent to which they opposed or supported six possible recreation management actions. A majority (63.4%) of river users indicated they either “somewhat” or “completely” supported limiting the number of commercial jet boats on the Colorado River, whereas 14.7% of river users opposed this action (Table 2-16, Figure 2-15). A majority of river users (60.7%) indicated support for improving existing access and/or campsites, whereas 7.1% of respondents opposed improvements. Approximately half of respondents “somewhat” or “completely” supported adding new access and/or campsites (52.5%). There were strong preferences for or against limiting the number of people within each group using the river: 39.9% of respondents supported this action, whereas 25.7% were in opposition. Finally, there was a similar response to limiting the number of watercraft that a single group can have on the river at one time; 38.1% supported and 22.4% opposed this management action.

Table 2-16. River Users’ Support for Selected Management Actions

Management Action	Completely Opposed (%)	Somewhat Opposed (%)	Neither Opposed Nor Supported (%)	Somewhat Supported (%)	Completely Supported (%)
Limit the number of commercial jet boats on the river*	7.6%	7.1%	21.9%	25.6%	37.8%
Improve existing access/campsites	2.8%	4.3%	32.3%	27.7%	33.0%
Add new access/campsites	5.7%	9.3%	32.5%	25.4%	27.1%
Limit the number of people within each group using the river	15.0%	10.7%	34.5%	27.1%	12.8%
Limit the number of watercraft that a single group can have on the river at one time	10.7%	11.7%	39.5%	24.2%	13.9%
Greater park ranger presence	5.7%	8.9%	52.3%	21.0%	12.1%

* Question only shown to Colorado River users; there are no commercial jet boats on the Green River.

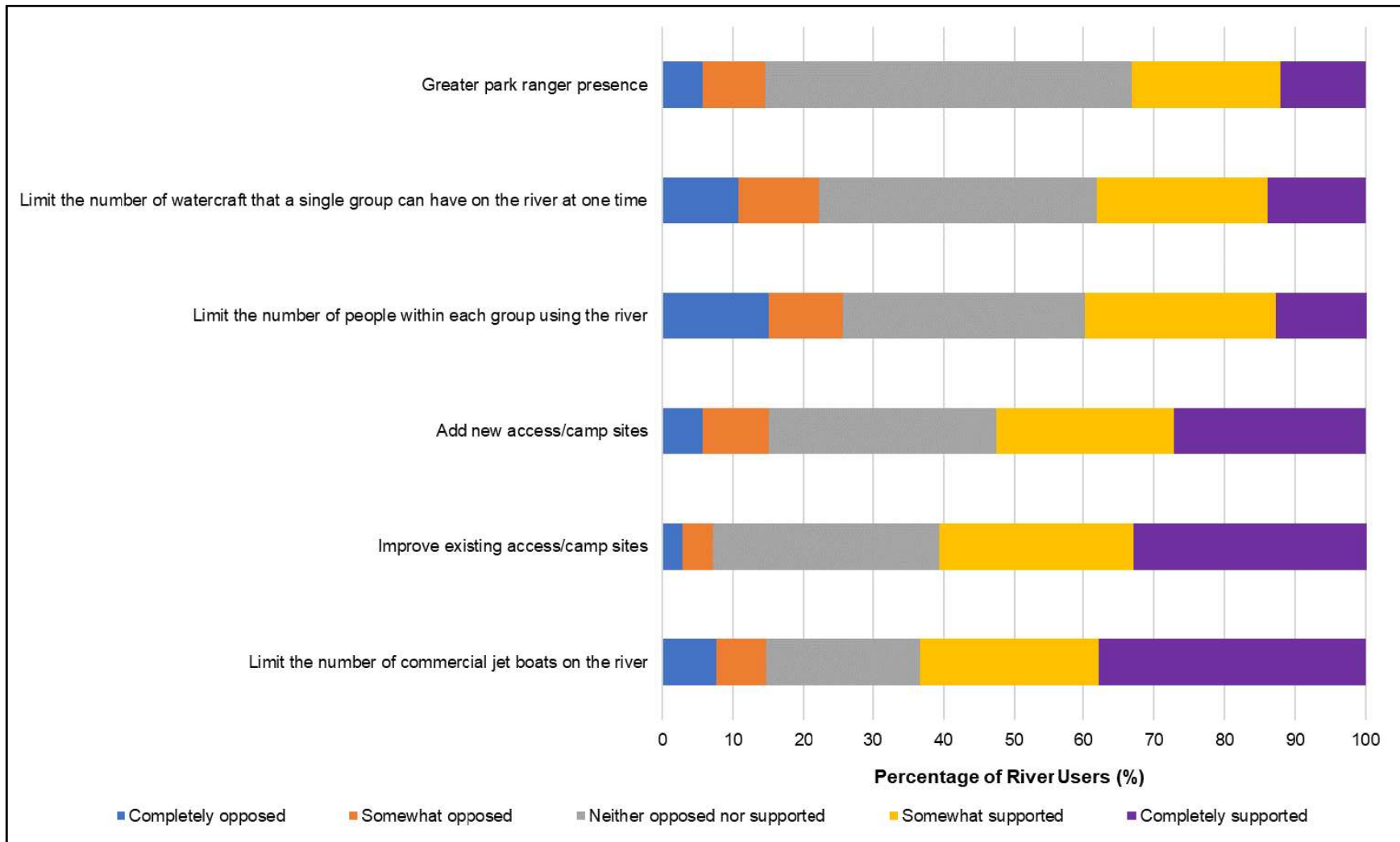


Figure 2-15. River users’ support for management actions.

2.6.2.5 Sociodemographic Characteristics

Survey respondents were typically middle age (mean age = 43.7), well-educated (65.2% had at least a bachelor’s or master’s degree), and white (97.1%), with 52.2% of respondents reporting an income above \$100,000 per year. Table 2-17 shows the sociodemographic characteristics of survey respondents.

Table 2-17. Sociodemographics of Survey Respondents

Sociodemographic Characteristics	Percentage of River Users	Mean
Age		43.7
Education		
Some high school	1.0%	–
High school graduate	4.5%	–
Vocational/trade school	3.8%	–
Some college	7.3%	–
Associate’s degree	4.5%	–
Bachelor’s degree	39.2%	–
Master’s degree	26.0%	–
Professional degree	7.3%	–
Doctoral degree	6.3%	–
Gender		
Male	52.0%	–
Female	46.6%	–
Other	1.4%	–
Ethnicity: Hispanic	3.1%	–
Race		
American Indian	0.4%	–
Asian	1.1%	–
Black	1.1%	–
Hawaiian or other Pacific Islander	0.4%	–
White	97.1%	–
Income		
Less than \$25,000	5.6%	–
\$25,000–\$34,999	4.1%	–
\$35,000–\$49,999	7.5%	–
\$50,000–\$74,999	12.7%	–
\$75,000–\$99,999	17.9%	–
\$100,000–\$149,000	22.0%	–
\$150,000–\$199,999	10.8%	–
\$200,000 or more	19.4%	–

Sociodemographic Characteristics	Percentage of River Users	Mean
Residency		
USA	98.3%	–
Other	1.7%	–

2.6.3 Summary

2.6.3.1 Watercraft Used, Group Size, and Trip Length

River users within the survey sample mostly used non-motorized watercraft, with the majority of recreationists using inflatable rafts (51.3%), kayaks (30.4%), and paddleboards (24.5%). Only 4.2% of recreationists used inflatable rafts with outboard motors, 3.3% used commercial motorized boats, and 1.0% used private motorized boats during their river trips.

The size of groups recreating on the rivers is large, which is not surprising because of the social nature of rafting and other river sports. The mean group size for those using inflatable rafts was 10.6 people, with some sampled groups having several dozen individuals. The data indicate that recreationists using non-motorized watercraft other than rafts also gather in relatively large groups. For example, the mean group size for groups using kayaks was 11.8 people. Paddleboarders (mean group size = 5.5 people), canoers (mean group size = 6.2 people), and inner tube users (mean group size = 6.7 people) also tend to recreate in fairly large groups on the rivers. River users in motorized watercraft had mean group sizes ranging from 1.7 (private motorized boat) to 6.9 (commercial motorized boat).

Nearly three-fourths (74.4%) of river users take day trips averaging approximately 4 hours. Of the quarter of river users who do take overnight trips, the mean number of days spent on the river was just under four (3.9). Collectively, these data suggest that most river users are setting out on half-day trips, likely based out of Moab. A smaller percentage of river users embark on longer excursions.

2.6.3.2 Boater Access Points and Intermittent Stops

The most heavily used put-in site on the Colorado River is Rocky Rapid, with approximately one-fifth (20.5%) of river users putting in at this location. Hittle Bottom Campground (16.4%), Dewey Bridge (15.8%), and Lower Onion Creek Campground (15.8%) are also used by relatively large percentages of river users for put-ins. Collectively, these four boater access points are the put-in locations for 68.5% of river users. All four sites are in the middle reaches of The Moab Daily Management Unit, from RM 94.5 to RM 80.5. A large percentage of river users (31.1%) reported never stopping on their trip down the Colorado River, which is understandable based on the mean trip time of 4 hours. Of those who did stop, the most common stopping points include Sandy Beach (14.4%) and Lower Onion Creek Campground (8.6%).

On the Green River, over half (53.9%) of river users reported putting in at Ruby Ranch, with just under one-third (30.8%) putting in at Green River State Park. Crystal Geyser is used for put-ins less frequently (15.4% of river users); however, it is used as a stopping point by 40.0% of river users who put in upstream.

2.6.3.3 On-River Encounters

On-river encounters are relatively uncommon, which may be because nearly all non-motorized river users travel downriver (37.1% of river users did not encounter another group). Less than one-third (28.6%) of

river users reported encountering another group using inflatable rafts. The percentage dropped to 22.1% for encountering groups using kayaks and 16.0% for encountering groups using paddleboards. Only 12.4% of river users reported encountering commercial motorized boats while on the river. Lower percentages reported encountering inflatable rafts with outboard motors (5.5%) and private motorized boats (3.4%).

The number of encounters river users are having generally appears to align with their expectations. Private motorized boats were the main exception to this, with 15% of respondents reporting “a little more” than expected and 40% of respondents reporting “a lot more” than expected. River users reported getting either “very close” (less than 150 feet) or “extremely close” (less than 50 feet) to some user groups: nearly half (44.4%) of all river users who encountered an inner tube group reported being less than 150 feet of them. This percentage was similar for encounters with inflatable rafts (41.2%) and kayaks (40.5%). Of the groups who did encounter a commercial motorized boat on their trip, 9.4% reported the boat getting “very close” (less than 150 feet), and 15.6% reported the boat getting “extremely close” (less than 50 feet). Although on-river encounters are relatively uncommon, they can occur in close proximity.

On-river encounters affect river users’ experiences. The data suggest that on-river encounters with motorized watercraft tend to detract from the river user’s experience, which may be because motorized watercraft are often encountered heading upriver in the opposite direction of non-motorized watercraft. Approximately half of river users who encountered either a private motorized boat (50.0%) or a commercial motorized boat (44.2%) said that the encounter either “somewhat” or “greatly” detracted from their experience. A lower percentage of these river users indicated their encounter with either a private (15.0%) or commercial (14.7%) motorized boat “somewhat” or “greatly improved” their experience. River users tended to be less affected by inflatable rafts with outboard motors; 25.0% indicated they “somewhat” detracted from the experience and 0% indicated they “greatly” detracted from the experience. Encounters with non-motorized watercraft either improved the experience, had no effect on the experience, or had a small (less than 12%) negative effect on the experience of most river users.

2.6.3.4 Support for Management Actions

Although on-river encounters with commercial motorized boats are relatively uncommon, sampled river users support management actions that would make these encounters even less frequent. Most Colorado River users (63.4%) said they either “somewhat” or “completely” supported limiting the number of commercial jet boats on the river; only 14.7% of river users opposed this action. This may be because the data suggest that on-river encounters with motorized watercraft tend to detract from the river user’s experience. River users’ support for this management action was stronger than their support for any other management action.

River users were generally in favor of improving existing access and campsites (60.7%) and adding new access and campsites (52.5%). River users were more divided about limiting the number of people within each group using the river (39.9% supported this action and 25.7% opposed it). River users were also more divided about limiting the number of watercraft that a single group can have at one time (38.1% supported it and 22.4% opposed it). More river users generally supported establishing a greater park ranger presence (33.1%) than opposed it (14.6%).

2.6.3.5 Conclusion

Survey data indicate that most visitors to the planning area are satisfied with their experience; however, when visitors are not satisfied or encounter conditions that they did not expect, those perceptions are usually associated with motorized use and congestion on the rivers. Particularly in asymmetric conflicts

with motorized use, visitors may not have expected to encounter motorized use and had strong negative perceptions of such use. Key data points include the following:

- A low number (3.3%) of sampled river users reported using a commercial motorized boat (4.2% reported using an inflatable raft with an outboard motor and 1.0% reported using a private motorized boat).
- Only 12.4% of river users reported encountering a commercial motorized boat while on the river (5.5% encountered an inflatable raft with an outboard motor and 3.4% encountered a private motorized boat).
- Despite the low use of motorized boats and low rate of encounters, 44.2% of river users who did encounter commercial motorized boats reported that they either “somewhat” or “greatly” detracted from their experience; 25% of river users encountering inflatable rafts with outboard motors indicated they “somewhat” detracted from their experience; and 50% of river users encountering private motorized boats reported that they either “somewhat” or “greatly” detracted from their experience.
- Of all river users surveyed, 63.4% indicated they either “somewhat” or “completely” supported limiting the number of commercial jet boats on the river.

CHAPTER 3. MANAGEMENT FRAMEWORK

This management framework has been designed to carry out the vision for the RMP planning process, which is to facilitate diverse and compatible recreational uses on four sovereign land river segments of the Colorado and Green Rivers while protecting navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality. In addition, the goals for the planning process (see Section 1.1.3) were used as guiding principles to help develop the management framework.

Recreation planning is a rational, systematic decision-making process that should represent the public interest through meaningful public engagement; consider the best available science; and integrate recreation use to harmonize with, protect, enhance, and sustain natural resources (Baas and Burns 2016). Recreation management should seek to maintain the quality and character of visitor experiences while also protecting resource conditions.

The management framework presented here describes desired conditions for each management unit; presents the indicators, thresholds, management actions, and monitoring protocol for key desired conditions; outlines management decisions; and discusses goals. This framework emphasizes the use of less restrictive management tools as much as possible, which is consistent with the statewide DOR boating management recommendation that setting use limits should be the management action of last resort (DOR 2010).

3.1 KEY TERMS

Key terms for this chapter are described below.

- **Type A Watercraft:** Watercraft operated solely by permanently integrated machinery, including but not limited to inboard-drive mechanisms, inboard/outboard drive mechanisms, remote steering controls, or air-cushion mechanisms.
- **Type B Watercraft:** Watercraft whose hull may incorporate multiple inflatable air chambers, without remote steering controls, which may be powered by humans or by non-permanently integrated machinery.
- **Type C Watercraft:** Watercraft powered solely by human effort, such as paddleboards, kayaks, canoes, rafts, or other inflatables (e.g., inner tubes).
- **Type D Watercraft:** Watercraft which may not fit the description of Type A, B, or C.
- **Type A Right-of-Entry Permit:** The use of sovereign lands by commercial outfitters for income-producing float trips where a right-of-entry permit may be required, and the trip is conducted using Type A Watercraft.
- **Type B/C Right-of-Entry Permit:** The use of sovereign lands by commercial outfitters for income-producing float trips where a right-of-entry permit may be required, and the trip is conducted using Type B or C Watercraft.
- **Private use, boater, or visitor:** A member of the general public using the river in a noncommercial capacity.
- **Commercial use, outfitter, or operator:** Any licensed business entity carrying passengers for hire.
- **Type A commercial use, outfitter, or operator:** Any licensed business entity carrying passengers for hire using Type A Watercraft.

- Type B/C commercial use, outfitter, or operator: Any licensed business entity carrying passengers for hire using Type B or C Watercraft.
- Type A Commercial Use Permit Area: The Colorado River from the northeastern boundary of Canyonlands National Park upstream to the Red Cliffs Lodge private boat ramp.

3.2 DESIRED CONDITIONS

A desired condition is a narrative statement that describes resource conditions, visitor experiences and opportunities, and facilities and services that FFSL will manage for in a particular management unit. Desired conditions provide long-term direction about what an area will look like, feel like, sound like, and function like in the future (Interagency Visitor Use Management Council 2016). Desired conditions have been developed for each of the four management units.

3.2.1 Colorado River Management Units

3.2.1.1 *The Moab Daily*

The Moab Daily Management Unit is a natural setting with evidence of human development above the OHWM along much of the Colorado River on river left (e.g., State Route 128, campgrounds, restrooms, trailheads). River users have opportunities to connect with nature through outstanding views of a scenic canyon and a free-flowing river segment. Recreational use of the management unit is moderate to high with a diversity of experiences available, from paddleboarding to river rafting and motorized to non-motorized boating. Commercial outfitters offer guided trip experiences, as well as livery services. Private boaters can link river sections together (described in Section 2.3.1.1) to create a desired day or overnight trip length. Some sections of this management unit provide boating challenges (i.e., rapids), whereas other sections provide opportunities for beginners. Encounters between groups are at a moderate level, and the presence of others is expected and tolerated. Multiple boater access points allow easy access to the river. Commercial uses are managed to consider the health of wildlife and wildlife habitat.

Appropriate activities, facilities, and services in The Moab Daily Management Unit are as follows:

- Private boating using Type A, B, C, and D Watercraft
- Type A commercial use in the Type A Commercial Use Permit Area
- Type B/C commercial use
- Primitive dispersed camping
- Boater access points
- Information boards and kiosks
- Special events (with appropriate authorization)

3.2.1.2 *Meander Canyon*

The Meander Canyon Management Unit is a natural, primitive setting with little evidence of human development above the OHWM. River users have opportunities to be immersed in a wild environment and experience the sounds, smells, and views of a largely undeveloped canyon landscape and free-flowing river segment. River users often feel a sense of solitude and awe. Commercial recreational use of the management unit coincides with partner agency goals and includes both motorized and non-motorized experiences. Commercial outfitters offer guided trip experiences, as well as river shuttle and livery

services that facilitate private boater experiences. Private boaters have opportunities for self-reliant, multi-day trips that typically extend downstream of the management unit. The Meander Canyon Management Unit offers flatwater opportunities for beginning boaters. Encounters between groups are at a low to moderate level; river users expect to see other groups but not at high rates. Boater access points for this management unit are limited. Commercial uses are managed to consider the health of wildlife and wildlife habitat.

Appropriate activities, facilities, and services for the Meander Canyon Management Unit are as follows:

- Private boating using Type A, B, C, and D Watercraft
- Type A commercial use in the Type A Commercial Use Permit Area
- Type B/C commercial use
- Primitive dispersed camping
- Limited boater access points
- Information boards and kiosks

3.2.2 Green River Management Units

3.2.2.1 Green River Valley

The Green River Valley Management Unit is a semi-natural, rural setting with evidence of human development above the OHWM along much of the river reach (e.g., agricultural fields, irrigation equipment, the city of Green River). River users have opportunities for solitude in a less wild setting. Recreational use of the management unit is moderate, with options for private motorized or non-motorized use. Commercial outfitters offer guided, non-motorized trip experiences that typically extend downstream of the management unit, whereas private boaters have opportunities for a short day trip. The Green River Valley Management Unit provides opportunities for beginners to improve their boating skills by navigating a single Class III obstacle. Encounters between groups are at a low to moderate level; river users expect to see other groups but not at high rates. Boater access points for this management unit are limited but appropriate for shorter trip lengths. Commercial uses are managed to consider the health of wildlife and wildlife habitat.

Appropriate activities, facilities, and services for the Green River Valley Management Unit are as follows:

- Private boating using Type A, B, C, and D Watercraft
- Type B/C commercial use
- Primitive dispersed camping
- Information boards and kiosks
- Special events (with appropriate authorization)

3.2.2.2 Labyrinth Canyon

The Labyrinth Canyon Management Unit is a natural, primitive, remote setting with comparatively little evidence of contemporary human development above the OHWM. As river users travel downriver into Labyrinth Canyon, they have opportunities to be immersed in a wild environment and experience the sounds, smells, wildlife, and views of an undeveloped canyon landscape and a free-flowing portion of the

river. Recreational use of the management unit is moderate, with options for private motorized or non-motorized use. Commercial outfitters offer guided, non-motorized trip experiences, and private boaters can create a desired day trip or link sections together for a self-reliant, multi-day trip. Commercial recreational use coincides with partner agency goals. The Labyrinth Canyon Management Unit offers flatwater opportunities for beginning boaters. Encounters between groups are at a low to moderate level; river users expect to see other groups but not at high rates. Several boater access points are available. Commercial uses are managed to consider the health of wildlife and wildlife habitat.

Appropriate activities, facilities, and services for the Labyrinth Canyon Management Unit are as follows:

- Private boating using Type A, B, C, and D Watercraft
- Type B/C commercial use
- Primitive dispersed camping
- Boater access points
- Information boards and kiosks

3.3 INDICATORS, THRESHOLDS, ACTIONS, AND MONITORING

Indicators are resource or experience characteristics that can be measured to track changes in conditions and assess progress toward achieving desired conditions. Indicators correlate directly with desired conditions because they translate the description of desired conditions into something measurable that can be tracked over time to evaluate changes (Interagency Visitor Use Management Council 2019).

A threshold (also called a standard) is the minimally acceptable condition for an indicator. Because recreational use can cause changes in resource conditions and visitor experiences, determining the acceptable level of change for indicators helps guide proactive management. Thresholds are the point at which the effects of visitor activities on desired conditions are expected to become enough of a concern that management action is needed (Interagency Visitor Use Management Council 2019).

Monitoring is the process of routinely gathering information or making observations to assess the status of specific resource conditions and visitor experiences. It can help determine whether thresholds are exceeded and if changes in management are needed (Interagency Visitor Use Management Council 2019). It can also provide feedback on the effectiveness of management actions in achieving and maintaining desired conditions.

A management action is a response to a threshold exceedance. Management actions can range from subtly influencing behavior in indirect ways, such as education, to more obvious and direct behavioral control through enforcement and regulation. Management actions should work to achieve desired conditions (Interagency Visitor Use Management Council 2019).

Indicators, thresholds, management actions, and monitoring protocols have been developed for key desired conditions of each management unit and are described in the following sections. Monitoring protocols would be implemented as funding becomes available. Monitoring protocol surveys could be administered through methods such as posted QR codes or web links. Survey results would be shared with the BLM and NPS to help inform recreation planning efforts.

3.3.1 Colorado River Management Units

Tables 3-1 and 3-2 present the indicators, thresholds, management actions, and monitoring protocols for The Moab Daily and Meander Canyon Management Units.

3.3.2 Green River Management Units

Tables 3-3 and 3-4 present the indicators, thresholds, management actions, and monitoring protocols for the Green River Valley and Labyrinth Canyon Management Units.

Table 3-1. Indicators, Thresholds, and Management Actions for The Moab Daily Management Unit

Desired Condition	Monitoring Question	Indicator	Threshold	Management Action	Monitoring Protocol
Recreational use is moderate to high; encounters between groups are at a moderate level.	Is the level of use affecting the quality of the visitor experience?	Number of groups passing by a defined location per hour.	No more than six groups per hour on average per day.	Implement more frequent monitoring to better understand use levels.	Monitor 10 sites over one high-use weekend or five sites over three high-use weekends once per year.
The presence of others is expected and tolerated.	Are visitors aware of the variety and type of watercraft that will be on the river, especially motorized uses?	Visitor perceptions of encounters with other types of watercraft.	50% of visitors reporting that encounters with different watercraft had a negative effect on their experience.	Partner with adjacent landowners (e.g., BLM, NPS) to implement education programs, such as installing signs at popular boater access points and working with private boater groups and commercial outfitters to help visitors understand what to expect.	Surveys at Sandy Beach and Local's Beach or two common trip take-outs (e.g., Takeout Beach) once every other year.
The presence of others is expected and tolerated.	Are there conflicts between different types of users?	Number of use conflict incidents reported and responded to by law enforcement (a decrease in use conflict incidents over time is desired).	No more than 12 use conflict incidents per year.	Partner with adjacent landowners (e.g., BLM, NPS) to implement education programs, such as installing signs at popular boater access points and working with private boater groups and commercial outfitters to help visitors understand river etiquette and what to expect. Increase enforcement presence.	Obtain one year of data at the end of each boating season.
Multiple boater access points allow easy access to the river.	Are there access issues?	Boater access point use levels.	No more than 15 minutes of wait time per boating group for 33% of groups at the water's edge before being able to launch or take out at popular boater access points.	Evaluate whether to designate parts of boater access points for use by certain types of watercraft to provide better flow. Evaluate the possibility of expanding existing boater access points. Evaluate the possibility of adding a new boater access point.	Monitor two popular boater access points over three high-use weekends once every other year.
Connections with nature through outstanding views of a scenic canyon.	Are riverbanks and gravel bars below the OHWM experiencing vegetation trampling, the creation of informal trails, shoreline damage, or the increased presence of invasive plants?	A visually observable increase in trampled vegetation, social trails, shoreline damage, or invasive plants adjacent to popular boater stops (e.g., Rocky Rapid, Hittle Bottom).	No more than a 5% increase in trampled vegetation, disturbed ground, or invasive plants adjacent to popular boater stops.	Restore disturbed area(s). Coordinate with and educate user groups on practices to limit further impacts.	Visual observation of five high-use areas and several gravel bars (if present), once per year. Monitoring will include photodocumentation.
Commercial uses are managed to consider the health of wildlife and wildlife habitat.	Are commercial groups negatively impacting wildlife or wildlife habitat?	Visual evidence of degradation of stream habitat below the OHWM; review of Utah Division of Water Quality water quality assessments.	No more than a 5% increase in shoreline damage or disturbed ground adjacent to popular boater stops (e.g., Rocky Rapid, Hittle Bottom). Compliance with Utah water quality standards.	Coordination with the U.S. Fish and Wildlife Service, Utah Division of Wildlife Resources, and Utah Division of Water Quality to address identified issues. Produce and distribute wildlife interpretation materials to commercial outfitters. Coordinate with commercial outfitters to ensure permit conditions pertaining to resource protection are being followed.	Visual observation of five high-use areas, once per year. Monitoring will include photodocumentation.

Table 3-2. Indicators, Thresholds, Management Actions, and Monitoring Protocol for the Meander Canyon Management Unit

Desired Condition	Monitoring Question	Indicator	Threshold	Management Action	Monitoring Protocol
Commercial recreational use coincides with partner agency goals.	Is use at appropriate levels?	FFSL would not permit a volume of use exceeding that prescribed by the NPS for the Colorado River above The Confluence in Canyonlands National Park.	Number of Canyonlands National Park commercial use authorizations for the Colorado River above The Confluence in Canyonlands National Park.	More frequent coordination with the NPS.	Attend meetings of the interagency wild and scenic rivers coordinating group two times per year.
Encounters between groups are at a low to moderate level; river users expect to see other groups but not at high rates. River users often feel a sense of solitude.	Is the level of use affecting the quality of the visitor experience?	Number of groups passing by a defined location per hour.	No more than three groups per hour on average per day.	Implement more frequent monitoring to better understand use levels.	Monitor one site over three high-use weekends once every other year.
Boater access points are limited.	Are there access issues?	Boater access point use levels.	No more than 15 minutes of wait time per boating group for 33% of groups at the water's edge before being able to launch at the Potash boater access point.	Evaluate the possibility of improving the Potash boater access point.	Monitor the Potash boater access point over three high-use weekends once every other year.
Opportunities to be immersed in a wild environment and experience the sounds, smells, and views of a largely undeveloped canyon landscape and free-flowing river segment.	Are riverbanks and gravel bars below the OHWM retaining their natural condition?	A visually observable increase in trampled vegetation, shoreline damage, or invasive plants.	No more than a 5% increase in trampled vegetation, disturbed ground, or invasive plants.	Restore disturbed area(s). Coordinate with and educate user groups on practices to limit further impacts.	Visual observation of two shoreline areas and gravel bars, if present, once every other year. Monitoring will include photodocumentation.
Commercial uses are managed to consider the health of wildlife and wildlife habitat.	Are commercial groups negatively impacting wildlife or wildlife habitat?	Visual evidence of degradation of stream habitat below the OHWM; review of Utah Division of Water Quality water quality assessments.	No more than a 5% increase in shoreline damage or disturbed ground adjacent to the Potash boater access point. Compliance with Utah water quality standards.	Coordination with the U.S. Fish and Wildlife Service, Utah Division of Wildlife Resources, and Utah Division of Water Quality to address issues. Produce and distribute wildlife interpretation materials to commercial outfitters. Coordinate with commercial outfitters to ensure permit conditions pertaining to resource protection are being followed.	Visual observation of two shoreline areas and the Potash boater access point once every other year. Monitoring will include photo documentation.

Table 3-3. Indicators, Thresholds, Management Actions, and Monitoring Protocol for the Green River Valley Management Unit

Desired Condition	Monitoring Question	Indicator	Threshold	Management Action	Monitoring Protocol
Recreational use is moderate; encounters between groups are at a low to moderate level. Visitors expect to see other groups but not at high rates. Opportunities provided for solitude in a less wild setting.	Is the level of use affecting the quality of the visitor experience?	Number of groups passing by a defined location per hour.	No more than four groups per hour on average per day.	Implement more frequent monitoring to better understand use levels.	Monitor two sites over three high-use weekends once per year.
Boater access points are limited.	Are there access issues?	Boater access point use levels at Swasey's Landing and Green River State Park.	No more than 15 minutes of wait time per boating group for 33% of groups at the water's edge before being able to launch or take out at Swasey's Landing and Green River State Park boater access points.	Evaluate whether to designate parts of boater access points for use by certain types of watercraft to provide better flow. Evaluate the possibility of expanding existing boater access points.	Monitor Swasey's Landing and Green River State Park over three high-use weekends once every other year.
Commercial uses are managed to consider the health of wildlife and wildlife habitat.	Are commercial groups negatively impacting wildlife or wildlife habitat?	Visual evidence of degradation of stream habitat below the OHWM; review of Utah Division of Water Quality water quality assessments.	No more than a 5% increase in shoreline damage or disturbed ground. Compliance with Utah water quality standards.	Coordination with the U.S. Fish and Wildlife Service, Utah Division of Wildlife Resources, and Utah Division of Water Quality to address issues. Produce and distribute wildlife interpretation materials to commercial outfitters. Coordinate with commercial outfitters to ensure permit conditions pertaining to resource protection are being followed.	Visual observation of two shoreline areas and the two boater access points once every other year. Monitoring will include photodocumentation.

Table 3-4. Indicators, Thresholds, Management Actions, and Monitoring Protocol for the Labyrinth Canyon Management Unit

Desired Condition	Monitoring Question	Indicator	Threshold	Management Action	Monitoring Protocol
Commercial recreational use coincides with partner agency goals.	Is use at appropriate levels?	FFSL, in coordination with the BLM, would not permit a volume of use exceeding that prescribed by the NPS for the Green River above The Confluence in Canyonlands National Park.	Number of Canyonlands National Park commercial use authorizations for the Green River above The Confluence in Canyonlands National Park.	More frequent coordination with the NPS.	Attend meetings of the interagency wild and scenic rivers coordinating group two times per year.
Recreational use is moderate; encounters between groups are at a low to moderate level. River users expect to see other groups but not at high rates.	Is the level of use affecting the quality of the visitor experience?	Number of groups passing by a defined location per hour.	No more than two groups per hour on average per day.	Implement more frequent monitoring to better understand use levels.	Monitor two sites over three high-use weekends once per year.
Several boater access points are available.	Are there access issues?	Boater access point use levels.	No more than 30 minutes of wait time per boating group for 33% of groups at the water's edge before being able to launch or take out at popular boater access points (e.g., Green River State Park, Ruby Ranch, Mineral Bottom).	Evaluate whether to designate parts of boater access points for use by certain types of watercraft to provide better flow. Evaluate the possibility of expanding existing boater access points. Evaluate the possibility of adding a new boater access point.	Monitor two popular boater access points (e.g., Green River State Park, Ruby Ranch) over three high-use weekends once per year.
Opportunities to be immersed in a wild environment and experience the sounds, smells, wildlife, and views of an undeveloped canyon landscape and free-flowing river segment.	Are riverbanks and gravel bars below the OHWM experiencing vegetation trampling, the creation of informal trails, shoreline damage, or the increased presence of invasive plants?	A visually observable increase in trampled vegetation, social trails, shoreline damage, or invasive plants at popular boater stops.	No more than a 5% increase in trampled vegetation, disturbed ground, or invasive plants adjacent to popular boater stops.	Restore disturbed area(s). Coordinate with and educate user groups on practices to limit further impacts.	Visual observation of eight high-use areas and gravel bars, if present, once per year. Monitoring will include photodocumentation.
Commercial uses are managed to consider the health of wildlife and wildlife habitat.	Are commercial groups negatively impacting wildlife or wildlife habitat?	Visual evidence of degradation of stream habitat below the OHWM; review of Utah Division of Water Quality water quality assessments.	No more than a 5% increase in shoreline damage or disturbed ground adjacent to high-use areas. Compliance with Utah water quality standards.	Coordination with the U.S. Fish and Wildlife Service, Utah Division of Wildlife Resources, and Utah Division of Water Quality to address issues. Produce and distribute wildlife interpretation materials to commercial outfitters. Coordinate with commercial outfitters to ensure permit conditions pertaining to resource protection are being followed.	Visual observation of eight high-use areas once per year. Monitoring will include photodocumentation.

3.3.3 Monitoring

Monitoring is an integral component of recreation management. Data from the monitoring protocols described in Tables 3-1 through 3-4 will be summarized in a monitoring report every 2 years and used to inform management, as shown in Figure 3-1.

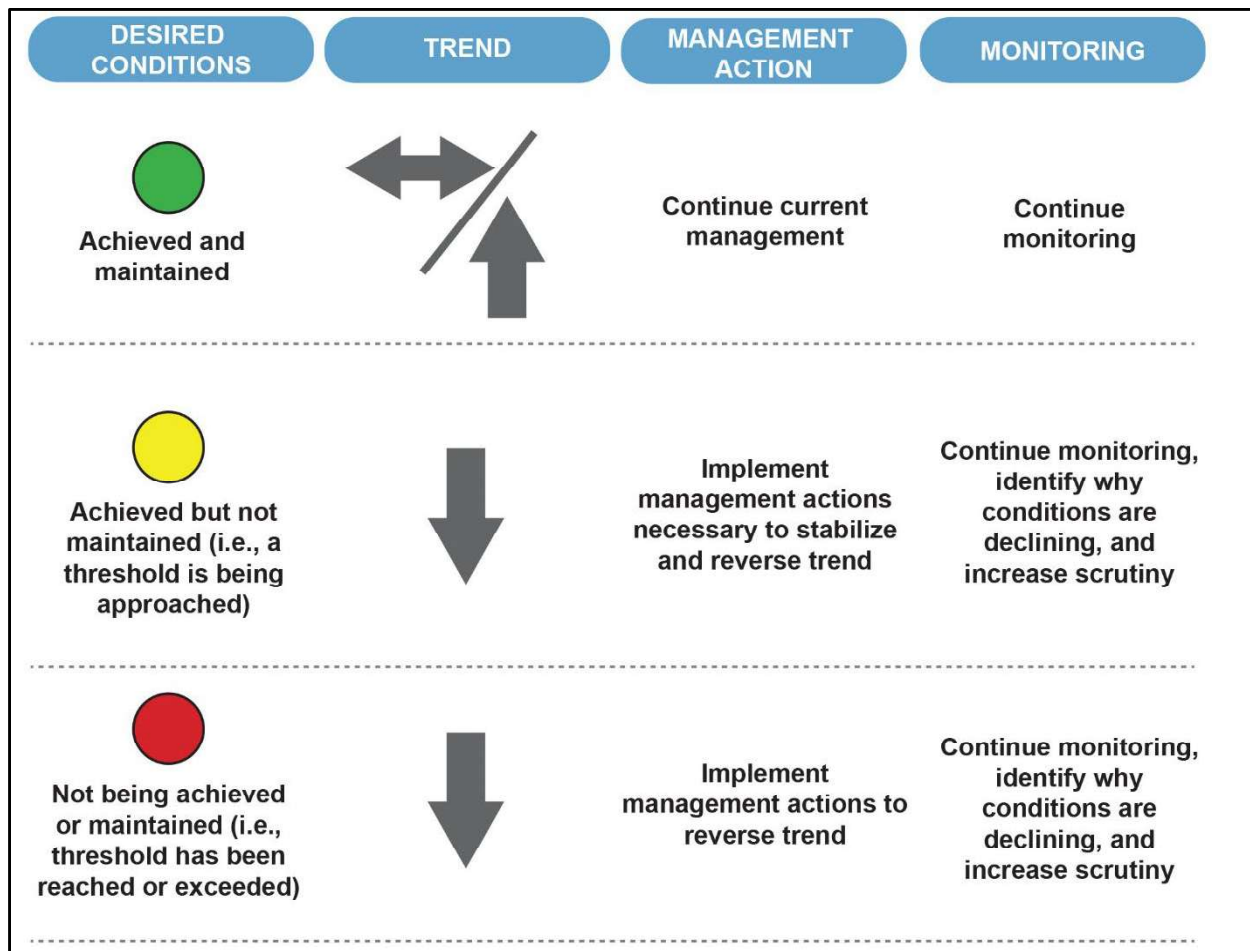


Figure 3-1. How monitoring data will inform management.

Adapted from Interagency Visitor Use Management Council (2019:Figure 7).

If monitoring results indicate a need, management actions in Tables 3-1 through 3-4 will be adjusted to achieve or maintain desired conditions. This flexibility allows FFSL to be sensitive to changing resource or visitor experience conditions. Indicators and monitoring protocols may also be adjusted if they are not sufficiently responsive to visitor use; however, this would likely occur during the first few years of monitoring so that data comparability is not affected over the long term.

Changes to the management actions in Tables 3-1 through 3-4 would depend on whether the desired condition(s) have been met. If management actions need to be adjusted to meet desired conditions related to visitor experience, FFSL would consider actions along a continuum, from influencing visitor expectations and behavior (e.g., voluntary or incentive-based programs) to regulating behavior (regulation of elements such as group size or number of watercraft allowed per group).

3.4 MANAGEMENT DECISIONS

As part of the RMP planning process, FFSL evaluated the results of the data collection effort described in Section 2.6 and reviewed the recreation issues identified through public outreach (see Section 2.5). Management decisions developed during the planning process are summarized below.

3.4.1 Camping

The four sovereign land river management units described in this RMP are designated as open to primitive dispersed camping with the following restrictions:

- Camping may be prohibited at the following times and locations for the protection of bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila chrysaetos*) nest incubation seasons after consultation with partner agencies:
 - From Dewey Bridge upstream to Cisco Landing from February 1 to June 30, camping may be limited to designed sites only.
- All camping activities will comply with Utah Code 65A-3-1, UAC R652-70-2400 (see Table 2-6), and the provisions of all other applicable laws, statutes, or authorizations.

FFSL may temporarily or permanently close areas to dispersed camping for the protection of fish and wildlife, migratory bird nesting seasons, or other values. Closed areas will be physically posted.⁷

3.4.2 Commercial Use Permitting

In consideration of the RMP findings in Section 2.6.3.5 (illustrated in Figures 2-13 and 2-14), FFSL will issue permits for commercial use based on the following guidelines:

- Commercial outfitters which operate Type A watercraft are required to obtain a Type A Right-of-Entry Permit.
- No more than three Type A Right-of-Entry Permits will be issued in a given calendar year.
- Commercial outfitters which have historically held Type A Right-of-Entry Permits (historically called “Right of Entry for Commercial Motorized Tours”), or the assignees thereof, will be given the opportunity to renew their permits before applications for new Type A commercial outfitters are considered.
- The terms and conditions of all types of right-of-entry permits may consider and prescribe mitigation for potential impacts to sovereign lands, including
 - fish and wildlife habitat,
 - water quality,
 - aquatic beauty,
 - navigability, and
 - public recreation.
- A breach of right-of-entry permit terms by a permittee may result in an automatic termination of the permit.⁸

⁷ Authorities: Utah Code 65A-3-1(2)(h), UAC R652-70-1900.

⁸ Authorities: Utah Code 65A-10-1(1), UAC R652-41-200.

- If a Type A Right-of-Entry Permit is not renewed by the permittee or is terminated by FFSL, an authorization may be issued to a new commercial outfitter via a competitive process consistent with statutes, administrative rules, and fee schedules.
- Additional planning and analysis may be required before permits are issued for commercial use of Type D Watercraft.

3.5 GOALS

Visitor use, monitoring, education and enforcement, fish and wildlife, and other resource goals have been developed as part of the management framework to provide additional guidance for decision making. These goals are consistent with the overarching, broad goals in the Colorado River and Green River CMPs and are described below.

3.5.1 Visitor Use Goals

- Offer all interested visitors a fair and equitable opportunity to experience the recreation opportunities of the planning area’s river segments.
- Maintain and protect current recreational use diversity and access.
- Manage commercial use as a necessary and desirable service to the public and a privileged use of public resources. Commercial outfitters are expected to exercise high standards of professional conduct and stewardship for the rivers.
- Maintain existing boater access points and improve existing boater access points where needed.
- Seek to enhance recreation access where needed when it meets desired conditions.
- Coordinate visitor use management with recreation management partners, such as the BLM, NPS, and DOR.
- Work to create a culture of respect for the planning area’s public trust and public interest values and an atmosphere of voluntary compliance with regulations.
- Evaluate future recreational uses and equipment as they first appear on the rivers. Take prompt management action if new uses or equipment do not meet desired conditions for one or more management units.

3.5.2 Monitoring Goals

- Continue to periodically monitor the volume of private recreational traffic in the planning area.
 - Work to develop a strategy for consistent measurement of non-commercial use.
- Develop a formal monitoring plan that includes the indicators, thresholds, management actions, and monitoring protocols described in Tables 3-1 through 3-4.
- Continue to monitor overnight use. If restrictions need to be implemented on overnight use in the future to maintain desired conditions, the limits in Table 3-5 should be evaluated.

Table 3-5. Partner Agency Group Size Considerations

Management Unit	Potential Future Group Size Restriction	Rationale
The Moab Daily	25	Complementary with the BLM Moab Field Office's group size for Westwater Canyon
Meander Canyon	40	Complementary with the Canyonlands National Park group size for Cataract Canyon
Green River Valley	25	Complementary with the BLM Price Field Office's group size for Desolation Canyon
Labyrinth Canyon (upriver from the Mineral Bottom boater access point)	25	Complementary with the BLM Moab Field Office for Labyrinth Canyon
Labyrinth Canyon (downriver from the Mineral Bottom boater access point)	40	Complementary with the Canyonlands National Park group size for Stillwater Canyon

Note: Group size numbers for Cataract and Stillwater Canyons in Canyonlands National Park may change with the forthcoming publication of a rivers management plan for the park (see Section 1.4.3).

3.5.3 Education and Enforcement Goals

- Improve the distribution of public information and education materials.
 - Provide information in multiple ways and to more varied populations (e.g., signage, kiosks, maps, brochures, websites).
 - Seek opportunities to use existing databases to reach visitors, such as email lists for boating groups.
 - Seek out local recreation-related businesses and organizations that could partner and distribute information; formalize local partnerships for outreach.
- Use public information and education materials to promote and inspire safe, responsible, and ethical river recreation and careful stewardship of the planning area’s resources.
- Public information and education materials should focus on the following:
 - Types of use in each management unit (including motorized and non-motorized use), as well as better times to visit popular areas for those seeking more solitude.
 - Positive interactions between different river users, resource stewardship, and river etiquette, including Leave No Trace principles (Leave No Trace 2024) and the suggested stewardship and river etiquette in the Colorado River and Green River CMPs.
 - Boating safety.
 - Water pollution from human use (from boat motor oil and gas residues, soaps and lotions, improper food and trash handling, pet waste, and soil erosion).
- Strive for a visible and professional river ranger presence in the planning area during the peak use season with a focus on public safety, visitor education, and resource protection.
- Use monitoring data to develop a planning area recreation infraction heat map as a tool for law enforcement to target areas with the greatest enforcement need. Update the heat map annually.

3.5.4 Fish and Wildlife Goals

- Work with partner agencies to reduce negative impacts to fish and wildlife habitat (e.g., shorelines, water quality) in the planning area.

- Cooperate with federal and state fish and wildlife agencies to protect the health of native species and their habitats.
- Address visitor impacts on fish and wildlife through education. Leave No Trace principles (Leave No Trace 2024) can be used to teach visitors to pack out all trash, waste, and food; to leave what is found (e.g., plants, wildlife); and to respect wildlife.
- Address visitor impacts on sensitive fish and wildlife species as needed. If necessary, discourage or prohibit visitor use during key breeding, nesting, or spawning times in sensitive fish and wildlife habitats.
- Address the impacts of pets on fish and wildlife behavior and health as needed. If necessary, consider seasonal restrictions on pets where appropriate to protect fish and wildlife.
- Manage invasive and noxious weed species along the banks of the rivers to protect wildlife habitat, as described in the Colorado River and Green River CMPs.
- Use monitoring data to identify and restore degraded shoreline and fish habitats in cooperation with recreation management partners.

3.5.5 Other Resource Goals

- Work with recreation management partners to identify problem areas of bank erosion, determine the causes of the erosion, and encourage solutions to limit or prevent future bank erosion.

CHAPTER 4. LITERATURE CITED

- American Whitewater. 2005. International Scale of River Difficulty. Available at: <https://www.americanwhitewater.org/content/Wiki/safety:start>. Accessed October 21, 2024.
- Baas and Burns (eds.). 2016. *Outdoor Recreation Planning*. Available at: https://www.academia.edu/42556675/Outdoor_Recreation_Planning. Accessed October 22, 2024.
- Bowen Collins & Associates, Inc. 2016. *Green River/Tusher Diversion EWP Project. Operation & Maintenance Plan*. On file, SWCA Environmental Consultants, Salt Lake City, Utah.
- Bureau of Land Management (BLM). 2008a. *Moab Field Office Record of Decision and Approved Resource Management Plan*. Available at: <https://eplanning.blm.gov/eplanning-ui/project/66098/570>. Accessed October 21, 2024.
- . 2008b. *Monticello Field Office Record of Decision and Approved Resource Management Plan*. Available at: <https://eplanning.blm.gov/eplanning-ui/project/68097/570>. Accessed October 21, 2024.
- . 2008c. *Price Field Office Record of Decision and Approved Resource Management Plan*. Available at: <https://eplanning.blm.gov/eplanning-ui/project/67041/570>. Accessed October 21, 2024.
- . 2012. *Business Plan for Westwater Canyon of the Colorado River*. Moab, Utah: U.S. Department of the Interior, Bureau of Land Management, Moab Field Office.
- . 2024a. What We Manage. Available at: <https://www.blm.gov/about/what-we-manage>. Accessed October 21, 2024.
- . 2024b. Our Mission. Available at: <https://www.blm.gov/about/our-mission>. Accessed October 21, 2024.
- Bureau of Land Management (BLM) and U.S. Forest Service. 2024. *Bears Ears National Monument Proposed Resource Management Plan and Final Environmental Impact Statement*. Available at: <https://eplanning.blm.gov/eplanning-ui/project/2020347/570>. Accessed October 21, 2024.
- Bureau of Land Management (BLM) and Utah Division of Forestry, Fire & State Lands (FFSL). 2017. *Interagency Noncommercial River Trip Permit for the Labyrinth Canyon Section of the Green River*. Available at: https://www.blm.gov/sites/default/files/documents/files/Recreation_Utah_LabyrinthPermit_6-28-17.pdf. Accessed October 21, 2024.
- Bureau of Reclamation. 2012. *Colorado River Basin Water Supply and Demand Study. Executive Summary*. Available at: https://www.usbr.gov/watersmart/bsp/docs/finalreport/ColoradoRiver/CRBS_Executive_Summary_FINAL.pdf. Accessed October 21, 2024.
- Dillman, D.A., J.D. Smyth, and L.M. Christian. 2008. *Internet, Phone, Mail, and Mixed-Mode Surveys: The Tailored Design Method*. 3rd ed. New York, New York: John Wiley and Sons Inc.
- Emery County. 2016. *Emery County General Plan*. Revised. Available at: <https://emerycounty.com/wp-content/uploads/2023/02/Generalplan2016.pdf>. Accessed October 21, 2024.

- Grand County Economic Development. 2022. *Moab Outdoor Adventure Guide*. Available at: <https://www.discovermoab.com/moag/>. Accessed October 21, 2024.
- Grand County and RPI Consulting. 2012. *Grand County Utah General Plan 2012*. Available at: <https://www.grandcountyutah.net/DocumentCenter/View/200/2012-General-Plan-Update-PDF>. Accessed October 21, 2024.
- Grand County and Rural Community Consultants. 2017. *Grand County Resource Management Plan, 2017*. Available at: <https://utah-resource-management-planning-plpco.hub.arcgis.com/pages/county-management-plans>. Accessed October 21, 2024.
- Interagency Visitor Use Management Council. 2016. *Visitor Use Management Framework. A Guide to Providing Sustainable Outdoor Recreation, Edition One*. Available at: https://visitorusemanagement.nps.gov/Content/documents/lowres_VUM%20Framework_Edition%201_IVUMC.pdf. Accessed October 21, 2024.
- . 2019. *Monitoring Guidebook. Evaluating Effectiveness of Visitor Use Management, Edition One*. Available at: https://visitorusemanagement.nps.gov/Content/documents/508_final_Monitoring_Guidebook_Edition_One_IVUMC.pdf. Accessed October 21, 2024.
- Jorgen, R. 2008. *Grand County Scenic Byways Corridor Management Plan*. Prepared for Grand County, Utah. Available at: <https://www.grandcountyutah.net/DocumentCenter/View/152/Scenic-Byways-Corridor-Management-Plan-PDF>. Accessed October 21, 2024.
- Leave No Trace. 2024. The 7 Principles. Available at: <https://lnt.org/why/7-principles/>. Accessed October 21, 2024.
- Martin, T., and D. Whitis. 2016. *Guide to the Colorado & Green Rivers in the Canyonlands of Utah & Colorado*. Flagstaff, Arizona: Vishnu Temple Press and Buda, Texas: RiverMaps, LLC.
- Murdock, T.M. 2023. Outdoor Recreation Planner. Moab BLM/Moab Daily river numbers. Moab, Utah: Bureau of Land Management. Email communication with Gretchen Semerad, SWCA Environmental Consultants. May 10, 2023.
- National Park Service (NPS). 1978. *Canyonlands General Management Plan*. Available at: https://www.nps.gov/cany/learn/management/upload/CANY_GMP_1978-web.pdf. Accessed January 3, 2024.
- . 2024. *About Us*. U.S. Department of the Interior, National Park Service. Available at: <https://www.nps.gov/aboutus/index.htm>. Accessed October 21, 2024.
- San Juan County, Rural Community Consultants, and Bio-West Consultants. 2022. *San Juan County Resource Management Plan*. General Plan Update. Available at: <https://utah-resource-management-planning-plpco.hub.arcgis.com/pages/county-management-plans>. Accessed October 21, 2024.
- Slade, D.C., R.K. Kehoe, and J.K. Stahl. 1997. *Putting the Public Trust Doctrine to Work: The Application of the Public Trust Doctrine to the Management of Lands, Waters and Living Resources of the Coastal States*. 2nd ed. Washington, D.C.: Coastal States Organization.

- SWCA Environmental Consultants, CRSA Architecture, River Science Institute, Inc., J. Schmidt, and A. Walker. 2020a. *Colorado River Comprehensive Management Plan*. Salt Lake City, Utah: SWCA Environmental Consultants.
- . 2020b. *Green River Comprehensive Management Plan*. Salt Lake City, Utah: SWCA Environmental Consultants.
- U.S. Fish and Wildlife Service (USFWS). 2024. The National Wild and Scenic Rivers System. Available at: <https://www.rivers.gov/wsr-act.php>. Accessed October 21, 2024.
- U.S. Geological Survey. 2018. Colorado River Basin Focus Area Study. Available at: <https://www.usgs.gov/mission-areas/water-resources/science/colorado-river-basin-focus-area-study>. Accessed October 21, 2024.
- Utah Department of Natural Resources and Utah Division of Parks and Recreation. 2019. *Utah's Outdoor Recreation Plan – 2019: Utah's Statewide Comprehensive Outdoor Recreation Plan 2019–2023*. Available at: <https://site.utah.gov/stateparks/wp-content/uploads/sites/13/2019/01/UtahsOutdoorRecreationPlanSCORP2019.pdf>. Accessed October 21, 2024.
- Utah Division of Outdoor Recreation (DOR) (previously the Division of Utah State Parks and Recreation). 2010. *Utah Boating Program. Strategic Plan*. On file, SWCA Environmental Consultants, Salt Lake City, Utah.
- . 2023. *Utah's Boating Laws and Rules*. Available at: https://issuu.com/utahrecreation/docs/dnr_boating_highlights_23_art_sp_?fr=xKAE9_zU1NQ. Accessed October 21, 2024.
- . 2024. Division of Outdoor Recreation. Available at: <https://recreation.utah.gov/>. Accessed October 21, 2024.
- Utah Division of State Parks (UDSP). 2024. Resources. Planning and Development. Available at: <https://stateparks.utah.gov/resources/planning-and-development/>. Accessed October 21, 2024.
- Webb, R. 1994. The Green River. Utah History Encyclopedia. Available at: https://www.uen.org/utah_history_encyclopedia/g/GREEN_RIVER_THE.shtml. Accessed October 21, 2024.

APPENDIX A

Public Involvement

Utah Administrative Code (UAC) R652-90-500 requires public participation in the Utah Division of Forestry, Fire & State Lands (FFSL) planning processes. The Resource Development Coordinating Committee (RDCC) was notified of the planning process, and public outreach began in February 2021.

Public involvement consisted of two stages: 1) project kickoff and information gathering, and 2) draft RMP review. A project website was developed and updated throughout the RMP planning process (<http://bit.ly/CGRRRMP>). Methods of communicating with the public, stakeholders, adjacent landowners, lessees, counties, and federal agencies consisted of direct emails, direct mail postcards, the project website, the FFSL website, newspaper notices, and notices with the RDCC. All meeting and participation information was posted on the project website. All email, postcard, and newspaper notices provided information on the timing, location, and content of public meetings and included instructions for how to provide written comments.

A list of planning process participants was developed based on the Colorado River CMP and Green River CMP outreach process, the FFSL sovereign lands coordinator's local stakeholder knowledge, individuals or organizations holding an FFSL authorization, landowners adjacent to the planning area sovereign lands, and recreation management partners. The list was updated throughout the planning process.

Project Kickoff and Information Gathering

A public project kickoff meeting was held virtually on Thursday, March 11, 2021, from 5:30 to 7:30 p.m. Notification for the meeting was sent by postcard to approximately 242 addresses on February 24, 2021, and by email to approximately 151 addresses on February 18 and March 4, 2021 (reminder email).

Formal legal newspaper notices for the RMP planning process and public meeting were submitted and requested to be posted on the following dates in 2021:

- *Salt Lake Tribune* (Salt Lake County): February 28, March 5 (online edition), and March 7
- *Deseret News* (Salt Lake County): February 26 and March 5
- *Uintah Basin Standard* (Uintah County): weeks of February 22 and March 1
- *Vernal Express* (Uintah County): weeks of February 22 and March 1
- *Southern Utah News* (Kane County): weeks of February 22 and March 1
- *The Insider* (Garfield and Wayne Counties): weeks of February 22 and March 1
- *ETV News* (Emery County): weeks of February 22 and March 1
- *The Times-Independent* (Grand County): weeks of February 22 and March 1
- *Moab Sun News* (Grand County): submitted online in February
- *San Juan Record* (San Juan County): February 22 and March 1

The 2021 virtual public meeting about the RMP planning process was held using Zoom webinar, a cloud-based video meeting platform. Registration information was provided to the public in meeting advertising materials and on the project website. At the beginning of the virtual meeting, FFSL presented a Microsoft PowerPoint overview of the RMP planning process. The presentation included information on how to participate in the planning process and the planning schedule. After the presentation, participants were able to submit questions through the Q&A feature on Zoom, which were answered by FFSL staff. The virtual meeting was attended by 40 individuals.

Comments could be submitted through the project website or by email. In total, 15 comment letters were received during the information gathering period. These comments were summarized internally in a table and carefully considered when developing the RMP content.

Draft Resource Management Plan Review

Federal recreation management partner agencies were given an opportunity to review the draft RMP and make comments prior to its public release. A 36-day draft RMP federal partner agency comment period occurred from November 7, 2023, through December 13, 2023. One agency submitted comments.

Three public meetings were held after the release of the draft RMP, as shown in Table A-1. Notification for the meetings was sent by postcard to approximately 242 addresses on May 1, 2024, and by email to approximately 107 addresses on May 1 and June 12, 2024 (reminder email).

Table A-1. Dates, Times, and Locations for Draft Resource Management Plan Public Meetings

Date	Time	City, County, and State	Location and Address
June 20, 2024	6:00–8:00 p.m.	Moab, Grand County, Utah	Grand Center 182 North 500 West
June 21, 2024	6:00–8:00 p.m.	Green River, Emery County, Utah	Green River Public Safety Building 570 Main Street
June 27, 2024	6:00–7:00 p.m.	Virtual	Virtual

Formal legal newspaper notices for the draft RMP release and public comment period were submitted and requested to be posted on the following dates in 2024:

- *Salt Lake Tribune* (Salt Lake County): May 1–8 and June 5
- *ETV News* (Emery County): May 1 and June 5
- *The Times-Independent* (Grand County): April 25, May 2, and June 6

The 2024 virtual public meeting after release of the draft RMP was held using Zoom webinar. Registration information was provided to the public in meeting advertising materials and on the project website. At the beginning of the virtual meeting, FFSL presented a Microsoft PowerPoint with an overview of the draft RMP, including data collection results and the proposed management framework. The presentation included information on how to comment on the draft RMP and the schedule. After the presentation, participants were able to submit questions through the Q&A feature on Zoom, which were answered by FFSL staff. The virtual meeting was attended by three individuals.

The 2024 in-person draft RMP public meetings combined formal presentation and open house formats. Attendees were greeted; asked to sign in; provided information about the meeting format; and given the option of taking a business card with the RMP website (<http://bit.ly/CGRRRRMP>) and information on how to comment. At the beginning of the meetings, FFSL presented a Microsoft PowerPoint overview of the draft RMP, including data collection results and the proposed management framework. Information on how to comment on the draft RMP and the schedule was also provided. Following this overview, FFSL staff answered questions and responded to comments in an open house format. Seven display boards providing draft RMP information were arranged around the meeting rooms for both in-person meetings. Eleven individuals attended the June 20, 2024, meeting in Moab and 15 individuals attended the June 21, 2024, meeting in Green River.

Public Comment Period

The formal 90-day public comment period for the draft RMP began on May 1, 2024, and ended on July 29, 2024. The public comment period followed the release of the draft RMP and coincided with the three public meetings previously described. Comments were accepted by email (cgrrmp@swca.com) and by postal mail.

FFSL received 108 separate written submissions commenting on the draft RMP. Comments made during the public meetings were also noted. Written comments pertained to subjects such as multiple use, commercial use, river experience, education and enforcement, private motorized use, key terms, camping, the RMP process and purpose, desired conditions, use limitations, general motorized use, thresholds, permits, wildlife, survey methodology, monitoring, indicators, the management framework, and river stewardship. From the written submissions, approximately 170 individual comments were extracted. Comments on the draft RMP were acknowledged and addressed, as appropriate, by FFSL. As required by UAC R652-90-600 (1) (b-d) and Utah Code 65-A-2-4, comment responses are provided in Table A-2. Comments received after the end of the public comment period are not included in Table A-2.

Table A-2. Draft Resource Management Plan Public Comments and Responses

Submission Number	Comment Number	Commenter	Topic or Theme	Comment	Response to Comment
1-57	1.1, 2.1, 3.1, 4.1, 5.1, 6.1, 7.1, 8.1, 9.1, 10.1, 11.1, 12.1, 13.1, 14.1, 15.1, 16.1, 17.1, 18.1, 19.1, 20.1, 21.1, 22.1, 23.1, 24.1, 25.1, 26.1, 27.1, 28.1, 29.1, 30.1, 31.1, 32.1, 33.1, 34.1, 35.1, 36.1, 37.1, 38.1, 39.1, 40.1, 41.1, 42.1, 43.1, 44.1, 45.1, 46.1, 47.1, 48.1, 49.1, 50.1, 51.1, 52.1, 53.1, 54.1, 55.1, 56.1, 57.2	Various (form letter)	Multiple use	The Colorado and Green Rivers are world class and should benefit the most users possible.	Thank you for your comment. Section 1.3.3 of the RMP states that FFSL administers sovereign lands using multiple-use, sustained-yield principles in accordance with Utah Code 65A-2-1, Utah Code 65A-10-1, and UAC R652-90-800. Multiple use is defined in Utah Code as "the management of various surface and subsurface resources in a manner that will best meet the present and future needs of the people of this state," and sustained yield is defined as "the achievement and maintenance of high level annual or periodic output of the various renewable resources of land without impairment of the productivity of the land" (Utah Code 65A-1-1). There is no particular hierarchy of uses on sovereign lands, except to the extent those uses do not interfere with the public trust (Utah Code 65A-10-1).
1	1.2	Mark Allen	Use limitations	I do support group size and watercraft limitations as a former riverguide balance between for profit and recreational users is not balanced.	Thank you for your comment. No new watercraft or group size limitations are proposed in the RMP.
1	1.3	Mark Allen	Commercial motorized use	Intrusive jetboats have at times been stacked layers deep waiting in Eddie's for their turn. The Moab daily needs some management of the commercial outfitters and slot limits. Slot limits for commercial outfitters should be balanced with similar allotments for recreational users.	Please see Section 3.4.2 of the RMP for commercial use permitting decisions.
1	1.4	Mark Allen	Commercial use	The serenity of a river trip can be conflicted by commercial permitting overruling recreational user opportunities.	Thank you for your comment. Please see Section 3.2 of the RMP to understand the desired conditions of river segments in the planning area, including a sense of solitude.
1	1.5	Mark Allen	Commercial motorized use	The state of Utah should be looking at ways to provide reasonable access that will sustain the growing numbers of visitation. Motorized recreation is growing more and more each year. Often agencies try to address increased use through closures, restrictions, and reservation systems. Each of these approaches is inferior since they create a scarcity of access, which concentrates use in remaining areas. Slot limits for commercial outfitters should be balanced with similar allotments for recreational users.	Please see Section 3.4.2 of the RMP for commercial use permitting decisions; the RMP does not propose new restrictions on existing commercial motorized tour companies. No closures or reservation systems are proposed in the RMP.
1	1.6	Mark Allen	Increasing visitor use	the Moab daily which is being overrun like most of our State Parks. Increases campgrounds have brought increased visitation past the sustainable point.	Thank you for your comment. Actions described in Section 3.3 of the RMP will help FFSL monitor and adapt to increasing visitor use.
1	1.7	Mark Allen	Multiple use	I don't want to see Utah give preferential treatment to any user group over another yet commercial outfitters do have more than their fair share of river days.	FFSL is required to administer sovereign lands using multiple-use, sustained-yield principles in accordance with Utah Code (see Section 1.3.3 of the RMP). No one type of use is given more emphasis than another, as long as uses do not interfere with the public trust (Utah Code 65A-10-1). Please see Figure 1-2 of the RMP, which outlines FFSL's goals for the planning process.
1	1.8	Mark Allen	Multiple use	believe the Green River and the Colorado River can be managed for all types of recreation within their jurisdiction. Motorized and non-motorized users can co-exist but recreational users should not take back seat to commercial outfitters. Time to recalibrate user days across the commercial entities.	Thank you for your comment. Please see responses to submission number 1, comment number 1.1 and submission number 1, comment number 1.7.
2-57	2.2, 3.2, 4.2, 5.2, 6.2, 7.2, 8.2, 9.2, 10.2, 11.2, 12.2, 13.2, 14.2, 15.2, 16.2, 17.2, 18.2, 19.2, 20.2, 21.2, 22.2, 23.2, 24.2, 25.2, 26.2, 27.2, 28.2, 29.2, 30.2, 31.2, 32.2, 33.2, 34.2, 35.2, 36.2, 37.2, 38.2, 39.2, 40.2, 41.2, 42.2, 43.2, 44.2, 45.2, 46.2, 47.2, 48.2, 49.2, 50.2, 51.2, 52.2, 53.2, 54.2, 55.2, 56.2, 57.3	Various (form letter)	Use limitations	I do not support group size and watercraft limitations as these are typically arbitrary and capricious. Many of the proposals are from a survey by river users. Decisions should be based on the laws and real science, not on the preferences of the majority of users. The Dingell Act has already imposed severe restrictions of use along sections of the Green River, the Utah DNR should not be imposing even more restrictive management.	Thank you for your comment. No new watercraft or group size limitations are being proposed in the RMP. The management framework in the RMP is not solely informed by the survey of river users; the survey, which collected scientific data, was used to inform the management framework. Please see Section 3.4 for specific management decisions regarding commercial use permitting and camping; the RMP does not propose new restrictions on existing commercial motorized tour companies.
2-57	2.3, 3.3, 4.3, 5.3, 6.3, 7.3, 8.3, 9.3, 10.3, 11.3, 12.3, 13.3, 14.3, 15.3, 16.3, 17.3, 18.3, 19.3, 20.3, 21.3, 22.3, 23.3, 24.3, 25.3, 26.3, 27.3, 28.3, 29.3, 30.3, 31.3, 32.3, 33.3, 34.3, 35.3, 36.3, 37.3, 38.3, 39.3, 40.3, 41.3, 42.3, 43.3, 44.3, 45.3, 46.3, 47.3, 48.3, 49.3, 50.3, 51.3, 52.3, 53.3, 54.3, 55.3, 56.3, 57.4	Various (form letter)	Commercial motorized use	The state of Utah should be looking at ways to provide reasonable access that will sustain the growing numbers of visitation. Motorized recreation, is growing more and more each year. Often agencies try to address increased use through closures, restrictions, and reservation systems. Each of these approaches is inferior since they create a scarcity of access, which concentrates use in remaining areas. Utah DNR should plan for opening more mileage and amenities to accommodate increased public demand to utilize these rivers.	Please see response to submission number 1, comment number 1.5. Please see Section 3.5.1 of the RMP for FFSL's goals regarding meeting public demand and visitor use, including the goal of enhancing recreation access where needed when it meets desired conditions.
2-57	2.4, 3.4, 4.4, 5.4, 6.4, 7.4, 8.4, 9.4, 10.4, 11.4, 12.4, 13.4, 14.4, 15.4, 16.4, 17.4, 18.4, 19.4, 20.4, 21.4, 22.4, 23.4, 24.4, 25.4, 26.4, 27.4, 28.4, 29.4, 30.4, 31.4, 32.4, 33.4, 34.4, 35.4, 36.4, 37.4, 38.4, 39.4, 40.4, 41.4, 42.4, 43.4, 44.4, 45.4, 46.4, 47.4, 48.4, 49.4, 50.4, 51.4, 52.4, 53.4, 54.4, 55.4, 56.4, 57.5	Various (form letter)	Commercial motorized use	The U.S. Bureau of Economic Analysis showed that in 2022 the outdoor recreation industry generates over \$1 trillion nationwide in economic activity. Moab, Green River and surrounding communities rely on recreation to sustain their economies. Restricting jet boats, motorized users and amounts of people will hurt tour companies and other local businesses.	Please see Section 3.4.2 of the RMP for commercial use permitting decisions. The RMP does not propose new restrictions on existing commercial motorized tour companies. There are no new restrictions on the number of people that jet boats can take on tours.
2-57	2.5, 3.5, 4.5, 5.5, 6.5, 7.5, 8.5, 9.5, 10.5, 11.5, 12.5, 13.5, 14.5, 15.5, 16.5, 17.5, 18.5, 19.5, 20.5, 21.5, 22.5, 23.5, 24.5, 25.5, 26.5,	Various (form letter)	General motorized use, survey methodology	It is important to recognize that discrimination towards American with disabilities within federal land management agencies is deeply rooted and hidden in plain sight. Recreation, primarily motorized recreation has taken a backseat to conservation and protection. Motorized recreation is often the only	Thank you for your comment. Please see Section 3.4.2 of the RMP for commercial use permitting decisions. The RMP does not propose new restrictions on existing commercial

Submission Number	Comment Number	Commenter	Topic or Theme	Comment	Response to Comment
	27.5, 28.5, 29.5, 30.5, 31.5, 32.5, 33.5, 34.5, 35.5, 36.5, 37.5, 38.5, 39.5, 40.5, 41.5, 42.5, 43.5, 44.5, 45.5, 46.5, 47.5, 48.5, 49.5, 50.5, 51.5, 52.5, 53.5, 54.5, 55.5, 56.5, 57.6			way those with mobility impairment disabilities are able to access public lands. Environmental justice also needs to be seriously considered. With survey respondents, many preferred some type of limitation on motorized use on the rivers, however the vast majority of respondents were also white males with an average salary of more than \$100,000 per year. One demographic of people should not be the deciding factors in limiting all other users on these rivers.	motorized tour companies. No new watercraft group size limitations are being proposed in the RMP. The survey data are representative of river users who use public boating access sites. Nearly all surveys of outdoor recreationists and tourists are distinctly different than local populations (tending to be more affluent, Caucasian, and educated). See Smith and Trautwein (2023) for data comparing outdoor recreationists in Utah to the state's population as a whole, for example. The survey was not designed to assess locals' perceptions of recreation use on the rivers; rather, the data collection effort was designed to capture data on the on-river recreational experiences of those individuals who use public boating access points. <i>Reference: Smith, J. W., and N. Trautwein. 2023. Insights Into the Characteristics of Outdoor Recreationists in Utah From a Statewide Survey. Institute of Outdoor Recreation and Tourism, Utah State University. Available at: https://digitalcommons.usu.edu/envs_facpub/1662/.</i>
2-57	2.6, 3.6, 4.6, 5.6, 6.6, 7.6, 8.6, 9.6, 10.6, 11.6, 12.6, 13.6, 14.6, 15.6, 16.6, 17.6, 18.6, 19.6, 20.6, 21.6, 22.6, 23.6, 24.6, 25.6, 26.6, 27.6, 28.6, 29.6, 30.6, 31.6, 32.6, 33.6, 34.6, 35.6, 36.6, 37.6, 38.6, 39.6, 40.6, 41.6, 42.6, 43.6, 44.6, 45.6, 46.6, 47.6, 48.6, 49.6, 50.6, 51.6, 52.6, 53.6, 54.6, 55.6, 56.6, 57.1	Various (form letter)	Multiple use	I don't want to see Utah give preferential treatment to any user group over another. I believe the Green River and the Colorado River can be managed for all types of recreation within their jurisdiction. Motorized and non-motorized users can co-exist.	FFSL is required to administer sovereign lands using multiple-use, sustained-yield principles in accordance with Utah Code (see Section 1.3.3 of the RMP). No one type of use is given more emphasis than another, as long as uses do not interfere with the public trust (Utah Code 65A-10-1). Please see Figure 1-2 of the RMP, which outlines FFSL's goals for the planning process, which include minimizing conflicts between different types of river users and maintaining the existing diversity of recreational opportunities.
58	58.1	Kim Carvo	Commercial motorized use	I am writing in support of jet boats on the Colorado River. As a native of the western Colorado area, an enjoyer of both motorized and non motorized river activities, there is no reason that those who prefer jet boats shouldn't be able to enjoy the river. Not only does it provide opportunities for elderly, disabled, and even veterans to enjoy the beauties this River has to offer, but it provides upstream and downstream travel making it more accessible and ease of travel. Jet boaters impact on the environment is no more or less than those in non motorized crafts. It would be a shame to take this away from those who respect and enjoy the river, and have been for decades.	Thank you for your comment. The RMP does not propose removing jet boats from the river (see Chapter 3, Management Framework, of the RMP).
58	58.2	Kim Carvo	Multiple use	Let's focus on having considerate, compassionate, and environmentally conscious river users BOTH motorized and non motorized. The river corridor can and should be shared by all.	Thank you for your comment. Please see response to submission number 1, comment number 1.8.
59	59.1	Ronaki Dolphin	River stewardship	We have the unique opportunity to showcase the Colorado River Canyon of Moab in a way that shows great care to the landscape while enhancing the experience for some 1 million people over the past 60 plus years. This family business of Canyonlands By Night has been the stewards of the Colorado River Canyon of Moab. The family and its employees have always operated and will always continue to operate the river with the highest ideals of conservation for the land, river, and all life associated with the Colorado River. Canyonlands By Night has a proven record of being the region's primary caretaker of the Moab area of the Colorado River. This company couldn't have survived over 60 years if they didn't abide by all rules and regulations of the Colorado River and constantly work to enhance the environment. One of many examples the family has had was maintaining and improving the river road for years before the county took control and fully paved Hwy 128 in 1989. As a boat Captain for the last 10 years I can attest to the family's beliefs and direction in caring for the river. Through their stewardship we do not exploit the river or its abundant resources. Instead we use our resources to enhance and showcase the river, its landscape, its nature and its splendor.	Thank you for your comment.
59	59.2	Ronaki Dolphin	River experience	As I mentioned earlier, at least one million people have had the unique and breathtaking taking experience of being on the river in a jet boat. Just this week I had a couple that took the same Sound and Light Show boat tour 50 years ago. They were so excited to be able to take the same tour again 50 years later. I asked them after if it was still everything they wanted. He shook my hand and simply said, "A Heartfelt Experience, Thank You Captain" Each week we have people that have returned to the tour once more. Many times they have brought friends or family because they want them to share this unique and amazing experience that can only seen with a jet boat. I ask each of you to take time and book the Sound and Light show tour. I'm confident this unique experience will leave you feeling a better person and more connected to a special place. Take a moment to see many of the pictures posted on the company's Facebook page and see the magnificent beauty of this stretch of the Colorado River Canyon Corridor of the Moab area. You will never experience this any other way than on our Sound and Light show boat. None of this could occur if Canyonlands By Night wasn't acting in good faith with their boats. But they do. They truly are the professionals and protectors of the Colorado River and those some million people who get to experience this beautiful and pristine environment.	Thank you for your comment.

Submission Number	Comment Number	Commenter	Topic or Theme	Comment	Response to Comment
59	59.3	Ronaki Dolphin	Use limitations	This family business supports and hires many people each year. It truly is family. Canyonlands By Night has a strong presence in the Moab Community and is involved and support many opportunities for families. Taking this family business away will have detrimental consequences for its employees and community. Also future guests will miss out on the most sincere and protected experience on the Colorado River. There could be irreparable harm to so many and serious unintended consequences.	Please see Section 3.4 of the RMP for specific management decisions regarding commercial use permitting and camping; the RMP does not propose new restrictions on existing commercial motorized tour companies.
59	59.4	Ronaki Dolphin	Education and enforcement	All watercraft should follow the rules and regulations of this part of the Colorado River Canyon corridor. There should be more education and better access to that education of preserving this corridor. There should be a penalty enforcement for those watercraft that fail to comply. Canyonlands By Night has always abided by current regulations. The company has a great working relationship with the many varied entities that has influence on the waterways.	Please see Section 3.5.3 of the RMP for FFSL's education and enforcement goals. The DOR is the authority over boater education; FFSL is committed to being a strong partner for the DOR. FFSL river rangers report the number of hours spent at ramps educating boaters, number of visitor contacts made per patrol, and the number of non-emergency assists provided on the water. This information is provided annually to Division leadership during the Utah Legislative Session, annually to the Utah Guides and Outfitters Conference, and annually on agency social media. This information can be retrieved any time by calling the FFSL Southeast Management Area Office at (435) 259-3766.
59	59.5	Ronald Dolphin	Multiple use	Let's all work together and develop a usage for all watercraft. Help empower us to continue to use this Colorado River Canyon Corridor in the Moab area. Help us continue our partnership with the various agencies so we can continue to be good stewards of the Colorado River.	Thank you for your comment. FFSL is happy to work with partners on items such as education and resource protection, as stated in the RMP.
60	60.1	Miranda Walston	Commercial motorized use	As a contributing member of the Moab community I believe jet boats of different shapes and sizes should be allowed continued access to the Colorado river with no added restrictions. I was born and raised here in Moab. My whole life I have enjoyed different forms of recreation on the Colorado River, including fishing boats, jet boats, jet skis, paddle boards, rafts, fishing, swimming, and camping. All of these activities have been done in a responsible and safe manner with 0 accidents to me or those in our group.	The RMP does not propose removing jet boats from the river. Please see Section 3.4 of the RMP for specific management decisions regarding commercial use permitting; the RMP does not propose new restrictions on existing commercial motorized tour companies.
60	60.2	Miranda Walston	Commercial motorized use	How can a group of people try to push change that takes away from the people who give the most to this community. I can't imagine shutting down businesses who have been in business for 60+ years. As a small business owner here in Moab I understand how difficult it is to run a seasonal business as well as keep employees happy throughout winter months. Those who want big change in our small community also have to understand the true impact it has on those who work hard to make Moab the amazing place it is.	Please see response to submission number 60, comment number 60.1.
61	61.1	Bob	Private motorized use	Please do not restrict private power boating on Colorado and Green rivers, best catfishing and waterfowl hunting in Utah! Already closed our campsites and access trails, it's a safety issue as much as an access issue.	The RMP does not propose restrictions on private motorized use. Please see Section 3.4 of the RMP for proposed management decisions.
62	62.1	Jason Parriott	Motorized use	As a life long resident of Moab and descendants of some of the original settlers of Moab I feel restricted use of any Motorized water craft up stream would be a huge injustice. Education for all should be the actual appropriate answer. I highly stand against this Change keep motorized watercraft legal.	The RMP does not propose restrictions on private motorized use. Please see Section 3.4 of the RMP for proposed management decisions, including commercial use permitting (the RMP does not propose new restrictions on existing commercial motorized tour companies).
63	63.1	D Willey	Key terms	The primary concern that arose in reviewing the draft is the definition of motorized and non-motorized watercraft listed in Section 2.1 Key Terms. Given that motor use on public lands and waters anywhere is a fraught and often dividing topic, with passionate, outspoken stakeholders for and against their utilization, it seems remiss to invite any amount of uncertainty in definitions that are intended to provide clarity on such a high-profile matter. The imminent issue at hand will be one of perception, especially in an area such as Labyrinth Canyon, where, as stated in section 2.5.2, there already exists "conflicts between motorized and non-motorized use", where commercial FFSL-defined "motorized use" is prohibited, yet the actual use of a motor on a watercraft-primarily-powered-by-human-effort by commercial groups does occur and is within their purview. Seeing or hearing a motor on a logo-ed boat has the potential to incense a visitor who did not closely read section 2.1, especially when, if surveyed, that visitor is asked to reflect on whether they were expecting to "encounter motorized use and had strong negative perceptions of such use." Such a negative perception would undoubtedly be exacerbated by a belief that motorized used was not allowed and therefore was not expected. This perception both a) decreases the amount of joy to be experienced by a visitor who becomes perturbed by what could be misunderstood as an insensitive infraction on regulations and their own anticipated experience and b) poses risks to commercial groups whose standard practices of using motors is threatened by the impact of this misunderstanding when surveys take this discrepancy of expectations into consideration and define thresholds and management actions. Since only half of page 2-1 is currently occupied by text, there appears to be room to rename, re-define, and clarify what is actually three definitions of watercraft or two separate sub-definitions of motorized use. It can then be made explicit within each management area which of these three is/are allowed, and all visitors can be prepared with a shared understanding of what is permissible and expectable, since, as we know, "when visitors are unaware of or encounter conditions that they do not expect, they have strong negative feelings."	We understand your concern. The key terms in Section 2.1 of the RMP have been updated for greater specificity. Key terms have also been added to Section 3.1 of the RMP for further clarification. FFSL hopes to improve the public's understanding of allowed and permitted uses on the rivers through the education goals described in Section 3.5.3 of the RMP.
63	63.2	D Willey	Camping	The next concern to be acknowledged is the camping restrictions outlined in 3.3.1, effective from Dewey Bridge upstream to RM 109 from February 1 to June 30. June is the busiest time of year on the river	Section 3.4.1 of the RMP has been updated to respond to your concerns.

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				and the highwater camp at RM 100.7 is the best and also one of the already very few respectable camping options in existence at this stretch of river. If this camp is to be restricted, will the creation of an alternative camp that is equal in size, accessibility, quality, and not infringing on eagle nesting habits be facilitated? Also in 3.3.1 it is stated that camping is prohibited from Cisco Landing to the Utah-Colorado state line. Is access to and camping within the Westwater corridor not managed by the Moab BLM?	
64	64.1	Sheri Griffith Expeditions	Process	We do want to take this opportunity to express our frustration for the timing on the release of the draft. In the fall we expressed this concern and were told we would be able to see a draft prior to the start of our busy season. The opportunity to comment on this plan is extremely important to us. Finding time to really understand and form a good response has been a hardship for us in our busy season.	FFSL follows administrative rules that prescribe the timing and duration of public comment periods. At the 2023 Utah Guides and Outfitters Conference, FFSL was informed that the timing of the comment period was difficult for some stakeholders; therefore the comment period was extended from the required 40 days to 90 days (3 months).
64	64.2	Sheri Griffith Expeditions	Purpose	We are struggling with the reasoning for creating a River Management Plan that has not existed, why not work with Cooperating Agencies that are currently managing the resource. We do want to recognize that it is important to update Management Plans to plan for existing use and future use. In many areas, use on the river has sky-rocketed, which affects not only the Natural Landscape but our visitor experience as well. It can be difficult to swallow increased use restrictions, but we understand their importance. We would love to have full inclusion in this process.	FFSL is the agency that is currently managing the resource. Section 1.1.2 of the RMP explains the reasoning for the plan. FFSL agrees with the need to update plans but also believes that the adaptive management outlined in Section 3.3 of the RMP will allow for management that is responsive to changing conditions. As stated in Chapter 3, the management framework emphasizes the use of less restrictive management tools as much as possible. Sheri Griffith Expeditions is on the contact list for this planning process.
64	64.3	Sheri Griffith Expeditions	Process	The survey did not include any of our staff or commercial guests that we are aware of, (This cuts out a huge portion of the users. Users who may not have the ability or awareness that this process is going on. We are one voice that represents hundreds to thousands of users.)	The sampling design was created to capture a representative sample of the users of public boater access points. The survey data are representative of river users on commercial trips that use public boater access points. If a commercial operator stopped at a public boater access point on survey days, their clientele was contacted and asked to complete the survey. Clarification has been added to Section 2.6.1.
64	64.4	Sheri Griffith Expeditions	Process	Note the difference between numbers on page 2-21 and B-1, B-2 and B-3. Also note the locations which do NOT include all river access points. And the data collected is not enough to base a Management Plan that is as inclusive as possible.	The data in the Appendix B tables are passenger and launch data collected through different methods by different agencies than the RMP survey data. The purpose of the RMP data collection effort was to better understand recreation issues and to inform management in the planning area (see Section 2.6 of the RMP). The sampling design was created to capture a representative sample of the users of public boater access points (not all access points), for several reasons, including the following: 1. Public boater access points facilitate the most, and the most diverse types, of on-river recreation. 2. There were limited fiscal resources to conduct surveys at other boater access points. Finally, the RMP is not based on the survey data. The survey data were used to inform the RMP. FFSL will continue to collect visitor use data.
64	64.5	Sheri Griffith Expeditions	Process	We are concerned that the data collected may create incorrect biases due to insufficient sample size and incomplete sample depth.	The survey effort collected data from 306 river users. Assuming the rivers receive 70,000 visits per year (based on BLM estimates [see Tables B-2 and B-3 in Appendix B of the RMP]), this equates to the results (i.e., estimated means) having a margin of error of 5.48%. This is well within the standards of acceptability for survey research (Vaske 2019). It is unclear what is meant by "sample depth," as this is not a common term used in survey research. <i>Reference: Vaske, J.J. 2019. Survey Research and Analysis: Applications in Parks, Recreation and Human Dimensions. 2nd ed. Venture Publishing.</i>
64	64.6	Sheri Griffith Expeditions	Multiple use	It is hard for us to comprehend a River Management Plan the includes so many different uses in the Moab Daily Section, (Cisco to the Potash Boat Ramp) The amount of use on the "Moab Daily" (Hittle Bottom to Take-Out Beach) far exceeds the use in the other areas of this proposed section, (Cisco-Hittle, Take-Out to Potash). The typical uses also differ in manner between all three of these sections.	The variety of use types in The Moab Daily Management Unit is broad. Because FFSL uses multiple-use, sustained-yield management practices, FFSL will not prioritize one use type above another.
64	64.7	Sheri Griffith Expeditions	Desired conditions	In 3.1.3.2 Labyrinth Canyon, It states, "...River users travel downriver into Labyrinth Canyon, they have opportunities to be immersed in a wild environment and experience the sounds, smells, wildlife and views of an undeveloped canyon landscape and free-flowing river." This implies that the Green River through Labyrinth is Free-Flowing, where we know it is highly regulated by upstream dams.	The text in this section (now Section 3.2.2.2 of the RMP) has been changed to "As river users travel downriver into Labyrinth Canyon, they have opportunities to be immersed in a wild environment and experience the sounds, smells, wildlife, and views of an undeveloped canyon landscape and a free-flowing portion of the river."
64	64.8	Sheri Griffith Expeditions	Commercial motorized use, key terms	On page 36 the plan states "motorized and non-motorized watercraft are permitted in this management unit, but no commercial motorized use is allowed." This appears that no motorized use is allowed in Labyrinth Canyon. It is however mentioned in the "Key Terms" on page 25 what the definition of motorized watercraft is. We believe there should be two definitions of motorized use. The second to include "kicker" outboard motors and that the plan should be amended to include outboard motorized use in Labyrinth Canyon.	The key terms in Section 2.1 of the RMP have been updated. Key terms have also been added to Section 3.1 of the RMP for further clarification. FFSL hopes to improve the public's understanding of allowed and permitted uses on the rivers through the education goals described in Section 3.5.3 of the RMP.
64	64.9	Sheri Griffith Expeditions	Safety	It is noted that motorized for administrative and emergency purposes is common. This statement is true but it should be recognized that there have been many cases where Outfitters with the use of a motor have assisted other river users in need of assistance.	FFSL understands and appreciates that emergency assistance has been offered in the past by several different types of users, including outfitters with motors.

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64	64.10	Sheri Griffith Expeditions	General motorized use	Commenting on the historic use of motors specifically on the Moab Daily segment primarily below the Take-Out beach to the Moab Bridge. Though we support many types of use on the river, it seems that the overwhelming push to restrict historic motor use to accommodate new types of users (Tubes/SUP's) is unfair.	The RMP does not add new limitations or restrictions to motorized use.
64	64.11	Sheri Griffith Expeditions	Education and enforcement	We believe education on the types of users on the river could change perception and perhaps change their experience. We also believe in communication between river users can help us understand each other and work together and sometimes compromise.	The DOR is the authority over boater education. FFSL is committed to being a strong partner for the DOR. FFSL river rangers report the number of hours spent at ramps educating boaters, the number of visitor contacts made per patrol, and the number of non-emergency assists provided on the water. This information is provided annually to leadership during the Utah Legislative Session, annually to the Utah Guides and Outfitters Conference, and annually on agency social media. This information can be retrieved any time by calling the FFSL Southeast Management Area Office at (435) 259-3766. Please see Section 3.5.3 of the RMP for education goals.
64	64.12	Sheri Griffith Expeditions	Education and enforcement	Note: only 12% of users encountered motorized boats. Safety was listed as a concern. We would like to see or know that these small vessel users are being given information on the rules and regulations that are given to motor users, so they know what to expect and what measures are followed to provide all the best experience.	Please see response to submission number 64, comment number 64.11. Section 3.5.3 of the RMP discusses public education, including boating safety.
64	64.13	Sheri Griffith Expeditions	Use limitations	Group sizes should follow current practices in other Cooperating Agencies.	An overnight group size limit of 25 people is a part of FFSL Administrative Rule R652-70-2400. Unfortunately, amendments to administrative rules are beyond the scope of this RMP. FFSL is aware of the lack of consistency between FFSL administrative rules and partner agency rules and will prioritize interagency consistency when the next opportunity to amend administrative rules arises.
64	64.14	Sheri Griffith Expeditions	Thresholds	Thresholds: Wait time at boat ramps. It seems we have already exceeded the proposed threshold. What are the proposed ways to mitigate this without affecting our business.	As stated in the Indicators, Thresholds, and Management Actions tables in the RMP (Section 3.3), potential management actions may include the following: <ul style="list-style-type: none"> Evaluate whether to designate parts of boater access points for use by certain types of watercraft to provide better flow. Evaluate the possibility of expanding existing boater access points. Evaluate the possibility of adding a new boater access point.
64	64.15	Sheri Griffith Expeditions	Thresholds	Thresholds: Group size. What exactly is a group? How is it determined how many "groups" pass by a single spot in an hour. What is the location? What is the time of Day?	Commercial outfitters may refer to UAC R650-206 for specific information about carrying passengers for hire. To determine groups passing by a defined location, sites will be monitored over high use weekends, as indicated in the Indicators, Thresholds, and Management Actions tables in Section 3.3 of the RMP. The locations and time of day will be determined during development of the formal monitoring plan (see Section 3.5.2 of the RMP). Monitoring will focus on busy locations and busy times of day.
64	64.16	Sheri Griffith Expeditions	Use limitations	We have experienced some very large groups on the Moab Daily stretch. Though we understand the importance of selling trips, the overall impact on really busy days does affect our guests' experience. Though it may not be a popular opinion, we do have interest in ways to mitigate the busy days. For example, if we knew there was a very large group, we would be open to adjusting our launch time or not running a trip on that date.	Prescribing launch times would require changes to FFSL's administrative rules, which are not part of this planning process.
64	64.17	Sheri Griffith Expeditions	Thresholds	Thresholds: Wildlife and Wildlife Habitat. How is this measured and determined between Commercial and Private Use? We strive to practice low impact, it is in our best interest to protect the resource. How can you penalize commercial users when the damage may have been done by private user groups. We do appreciate your Monitoring Goals (3.4.2) and are curious to see what and how this will be implemented for private user groups.	No new penalties to either commercial or private boaters are proposed in the RMP. Monitoring wildlife and wildlife habitat will allow FFSL to proactively work with other agencies to address any impacts. FFSL is required by Administrative Rule to consider fish and wildlife habitat when implementing multiple-use policies (see Section 1.3.3 of the RMP).
64	64.18	Sheri Griffith Expeditions	Permits	Utah Code 65A-10-1(1) gives the authority of the division to manage sovereign lands but does not say anything about if any breach of permit terms by a permittee will result in automatic termination of the permit. Under this rule if an outfitter has an infraction on the Moab daily their entire operation may be shut down.	This has always been true. Violations of FFSL permit terms may result in termination of permits with cause. A FFSL right-of-entry permit is a permission implement, not a contract. Division decisions may be subject to the Administrative Rules for Consistency Review, found in UAC R652-9.
64	64.19	Sheri Griffith Expeditions	Process	"Continue to monitor overnight use. If restrictions need to be implemented on overnight use in the future to maintain desired conditions." We know that this is something that may need to happen in the future. We hope that this plan will address the timeline and process of how this might look and would like to be part of the process.	The results of overnight use monitoring will inform whether change is needed; a timeline and/or process for change would be developed at that time. All FFSL planning decisions are governed by UAC R652-90-500, including public notice and public participation requirements. This will allow Sheri Griffith Expeditions the opportunity for participation and involvement.

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64	64.20	Sheri Griffith Expeditions	Camping	The protection of wildlife is important to us but we disagree with the proposal to close camping above Dewey Bridge up to mile 109 from February to June 30. This stretch has minimal campsites and some of the highwater campsites are critical to us in the month of June. (Specifically, mile 100.7)	FFSL proposed this closure to increase consistency with the BLM Moab Field Office Record of Decision and Approved Resource Management Plan DOI-BLM-UT-Y010-2008-0001. Upon review, FFSL agrees that the draft RMP campsite restriction language should be changed. The text in Section 3.4.1 of the RMP has been updated to reflect your concerns.
64	64.21	Sheri Griffith Expeditions	Camping	Unsure why the camping restrictions from Cisco Landing to the Utah-Colorado State Line. (February 1 to June 30) We do not feel this is necessary as the Moab BLM has historically managed this stretch.	FFSL proposed these restrictions to increase consistency with the BLM Moab Field Office Record of Decision and Approved Resource Management Plan DOI-BLM-UT-Y010-2008-0001. The text in Section 3.4.1 of the RMP has been updated to reflect your concerns.
65	65.1	Cheryl Frank	Private motorized use	We have been using a jet boat on the Colorado and Green rivers since 1982. This has been one of the best items we have spent with our daughter friends and now our grand children. During these times we have always complied with the rules in place. We have also paddle boards canoes and rafts. The great thing we have notice is that it is multi use for all community members. Now we take the mussel test each year, buy fishing licenses boat registrations. My husband is an avid bird hunter so he buys federal duck stamps, licenses habitat registrations. Do not forget the Pittman Robinson fees. We also enjoy when the commercial boaters go by. We are in many tourists picture streams hosing up a stringer of catfish. I have so many thoughts on this. As we get older our boating is such a part of our lives. We hope to continue to enjoy with our grand children. It seems as if every activity that we have done over the last 40 years is being stopped limited.	The RMP does not propose new restrictions to private motorized traffic on any of the four river management units.
65	65.2	Cheryl Frank	Safety	During some of our adventures we have rescued canoes that have missed the boat ramps. We loaded up canoes and took back to their appropriate boat ramp. One time a group lost their belongings in the river. We happened to be fishing by Big Bend and my husband was able to fire up jet boat and gather belongings before lost. Another one my husband helped a sheriff's department in Colorado go to an Island to retrieve a person who had died while he was duck hunting.	Thank you for your comment. We appreciate your willingness to help others in need.
65	65.3	Cheryl Frank	River experience, wildlife	As for conflict we are respectful of others. It is not hard to plan moves around others. There are many who do not understand that there are times that boars cannot slow or the boats sinks and is difficult to control. We have had kayak and rafter purposely block entire river in front of us. Then it I difficult to avoid passing them fast. Wildlife. Not sure what conflict there is. We have seen deer elk bears beavers eagles ospreys and many more.	Thank you for your comment.
66	66.1	Shon Walter	General motorized use	I urge the CRCMP Planning Committee to reconsider the proposed restrictions on motorized boat operations. These restrictions would not only harm the local economy and reduce the safety of all river users but also take away a cherished activity that many visitors enjoy and look forward to. A balanced approach that allows for the coexistence of all river users while preserving the river's natural beauty and ecological health is essential. It is important that we find a balanced approach that is fair and equitable to everyone. I went on a Jet Boat tour that does the spin and splash on the river. It was a fun and memorable tour and I noticed the captain was very respectful of other boats on the river. He slowed down to almost a stop at any point he approached other boaters and was very careful to cause minimal waves on the river when there were other boaters in the area. This company does it right and is very respectful on the river.	The RMP does not propose new restrictions on existing commercial motorized tour companies.
67	67.1	Kenn Babin	Commercial motorized use	I recently took a motorized boat tour in Moab Utah on the Colorado River. The boat ride was an excellent way to learn about the history and geology of the river and surroundings. I am in support of allowing motorized boats and private docks for safe access to the Colorado River. The boat was quiet and did not cause disturbances to the river. Please continue to allow motorized boats on the Colorado River. It is important to allow safe access for these educational tours!!	The RMP does not propose new restrictions on existing commercial motorized tour companies.
68	68.1	Gabe Ekker	General motorized use	I just wanted to express my desire to continue to use a boat motor on the Green River and Colorado rivers. Our family has had many great trips on the rivers using motors and we would love to be able to continue to do so. Thanks for your consideration.	The RMP does not propose new restrictions to private motorized traffic on any of the four river management units.
69	69.1	Caleb Shumway	Not applicable to the RMP	I was recently made aware of your organizations intent to implement a Colorado River Comprehensive Management Plan...In recent years the river has been abused by those who have no actual care about the Colorado River...What is the perspective of someone who was raised on its banks and actively lives in harmony with it to this day? Environmental Protection: The rivers banks are always naturally changing. After every high water there is a changed river underneath. Prohibiting motor will not change the natural erosion that carved the canyons of the Colorado River. Wildlife are more disturbed by the hundreds of floating tourists who are scattered across the river disturbing the banks. Most of the pollution in the river is caused by massive amounts of watercraft as passengers discard their waste and soak their chemical covered bodies in the water. Normal motorized watercraft add no additional pollution to the water with air emissions similar to cars along the bank.	The Final Colorado River CMP was completed in January 2020; public comments on this plan are no longer being accepted.

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69	69.2	Caleb Shumway	General motorized use	Reducing User Conflicts: The river can be narrow in some places forcing closer interaction between all vessels on the water. Laws are already in place to govern the interactions various types of vessels and are honored by the motorized community. No law or regulation can stop the complaints of those who seek to be offended by the difference of others. To remove motorized access due to the hate of a few people would be poor conflict management. Motor and non-motor vessels can have a symbiotic relationship. In 2024 a nonmotorized life was saved due to the nimbleness of a motorized watercraft. If motorized stopping management policies had been in place there would have been a death, and it would have been preventable. Motorized vessels are the guardians the of the river.	The RMP does not propose new restrictions to private motorized traffic on any of the four river management units. In addition, the RMP does not propose new restrictions on existing commercial motorized tour companies.
69	69.3	Caleb Shumway	General motorized use	Sustainable Recreation: If you know the river you know it will naturally limit motorized vessels. Those who do not respect it won't be on it for long. Nonmotorized vessels are a little more forgiving resulting in higher numbers, but limits access based on physical ability.	Thank you for your comment.
69	69.4	Caleb Shumway	Multiple use	Having ran the river as a rafting guide and has a motorized user I love all forms of recreation and welcome all if they can respect the environment and others on the river.	Thank you for your comment.
70	70.1	Tonya T.	Commercial motorized use	I completely support eliminating commercial jet boats upstream of the Moab ramp on the Colorado river.	FFSL is required to manage the rivers using multiple-use, sustained-yield principals. In that spirit, FFSL seeks to balance the needs and effects of different user groups, including commercial jet boats. See response to submission number 1, comment number 1.1.
70	70.2	Tonya T.	Commercial motorized use	I've have been writing since 2015 about Moab Jett and the dangers they have brought to the section of the Colorado river below White's and upstream of the Moab ramp. For example - RECKLESS DRIVING - To allow their boats to race around on that section of river, multiple times a day, with multiple boats, which is primarily, as well as heavily, used by people in non-motorized crafts, is simply dangerous. In any other venue, like the highway or a neighborhood, what Moab Jett does would be called reckless driving. It seems just a matter of time before something tragic happens when they don't notice, because they're going so fast, weaving and spinning in circles, the swimmer without their boat &/or a PFD. NOT WAKELESS AROUND OTHER BOATERS - I always know they're coming, since you can hear them way before you see them, so I prepare for their passing which, at this point for me, they rarely slow down for. I just try to make sure my stuff and I'm in a spot where I can deal with their waves and feel sorry for those who don't understand they're about to get waked and don't have time to get to their unattended boats or other items on the shore or not secured on their boats, NOT RESPECTING UPSTREAM BOATER'S RIGHTS - Just the other day they had two boats screaming upstream and didn't see me and the other person I was boating with until they were super close, due to the bends and blind spots in the river. My partner was able to get below them, but I ended up in an eddy, waiting for them to pass, so I could get back to being a safe distance from the person I was boating with. Instead of them passing me, they decided that where they were was a good place for them to do the thing they do where they go back and forth and make waves that they then turn around and drive through. I was left trapped in the eddy, forced to watch and wait for them to finish doing this stunt. In my opinion as well as many other people I know, and probably in the opinion of the non-human animals trying to live in and near the river, it is extremely frustrating that Moab Jett is permitted to bring so much danger and disrespect to a stretch of the river that they don't need to be on. Would it really affect their business to not be permitted to be on the stretch of river upstream of the Moab ramp? Everything they do upstream of that ramp can be done downstream of that ramp. Between the Moab ramp and Potash ramp is a stretch of river with very low non-motorized traffic. I'm curious about their permit, if it's ever/when it's up for renewal and if there's any chance of changes to the area they're allowed to operate in &/or how many trips a day they are allowed to do. Please keep me posted if public opinion is taken into consideration when it comes to their permit. And if so, and you need volunteers, I am super willing to collect data to help make informed decisions.	Thank you for your comment. The current Right-of-Entry Permit (UAC R652-41) for commercial motorized tour operators allows non-exclusive, non-permanent use of sovereign lands for a short-term period of generally no more than 1 year. Permitted operators must follow applicable laws. Please see Section 3.4.2 of the RMP for commercial use permitting management decisions.
71	71.1	PLPCO and Utah Division of Water Rights	Water rights	The RMP should address water rights and compliance with water right regulation. DWRI Southeastern region may be contacted at (435) 613-3750 for additional information.	This is a Recreation Resource Management Plan that functions as a supplement to both the Colorado River CMP and the Green River CMP. The January 2020 CMPs discuss FFSL's relationship with the Utah Division of Water Rights and water rights. FFSL is grateful for and will continue to enhance our collaboration with the Division of Water Rights.
72	72.1	Pete Gross	Multiple use	Congress established Hells Canyon National Recreation Area which was signed into law December 31, 1975 and managed by Wallowa-Whitman National Forest. Float trip launches immediately below Hells Canyon Dam along the newly designated Wild and Scenic stretch of the Snake River were limited to five trip launches per day with a maximum party size of 30 later reduced to 24. The number of motorized launches were initially unrestricted. The USFS was tasked with developing a management plan for jet boats. I rowed 12 six-day trips the length of the Snake River from the dam to Heller Bar just below the confluence with the Grande Ronde River on the Washington side in 1977-78. We almost never saw jet boats along the Wild segment between the major rapids of Wild Sheep and Rush Creek.	Thank you for your comment.

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				<p>For years, the USFS failed to establish a management plan for powerboats. Jet boat traffic exploded over the ensuing years. By the time the USFS implemented a river management plan, the plan was heavily biased in favor of jet boaters largely due to the failure of the USFS to act in any timely manner. On river conflicts became more common. One jet boat outfitter out of Lewiston shared with me that he had more problems with other jet boaters than he did with floaters. I witnessed several confrontations at both the Hells Canyon and Heller Bar boat ramps between floaters and jet boaters.</p> <p>The reverse happened along the Lower Salmon River from Hammer Creek a couple of dozen miles downstream of Riggins, Idaho to the confluence with the Snake River. The BLM did not restrict the number of launches of either type. During the summer months, float trips dominate the Lower Salmon. Jet boaters tend to avoid the Lower Salmon due to the hassle of navigating between numerous floaters along with low water challenges in late summer.</p> <p>I share this cautionary historical perspective because the multiple use argument often used to justify the motorized assault on our backcountry has major flaws</p>	
72	72.2	Pete Gross	Multiple use	<p>On the Lower Salmon River, I had a couple of river ranger friends observe as many as three dozen river parties totalling several hundred floaters simultaneously floating and camping along a 50 mile stretch of river with minimal impact upon each other except competition for favored camps. At any given time in mid-summer, several hundred people might be floating the Lower Salmon River separated from each other by days and miles and scarcely aware of each other's presence, sometimes even floating past another group in camp unnoticed. By contrast, just ONE jet boat can and often does readily encounter and negatively impact several hundred other users in a matter of a few hours with its audio imprint and wake. The bottom line is that the faster you travel in the back country, the more space you "occupy" both literally AND acoustically. . .Where it's unregulated, motorized use literally drives away non-motorized use as the few expel the many, and the concept of multiple-use allows the achievement of the lowest common denominator.</p>	Thank you for your comment. FFSL's multiple-use management decision-making assumes that all users' experiences have equal worth.
72	72.3	Pete Gross	Process	<p>Whenever federal land management agencies raise the possibility of restricting motorized use, whether it's overflights in the Grand Canyon, snowmobiles in Yellowstone, jet boats in Hells Canyon, or off-road vehicles just about anywhere, groups representing these motorized users make almost as much noise in the halls of the land management agencies as they do in the backcountry. Invariably, they argue for shared "multiple" use, equal access for everyone, and claim to bring economic benefits to surrounding communities. These arguments are appealing because they are clear and simple ... and often false. Ironically, the failure to restrict and manage motorized use probably has a greater negative economic impact on surrounding communities. I applaud your pro-active efforts to manage these stretches of the Colorado and Green Rivers while use levels are still manageable.</p>	Thank you for your comment. FFSL left the public comment period open for 90 days (twice as long as the minimum required review period) so that as many voices as possible would be heard.
73	73.1	Cynthia Shumway	Multiple use	<p>I support the use of motorized boats and private docks. I believe that all users can coexist. There is no need to make new rules that put limitations on motorized boats. Anyone who is familiar with the Colorado River knows that nature makes its own rules. When the river flow is slow and low, only specialized boats can even get around on the river. Our local jet boat companies are well trained and are able to share the beauties of the river with visitors. . .My husband, who is a Moab native, and I have raised our children on the river. Not only do we use motorized boats , we also enjoy white water rafting, canoeing, kayaking, fishing, paddle boarding, and even just floating down the river with a life jacket on. All of the river companies have been friendly and kind to us. We have made many friends through the years by just being on the river. We are polite and courteous to everyone we meet on the river, even the people who frown at us and wave with their middle finger .</p> <p>No matter what you do, the high water season will always erode the bank. Have you ever seen the river cross the road? It happens. The animals who get flooded out just come back when the water drops. For those who think they are entitled to a noise free wilderness experience, they need to take themselves to a more remote part of the river that doesn't have a main road running next to it. Our family has been enjoying the Colorado River for generations. From the Friendship Cruises of the 1950's to our current days filled with wakeboarding, jet skiing, rafting, paddle boarding and etc. There is room for everybody that loves the river. Please do not put limits on our precious river experiences.</p>	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. See response to submission number 1, comment number 1.1. The RMP does not propose new restrictions to private motorized traffic on any of the four river management units. In addition, the RMP does not propose new restrictions on existing commercial motorized tour companies.
74	74.1	Craig Shumway	Multiple use	<p>One of my favorite activities here in Moab is running my boat up and down stream on the Colorado River. I have accessed the Colorado river using the Moab, Potash and the dewy boat ramps and areas between. Those activities include spending family time on the river, boat rides, fishing, water skiing and more. This has been a tradition starting back in the 1960's with my father driving our family boat on the river. To this day we still are and enjoy using the river with gas powered boats. I also want to note that I have and use rafts, and other paddle type vessels on the river. The Colorado has a rich history of boat use between Moab, Green River Utah and Dewy. Please keep the river open for every one to use it, this includes motorized boats, there is room for all.</p>	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. See response to submission number 1, comment number 1.1. The RMP does not propose new restrictions to private motorized traffic on any of the four river management units. In addition, the RMP does not propose new restrictions on existing commercial motorized tour companies.
75	75.1	NAVTEC Expeditions	Process	<p>NAVTEC did not make the June 20th meeting due to the notification email going to spam. I was informed through Facebook, there was an in-person meeting concerning the release of the draft RMP at the Grand Center in Moab. I am confused why NAVTEC was not informed of the meeting from FFSL as I am major stakeholder and have attended every meeting concerning the complete RMP. This year we</p>	Two emails were sent out regarding three public meetings for the draft RMP: one on May 1, 2024, and one on June 12, 2024. Advertisements were also placed in several newspapers, including <i>The Times-Independent</i> . The advertisement in <i>The Times-Independent</i> ran April 25, May 2, and June 6 of 2024. Written notices were also emailed directly to lessees of

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				are being levied a new user fee by FFSL of \$2/person to fund these types of projects and it would have been appropriate to receive ample notice to attend.	record (including NAVTEC Expeditions) and adjacent landowners. This meets, if not exceeds, the requirements outlined in Notification and Public Comment, UAC R652-90-500.
75	75.2	NAVTEC Expeditions	Process	In prior meetings I have expressed the difficulty of public scoping during high season, Memorial Day through Labor Day, as outfitters are busy running their business. Outfitters provide for the lion's share of use along the Colorado and Green Rivers. This plan has been in the works since 2021. I feel the dropping of this plan is deliberate and unacceptable.	FFSL follows administrative rules that prescribe the timing and duration of public comment periods. At the 2023 Utah Guides and Outfitters Meeting, FFSL was informed that the timing of the comment period was difficult for some stakeholders; it was extended from the required 40 days to 90 days (three months).
75	75.3	NAVTEC Expeditions	Purpose	I would call the plan out for piecemealing. Why develop a management plan that did not include everything right up front, recreation, wildlife, soils, hydrology, fuels.	This is a Recreation Resource Management Plan that functions as a supplement to both the Colorado River CMP and the Green River CMP. The January 2020 CMPs discuss wildlife, wildlife habitat, hydrology, water quality, geology, paleontology, recreation, infrastructure, and other topics in detail.
75	75.4	NAVTEC Expeditions	Permits	Stating that permits may be subject to additional oversight and mitigation at some unknown point, involving some unknown set of guidelines to be developed is unacceptable. How are outfitters supposed to operate with such uncertainties? Our overlapping permits with NPS and BLM are issued for 10 years to provide minimum certainty. NAVTEC Expeditions serviced 8262 passengers employing 65 people last year. Our use and voice are not accounted for in the draft RMP. The CRMP is designed to regulate and negatively affect commercial operators.	FFSL is not sure which section of the RMP you are referring to (we do not see that language). The information in Section 3.3.2 of the draft RMP (Section 3.4.2 of the final RMP) applies to commercial motorized use. The right-of-entry permit for commercial use (motorized or non-motorized) of sovereign lands allows non-exclusive, non-permanent use of sovereign lands for a short-term period of generally no more than 1 year. This is prescribed in UAC R652-41; amendments to the administrative rules are beyond the scope of this RMP. Please see Section 1.1.3 to understand FFSL's vision and goals for this planning process, which include maintaining the existing diversity of recreational opportunities. In addition, the RMP does not propose new restrictions on existing commercial motorized tour companies or non-motorized commercial outfitters.
75, 80	75.5, 80.3	NAVTEC Expeditions, Utah Guides and Outfitters	Purpose	<p>Vision and Purpose — The data provided does not support the recommended management actions and does not follow the multiple use high yield principle.</p> <ul style="list-style-type: none"> · Purpose and Vision of CRMP is to reduce recreation conflicts. Even with the skewed survey and number of comments provided, user conflict does not support management action. · Plan does not follow Multiple Use, and sustained yield principle as primary rationale. The plan encourages ethical recreational use that minimizes resource impacts as primary rationale. · Code 65A-2-2 was amended in 1994. We have 30 years where there haven't been planning procedures in place. Why now, and is the authority necessary or burdensome? · The plan states the objective is to create a better understanding of current recreational use. Then why create river segments that do not align with current use patterns. · C-1 the comments themes for supporting and limiting motorized use were 24 to 29. This does not seem to be a large enough imbalance to support management actions. · The support of having greater park ranger presence was either not supported or opposed at 66.9% which should tell the FFSL that they don't want more rangers on the river. · Appendix C - the comments received all have a similar theme to them and ask for a similar thing which seems like a special interest group sent out a newsletter and asked for comments (UGO only) 	<p>FFSL believes that the RMP meets the agency's obligation to administer sovereign lands using multiple-use, sustained-yield principles in accordance with Utah Code 65A-2-1, Utah Code 65A-10-1, and UAC R652-90-800. The data collected through the survey was used to inform the development of management actions. Most of the management actions consist of monitoring, as described in Section 3.3 of the RMP, along with the goals described in Section 3.5. The RMP does not propose new restrictions on existing commercial motorized tour companies or non-motorized commercial outfitters.</p> <p>FFSL is required to develop planning procedures for natural and cultural resources on state sovereign lands by Utah Code 65A-2-2 and has been doing so for sovereign lands in Utah as funding allows. The most recent plans for this area are the January 2020 Colorado River and Green River CMPs. The RMP is a supplement to those plans. The river segments discussed in the RMP align with the segments in the CMPs for consistency.</p> <p>Table C-1 in Appendix C of the RMP summarizes the approximate number of recreation-related comments submitted during information gathering for the Colorado River and Green River CMPs, during public review of the draft Colorado River and Green River CMPs, and during information gathering for the RMP. The management actions were not developed because of the comment tallies; the table is included only to provide information about public viewpoints and to illustrate that there are differing viewpoints on recreation. The comment themes were summarized after all comments for the CMPs and the RMP information-gathering process were received through the formal comment submittal process. FFSL sought feedback from all river partners, entities, and stakeholders.</p> <p>A total of 52.3% of river users neither opposed nor supported greater park ranger presence; 14.6% of river users somewhat or completely opposed greater park ranger presence; and 33.1% somewhat or completely supported park ranger presence (see Table 2-16 of the RMP).</p>
75, 80	75.6, 80.4	NAVTEC Expeditions, Utah Guides and Outfitters	Survey methodology	<p>Survey Concerns — Data collection excluded certain visitors creating bias. Results are neither consistent nor representative.</p> <ul style="list-style-type: none"> · 1.1.1 "Based on stakeholder input and the results of the data collection and analysis, FFSL developed a management framework to address and reduce recreation conflicts, overcrowding, and other recreation issues on the four river segments." Commercial stakeholders were not consulted. · 2-17 states when visitors are unaware of or encounter conditions that they do not expect they have strong negative feelings. Following this logic the survey should be skewed to the user groups that are surveyed. · 2-19 The survey does not include commercial passengers. A skewed survey does not provide an accurate characterization of how recreationists are using the river, nor does it provide fair insight for management actions. · Table 2-13 does not include Government agency watercraft · Not including commercial passengers in the survey is not fair as they are paying a \$2/person fee to fund this research. How does FFSL plan cost recovery from private user? 	<p>The recreational use survey was conducted by Utah State University's Institute for Outdoor Recreation and Tourism (IORT) and their staff.</p> <p>Regarding potential bias toward the users of public boater access points: The sampling design was created to capture a representative sample of the users of public boater access points (Section 2.6.1 of the RMP). The RMP notes that "Users at private boater access points, such as those at Canyonlands by Night and Red Cliffs Lodge, were not surveyed. The survey results therefore do not capture the data points, preferences, and perceptions of river users who only use these private points (e.g., motorized users at Canyonlands by Night)."</p> <p>The sampling design focused on public boater access points for several reasons, including the following:</p> <ol style="list-style-type: none"> 1. Public boater access points facilitate more river users and the most diverse types of users for on-river recreation. 2. There were limited fiscal resources to conduct surveys at private boater access points or more boater access points.

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				<ul style="list-style-type: none"> · 2-30 Most river users either somewhat or completely supported limiting commercial jet boats. This is a biased management recommendation as commercial clients were not surveyed. · 2-32 demographics are not representative of all river users. Nor do they include Moab's local population, 43-year-old white Americans who make over 100k/ year is not representative of 90% of users. · 2-34 "although on-river encounters with commercial motorized boats are relatively uncommon, sampled river users support management actions that would make these encounters even less frequent" 43 people support limiting commercial motorized use compared to the historical use of thousands of commercial guests. These people were surveyed. This is not a data supported management decision. · 2.6.1 The method of using private boater access points, such as Canyonlands By Night and Red Cliffs Lodge weren't used on the Colorado River, but private access at Ruby's Ranch on the Green River was used as well as 6 mile beach which is not a launch point. This leads to biased results as it favors non-motorized users. · Who were the survey technicians? Were they SWCA, FFSL employees or private unbiased contractors? · Table 2-12 indicates that 37.1% respondents never encountered another watercraft. How many of those commenters listed encounters with commercial motorized boats detracted from their experience? (NAVTECH only) · Table 2-15 says that the motorized boats somewhat detracted or greatly detracted from their experience Table 2-15 says that the motorized boats somewhat detracted or greatly detracted from their experience. We believe this is an inaccurate representation as the number of users in a motorcraft was only 8.5%. · 2.6.3.5 "... visitors may not have expected to encounter motorized use and had strong negative perceptions of such use. We believe education on the types of users on the river could change perception and perhaps change their experience. · 3.1 What percentage of surveyed participants were on commercial trips? Table B-1 shows roughly >50K commercial passengers on the Moab Daily, and it seems like this largest demographic should have been included in the survey. (UGO only) · 3.1 The term "visitor experience" is used only for private users and does not include commercial users. Considering commercial users pay a \$2 fee to FFSL they should be considered a visitor and have weight in the process. (NAVTECH only) · 2.6.3.1 The group size of 6.9 for commercial motorized boat is low and unrealistic. 	<p>3. There was a concern that even if data were collected from the users of private boater access points, that data would yield very few responses (this is based on our survey technicians' having difficulty getting responses from the users of private tour services at public boater access points. These river users are often loaded directly to their bus/shuttle, making it more difficult to contact them relative to those river users not on private tours).</p> <p>Although the survey data are not representative of the users of private boater access points, they are representative of river users on commercial trips that use public boater access points. If a commercial operator stopped at a public boater access point, their clientele was contacted and asked to complete the survey.</p> <p>Regarding potential bias toward non-motorized users: IORT created the sampling design in close consultation with FFSL staff to ensure visitors were surveyed at locations that received both motorized and non-motorized boating use. The survey protocol did not discriminate between either type of user; every group coming off the river during a sampling period was contacted. This does not mean that a group which was contacted elected to complete the survey. All groups, regardless of their size and type of watercraft used had equal probability of being included in the sample, making the data representative of all users of the sites that were sampled.</p> <p>In response to "Table 2-13 does not include Government agency..." FFSL is interested in characterizing how recreationists are using the river, not government agencies (the purpose of the data collection effort is described in Section 2.6 of the RMP). FFSL solicited inter-Agency comments from governmental agencies through a separate RDCC inter-agency comment process.</p> <p>In response to "2-30 Most river users either somewhat or completely supported limiting commercial jet boats..." the RMP does not propose new restrictions on existing commercial motorized tour companies.</p> <p>In response to "2-17 states when visitors are unaware of or encounter conditions..." visitors who encounter unexpected conditions can have strong negative reactions. The survey instrument was designed following best practices within the field of outdoor recreation resource management (Vaske 2019). Specifically, the survey asked the question about the number of watercraft encountered, relative to the number encountered using 1) neutral framing language; 2) bipolar response options (ranging from "A lot less than expected" to "A lot more than expected"); and 3) an inclusive set of watercraft types.</p> <p>This well-accepted protocol ensures the survey instrument itself does not influence how questions are answered. The data show that for most watercraft types, river users' expectations of how many other types of watercraft are on the river aligns with reality (Figure 2-12 and Table 2-13 of the RMP). Additionally, encounters with other types of boaters tend to have little effect on visitors' experiences (Table 2-15 and Figure 2-14 of the RMP).</p> <p><i>Reference: Vaske, J.J. 2019. Survey Research and Analysis: Applications in Parks, Recreation and Human Dimensions. 2nd ed. Venture Publishing.</i></p> <p>In response to "2-32 demographics are not representative of all river users..." the demographics are representative of all river users who use public boating access sites.</p> <p>Regarding demographics not being representative and not including the local Moab population, the sampling design was created to capture a representative sample of the users of public boater access points (Section 2.6.1 of the RMP). Commonly, surveys of outdoor recreationists and tourists are distinctly different than local populations. See Smith and Trautvein (2023) for data comparing outdoor recreationists in Utah to the state's population as a whole, for example.</p> <p><i>Reference: Smith, J.W., and N. Trautvein, 2023. Insights Into the Characteristics of Outdoor Recreationists in Utah From a Statewide Survey. Institute of Outdoor Recreation and Tourism, Utah State University. Available at: https://digitalcommons.usu.edu/envs_facpub/1662/.</i></p> <p>In response to "2-34 although on-river encounters with commercial motorized boats are relatively uncommon, sampled river users support management actions..." it is unclear what management decision you are referring to. The RMP does not propose new restrictions on existing commercial motorized tour companies or non-motorized commercial outfitters.</p> <p>In response to "Table 2-12 indicates that 37.1% respondents never encountered another watercraft. How many..." none. The survey was administered via Qualtrics' off-line survey delivery application, which allowed us to only ask river users the question about whether encounters with other types of watercraft improved or detracted from their experience if they</p>

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					<p>did encounter that type of watercraft. This is accomplished through the Carry Forward Choices function of the Qualtrics Survey Application (Qualtrics 2024)</p> <p><i>Reference: Qualtrics. 2024. Carry Forward Choices. Available at: https://www.qualtrics.com/support/survey-platform/survey-module/question-options/carry-forward-choices/.</i></p> <p>In response to "Table 2-15 says that the motorized boats somewhat detracted or greatly detracted from their experience..." the data are accurate. These are two different survey questions, and the numbers are not directly comparable.</p> <p>In response to "2.6.3.1 The group size of 6.9 for commercial motorized boat is low and unrealistic," the value is correct for the mean group size of commercial motorized boat trips using public boating access points. The range is large, with a maximum reported group size of 26. Given a few (n = 8) respondents who were using a commercial motorized boat indicated their group size was five or less, which is unlikely, it is possible respondents were interpreting their group size as their personal group size and not the total size of the group on the river.</p> <p>Sovereign lands are public lands managed under multiple-use, sustained-yield principles. All commercial use of sovereign lands requires the payment of fees. Remittal of fee payments does not divest the public's interest in sovereign lands.</p>
75, 80	75.7, 80.5	NAVTEC Expeditions, Utah Guides and Outfitters	General motorized use	<p>Motorized use Restrictions — Conflicts between motorized and non-motorized users are a target for regulation despite FFSL acknowledgment that encounters are relatively uncommon.</p> <ul style="list-style-type: none"> - Key terms define motorized use as boats capable of traveling faster than wakeless speed and non-motorized watercraft may incorporate small kicker motor incapable of putting watercraft on plane. A unique negative targeting definition. 73-18-2 state boating act defines "Motorboat" means any vessel propelled by machinery, whether or not the machinery is the principal source of propulsion. A management plan cannot override Utah State legislature. - 2-5 list commercial motorized use limited to permit area. No motorized use upstream of red cliffs lodge. NAVTEC's upstream BLM SRP allows for motorized travel in this area. (NAVTEC only) - FFSL says it issued 28 non-motorized permits and 3 motorized permits. NAVTEC's permit from FFSL has never specified non-motorized use. We have been operating motorized tours in this area since 1987. (NAVTEC only) - 2-12 states motorized use for administrative and emergency purposes is common but does not provide details of use numbers. We think these numbers should be included. - Currently, the BLM has 10 year SRP permits for upstream motorized use. This could affect many outfitters that launch motorized craft at high water on the Moab Daily. (UGO only) - 2-12 states no commercial motorized use is allowed in Labyrinth. This is conflicting information to what UGO members have been told by the BLM current regulations. - 2-18 noise disruptions, safety concerns, and bank erosion should not be included as valid conflicts. HWY 128 is a motorized connector corridor; motorboats provide more rescues than accidents and banks are replenished every high water year. Motorized boat use has not increased, and boats are not larger than before. See CNP use numbers. - 2-24 states more than half of respondents noted motorized boats they saw were either a little more or a lot more than expected however only 12% of respondents encountered motorized boats. 2-25 shows the number of paddle boards encountered was far greater than any other craft. - 2-26 lists distance of encounters. This can be confused as a safety concern. Encounters on the river are a normal part of boating. Whether people are coming to a motorboat to ask a question, or the motorboat is communicating with the other party. It is hard to communicate outside of 100 feet on the river. Deep water also is fast water, so it is naturally where boats pass each other. This does not mean motorboats were passing non-motorized boats within 50 feet at dangerous speeds. - 2-34 although river encounters are relatively uncommon, they can occur in close proximity. Once again, this makes the encounters seem to be unsafe. - Motorized Use. The draft states there is no commercial motorized use in Labyrinth Canyon. This is cleared up by the definition of motorized use on page 25. Is it our belief that there should be two categories of motorized use definitions. Currently the definition says that outboard "kicker" motors and "non-motorized" (UGO only) - 2.5.1 Conflicts between motorized and non-motorized users seems to be a key recreation issue for the FFSL, yet 12.4% of the river users sampled in the survey reported encountering commercial motorized boats while on the river. So why is such a relatively low percentage item getting so much attention? 	<p>The RMP takes no action to restrict recreational motorized use. The limits for commercial use permitting in Section 3.4.2 of the RMP have existed since the filing of Withdrawal No. 999-00212 in 2020.</p> <p>In response to "Key terms define..." the key terms in Section 2.1 of the RMP have been modified based on public comment. In addition, key terms have been added to Section 3.1 of the RMP for further clarification.</p> <p>In response to "2-12 states motorized use," the RMP is a Recreation Resource Management Plan developed to facilitate diverse and compatible recreation uses while protecting public trust values.</p> <p>In response to "Currently, the BLM has 10..." the RMP cannot change BLM administered land use authorizations.</p> <p>In response to "2-12 states no commercial..." the text has been clarified. Private motorized watercraft have been and will be allowed in Labyrinth Canyon; some motorized commercial uses have been permitted in Labyrinth Canyon; and Class B motorized uses will be permitted in Labyrinth Canyon moving forward. The BLM does not have authority below the OHWM of the Green River in Labyrinth Canyon.</p> <p>In response to "2-18, noise disruptions, safety concerns..." this statement summarizes public comments and reflects the opinion of those commenters. It is appropriate to include in a discussion of public concerns. Comments that support motorized use are also discussed in this paragraph.</p> <p>In response to "2-24 states more than half," 12.4% of respondents encountered commercial motorized boats, and 3.4% of respondents encountered private motorized boats. Of those who encountered motorized boats, approximately 28.5% encountered a little or a lot more commercial motorized boats than expected, and 55.0% encountered a little or a lot more private motorized boats than expected. Inflatable rafts were the most encountered watercraft.</p> <p>In response to "2-26 lists distance of encounters..." and "2-34 although river encounters..." this is the data collected from the surveys. The survey did not ask about safety concerns, and the data are not represented as a safety concern (watercraft speed was not assessed and is not discussed). The RMP summarizes watercraft encounters and perceptions based on data from the surveys. FFSL understands that watercraft may need to be in close proximity to communicate, as well as in draft-restricted environments.</p> <p>In response to "2.5.1 Conflicts between..." please see the second and third bullet points in Section 2.6.3.5 of the RMP.</p>
75, 80	75.8, 80.6	NAVTEC Expeditions,	Process, use limitations	<p>Section Confusion — FFSL has redrawn the Colorado River sections to fit the draft and not followed current use patterns creating confusion.</p>	<p>FFSL is required to develop planning procedures for natural and cultural resources on state sovereign lands by Utah Code 65A-2-2. The most recent plans for this area are the January</p>

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		Utah Guides and Outfitters		<ul style="list-style-type: none"> · 2.6 "The purpose of the data collection effort was to 1) provide an accurate characterization of how recreationists are using the rivers, 2) characterize the types of on-river encounters between river users, and 3) assess river users' preferences for potential management actions." Why then is FFSL creating areas that do line up with current use patterns. · Current sections should be as follows: Ruby Horsethief, Westwater Canyon, Cisco-Hittle, Moab Daily, Meander Canyon, Grey Canyon, Labyrinth Canyon, Dolores River. · Applying one set of rules to Ruby, Westwater, Cisco, Moab Daily to bridge does not acknowledge the current use or designations of these sections that have been in place decades. (NAVTEC only) · The Daily stretch. Seems hard to categorize this entire stretch into one lump group as the uses are so varied from the actual Daily, Above Dewey and below Take-out. (UGO only) · With all the sampling locations, it would be nice to see the correlation between the answers received. I'm wondering if users at Dewey Bridge were part of the 44.2% that said their encounters with commercial motorized boats detracted from their experience? · Table 3.5 The limit of 25 group size restriction states that it complements the BLM Westwater Canyon. Westwater Canyon is a wilderness area and therefore has a 25-person restriction. The Moab Daily is one of the only places large groups can camp. Why if Meander Canyon has a minimum of 40 wouldn't that be connected to the Daily? The same goes for Green River Valley to be compared with Deso/Grey. 	<p>2020 Colorado River and Green River CMPs. The RMP is a supplement to those plans. The river segments discussed in the RMP align with the segments in the CMPs for consistency.</p> <p>In response to "With all the sampling locations..." users at Dewey Bridge were included in the sample, and the reported statistic related to encounters with commercial motorized boats. However, only two surveys were completed at Dewey Bridge. The responses from these individuals would only have a marginal impact on the reported statistics.</p> <p>In response to "Table 3.5 The limit..." this table is for future consideration only. No new group size limits are being implemented at this time. FFSL believes that consistency with the management of partner agencies is important for recreationists, and the table was included in the RMP for that reason. We understand that having differing size limits on The Moab Daily and Meander Canyon is not ideal. If Canyonlands National Park or the BLM change their group size limits during future planning efforts, FFSL would try to be consistent with those changes.</p>
75, 80	75,9, 80,7	NAVTEC Expeditions, Utah Guides and Outfitters	Process, use limitations	<p>Inconsistency with Cooperating Agencies — FFSL has created regulations without collaboration from entities that have jurisdiction and or management authority. These regulations include commercial use restrictions, motorized use restrictions, not recognizing BLM issued permits.</p> <ul style="list-style-type: none"> · NAVTEC has an SRP with the BLM to provide upstream motorized tours above castle creek. The plan does not recognize that permit. (NAVTEC only) · 1-9 "because this section of the Colorado river has not been adjudicated, interim management of the riverbed will be accomplished through cooperation with the Federal Government. FFSL supports partnerships and collaborations with other entities that have jurisdiction and or management authority for recreation on the Colorado and Green River as well as with interested stakeholders. It appears the field manager at the Moab BLM were not made aware of the meeting or release of draft plan. · The draft plan references Grand County general plan to measure and protect natural quiet along 128. However, management actions should not be considered this as this section follows a highway (UGO only) · 2-16 states' max group size for overnight river trips is 25. This number does not align with border agencies. 40 for CNP and unlimited on the BLM daily. · Closure to camping above Dewey bridge to mile 109 from February to June 30, Love eagles, but the best highwater camp is mile 100.7. This camp is also frequently used by outfitters with larger group. This camp is also frequently used by CFI. Note: SGE was launching at Cisco June 16, so was DNR. When asked turns out we were both aiming for that camp. · 3.3.1 FFSL does not have jurisdiction of camping above RM113, so how can they close camping upstream to the Utah-Colorado state line? · 3-6 limiting the groups/hour is not how river trips operate. Most everyone launches in the morning and takes out late afternoon. We have naturally spaced out and do not need FFSL holding a launch window. (UGO only) · Thresholds. What exactly is a group? How do they determine how many "groups" pass by a single spot in an hour. What is the location. What is the time of day. It seems in all reaches of river we may already be at the "threshold" Am I reading this wrong. To add onto that what is the threshold for wait times at ramps. (NAVTECH ONLY) 	<p>FFSL itself is the jurisdictional agency with management authority over Utah sovereign lands. FFSL did reach out to and collaborate with interagency partners through RDCC Project No. 86009 and individually through interagency correspondence on November 7, 2023 (interagency partners were also included on the 2024 email announcements for the draft RMP release and public meetings). At the request of FFSL's federal partners, FFSL extended the federal partner comment period twice. During that time, FFSL received one set of agency comments from Canyonlands National Park.</p> <p>"Special recreation permits" are mentioned in the RMP in Sections 1.5.2, 2.3.1.1, 2.4.3, and in Appendix B.</p> <p>The RMP does not propose new restrictions on existing commercial motorized tour companies or non-motorized commercial outfitters. No noise restrictions are proposed.</p> <p>In response to "2-16 states' max group size," an overnight group size limit of 25 people is a part of FFSL Administrative Rule R652-70-2400. Unfortunately, amendments to administrative rules are beyond the scope of this RMP. FFSL is aware of the lack of consistency between FFSL administrative rules and partner agency rules and will prioritize interagency consistency when the next opportunity to amend administrative rules arises.</p> <p>In response to "Closure to camping..." and "3.3.1 FFSL does not..." FFSL proposed this closure to increase consistency with the BLM Moab Field Office Record of Decision and Approved Resource Management Plan DOI-BLM-UT-Y010-2008-0001. Upon review, FFSL agrees that the draft RMP campsite restriction language should be changed. The text in Section 3.4.1 of the RMP has been updated. FFSL has jurisdiction to manage camping on sovereign lands.</p> <p>In response to "3-6 limiting the groups/hour," the RMP does not set limits on the number of groups per hour or launch windows. This is an indicator to be used for monitoring purposes.</p> <p>In response to "Thresholds. What exactly is a group?..." the locations and time of day will be determined during development of the formal monitoring plan (see Section 3.5.2 of the RMP). Monitoring will focus on busy locations and busy times of day.</p>
75, 80	75,10, 80,8	NAVTEC Expeditions, Utah Guides and Outfitters	Permit, desired conditions	<p>Termination of Permit — FFSL does not have the authority to terminate a US Congressional concession contract or BLM SRP. The draft CRMP places FFSL as the ultimate authority and provides no recourse or oversight of permit termination due to breach in contract or resource degradation by all users.</p> <ul style="list-style-type: none"> · Table 3.1 The Desired Condition is "Commercial uses are managed to consider the health of wildlife and wildlife habitat." The threshold is "No more than a 5% increase in shoreline damage or disturbed ground adjacent to popular boater stops (e.g., Rocky Rapid, Hittle Bottom). Compliance with Utah water quality standards." Tell me how commercial users will prevent private users from increasing the shoreline damage at say Rocky Rapid? Commercial operators are a steward and will help their guests be the best possible visitors, but there's not a way for them to control private users which can often not understand the goals of certain areas. The survey states that Rocky Rapid was one of the most popular put-in locations and the majority of people surveyed were private users, so that should tell you that the shoreline damage or disturbed ground adjacent is more likely being effected by private users. Yet commercial users will be penalized for such damage. 	<p>The RMP acknowledges that permits are required from other agencies, such as the BLM and NPS in certain areas (e.g., Canyonlands National Park). It also discusses the interagency river permit system for Labyrinth Canyon (Section 1.5.1). It does not make any statements about FFSL having the authority to terminate other agencies' permits. FFSL does have the authority to terminate its own right-of-entry permits "for failure to comply with any term or condition of the conveyance document or applicable laws or rules," as stated in UAC R652-41-1500.</p> <p>The RMP does not ask or require commercial users to control private users' activities or impacts. The desired condition is that "commercial uses are managed to consider the health of wildlife and wildlife habitat." This is appropriate because FFSL issues right-of-entry permits to commercial outfitters and in doing so must also protect the public trust, which includes fish and wildlife habitat. If the threshold is exceeded, management should consist of working with commercial outfitters to ensure permit conditions are followed and potentially distributing wildlife interpretation materials to outfitters. FFSL recognizes that private users</p>

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				<ul style="list-style-type: none"> Utah Code 65A-10-1(1) gives the authority of the division to manage sovereign lands but does not say anything about if any breach of permit terms by a permittee will result in automatic termination of the permit. UAC R651-41-200 states, "The division may issue non-exclusive right of entry permits on sovereign lands when the division deems it consistent with division rules." Does not state right to terminate permit. Under this rule if an outfitter has an infraction on the Moab daily their entire operation would be shut down. (UOG Only) The rule which could terminate the permit was added in 2022 as a condition of the permit, "Termination. This right-of-entry may be terminated by PERMITTER upon breach of any conditions hereof. If PERMITTER determines that the PERMITTEE, its assigns or successors in interest, have breached any conditions of this right-of-entry, PERMITTER shall provide notice of the breach in writing by certified mail, return receipt requested, specifying the particular breach. The PERMITTEE shall have thirty (30) days from the date of such notice, or such longer period as may be required under the circumstances as approved by the PERMITTER to correct such breach. If PERMITTEE fails to correct such breach within such period, PERMITTER may terminate this right-of- entry upon thirty (30) days' notice; provided, however, such termination shall not release PERMITTEE from liability for damage prior to such termination." I disagree with this addition to the permit and think there should be some sort of recourse for Permittee's to fix the breach of condition. Best practice for termination of contract should be spelled out in State Legislature and gone through the rule making process as is standard for all contracts. 	<p>may contribute to impacts on wildlife and wildlife habitat. The education goals in Section 3.5.3 of the RMP are designed to help address private user impacts.</p> <p>Any right-of-entry permit granted by FFSL on sovereign land may be terminated in whole or in part for failure to comply with any term or condition of the conveyance document or applicable laws or rules. Based on a written finding, the director shall issue an appropriate instrument when terminating the right-of-entry permit for cause (see UAC R652-41-1500). FFSL decisions may be subject to the Administrative Rules for Consistency Review found in R652-9.</p>
76	76.1	Kimberly Schappert	Commercial motorized use	<p>I am writing to comment on the Moab Jett tours currently operating on the Moab Daily section of the Colorado River. Back when they first started with one single boat, we were slack jawed as it passed by. How could this be happening on this stretch of river? There we were, floating on our Walmart rafts from Grandstaff Canyon to the boat ramp, with dogs in their life jackets swimming along. It was an onslaught on a usually quiet and calm part of the river, benevolent enough for an activity such as this on a hot summer day. Instead, everyone went on high alert: would they see us? Would they notice a dog or an otter or someone floating in their life jacket spread out from the group, before they took their head off?? It was definitely a defining moment in the evolution of Moab attractions, one we regarded in disbelief.</p> <p>I moved away for 6 years and during my first time back on the river with a paddling buddy, out for a couple of hours stolen from busy schedules, I was introduced to the new Moab Jett operation. Three boats at a time, three times a day, roaring up or down the canyon, audible from far away and out of site, to up close and personal as we cowered in the eddy waiting for their flush of high water wave trains that hammer the shore to subside. We sacrificed 40 minutes of our 2 hour respite sitting in our boats waiting for Moab Jett's 3 boats to joyride their customers up the river, racing back and forth to create as much wake and splash as possible, and back down through the narrow corridor. Our experience was trashed, to say the least, and the impacts on the shoreline for any river habitat must be destroyed with that kind of regular disturbance.</p> <p>Is it a fair use of this valuable resource that one inconsiderate concessionaire impacts every other user group: rafters, kayakers, swimmers, beach goers, stand up paddle boaters, etc, as well as the natural flora and fauna? And that they impact them throughout the day? I say no, it is not fair at all and a grossly inappropriate use of the crown jewel of our Moab backyard.</p> <p>Moab Jett should suspend their operations and Sovereign Lands, BLM, and NPS should conduct a study evaluating Moab Jett impacts from social and environmental perspectives. Any other concessionaire has to comply with any and all regulations effecting their permit area. If there are no regulations governing this operation, then the study will show what regulations are needed.</p>	<p>Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups, including commercial jet boats (which must comply with applicable laws, regulations, and permit conditions). See response to submission number 1, comment number 1.1.</p>
77	77.1	Karen Peterson	General motorized use	<p>My name is Karen Peterson, and I am writing to express my concerns about potential closures of the Colorado River to jet boats and motorized watercraft. My husband has been running the river in a jet boat since he was five years old in 1965, participating in the Memorial Friendship Cruise with his parents and many other boaters. Our family has a deep-rooted tradition of boating, camping, fishing, hiking, and exploring the river.</p> <p>We live in Grand Junction and have spent countless days on the river...The river is integral to our lives, and we always ensure to clean along the banks during our visits. I believe the environmental impact of jet boats is minimal compared to the joy and access they provide to families like ours.</p> <p>I would appreciate it if the impact studies on the river could be made public to ensure a well-informed community discussion about the environmental effects of jet boats. We all cherish our great outdoors, and no group should be excluded from its enjoyment.</p> <p>In 2016, I was diagnosed with cancer...our jet boat allows me to continue enjoying the river, as rafting is no longer a feasible option. This accessibility is crucial not only for me but for others who may face similar physical challenges, including the elderly like my father.</p> <p>The ability to travel both upstream and downstream on the Colorado and Green River in a jet boat is important for several reasons:</p>	<p>Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups, including commercial jet boats (which must comply with applicable laws, regulations, and permit conditions). The RMP does not add new limitations or restrictions to motorized use.</p>

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				<p>Accessibility Jet boats provide a way for individuals with physical limitations, including the elderly and those with disabilities, to enjoy the river. These boats offer more stable and comfortable seating compared to rafts or kayaks.</p> <p>Family Traditions Many families, like ours, have longstanding traditions of using jet boats on the river. These activities are part of our cultural heritage and recreational practices.</p> <p>Wide Range of Activities Jet boats enable a variety of recreational activities, including fishing, camping, and exploring, which might be less feasible with non-motorized boats.</p> <p>Safety In case of emergencies, jet boats can navigate upstream to provide quick assistance, offer evacuation options, and transport supplies or injured individuals to safety.</p> <p>Rapid Response Jet boats can travel quickly in both directions, making them valuable for search and rescue operations and emergency responses on the river.</p> <p>Economic Benefits Recreational activities involving jet boats contribute to the local economy through tourism, services, and equipment sales. This economic activity supports local businesses and communities.</p> <p>Educational Opportunities Access to different parts of the river facilitates educational programs, scientific research, and environmental monitoring. It allows researchers and students to study diverse river ecosystems and engage in conservation efforts.</p> <p>Environmental Stewardship Many jet boat users actively participate in river cleanups and environmental conservation efforts. Their ability to navigate the river enables them to reach and clean up areas that might otherwise be neglected.</p> <p>Overall, the ability to travel both upstream and downstream in a jet boat enhances the accessibility, safety, and enjoyment of the Colorado River, supporting a wide range of recreational, cultural, economic, and environmental activities.</p> <p>*NOTE: The motorized user group who uses the Colorado and Green River corridor for upstream and downstream travel is the only user group that has diminished giving less impact over time.</p> <p>I urge you to consider the needs of all river users, especially those who have respected and cared for our river while enjoying its beauty. Please do not close the river to jet boats and motorized watercraft.</p>	
78	78.1	Dr. Etienne Prinstoo and Jennifer Stahn	Commercial motorized use	<p>We recently partook in a morning river cruise with Canyonlands by Night and Day tour company. The ability to take in the natural beauty of the area, including the many wild birds and animals we saw, was a blessing. Our guide was sure to respect the nature around us and it showed in how it responded, especially the wildlife which was curious and abundant on our tour. These types of tours are important for ensuring those who get out on the water are shown how to properly respect the natural environment, instead of crushing up against the vegetation or interfering with the natural habitats of the many animals who live in the area. We saw several other rafting outfits, independent paddlers, etc who made their way into these areas when they needed a break, which was quite disconcerting. If they had been properly shown how to respectfully interact with the natural environment, as we were on this tour, Utah's natural environment would be much better for it. Please keep a place for these motorized tours on the Colorado River, they are an important part of both tourism and education.</p>	Thank you for your comment. The RMP does not propose new restrictions on existing commercial motorized tour companies.
79	79.1	Mike Hill	Education and enforcement	<p>The presented science on managing the ecosystem, and other resource management objectives seems sound. However, I think the key elements regarding your River plan is to educate all users about the legal aspects regarding river use in the state of Utah, as well as educating people on Utah boating safety and boating laws and what it is like to be a responsible boater, whether it is motorized or non-motorized. I think this should be done prior to conducting any survey regarding implementing any river management plan.</p>	Thank you for your comment. Please see the education goals in Section 3.5.3 of the RMP.
79	79.2	Mike Hill	Survey methodology	<p>Your survey/management program seems to put two user groups in conflict, the motorized and non-motorized. It's creating an us versus them. Its fueling the division. Instead you should be creating a collaboration between two similar uses on the same stretch of rivers. Educating all users. You could create the same survey regarding the town boat ramp and the users there. You could mostly ask the people fishing and swimming and bringing their dogs to the river what they thought the purpose of the Town boat ramp is for. You would have an overwhelming majority asking for what is illegal and unsafe at the ramp, which is fishing from the ramp, and swimming people and dogs from the ramp. Then</p>	The recreational use survey was conducted by Utah State University's IORT and their staff. The survey was undertaken to better understand recreation issues and to inform management in the planning area. It asked questions through a survey instrument that was designed following best practices in the field of outdoor recreation resource management (Vaske 2019). Specifically, the survey used neutral framing language, bipolar response options (ranging from "A lot less than expected" to "A lot more than expected"), and an inclusive set of watercraft types. This well-accepted protocol ensures that the survey

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				similarly you could only ask a few motorboat users what the ramp should be used for. The resulting survey would be senseless data. If every user was educated on what the town ramp is for , and what the expectations are- legally, as well as etiquette, I believe you would have different results than the above scenario. Similarly the town ramp data could then be applied to all boat ramps on the green and colorado on how they should be managed. More senseless data. Seems that was done regarding managing Green and Colorado river use on all sections.	instrument itself does not influence how questions are answered. Please see the responses to submission number 75, comment number 75.6 for additional information on survey methodology. <i>Reference: Vaske, J.J. 2019. Survey Research and Analysis: Applications in Parks, Recreation and Human Dimensions. 2nd ed. Venture Publishing.</i>
79	79.3	Mike Hill	Education and enforcement	Regarding Education: 1. For over 3 decades prior owners of Texp Rivers Ways (Vaughns) created a false narrative to all their clients that the Green River was a non motorized section, (motor use, as well as the Friendship Cruise, is in the Enabling Legislation of Canyonlands National Park, it would take an act of congress to change that. I would explain that and get ignored, they had their agenda. 2. The same false narrative has been applied to the Moab Daily section. 3. I joined Grand County SAR to help with their boating program. They were completely void of knowledge of Utah Boating Education and Safety, and didn't want to learn it.I became boat captain and made Utah Boating Education and safety a requirement to be on the boat, let alone operate a boat. I had one legacy manager asking not to do that that some folks would quit,wow. I made the change- no one quit. New operators embraced it. The legacy operators not so much. I had a SAR member who guides on the moab daily tell me taking a boater safety and education course was a waste of her time and not needed to operate motor boats. 4.I have been at the town ramp more than once and have been waked by a state LE boat. 5. At one of our ramp meetings a with outfitters at Lions Park I had a UDWR Officer tell me there is nothing illegal regarding fishing and swimming at a boat ramp-another wow. It's illegal in all 50 states. Brody corrected him about 5 minutes later when he showed up late to meeting.	Thank you for your comment. Please see the education and enforcement goals in Section 3.5,3 of the RMP. Also, please refer to Table 2-5 in the RMP for a summary of the historical uses allowed and permitted in the planning area.
79	79.4	Mike Hill	Education and enforcement	Who is boat savvy? Who is educated on boater safety and use? Moab Jett from what I have seen is respectful of wakeless speed. From a distance when they spin, people dont understand and complain. CBN -Spin King what I have seen they trae respectful of wakeless speed. The size of the boat does concern some folks. There is some local JetSkiers that are absolutely dialed in with wakeless speed around other water craft , don't know who they are. A few of the sport boat operators, but not all. I believe you need an aggressive Education Campaign promoting boater education and safety for all watercraft. Allowed use and how to share the resource. Make it interesting with local and regional history. Not just a checklist of regulations. Kiosks at every ramp , tv spots in hotels/motels, printed flyers, require commercial operations to educate clients on facts regarding, use, safety, regulations. Utah just started that an education program with OHV?. The NPS has excellent Interpretive/Education employees, use them as resource in develepepment.	Thank you for your comment. Please see the education and enforcement goals in Section 3.5,3 of the RMP.
79	79.5	Mike Hill	Wilderness	Regarding Wilderness designation on land along rivers. All of Canyonlands NPS land is Recommended / Proposed Wilderness . Water use is cherry stemmed inbetween to allow historic use. Motor use is allowed on all rivers in CANY. Commercially is limited more than privately. With that boundary you could use a generator on a boat, but not on shore. The same management tactic is done with 4wd roads in the Maze District and the Island in Sky District of CNY to allow historic use in Wilderness same areas. Either side of the paved (150) road in Arches National Park is managed as wilderness.	The RMP does not cover the Colorado and Green River segments that are in Canyonlands National Park, nor does it address wilderness.
79	79.6	Mike Hill	Adjudication	Regarding adjudication of the Moab daily. I believe in the '50-60s? US Coast Guard deemed the Colorado River non navigable, as it was administered out of California, current USCG management couldn't be bothered. There was a document at NPS HQ here in Moab to that effect. Fast forward, New USCG management showed up and stated they had jurisdiction on the Colorado River. Is it deemed navigable from the Colorado border? Utah State fought the USCG regarding that jurisdiction and lost- now boats 16' and longer now need a throw cushion per USCG. We have to adopt their regs. If the Moab daily is deemed navigable by USCG, does that help the states case? this is just a highlight of my thoughts..... If requested I could meet with your folks and discuss my decades of dealing with similar issues with the NPS here regarding, river use,wilderness, commercial use, private use , legal aspects, etc.	The U.S. Coast Guard makes determinations of navigability for admiralty purposes, which apply to the Inland Navigation Rule, the Utah State Boating Act, and ultimately the Division of Recreation. This is distinct from FFSL's jurisdiction, which applies to navigability for title purposes. This RMP does not address navigability for admiralty purposes.
80	80.1	Utah Guides and Outfitters	Process	Thank you for the opportunity to submit comments for the revision of the Colorado & Green Rivers Recreation Resource Management Plan. This submission is an attempt to try and centralize some of the comments and concerns that the Commercial Outfitters have regarding the new RMP. Most of these comments are from members of the Utah Guides and Outfitters (UGO). Outfitters have been encouraged to also send their personal comments as well. While we appreciate the open comment	Thank you for your comment. FFSL follows administrative rules that prescribe the timing and duration of public comment periods. At the 2023 Utah Guides and Outfitters meeting, FFSL was informed that the timing of the comment period was difficult for some stakeholders; it was extended from the required 40 days to 90 days (3 months).

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				period, we do want to voice that it has been difficult to compile opinions for comment as the timing has coincided with all our outfitters' busiest time of the year. Please don't hesitate to reach out to us at UGO if you have any additional questions or need for clarification.	
80	80.2	Utah Guides and Outfitters	Survey methodology	Outfitters are major stakeholders, and we believe our use and voice are not accounted for in the draft.	The sampling design was created to capture a representative sample of the users of public boater access points. The sampling design focused on public boater access points for several reasons, including the following: 1. Public boater access points facilitate the most amount of river users, and the most diverse types of users for on-river recreation. 2. There were limited fiscal resources to conduct surveys at other access points. The survey data are representative of river users on commercial trips that use public boater access points. If a commercial operator stopped at a public boater access point, their clientele was contacted and asked to complete the survey. In addition, FFSL received and considered commercial stakeholder feedback through the public comment process.
81	81.1	Kerry Soliz	Commercial motorized use	I am writing to voice my support to eliminate jet boats in the Colorado River in Moab. They are noisy and dangerous. There are 1000's of people on the river everyday. Jet boats put them in danger. The only exception I would be willing to support is the evening boat and light show of Canyonlands by night. The large boat they use is pretty quiet and slow moving. Please ban jet boats on the Colorado River.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups, including commercial jet boats (which must comply with applicable laws, regulations, and permit conditions). See response to submission number 1, comment number 1.1.
82	82.1	Scott Solle	General motorized use	I personally enjoy using my inflatable sport boat on Moab's Fisher Towers Daily stretch from Dewey Bridge to Potash, especially when the water is high. Having this opportunity to utilize my inflatable with a motor to run upstream and downstream has provided me with the skills necessary to operate in Cataract Canyon, where I currently work for river companies to provide safety and support at high water. By practicing my personal driving skills on the Fisher Towers Daily, I have also gained the necessary skills to teach courses in Swiftwater Boat Operations to rescue teams all over the country. Having access to the rapids on the Fisher Towers Daily provides a world class training area for rescue personnel who travel to Moab to train for disaster response. Having access close to town on a river that has Class III whitewater makes the Daily stretch perfect. It is not in a wilderness area, there is historical use, and it is roadside. Where in the Western United States would you suggest this kind of training be provided? Closing the Daily to motorized travel is different than closing a land based motorized trail, where one can go elsewhere to thousands of miles of trails open to motorized use. There are simply few rivers that provide the opportunity to recreate with props... Please do not restrict motorized access to the Colorado Fisher Towers Daily.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use.
83	83.1	Christine Sheeter	General motorized use	I live in Green River Utah. I recreate on and along the Green River often. I sit and contemplate, I raft, canoe, and swim. The vibrations/sound waves of motorized vehicles such as jet ski's and drones takes all the joy and awe away, for me. Further, it's not only the sound (and it's echoing off the cliffs) that's disruptive, distracting and invasive; it's the visual. It looks and therefore feels like an ugly human invasion into the tranquility and peace in a stunning natural environment. Thank You for your attention	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups, including motorized boats. See response to submission number 1, comment number 1.1.
84	84.1	Mark Peterson	General motorized use	It's without a doubt the river corridor is becoming more popular and used throughout the area that is being reviewed. The section of Green River, from Green River Utah to the mineral bottom takeout has so much history and beauty for people to enjoy. This section has historical Indian sites as well as settlers and ranches. there is also a historical use of boating from John W. Powell to the Friendship cruise of modern days. Commercially it has been used for travel and recreation, both downstream and upstream, for many years. This river corridor is the only means to access many areas and canyons along its banks. As a jet boater I would only ask, the area remains open to all types of use for upstream and downstream travelers. This would allow others with handicaps and mobility challenged people to enjoy the area. I believe it is worth noting, the motorized groups (jetboat/powerboat) that use the area, both upstream and downstream are the only user group that has diminished over the years. All other user groups have increased by a large amount in comparison. It would be our opinion the management of this area should, and hopefully will include the small group of users that choose to visit the area with a power boat for upstream and downstream travel. One option is to keep the corridor use as it currently is.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use.
84	84.2	Mark Peterson	General motorized use	In regards to the river management plan that is being reviewed this year. We see a lot of questions and talk about the need to limit or remove the use of motorized crafts/boats that use these public lands and waterways, for both upstream and downstream travel. If the plan restricts this type of use it would limit or remove the ability of mobility challenged people including veterans, elderly, and other handicapped people from seeing and using this very wonderful area.	Please see response to submission number 84, comment number 84.1.
85	85.1	Mary Ellen Simpson	General motorized use	As policy makers, you should be aware that a very one-sided response to an issue usually comes from 2 places 1) special interest groups (who seem to run rampant in the Moab area) or 2) a handful of dissatisfied individuals who had an isolated poor experience. I have personally recreated on the Colorado	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of

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				river annually (at a minimum) since 2008. I have participated in both motorized and nonmotorized adventures on the Colorado thru several different companies. I have personally seen a great deal of cooperation between all parties utilizing the river. The plan to restrict businesses who have operating with their license and impose devastating restrictions on those businesses is ridiculous. The investment that these companies have in the community and property can just be eliminated with a no regard except for the non-motorized users? Please carefully consider what has made Utah such a booming tourist destination before you join the liberal mentality of the BLM and restrict access to thousands of people who may be older or have physical disabilities that prevent the usage of non motorized recreation on the Colorado!	different user groups. The RMP does not add new limitations or restrictions to motorized use.
86	86.1	Marc Hunter	General motorized use	<p>I am writing to voice my concern regarding the possibility that motorized boats and private docks will be eliminated from the Colorado River outside Moab, Utah. In my opinion, this would be a colossal mistake. I support motorized boats and private docks on the Colorado river. As a native of Utah and still resident, I would urge you in the strongest possible language to leave that recreation option open to all people that choose to enjoy the Moab area.</p> <p>I have visited that part of Utah on over 30 occasions during my life. During those visits I have used motorized boats and rafts as a way my family chooses to experience the river. I would hate to see the raft of the motorized boats suffer in the proposed policy. Balanced usage between all people who enjoy the river should not be limited. In our nation, people need to have as many options available as possible to them as they enjoy the outdoors. Shutting down this option in the Moab area will deny citizens of this choice as well as having a negative impact in the Moab economy.</p> <p>I am not sure how this has even become an issue. I know of no one, personally, that has expressed a need to eliminate this option. Again, I would ask that the DNR not restrict the use of motorized boats and private docks on the Colorado River.</p>	Thank you for your comment, FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use or docks.
87	87.1	Michele Nuttall	General motorized use	I believe that our natural resources are for everyone's enjoyment. Non- motorized boats generally float a long way down a river. Having a section where motorized recreation can occur is called sharing, not eliminating. Please do not ban this type of recreation, not everyone enjoys rafting only.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use.
88	88.1	Timb Mannuzza	Survey methodology	Wanted to make a note that the time period in which data was collected was most likely the highest use time for these sections of river as seen by others in the Covid outdoor boost.	Thank you for your comment, FFSL is continuing to collect recreational use data.
88	88.2	Timb Mannuzza	Indicators	Like the use of tiered management with thresholds. During high water boaters per hour might not be as good of an indicator as boater density. The experience is far more impacted by the other boaters that are either have bad spacing and there for are surrounding or intermingled with your group for a extended period of time or are right behind or in front of the group. Adding in a layer that monitors space between boater groups rather than just counting boater groups might better capture whether the river is feeling crowded, when during high water many groups could pass a point in a period of time without interacting with each other.	We agree that there are several management strategies that may work well under certain conditions that this plan does not contemplate. Monitoring protocols and management actions proposed in this RMP are the best tools FFSL has to manage recreation given our existing authorities in UAC R652.
88	88.3	Timb Mannuzza	Use limitations	River stretches that are considered put ins such as potash to canyonlands and mineral bottom to canyonlands should match river stipulations for Cataract Canyon. Most of the public doesn't know of FFSL therefore will follow Canyonlands stipulations from who they receive a permit. The commercial and outdoor educational industries of Moab have a lot of business around taking people who otherwise could not go down cataract canyon and the stipulations being different from firepan to group size make this a head ache and trap to navigate. The FFSL stipulations for these section could simply be set to defer to Canyonlands regulations which are considered adequate for a national park and make it a lot cleaner for everyone.	An overnight group size limit of 25 people is a part of FFSL Administrative Rule R652-70-2400. Unfortunately, amendments to administrative rules are beyond the scope of this RMP. FFSL is aware of the lack of consistency between FFSL administrative rules and partner agency rules and will prioritize interagency consistency when the next opportunity to amend administrative rules arises.
88	88.4	Timb Mannuzza	Education and enforcement	We would prefer to have more interpretive rangers rather than law enforcement rangers as education is by far what the public needs to better conserve these water ways.	Thank you for your comment.
89	89.1	Aubri Russell	General motorized use	As a lifelong local resident who cherishes the Colorado River, I respectfully oppose the idea of restricting the use of motorized boats. These boats are not only a part of our local recreational heritage but also provide vital access to the river's hidden gems and scenic spots that are beloved by residents and visitors alike. Rather than a blanket ban, I advocate for better education on responsible boating practices and stricter enforcement of regulations to maintain harmony between recreation and conservation efforts. Let's preserve our river's beauty while ensuring everyone can continue to enjoy it responsibly.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use. Education and enforcement goals are discussed in Section 3.5.3 of the RMP.
90	90.1	Max Sterling	General motorized use	I am writing this in response to the idea of restricting motorized boats from the river. And private docs on the Colorado river. These things are essential to our way of life and something to be enjoyed by all Coloradans. Do not place these restrictions. They are our right as The people of Colorado	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use or docks.
91	91.1	Matthew Jones	General motorized use	I am completely opposed to closing the river to motorized water vehicles. I rely on them for income. We cannot keep closing everything. I vote against restrictions on motor vehicles on the Colorado river.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of

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					different user groups. The RMP does not add new limitations or restrictions to motorized use.
92	92.1	Gary Crittenden	Commercial motorized use	My brother paid for our entire family to have this experience. It is the only way my parents could have had this experience with their kids and grandkids. The respect the crew had for the river and the professionalism did a bunch to educate us all. Please do not take this experience from those of us who look forward to this moving experience again someday.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use.
93	93.1	BlueRibbon Coalition	Multiple use	As non-consumptive users, our rights will not interfere with any of the other users of Colorado River and Green River water. We feel that recreationists have a right to access and use stored water. It is in the public interest to allow recreational use of our natural resources that leads to no adverse effect or depletion of those assets. Colorado River and Green River water belongs to us all and we encourage any move in a direction that enables the benefits of this water to be enjoyed by the greatest number of users.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles.
93	93.2	BlueRibbon Coalition	General motorized use	Local communities rely on motorized recreation for economic opportunities. . . According to the Bureau of Economic Analysis, outdoor recreation had a record breaking year in 2022. Outdoor recreation now accounts for over \$1 trillion in economic activity. For reference, the oil and gas industry is \$812 billion. Outdoor recreation is popular. It is an economic juggernaut. . . . Instead of building new roads, trails, campgrounds, and infrastructure to accommodate the new growth in outdoor recreation, land managers are relentlessly closing public lands for the public to use. It doesn't make any sense. A deeper dive into the numbers reveals that the engine driving this record-breaking growth is literally the millions of engines that find their way into the various forms of motorized recreation. Non-motorized forms of recreation account for \$33 billion in economic value. Gear that is used in all forms of recreation accounts for \$52 billion. Motorized forms of recreation account for a shocking \$78 billion in economic value. Many businesses rely on the use of jet boats in order to continue their operations. Sufficient analysis needs to show the economic effects of restricting jet boats. Surely, this will have a ripple effect on the local economies and have devastating effects.	Thank you for your comment. The RMP does not add new limitations or restrictions to motorized use.
93	93.3	BlueRibbon Coalition	Process	BRC has concerns that preferential treatment is being given to non-motorized users such as rafters. Despite their aggressive litigation efforts, there are few, if any, court decisions that have forced an agency to restrict any motorized recreation based on alleged "conflict." Rather, the courts have generally upheld a reasoned agency conclusion designed to address any alleged "conflict." See, e.g., <i>Wild Wilderness v. Allen</i> , 871 F.3d 719, 728-729 (9th Cir. 2017); <i>Pryors Coalition v. Weldon</i> , 803 F.Supp.2d 1184 (D. Mont. 2011), <i>aff'd</i> , 551 Fed. Appx. 426 (9th Cir. 2013). There are many strategies that can be employed to manage the ever-growing human population that desires to recreate on and around the Colorado and Green Rivers. We generally support the concept of "shared use." As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. There will always be a handful of pathologically disgruntled individuals seeking their own private rejuvenation on these rivers. These outliers should not dictate policy or use designations, and should be handled in a similar way as children testing parental boundaries.	Section 1.3.3 of the RMP states that FFSL administers sovereign lands using multiple-use, sustained-yield principles in accordance with Utah Code 65A-2-1, Utah Code 65A-10-1, and UAC R652-90-800. Multiple use is defined in Utah Code as "the management of various surface and subsurface resources in a manner that will best meet the present and future needs of the people of this state." There is no particular hierarchy of uses on sovereign lands, except to the extent those uses do not interfere with the public trust (Utah Code 65A-10-1). The RMP does not add new limitations or restrictions to motorized use. Regarding potential bias toward non-motorized users: The sampling design was created by Utah State University's IORT in close consultation with FFSL staff to ensure visitors were surveyed at locations that received both motorized and non-motorized boating use. The survey protocol did not discriminate between either type of user: every group coming off the river during a sampling period was contacted. All groups, regardless of their size and type of watercraft used had equal probability of being included in the sample, making the data representative of all users of the sites that were sampled.
93	93.4	BlueRibbon Coalition	River experience, education and enforcement	Contrasted to those using "conflict" in a transparent effort to put a thumb on the scales of management balance, there are legitimate concerns that usually reflect the simple fact there are too many people trying to enjoy the same areas at the same time. These "conflicts" can occur within user groups or modalities as often as they occur between them. The agency should consider strategies to publicize and manage these situations. Finally, we have always been and remain strong advocates of an active and effective enforcement program, so that users who violate or choose to remain criminally ignorant of management prescriptions suffer meaningful adverse consequences. All users need to understand and respect the fact that their use of our public waters is a privilege to be shared with others under the terms established by applicable law. BRC also is opposed to restrictions on personal docks. These docks have had a long standing history of use and provide recreational access.	Thank you for your comment. Please see Section 3.5.3 of the RMP for education and enforcement goals. The RMP does not add new limitations or restrictions to personal docks.
93	93.5	BlueRibbon Coalition	Survey methodology	It's also imperative to point out that many of the surveys that have been conducted that show motorized users affect the recreational experience were responded primarily by wealthy white males. This one class of people should not be dictating the entire recreation resource management plan.	The demographics are representative of river users who use public boating access sites and may or may not align with Moab's local population. Commonly, surveys of outdoor recreationists and tourists are distinctly different than local populations. See Smith and Trautvein (2023) for data comparing outdoor recreationists in Utah to the state's population as a whole, for example. The data collection effort was designed to capture data on the on-river recreational experiences of those individuals who use public boating access points. <i>Reference: Smith, J.W., and N. Trautvein. 2023. Insights Into the Characteristics of Outdoor Recreationists in Utah From a Statewide Survey. Institute of Outdoor Recreation and Tourism, Utah State University. Available at: https://digitalcommons.usu.edu/envs_facpub/1662/.</i>

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93	93.6	BlueRibbon Coalition	Process	BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address: Ben Burr BlueRibbon Coalition P.O. Box 5449 Pocatello, ID 83202 brmedia@sharetrails.org	BlueRibbon Coalition had been added to the contact list for this planning process.
94	94.1	Western River Expeditions	Purpose	As a preface to the comments of Western River Expeditions, Inc., we would like to make the following general observation. The segments of Colorado and Green Rivers covered by this proposed plan are already highly regulated by the United States Department of the Interior, Bureau of Land Management (BLM) and the State of Utah, Department of Natural Resources Division of Outdoor Recreation (DOR). The question that we have consistently asked since the first time that a State Sovereign Lands representative showed up at a Utah Guides and Outfitter meeting, nearly 20 years ago, is, "why is any oversight by Forestry Fire and State Lands (FFSL) even necessary?" We understand the history, existence and mandate of FFSL, but the reality is that river users simply cross State Sovereign Lands for a few feet at any given ingress or egress point on the river or at any point chosen as a lunch stop or campsite. The contact with FFSL managed lands is transient, fleeting and low-impact. By far, the majority of our activity is conducted on federally managed lands or on the surface of the water which is regulated and patrolled by DOR. Yet, FFSL appears to want to be the primary arbiter of what happens on these segments of river	FFSL is the agency that is currently managing the resource. FFSL is required to develop planning procedures for natural and cultural resources on state sovereign lands by Utah Code 65A-2-2 and has been doing so for sovereign lands in Utah as funding allows. The most recent plans for this area are the January 2020 Colorado River and Green River CMPs. This is a <i>Recreation</i> Resource Management Plan that functions as a supplement to both the Colorado River and the Green River CMPs. FFSL believes that interagency coordination and communication are essential to ensuring the health and sustainability of Colorado and Green River sovereign lands.
94	94.2	Western River Expeditions	Use limitations	In general, the supporting data submitted does not justify many if any of the draconian restrictions proposed in the management plan. For example, complaints from a handful of stand-up paddle boarders who don't like jetboats and who don't understand boating proximity laws shouldn't carry the weight that they clearly are carrying in this process.	It is not clear what restrictions you are referring to. The RMP does not add new limitations or restrictions to motorized use, group size, or watercraft numbers.
94	94.3	Western River Expeditions	Permits	We have dutifully submitted our annual application and corresponding fees each year since FFSL made its presence known, but suddenly we are subjected to dramatically higher fees in the form of a \$2 per passenger charge and for what? This has all the hallmarks of a solution in search of a problem. The amounts that we are talking about are not insignificant. In the case of Western River Expeditions, our annual fees to FFSL will increase from \$250 to approximately \$26,000. · There is simply no need for extra patrols of the river or additional regulation when there is more than enough already. These are some of the most highly regulated resources on the planet. · If this is primarily about FFSL's mission to earn revenue for the State of Utah, then why create an entire bureaucracy to spend the money? The net benefit to the State of Utah will be nothing. · The reality is that the segments of river affected by this proposed management plan are not experiencing widespread degradation and are, in most cases, in better shape than they were back in the 1970s when commercial river rafting started gaining popularity and professional outfitting companies and their guides became active stewards of the river and its environment. Because of techniques and ethics developed by professional river runners, these river segments are in nearly pristine condition. Regardless of this fact, it is the commercial rafting companies who will be funding this new bureaucracy and living under the threat of cancellation of our permits if we get crosswise with one of the new, unnecessary river rangers. · Is the Utah Legislature aware of this effort to expand government regulation and create a new bureaucracy out of whole cloth? If not, they will be now.	FFSL's fee schedule and policy are separate from this recreation resource management planning process. UAC R652-41-600 gives FFSL the authority to "establish minimum fees for right of entry permits which may be based on the cost incurred by the division in administering the right of entry permit and the fair-market value of a proposed land use." The proposed management framework in the RMP (especially Section 3.3) was developed to facilitate diverse and compatible recreational uses on the four sovereign land river segments of the Colorado and Green Rivers while protecting navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality. The RMP was developed in response to stakeholder input regarding recreation conflicts, overcrowding, and other recreation issues. The Utah Legislature appropriated the funds for the development and completion of this RMP.
94	94.4	Western River Expeditions	Purpose	Vision and Goals Every single one of the bullet points listed in this section of the plan is already being accomplished by the BLM and DOR.	Please see response to submission number 94, comment number 94.1.
94	94.5	Western River Expeditions	Camping	Camping: Restrictions on camping and motorized use have existed for the reach from Cisco Landing down river for two miles for several decades, however, the camping restrictions from February 1st through June 30th from Cisco Landing upstream to the Utah/Colorado state line forecloses the possibility of any overnight rafting trips all the way upstream to approximately river mile 132, yet your own document states that the FFSL RMP only applies as far upstream as river mile 113. If this RMP was done in cooperation with the Bureau of Land Management, have they actually agreed to shut down all overnight camping from the border down to the Cisco Landing? I doubt it and will enjoy the impending legal battle should FFSL attempt to exert this authority. Why is it that agencies which have far greater responsibility than FFSL for protecting the health and welfare of the eagles have not chosen to impose such strict camping rules?	FFSL proposed this closure to increase consistency with the BLM Moab Field Office Record of Decision and Approved Resource Management Plan DOI-BLM-UT-Y010-2008-0001. Upon review, FFSL agrees that the draft RMP campsite restriction language should be changed. The text in Section 3.4.1 has been updated to respond to these concerns. FFSL did reach out to and collaborate with interagency partners through RDCC Project No. 86009 and individually through interagency correspondence on November 7, 2023 (interagency partners were also included on the 2024 email announcements for the draft RMP release and public meetings). At the request of FFSL's federal partners, FFSL extended the federal partner comment period twice. During that time, FFSL received one set of agency comments from Canyonlands National Park.

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94	94.6	Western River Expeditions	Key terms	Commercial Motorized Use Permitting This section needs clarification. The terminology used is different than the "Key Terms" defined in Section 2.1. Do the "motorized use permits" referenced in the section apply only to "motorized watercraft" as defined in Section 2.1? In other words, does it only apply to motorized craft "capable of traveling faster than wakeless speeds?" If not, then FFSL will have effectively negated the majority of the concession contracts that exist between Canyonlands National Park and local river outfitters. Language is important and this poorly written section makes it difficult to weigh-in on this provision. As you can imagine, if the attempt is to also limit downstream motorized travel to only three companies, then how are you going to choose? Has the economic impact of any of these restrictions been considered? You say that existing permittees will be given the opportunity to renew before new applications are accepted. Are these renewals permanent, or will there eventually be only three companies, total, allowed to operate?	We understand your concern. The key terms in Section 2.1 of the RMP have been updated. Key terms have also been added to Section 3.1 of the RMP for further clarification. FFSL hopes to improve the public's understanding of allowed and permitted uses on the rivers through the education goals described in Section 3.5.3 of the RMP. The RMP does not add new limitations or restrictions to motorized use.
94	94.7	Western River Expeditions	Use limitations	Partner Agency Group Size Considerations: The restriction of 25 people maximum camping on the Moab Daily is too restrictive. Why not have it match the group size of 40, plus guides, that exists in Canyonlands National Park? There are many larger youth groups that have historically enjoyed camping along this stretch of river and which will be prevented from doing so with this level of restriction. Also, why a hard cap and 25 and not 25 plus guides, which is the actual group size used by the BLM and misstated in your document. The hard cap of 40 in Canyonlands is also a misstatement, because it is 40 guests plus guides.	An overnight group size limit of 25 people is a part of FFSL Administrative Rule R652-70-2400; this is not a new restriction. Unfortunately, amendments to administrative rules are beyond the scope of this RMP. FFSL is aware of the lack of consistency between FFSL administrative rules and partner agency rules and will prioritize interagency consistency when the next opportunity to amend administrative rules arises.
95	95.1	OARS Canyonlands	Thresholds	<i>RMP Table 3-1, Threshold: No more than six groups per hour.</i> No more than six groups per hour on average. We think this should be a daily average i.e. if 10 groups are observed in one hour yet the rest of the day only a couple of groups are observed it doesn't seem more frequent monitoring is needed and that resources could be better used elsewhere	Thank you for your comment. This edit has been made to all of the tables in Section 3.3 of the RMP.
95	95.2	OARS Canyonlands	Monitoring	<i>RMP Table 3-1, Monitoring Protocol: Surveys at Sandy Beach and Local's Beach or two common trip take-outs (e.g., Takeout Beach), once every other year.</i> Surveys that get a commensurable number of motorized users is important, consider locations these users will participate	Thank you for your comment. FFSL plans to survey visitors at locations that receive both motorized and non-motorized boating use.
95	95.3	OARS Canyonlands	Thresholds	<i>RMP Table 3-1, Threshold: No more than 15 minutes of wait time per boating group at the water's edge before being able to launch or take out at popular boater access points.</i> Parking congestion from non-boaters at Take Out Beach presumably increases this wait time therefore additional, separate parking for non-boaters should be considered	Parking at Takeout Beach is in the BLM's jurisdiction rather than FFSL's. However, FFSL would be happy to support the BLM in addressing congestion in this area.
95	95.4	OARS Canyonlands	Thresholds	<i>RMP Table 3-2, Threshold: No more than 15 minutes of wait time per boating group at the water's edge before being able to launch at the Potash boater access point.</i> Obviously this is specific to Potash, and Meander Canyon doesn't contain a takeout for Cataract trips, however, since the majority of users launching at Potash would naturally takeout at Hite, evaluating the improvement of a Hite takeout should also be a Management Action. Additionally, it's our opinion that the travel time to Bullfrog or Hall's should be considered as "wait time".	FFSL has reached out to partner with Glen Canyon National Recreation Area regarding access at Hite. FFSL will monitor and partner with the NPS as the situation develops.
95	95.5	OARS Canyonlands	Indicators	<i>RMP Table 3-2, Indicator: FFSL would not permit a volume of use exceeding that prescribed by the NPS for the Colorado River above The Confluence in Canyonlands National Park.</i> Along with Canyonlands NP in-the-works RMP we have suggested that along with our whitewater concession contracts that we also receive a flatwater concession contract which would in turn have a motorized component. We're assuming that if that change happened with Canyonlands NP in the future that the change would also be updated/accepted by FFSL	Thank you for your comment. FFSL works closely with its recreation management partners, such as the NPS. FFSL is unable to commit to any RMP changes at this time, because the Canyonlands National Park planning process is still ongoing.
96	96.1	American Whitewater	Process	We are pleased with the effort to follow up on the Green and Colorado River CMPs with focused data and management direction for river recreation on these high quality recreation segments.	Thank you for your comment.
96	96.2	American Whitewater	Key terms	American Whitewater advocates for the use of different terminology for river users. We believe that outfitters is a better term than commercial and self-guided or self-outfitted is a better term than private users. The use of the word private has a bad connotation and implies that it is an exclusive activity when it is really the public enjoying public rivers. For the purposes of these comments, we will use the terms commercial and private so as not to cause confusion, but we recommend changing these terms in the final plan.	FFSL's use of "commercial" and "private" attempt to make consistent reference to FFSL Administrative Rules and definitions in Utah Statute. Key terms have been updated in Section 2.1. In addition, key terms have been added to Section 3.1 of the RMP for further clarification.
96	96.3	American Whitewater	Management framework	General Comments: - Appropriate management of human waste should be added to the public information focus (3-11) - We ask FFSL not to consider visitor prohibition for fish unless there is robust scientific information discovered that supports that approach. There is little evidence to show that the presence of people and boats, especially non-motorized, affect fisheries if they are not actively fishing and killing them. (3-12)	Human waste is covered in FFSL's recreational use rules (see Table 2-6 of the RMP) and is also covered in the Leave No Trace principles discussed in Section 3.5.3 of the RMP. Thank you for your comment. Any proposed seasonal restrictions would be based on scientific information.

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				<p>- For all river segments, dories should be added as a craft for appropriate private non-motorized boating crafts (3-1 to 3-3).</p> <p>- For all river segments, commercial uses should be managed to consider wildlife and consider impacts to the private user experience.</p> <p>- In section 3.2, indicators, thresholds, and monitoring is defined, but the fourth item, "actions", is not. To improve consistency and understanding of what the scope of actions will be, this should be more clearly defined on page 3-3.</p> <p>- We support adaptive management for recreation on these river segments, however if the FFSL implements regulations that change group size or number of groups, then there should be a separate planning process that considers public comment on the specific changes (3-8).</p>	<p>The text in Sections 3.2.1.1, 3.2.1.2, 3.2.2.1, and 3.2.2.2 has been modified to reflect the key terms added to Section 3.1. This text is intended as incomplete lists of example types. Navigation and public recreation are already defined management objectives for FFSL (see UAC R652-2-200).</p> <p>A definition of "management action" has been added to Section 3.3 of the RMP. Any FFSL administrative rule changes for group size or group numbers would require a public involvement process.</p>
96	96.4	American Whitewater	Special designations	<p>Wild and Scenic River Segments, Labyrinth Canyon</p> <p>- Page 1-12 states that rivers must be determined eligible and suitable in order to be designated as a Wild and Scenic River. This is not true and should be corrected for accuracy and improved public understanding of the Wild and Scenic River process. The following is true: federal agencies must study rivers for eligibility; congress can direct federal agencies to study rivers for suitability; and congress can also designate any river as a Wild and Scenic River without it previously being determined as eligible or suitable. This section should be corrected for accuracy.</p> <p>- The language on page 1-13 in regards to Wild and Scenic River status for the Green River through Labyrinth canyon is confusing and misleading and should be corrected. The Wild and Scenic River designation includes the river itself on Sovereign Lands, not just the adjacent BLM lands. It is a federal designation and applies to the entire river corridor even though private and state property rights are protected. It is correct that the designation has not changed the ownership of the bed of the river, but the Wild and Scenic Rivers Act regulations still apply to the river corridor on non-federal lands. We really appreciate FFSL's commitment to managing their lands in consideration of BLM priorities and additionally should directly consider the Wild and Scenic Rivers Act itself.</p> <p>- The BLM is going to develop a Comprehensive River Management Plan (CRMP) for the Wild and Scenic River Segments on the Green River. The CRMP will need to include a user capacity study, a flow needs analysis, and extensive public comment. Many of the findings and management actions from the CRMP may impact river use on Green River on Sovereign Lands and we encourage continued robust cooperation between FFSL and the BLM as the CRMP is developed and implemented.</p> <p>- We are deeply invested in the CRMP development process and are very interested in working with the BLM and FFSL on the CRMP and its implementation. We have asked the BLM to begin the CRMP development process, since it has been more than three years since the river was designated.</p>	<p>Section 1.3.5 has been edited for clarity.</p> <p>Thank you for your comments. FFSL will continue to work cooperatively with the BLM on management of the wild and scenic segments of the Green River.</p>
96	96.5	American Whitewater	Camping	<p>Moab Daily</p> <p>- In addition to primitive dispersed camping there are also a number of developed fee sites that boaters often use either at boater access points before and after trips or during trips as a multi-day. This should be incorporated as an appropriate activity for this river segment (3-1).</p>	<p>Developed fee sites are on BLM land and not managed by FFSL; therefore, they are not included in this section of the RMP.</p>
96	96.6	American Whitewater	Connected plans, monitoring	<p>Meander Canyon</p> <p>- We suggest that the Bears Ears National Monument and its Resource Management Plan that is in progress should be included in section 1.5, "connected management plans with recreation guidance". While Bears Ears does not include the Colorado River corridor, it is adjacent to the river in Meander Canyon. This is not relevant for on water recreation or camping outside of the National Monument, but could have implications for hiking or canyoneering from the river.</p> <p>- On page 3-6, it states that FFSL will monitor commercial recreational use in Meander Canyon and in Labyrinth by coordinating more with NPS and by attending the Interagency Wild and Scenic Council meetings. American Whitewater is pleased to see this and strongly encourages coordination between FFSL and the Council. We are interested in learning more about how FFSL aims to achieve monitoring by attending these meetings and we are interested in discussing this further with FFSL.</p>	<p>Thank you for your comment. The Bears Ears National Monument plan has been added to Section 1.5 of the RMP.</p>
97	97.1	Brenner Parriott	General motorized use	<p>I am reaching out to voice my opinion on motorized boats and private docks on the Colorado River. Like many who recreate on the river, we love to use Jet Boats and Jet Skis to enjoy our time. We also have enjoyed many tours including but not limited to Canyonlands by Night and Moab Jet. The motorized boats are an access point for those who cannot physically recreate with non-motorized watercraft. It allows those who would never get the chance an easier access to the beautiful waters and landscape. All tours, friends, and family I have been around for over 20 years on the river have always upheld safety and sustainability.</p>	<p>Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use or docks.</p>
97	97.2	Brenner Parriott	Survey methodology	<p>I am not too impressed with the analysis used to oppose or support motorized users, being the minority group on the river even if we got every single motorized user to take the survey the results would be skewed due to the astronomical difference in user quantity. It is entirely unfair to judge "river users" motorized use off this survey, because no matter how many motorized users fill it out there is 10X more non-motorized users. 92% of river users do not use Motorized boats, so without allowing those who do</p>	<p>Given the survey was intended to generate an accurate representation of the river users who use public boating access points, it is accurate to say that 8.5% of these users are using motorized watercraft (4.2% using inflatable rafts with outboard motors; 3.3% using commercial motor boats; and 1.0% using private motor boats). It is important to point out that these estimates, derived solely through the on-site survey, align very closely with data</p>

Submission Number	Comment Number	Commenter	Topic or Theme	Comment	Response to Comment
				use them an equal voice creates biased data. On the Moab daily the 54,540 people who access you only have 8% even considering supporting motorized use, as the minority group this is an unfair survey that should not be considered without balancing out the massive difference in support. The rest are biased opinions from inflated one sided data. That means it only takes but 10% non-motorized users to inflate survey data. According to your survey around 8.5% used some sort of motorized device.	reported by the BLM, which estimates that 8.0% of all river use of The Moab Daily is motorized (see Table B-1 in Appendix B of the RMP). Please see response to submission number 75, comment number 75.6 for FFSL's responses to potential bias in the survey.
97	97.3	Brenner Parriott	Survey methodology	<p>It is ironic that the conclusion isolates 63.4% of users "somewhat" or "completely" supported limiting the number of commercial jet boats but does not correlate the 60.7% of users wanting more access and camp sites. So, it is okay for those not using motorized boats to want more access even though their participation is 93%! Considering allowing more access would have no benefit to waterway management. The biased statement of "Those perceptions are usually associated with motorized use and congestion on the rivers" is an assumption and a hard one to believe when only 12.4% of encounters were with commercial Jet Boats so maybe 30ish people on the survey didn't like commercialized boating? If you use that 12.4% against all of the non-motorized users is still only around 6200 people. The only thing this data tells me the congestion is coming from the 50+ thousand non-motorized users and their using their biased opinions to remove commercial motorized use. Even less is the private use at 3.4% reported.</p> <p>So out of the 252 people surveyed the estimated motorized supporters would only be around 20 people (8%.) This is biased data and should not be used to interpret the overall interests of motorized users and those who benefit from its existence. The bottom line here is motorized boats spend less time on the river and are the extreme minority when considering public land use. You would see little to no effects by limiting Commercial or public motorized use. If anything, we can all agree this survey showed us most people want Rangers on the water to help mitigate and Rangers on the water would be able to gain true unbiased data as to what the concerns may be on the water. The data emphasized doesn't really correlate to the vision stated and clearly forces motorized use into a corner. At the same time more rangers on the water would be motorized use.</p>	<p>The 63.4% of river users that either "somewhat" or "completely" support limiting the number of commercial jet boats on the river were not asked about and did not request more access to the river. This is a data point that reflects support for management actions only.</p> <p>The statement "Survey data indicate that most visitors to the planning area are satisfied with their experience; however, when visitors are not satisfied or encounter conditions that they did not expect, those perceptions are usually associated with motorized use and congestion on the rivers" is supported by the collected data. Please see response to submission number 75, comment number 75.6 for FFSL's responses to potential bias in the survey.</p> <p>The RMP does not add new limitations or restrictions to motorized use.</p>
97	97.4	Brenner Parriott	General motorized use	<p>We can all agree that times change the way we recreate, but it doesn't have to eliminate selective interests. Those who chose to recreate on motorized boats & watercraft are always open to constructive solutions to keeping our public lands open while protecting the environment and participants. Not only is motorized boating a large part of our community, but it is also a large part of our state recreation. As other bodies of water in this state have found solutions without eliminating access to motorized users, we hope and encourage this type of behavior and decision making on our side of the river as well.</p> <p>Not only does motorized use allows access to those who physically cannot recreate on the river without. It also provides safer measures for those on the river who need assistance and support in the waters. Countless times we have seen motorized users save lives. Countless times we have seen motorized users support different river users in need. As someone who has both enjoyed motorized and non-motorized use on the river, I can tell you that it is a safer environment with motorized users on the water. Motorized use also allows enjoyable access to parts of the river that are too dangerous for non-motorized watercraft. This includes access the rangers need to help keep our river properly managed. I would encourage those considering a ban and limitations on motorized boating to rethink their position and the negative effects it will have on the local community.</p>	Section 1.3.3 of the RMP states that FFSL administers sovereign lands using multiple-use, sustained-yield principles in accordance with Utah Code 65A-2-1, Utah Code 65A-10-1, and UAC R652-90-800. Multiple use is defined in Utah Code as "the management of various surface and subsurface resources in a manner that will best meet the present and future needs of the people of this state." There is no particular hierarchy of uses on sovereign lands, except to the extent those uses do not interfere with the public trust (Utah Code 65A-10-1). The RMP does not add new limitations or restrictions to motorized use.
97	97.5	Brenner Parriott	Multiple use	<p>I am all about supporting public input in a equal manner, but when one side is the overwhelming majority, this data does not support all users.</p> <p>Negative Consequences Include, but are not limited to:</p> <ul style="list-style-type: none"> Loss of local income or business operations all together. Loss of safe access to deeper parts of the river. Loss of general safety on the water. Loss of Public use to those who enjoy motorized boating. Loss of Public trust in analytical data. Biased opinions damaging the publics right to use the land. <p>In conclusion, Keeping motorized use while increasing ranger enforcement and education follows your vision. Adding more regulation, removal and negative consequences to motorized users will do nothing for your overall vision and goes against your diversity and ehancement of recreational access and will limit access to many who cannot recreate without motorized watercraft.</p>	Please see previous responses to your comments. Education and enforcement goals are discussed in Section 3.5.3 of the RMP.
98	98.1	Jason Parriott	General motorized use	As a life long resident of Moab and descendants of some of the original settlers of Moab I feel restricted use of any Motorized water craft up stream would be a huge injustice. Education for all should be the actual appropriate answer. I highly stand against this Change keep motorized watercraft legal.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use. Education and enforcement goals can be found in Section 3.5.3 of the RMP.

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99	99.1	Richard Barton	General motorized use	<p>We express our support for motorized boats to be on the Colorado river. We have had friends in Utah, other states and around the world that have gone to the Moab area and had memorable experiences with Canyonland by nights tour company on the Colorado river.</p> <p>They have great respect for the area and that respect is developed in those who get to tour the river. The livelihood of those in the Moab area should be supported by having work opportunities on the Colorado River. For environmental groups to try to take away what residents and their pioneer ancestors that settled the area have established is not right. Environmental groups need to get out of the way.</p>	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups. The RMP does not add new limitations or restrictions to motorized use.
100	100.1	Kelly Dunham	Hunting, education and enforcement	<p>My concerns are:</p> <p>Hunting along the Green River from Swasey's through the town of Green River. The rules say you need to be 200 yards from dwellings, livestock, etc. The river is not 200 yards wide and people cannot see through the trees so they are constantly shooting in the direction of people and animals. There are more and more homes along the river throughout this section. Hunting should be restricted in this section. If not, who is responsible for cleaning up he trash along with human waste below the ordinary high water line?</p> <p>Provide more information for people that recreate on the Green River along with local informative sessions in hopes of local businesses giving correct information and people having a safer experience.</p>	Thank you for your comment. The Utah Division of Wildlife Resources manages hunting and hunter education. FFSL suggests sharing your concerns with this agency.
101	101.1	Gayna Salinas	Education and enforcement	<p>The meeting you held in GR was informative and helpful.</p> <p>With the DNR it appears that there can be and should be lots of combinations of resources for the purposes of education about the Colorado and Green Rivers.</p> <p>Some suggestions as comments. On the radio I hear announcements about boating safety done by the state of Utah. Why can't you just add one more sentence to that about the specific issues concerning the Colorado and Green rivers?</p> <ul style="list-style-type: none"> - post in the post offices a short info about river and motorized interaction and river safety, ie life jackets, how motorized craft and non motorized are to share the river. -post in the visitor centers around the area. -send information to the junior high and high schools in Moab and Green River to educate local kids...For this you can probably get a local person who attended your meetings to do this. The students are the ones who then work in visitor centers and local industry informing tourists... they can't inform others if they are not informed. <p>I assume there is also a facebook or virtual presence that handles posted information.</p> <ul style="list-style-type: none"> -combine with the state of Utah river permits for private parties an info sheet that goes out when permits are granted. <p>It seems like the DNR, BLM and park service can combine and have a general river ethic, river manners and protocol bulletin that goes out with all the agencies to be posted in their public places.</p> <ul style="list-style-type: none"> -request and post on all used boat sales on KSL.com for example, an FYI boat ethic, safety. I don't think KSL would be opposed to it. Under the sale of boats there is a statement similar to smoking disclaimers that give a one line info site to go to. <p>None of these should be extra time consuming , just involve coordination.</p>	Thank you for your comment. Please see Section 3.5.3 of the RMP for education and enforcement goals.
101	101.2	Gayna Salinas	Access	Specifically, around Green River I do believe it is something to push for, a coordinated put in area either in Elgin on the east side of the river or a put in place on the west side of the river just south of the interstate... moving it out of town for the traffic of parking etc. The number of vehicles that park at Swaseys take out is huge, the reason to move to an area that is not in Elgin. I understand the state park has their own put in but there could be way more traffic at a boat put in that was exclusively for boats and rafts. There are places that would lend to a more natural area that would not involve huge costs because of the natural slope of the river bank. Something to seriously consider.	Thank you for your comment. FFSL looks forward to partnering with the City of Green River in the future as it implements river planning.
101	101.3	Gayna Salinas	Access	If the state park in GR is to be the only put in area, is there a possibility to have a yearly fee for use for those that put in frequently rather than a pay for each entrance to the park area?	State parks are managed by the UDSP. FFSL suggests reaching out to them with this question.
101	101.4	Gayna Salinas	Use limitations	I think capping the number of commercial boats has to be done but not sure what number is best. Perhaps the number can be capped for five years and then re-evaluated at the end of that time to maintain the number or increase or decrease.	The RMP does not add new limitations or restrictions to commercial users. FFSL will use the indicators, thresholds, actions, and monitoring described in Section 3.3 of the RMP to facilitate diverse recreational use while protecting navigation, fish and wildlife habitat, aquatic beauty, public recreation, and water quality.
101	101.5	Gayna Salinas	Management framework	I would like to see a continued management of the river banks with cutting dead wood and controlling the weeds, Russian olives etc. This can be done in coordination with the local soil conservation districts and others. The fire hazard is huge with the dead wood tamaracks. It would be nice to have some areas where the river can be accessed for fishing etc so people who are wanting to get to the river do not have to go through private property to do so.	Thank you for your comment. Please see the goals in Section 3.5.4 of the RMP.

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102	102.1	Canyonlands by Night	Survey methodology	Data Collection and Stakeholder Input The assertion that the management framework was developed based on stakeholder input and thorough data analysis is ungrounded. The data collection process was neither comprehensive nor unbiased. Many data collection points and user types were excluded, making the data one-sided. Additionally, the stakeholder input used did not encompass all relevant parties, focusing disproportionately on government agencies and special interest groups	Please see response to submission number 75, comment number 75.6 regarding potential bias toward the users of public boater access points and regarding potential bias toward non-motorized users. Please also see response to submission number 102, comment number 102.7.
102	102.2	Canyonlands by Night	Survey methodology	Inaccurate Data Representation The CMP's vision to integrate public input and new recreational use data into responsible management strategies is flawed due to skewed data collection. The survey indicated that only 12.4% of river users encountered commercial motorized boats, yet this issue is given undue emphasis. Moreover, the survey's questions may have led respondents to negative perceptions, with 44.2% stating encounters with commercial boats detracted from their experience.	Please see response to submission number 75, comment number 75.6 regarding potential bias toward the users of public boater access points and regarding potential bias toward non-motorized users. The survey instrument was designed following best practices within the field of outdoor recreation resource management (Vaske 2019). Specifically, the survey asked all questions using 1. neutral framing language; 2. bipolar response options (ranging from "A lot less than expected" to "A lot more than expected") where appropriate; 3. inclusive sets of response options; and 4. randomization of question order where appropriate (e.g., when asking about support or opposition to potential management actions). Every effort was made to ensure the instrument itself did not influence how questions are answered. The research team overseeing data collection has 60+ years of experience leading studies into outdoor recreation use and experiences (Utah State University 2024). As stated in Section 2.6.3.5, "Despite the low use of motorized boats and low rate of encounters, 44.2% of river users who did encounter commercial motorized boats reported that they either 'somewhat' or 'greatly' detracted from their experience; 25% of river users encountering inflatable rafts with outboard motors indicated they 'somewhat' detracted from their experience; and 50% of river users encountering private motorized boats reported that they either 'somewhat' or 'greatly' detracted from their experience." <i>Reference: Utah State University, 2024. Institute of Outdoor Recreation and Tourism. Available at: https://extension.usu.edu/fort/index.</i>
102	102.3	Canyonlands by Night	Survey methodology	Survey Methodology Concerns The data collection excluded significant private boater access points on the Colorado River, such as Canyonlands By Night and Red Cliffs Lodge, while private access points were used on the Green River. Additionally, the sociodemographic data lacks depth, failing to account for geographic proximity to survey locations, thus potentially misrepresenting the true local impact and opinions.	Please see response to submission number 75, comment number 75.6 regarding potential bias toward the users of public boater access points. The demographics are representative of river users who use public boating access sites and may or may not align with Moab's local population. Commonly, surveys of outdoor recreationists and tourists are distinctly different than local populations (tending to be more affluent, Caucasian, and educated). See Smith and Trautvein (2023) for data comparing outdoor recreationists in Utah to the state's population as a whole, for example. It is unclear what is meant by "the sociodemographic data lacks depth, failing to account for geographic proximity to survey locations, thus potentially misrepresenting the true local impact and opinions." The survey was not designed to assess local's perceptions of recreation use on the rivers. Rather, the data collection effort was designed to capture data on the on-river recreational experiences of those individuals who use public boating access points. <i>Reference: Smith, J.W., and N. Trautvein. 2023. Insights Into the Characteristics of Outdoor Recreationists in Utah From a Statewide Survey. Institute of Outdoor Recreation and Tourism, Utah State University. Available at: https://digitalcommons.usu.edu/envs_facpub/1662/.</i>
102	102.4	Canyonlands by Night	Management framework	Management Actions and Regulation The management actions proposed, such as limiting commercial jet boats, are based on biased data and lack diverse sampling. Additionally, the CMP's goals seem to unfairly target commercial operators while overlooking the challenges in regulating private users who may not adhere to size and usage restrictions.	The RMP does not add new limitations or restrictions to motorized use. There are no new size or usage restrictions. FFSL's authority to regulate private users is prescribed through UAC R652-70-2400, which this plan is not able to modify.
102	102.5	Canyonlands by Night	Permits	Jurisdiction and Permit Conditions There are inconsistencies in FFSL's jurisdiction and management actions, especially regarding camping restrictions upstream to the Utah-Colorado state line. The conditions for terminating permits are also overly stringent, providing little recourse for permittees to address and rectify breaches.	FFSL proposed the camping decisions to increase consistency with the BLM Moab Field Office Record of Decision and Approved Resource Management Plan DOI-BLM-UT-Y010-2008-0001. Upon review, FFSL agrees that the draft RMP campsite restriction language should be changed. The text in Section 3.4.1 has been updated to address public comments.

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					FFSL does have the authority to terminate its own right-of-entry permits "for failure to comply with any term or condition of the conveyance document or applicable laws or rules," as stated in UAC R652-41-1500.
102	102.6	Canyonlands by Night	Use limitations	Group Size Restrictions The proposed group size restrictions are arbitrary and not uniformly applied across different river segments, no agencies leading to potential confusion and unfair restrictions on commercial operators.	No day-use group size restrictions are proposed in the RMP. Overnight group size restrictions are prescribed in UAC R652-70-2400, which this RMP is unable to modify. The partner agency group size considerations in Table 3-5 are considerations only to help prescribe consistency with partner agencies when the next opportunity to amend administrative rules arises.
102	102.7	Canyonlands by Night	Process	Public Comments and Special Interest Influence The public comments received exhibit a common theme, suggesting a coordinated effort by special interest groups, thereby skewing the feedback process.	The key recreation issues discussed in Section 2.5 of the RMP were identified through the public outreach processes of the 2020 Colorado and Green River CMPs and the information gathering for the RMP. Comments were solicited from all stakeholders. Please refer to Appendix A of the RMP, Appendix A in the Colorado River CMP, and Appendix A in the Green River CMP for details on public involvement processes.
102	102.8	Canyonlands by Night	Not applicable	Unacceptable Framework in the Final Colorado River Management Plan If issues arise from the Colorado River Resource Management Plan, the framework set up by the "Final Colorado River Management Plan" is inadequate. The objectives intended to reduce recreation conflicts, especially between motorized and non-motorized users on the Moab Daily segment, include "consider adding new restrictions or limitations to existing recreation authorizations to reduce user conflict" (Page 197). This approach is unacceptable as it imposes further unnecessary restrictions and does not effectively address the root causes of conflicts.	This comment is referring to the Colorado River CMP, which was finalized in January 2020. Comments are no longer being accepted on this plan.
102	102.9	Canyonlands by Night	Not applicable	These issues collectively result in a management plan that does not adequately address the needs and realities of river users, I believe a more balanced and equitable approach is necessary, and I hope you can make a revised plan that genuinely reflects comprehensive stakeholder input and fair management practices. In conclusion, the Colorado River CMP, as it stands, presents several issues that undermine its efficacy and fairness. I urge you to reconsider the plan, taking into account a more comprehensive and unbiased data collection process, equitable stakeholder representation, and fair management actions that do not disproportionately impact commercial operators.	This comment is referring to the Colorado River CMP, which was finalized in January 2020. Comments are no longer being accepted on this plan.
103	103.1	Taylor Torgerson	Permits	I am interested in starting a Jet-ski guided tour company on the Colorado River. I have a lot to say about how I have specific plans for my company to be environmentally and ethically responsible, while also minimally impacting other riverway users. However, the current CRRMP prevents me from starting this company so I will focus my comments on that and I look forward to a future date where I hope to work with you to meet your requirements and highest expectations you hold for commercial outfitters on the Colorado River.	Thank you for your comment.
103	103.2	Taylor Torgerson	River experience	It is my understanding that the commercial motorized use of the Colorado River is a key issue addressed in the CRRMP and that several key issues are noted in 2.5.1 such as noisiness, disruption of peace and solitude, disruption of camping, increased river congestion, and overall diminishing of non-motorized experience. Working as a river guide over the last several years, I can certainly agree that there can be frustrating conflicts or grievances that can occur between river users (motorized or non-motorized), especially one as popular and populated as the Colorado River. My experience as a river guide has also taught me that the river is a unique and wild setting that should be enjoyed by as many people as possible. While I have certainly had grievances when running into other river users there is also something to be said about the positive feeling when you can see others finding joy in something that brings you joy. A mutual respect and happiness can be shared with those recreating in similar or different ways around us.	Thank you for your comment. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups.
103	103.3	Taylor Torgerson	Multiple use	I advocate for an approach to river management that celebrates diversity, fosters cooperation, and promotes the shared enjoyment of this natural treasure. As stated in section 1.3.3 "There is no particular hierarchy of uses on sovereign lands" and that "sovereign lands... are held by the state in trust for the benefit of all people" (section 1.3.2). I believe that the Colorado River can be more greatly utilized by different types of recreationalists but right now motorized users are being unjustly excluded from the recreational scene. This argument can be supported from the stats that only 44% of users said that commercial motorized boats somewhat or greatly detracted from their experience compared to the 63.4% of people who somewhat or completely support limiting the number of commercial jet boats. This means of those 63% supporting that action, roughly 20% of them were NOT negatively affected by the commercial motorized boats yet they STILL want to limit them (Tables 2-15 and 2-16). And yet, the percentage of those who even encountered commercial motorized boats is only 12% (Table 2-12, 2.6.2.3) which is objectively small especially in comparison to the 63% (Table 2-16) of people who support limiting the number of commercial motorized boats on the river. More simply said, only 12% of river users encountered commercial motorized boats but somehow 63% of people surveyed want to limit the number of commercial boats on the river.	The RMP does not add new limitations or restrictions to motorized use.

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103	103.4	Taylor Torgerson	Multiple use	<p>In the Conclusion found on Section 2.6.3.5 of the CRRMP Draft it is noted that "Survey data indicate that most visitors to the planning area are satisfied with their experience; however, when visitors are not satisfied or encounter conditions that they did not expect, those perceptions are usually associated with motorized use and congestion on the rivers." As a frequent patron of the river I understand the unique experiences that can take place on the river and the importance of preserving its uniqueness. However, the statistics provided are more indicative to me that many rafters, kayakers, and paddle boarders wish to "gatekeep" the Colorado river for themselves; rather than the statistics being an actual reflection of the negative impact of commercial motorized boats on recreation use. This argument can be supported by the fact that only 8.5% of the sample surveyed were motorized boaters, and only 3.3% of those surveyed were commercial motorized boaters (table 2-9). In comparison, roughly 90% of those surveyed were rafters, kayakers, paddleboarders etc. leading to a potentially biased survey.</p> <p>This "gatekeeping" phenomena isn't uncommon to Moab and it isn't unique to recreation on the river. Commonly hikers have disliked bikers, bikers have disliked motorcycle riders, climbers have disliked paragliders, just about all of them have disliked jeepers and 4x4'ers. Now, this isn't a true statement for all people and all hobbies but it's an easy analogy to understand that some people doing certain recreational hobbies feel that others are infringing on their hobbies or detracting from their experience by recreating alongside them but in different ways. However, recreating in Moab isn't just THEIR experience. It is OUR experience. We all share it and we should be tolerant to others' choices of recreation as long as we can do it respectfully, responsibly, and within good measure. And it is the responsibility of the lawmakers or in this case the CRRMP authors to draw the line between promoting positive experiences and allowing exclusion of a certain user group.</p>	<p>Given the survey was intended to generate an accurate representation of the river users who use public boating access points, it is accurate to say that 8.5% of these users are using motorized watercraft (4.2% using inflatable rafts with outboard motors; 3.3% using commercial motor boats; and 1.0% using private motor boats). It is important to point out that these estimates, derived solely through the on-site survey, align very closely with data reported by the BLM, which estimates 8.0% of all river use of The Moab Daily is motorized (see Table B-1 in Appendix B of the RMP).</p> <p>The survey assessed river users' perceptions and support for management actions; it did not ask and does not necessarily indicate that some river users wish to exclude other river users.</p> <p>FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups.</p>
103	103.5	Taylor Torgerson	Commercial motorized use	<p>As with any conflict, I believe there is a good compromise to be found where everyone can feel heard and satisfied. In this public comment I would like to propose that the Commercial Tour Permit Area be redefined and perhaps separated. No doubt that the area of the Moab Daily, ranging from Little Bottom to Takeout Ramp is full of rafters, kayakers, and other non-motorized recreationalists and we should prioritize their experience. But the section of the Colorado River below Takeout Ramp and especially below US-191 Bridge is underutilized. This underutilized section could accommodate additional permits for responsible commercial motorized operations like mine. Limiting the number of permits on the section that contains more rafters will allow them to feel secluded and isolated, preserving the natural and calm feel leaving those recreationalists satisfied and happy. By following this proposal both groups can be satisfied, everyone gets to recreate in the way they choose, and we reduce and minimize the number and frequency of conflicts as we set an example for other recreationalists showing that two separate groups can positively coexist.</p>	<p>Thank you for your comment. As indicated in the RMP, FFSL has decided to define the Type A Commercial Use Permit Area as the Colorado River from the northeastern boundary of Canyonlands National Park upstream to the Red Cliffs Lodge private boat ramp. This is not a change from the existing tour area.</p>
103	103.6	Taylor Torgerson	Multiple use	<p>In conclusion, I urge decision-makers to adopt an approach to river management that embraces diversity, fosters cooperation, and promotes equitable access for all recreational user groups. The Colorado River is a cherished natural resource that holds immense value for residents and visitors alike, and it is essential that we work together to ensure its preservation and enjoyment for generations to come.</p> <p>By recognizing the importance of inclusivity and finding innovative solutions to address the concerns of all stakeholders, we can create a balanced and sustainable recreational environment that respects the unique needs and preferences of each user group. My proposal to redefine the Commercial Tour Permit Area and allow for increased access to underutilized sections of the river represents a step towards achieving this goal, while also minimizing conflicts and maximizing the enjoyment of this natural treasure for all.</p>	<p>Thank you for your comment. Please see responses to your previous comments.</p>
104	104.1	Taylor Torgerson	Management framework	<p>As I mentioned in my previous email, I am very interested in starting a jet ski company in the area. I believe there is a significant opportunity to enhance recreational activities on the Colorado River while ensuring the safety and enjoyment of all users. Specifically, I proposed increasing the number of permits issued and adjusting the area boundaries to prevent motorized vehicles from infringing on areas of the river with a high volume of rafters. I understand that balancing the diverse interests of river users is a challenging task, and I appreciate the effort you are putting into developing a comprehensive management plan. I am confident that with thoughtful planning and stakeholder input, we can create a framework that supports both motorized and non-motorized recreation harmoniously. To that end, I would welcome any opportunity to discuss this further with you. I hope to contribute to a solution that aligns with the interests of all parties involved and ensures the sustainable and enjoyable use of our beautiful river.</p>	<p>Thank you for your comment. Management decisions are outlined in Section 3.4 of the RMP.</p>
105	105.1	Alex Mickel	Permits	<p>Hope this email finds you well. Per the clause in our permit please consider this official correspondence that we intend to renew our permit in 2025.</p> <p>Please note that we travel upstream for a variety of reasons in meander canyon and this is critical to our operation above the park boundaries.</p>	<p>Thank you for your comment. The RMP does not add new limitations or restrictions to motorized use.</p> <p>To renew an application, FFSL must receive a formal right-of-entry application (which was sent to you on September 25, 2024).</p>

Submission Number	Comment Number	Commenter	Topic or Theme	Comment	Response to Comment
105	105.2	Alex Mickel	Process	The timing of the release of the management plan comment period could not have been worse and was disappointing as not only was it the busy season but absolutely the busiest time of the year. I implore your agency to consider timing in the future for such actions.	FFSL follows administrative rules that prescribe the timing and duration of public comment periods. At the 2023 Utah Guides and Outfitters meeting, FFSL was informed that the timing of the comment period was difficult for some stakeholders; it was extended from the required 40 days to 90 days (3 months).
106	106.1	Jose Tejada, Sherri Griffith Expeditions	Process	This submission is an attempt to try and express some concerns regarding the new RMP. These comments are mine as an individual and as a commercial outfitter. While I appreciate the open comment period, I would like to note that it has been difficult to compile opinions for comment as the timing has coincided with my business's busiest time of the year. Please don't hesitate to reach out to me if you have any additional questions or need for clarification. The Colorado River and Green River Recreation resource management plan draft presents several issues. As a private boater, I consider myself an important stakeholder, and I believe my experience and voice are not accounted for in the draft. These are some of my concerns.	FFSL follows administrative rules that prescribe the timing and duration of public comment periods. At the 2023 Utah Guides and Outfitters meeting, FFSL was informed that the timing of the comment period was difficult for some stakeholders; it was extended from the required 40 days to 90 days (3 months).
106	106.2	Jose Tejada, Sherri Griffith Expeditions	Purpose, survey methodology	Vision and Purpose – The data seems limited and the recommended management actions an overreaction.	The purpose of the data collection effort was to 1) provide an accurate characterization of how recreationists are using the rivers, 2) characterize the types of on-river encounters between river users, and 3) assess river users' preferences for potential management actions. The sampling design was created to capture a representative sample of the users at public boater access points, including private boaters and commercial outfitters. There were limited fiscal resources to conduct surveys at other access points; however, FFSL is continuing to collect data as funds allow. The management framework in the RMP is not a significant change from existing management, except for the indicators, thresholds, actions, and monitoring details provided in Section 3.3, which do not establish user restrictions or limitations.
106	106.3	Jose Tejada, Sherri Griffith Expeditions	Survey methodology	Survey Concerns – Data collection excluded certain visitors (commercial motorized tour clients) creating results that are neither consistent nor representative.	Please see response to submission number 75, comment number 75.6 regarding potential biases.
106	106.4	Jose Tejada, Sherri Griffith Expeditions	General motorized use	Motorized use Restrictions - Conflicts between motorized and non-motorized users seem to be a target for regulation despite FFSL acknowledgment and my experience that encounters are relatively uncommon.	The RMP does not add new limitations or restrictions to motorized use.
106	106.5	Jose Tejada, Sherri Griffith Expeditions	Process	Section Confusion – FFSL has redrawn the Colorado River sections to fit the draft and not followed current use patterns creating confusion. The proposed daily section is to long and varied to propose a one size fits all solution	FFSL is required to develop planning procedures for natural and cultural resources on state sovereign lands by Utah Code 65A-2-2. The most recent plans for this area are the January 2020 Colorado River and Green River CMPs. The RMP is a supplement to those plans. The river segments discussed in the RMP align with the segments in the CMPs for consistency.
106	106.6	Jose Tejada, Sherri Griffith Expeditions	Process	Inconsistency with Cooperating Agencies – FFSL has created regulations without collaboration from entities that have jurisdiction and or management authority. These regulations include commercial use restrictions, motorized use restrictions, not recognizing BLM SPR. Conflicts with other agencies must be resolved before a plan can move forward	FFSL did reach out to and collaborate with interagency partners through RDCC Project No. 86009 and individually through interagency correspondence on November 7, 2023 (interagency partners were also included on the 2024 email announcements for the draft RMP release and public meetings). At the request of FFSL federal partners, FFSL extended the federal partner comment period twice. During that time, FFSL very gratefully received one set of agency comments from Canyonlands National Park.
106	106.7	Jose Tejada, Sherri Griffith Expeditions	Permit	The draft CRMP places FFSL as the ultimate authority and provides no recourse or oversight of permit termination. This may result in a dispute between FFSL and federal contract holders	FFSL is the administrative authority over all commercial uses of sovereign lands and reserves the right to terminate any division-issued authorization with cause. FFSL decisions may be subject to the Administrative Rules for Consistency Review found in R652-9.
107	107.1	Canyonlands by Night	River experience	Let me talk a little bit about those changes on the river: When we first started running, we would have high water every spring that would wash all the sandbars along the banks and the islands away. Today, we have a lot of new islands in the river that are getting larger and with more vegetation each year. That's because of little plant called Tamarisk. Tamarisk started to stabilize the banks of the river. When I started there were very few Tamarisks along the river. Today there's very few places that Tamarisk is not found along the river and tributaries of the river, because they grow so fast and can survive under water (at least for 40 days) as proven at Lake Powell. They aren't being moved or washed away during high water. There were no islands each spring after high water, because they were washed away, once the water receded here would be new islands that would form usually down river about 100 yards. Today because of the Tamarisk the water is getting narrower and closer than it was when I first started running. I think I could find several pictures to prove this observation. I think it would be hard to find a place where my boats have eroded the banks enough to alter the course of the Colorado River, while we know each high/low water season does that enough.	Thank you for your comment. We appreciate your observations and will continue our work regarding invasive species management and look for opportunities to work with other partners to address tamarisk.
107	107.2	Canyonlands by Night	Multiple use	At Canyonlands By Night we've always tried to be good stewards of this beautiful land that God has given us. Our motto has always been that we want the next generation to see the same things along the Colorado River. All of us love to see deer, big horn sheep, and other wildlife along the Colorado River. The number of people coming to Moab has increased tremendously over the years. With that, places for people to stay have increased, including campgrounds. Before 1980 we would see deer, sheep,	Thank you for your comment. FFSL recognizes the increasing recreational use of the rivers. FFSL is required to manage the rivers using multiple-use, sustained-yield principles. In that spirit, FFSL seeks to balance the needs and effects of different user groups.

Submission Number	Comment Number	Commenter	Topic or Theme	Comment	Response to Comment
				cougars and bear along the banks of the river and many times swimming across the river. So, what changed? When I started running there weren't any campgrounds along the river and Hwy 128 was only paved part way and it wasn't even called Hwy 128, it was a county road. In the late 70s and early 80s is when the BLM put in Goose Island Campground and Big Bend. Our boats may scare wildlife along the river for a few moments, not unlike the cars, trucks and motorcycles going up and down the river road, but the number of users on the river and campers have greatly increased the disappearance of wildlife in those areas. Campers and their dogs create noise for a longer amount of time and for up to 14 days and those beloved pets can also chase and scare away the wildlife. The pathway also brings more people into an area that would normally only have road access. There was a reason Goose Island is called what it is, but you don't see any geese there anymore. Ducks and Geese would use the area to raise their young, but those days are long gone. So I ask you: "how can you justly ignore one users noise to single out another's and how can you say that one user is the culprit of the issues when it's really the overwhelming increase of people enjoying the recreational opportunities our area provides?"	
107	107.3	Canyonlands by Night	Wildlife, permits, survey methodology	As far as Blue Heron rookeries, there used to be many nests along the river where these campgrounds have been built. Today you won't find any. There's still a very prosperous rookery located near Potash and it will be affected by the new camping going on in that area. We have gone past this rookery every summer day for years and shown our guests. I would like to surmise that our jetboats going by for a few minutes each day over the many years hasn't moved it, but that the campers will likely have some effect to it. There is a balance to people's recreational needs and protecting the environment and wildlife, but many points in the River Management Plan have been focused on reducing the conflicts of motorized and non-motorized users. The FFSL will get \$2 per person on every person on our boats. This number of people alone that we share this beautiful area with in a responsible and safe manner will be a huge benefit for the FFSL. There isn't a tax allocated on private users, yet it seems like they have the more weight in the say of what happens? We are giving people access to the area and teaching them the overall Moab themes of conservation and respect for our land and rivers. Can you say the same for all the private users? So why does one user group get a bigger say in what happens, while the other who pays to give you more employees and money for your efforts has to suffer? Sending a mass email out to conservation groups to weigh in during the comment period was not a just look at the real feelings of everyone who uses the river. Also doing a multi-year research effort to gain people's views at the docks, but not using a dock that only serves jet-boaters because you feel it will skew your research is in fact skewing the research. Not asking the jet-boaters getting off the river at the Moab Dock and only asking other users your research questions, is also not getting a complete and honest look at the number of users and what their OVERALL feelings are.	FFSL is the administrative authority over all commercial uses of sovereign lands. UAC R652-41-600 gives FFSL the authority to "establish minimum fees for right of entry permits which may be based on the cost incurred by the division in administering the right of entry permit and the fair-market value of a proposed land use." FFSL's authority to regulate private users is prescribed through R652-70-2400, which this plan is not able to modify. The RMP does not add new limitations or restrictions to motorized use. There are no new size or usage restrictions. Emails were sent to known stakeholders to inform them of the release of the draft RMP and public meetings, including commercial users/outfitters, state agencies, county stakeholders, private stakeholders, restoration partners, non-profits (e.g., American Rivers, Colorado Plateau River Guides, National Ability Center, River Runners for Wilderness), emergency response entities, and federal partners. Postcards also were sent to adjacent landowners and lessees. Please see response to submission number 75, comment number 75.6 regarding potential bias toward the users of public boater access points.
107	107.4	Canyonlands by Night	Safety	Every year we have non-motorized users who get into trouble on the river. The FFSL, BLM and other agencies don't have enough staff to help them. We are on the river more and help when there's a need. Safety is our priority, and we are always willing to help those who need it whether they are a motorized or non-motorized user of the river. I think being a good steward of the entire area and being a good human means that you're willing to help those in need not just certain segments.	Thank you for your comment. We appreciate your willingness to help others.
107	107.5	Canyonlands by Night	Purpose	So, have the changes along the river been caused only by us? No. It's all the users. Is there a need for the River Management Plan for the area? I'm not one who enjoys more restrictions and regulations, but the parts of the plan to educate people would be beneficial. Understanding and a cooperative attitude between all users is the only way to properly enjoy the Colorado River.	Thank you for your comment.
108	108.1	Katie Norsworth, Voluntary Witness Statement	Education and enforcement	On June 24th, 2024, me, my husband, and our two children, put in floatation tubes we had rented into the Colorado River a few feet north of mile marker 6 on HWY 128. It was a beautiful day and we were looking forward to some fun floating for the first time in Utah. We are an active family and own our own paddleboard and kayaks and paddleboard in south Louisiana, where we enjoy deep, current filled waters often. While we launched our tubes into the river, three blue speed boats operated by the Moab Jetts company, were driving erratically nearby. I am not sure how close they were at that time, but given the fact that the river is only around 200 feet wide at the section we put in, AND all three boats were doing multiple 360 turns at high speeds I am pretty sure they were making wakes within 150 feet of us. Despite their obnoxious behavior, we really didn't think much else of them. A short way down the river, maybe a bit closer to mile marker 5, our family became stuck in a strong upriver current. It took some work, but we finally made our way out of that current, and into the correct, down river one. Once we finally worked our way into the correct current, the 3 Moab Jetts boats came flying by once again. This time, their wakes were so strong, they pushed us out of the current we had worked so hard to get out of and back into the upriver one. Although I don't have a way to measure the distance, I can say with certainty that they were within 150 feet from us, making a wake. We were in the center of the river when they intially passed us, so even at the river's widest point, they would have been within 150ft. We tried waving for help to have them assist with getting us back into the correct current, and they simply waved back. To say the least, it was very frustrating. I can not even begin to describe the careless way they operate boats with children floating nearby. My kids were scared, and we were afraid of the boats returning, to once again boat recklessly close to us, that we simply got out of the river at that point and walked along the highway, downstream, past the area we were having issues with. I would like to point	This comment was submitted to the RMP planning team through the Department of Natural Resources law enforcement with the permission of the witness.

Submission Number	Comment Number	Commenter	Topic or Theme	Comment	Response to Comment
				<p>out that we encountered a handful of other boats the rest of our trip. All other boats we floated past honored the no wake law, and were safe and courteous.</p> <p>What concerns me the most, is after our float was over, and we returned to our hotel, I called Moab Jett to report the behavior of their commercial boat pilots to the manager on duty. I explained to her that their driving was unsafe, erratic, problematic, scared my children, and our waves for assistance were ignored. I wish I would have recorded the phone conversation with this manager for proof of her wanton disregard for water safety. She insulted me multiple times for being an out of townner, stated that we were unsafely floating on the river (how I do not know, since we were in compliance with all Utah laws), defended her pilots wanton disregard for safety, and also stated that tubes should never be floating on the Colorado River. She stated that they are actively trying to advocate for them to be restricted more.</p> <p>Rivers aren't just for those with motorized boats. They should also be safe to use with other non motorized water craft, tubes included.</p> <p>I am very sad that we have no video, or photo recordings of the multiple times we encountered the Moab Jett boats on our float down the Colorado River. I am also sad that I didn't record my phone conversation with the manager where she defended her pilots action, and chastised me for mine.</p> <p>If you do a google review search of Moab Jett, you will find that we are not the only people who have witnessed this type of behavior from the Moab Jett Company.</p> <p>They definitely broke the law in regards to making wakes multiple times within 150 feet from us. And I believe they also broke Utah law just by operating so wrecklessly, on purpose, so close to a family trying to float down the river. Please, give the google reviews a look over. This is a pattern they are continually doing, and it is unsafe.</p> <p>Please let me know if you have any other questions.</p> <p>Lastly, I would like to thank all parties in law enforcement we have come in contact with in Utah. I originally reported this to sherrifs dispatch in Grand County. The dispatcher explained that this wasn't in their jurisdiction, but that she would get my information forwarded to who needed it, once she found out. I was then contacted promptly by Lucas Turkington of Utah DNR. I know this isn't part of my statement, I just wanted to thank both agencies for prompt, complete attention It is much appreciated.</p>	

APPENDIX B

Bureau of Land Management and National Park Service River Use Data

River use data were obtained from the Bureau of Land Management (BLM) and the National Park Service (NPS) and reviewed during development of the Colorado River and Green River Recreation Resource Management Plan. The BLM and NPS are key recreation management partners for the planning area. The BLM and NPS river use data are summarized below.

Bureau of Land Management River Use Data

The Moab Daily

The BLM issued 22 special recreation permits for commercial outfitters for motorized and non-motorized river trips on The Moab Daily for 2023. One of the 22 commercial permits is for upstream motorized travel; the remainder are for downstream non-motorized travel (Murdock 2023a). Approximately 95% of visitor use on The Moab Daily is between Dewey Bridge and Takeout Beach; very few commercial outfitters run below Takeout Beach (Murdock 2023b). Table B-1 shows the total number of passengers served by commercial special recreation permits from 2018 to 2022.

Table B-1. Number of Passengers on Non-Motorized or Motorized Commercial Trips on The Moab Daily (2018–2022)

Year	Non-Motorized		Motorized		Total
	Number of Passengers	% of Total Passengers	Number of Passengers	% of Total Passengers	
2022	50,193	92.0%	4,347	8.0%	54,540
2021	63,945	93.9%	4,144	6.1%	68,089
2020	34,567	94.3%	2,100	5.7%	36,667
2019	57,324	95.4%	2,767	4.6%	60,091
2018	52,971	94.9%	2,845	5.1%	55,816

Source: Murdock (2023a).

Note: The low counts in 2020 are likely a result of the COVID-19 global pandemic.

Labyrinth Canyon

The total number of launches and passengers for the Labyrinth Canyon river segment from 2013 to 2022 are shown in Table B-2.

Table B-2. Number of Launches and Passengers in Labyrinth Canyon (2013–2022)

Year	Number of Launches	Number of Passengers
2022	499	3,623
2021	868	5,400
2020	–	–
2019	754	4,575
2018	683	4,122
2017	506	2,840
2016	561	2,951*
2015	567	3,168
2014	588	3,091
2013	444	2,304

Source: Murdock (2023c).

Note: No river trips were permitted in 2020 because of the COVID-19 global pandemic.

* Passenger and launch numbers for August 2016 were not tracked; the BLM used estimates of 250 for passengers and 45 for launches for the month of August.

National Park Service River Use Data

The NPS collects visitor data for the flatwater segments of the Colorado and Green Rivers in Canyonlands National Park (Table B-3). Flatwater segments in Canyonlands National Park consist of a small portion of Labyrinth Canyon on the Green River, Stillwater Canyon on the Green River (directly downriver of Labyrinth Canyon), and the continuation of Meander Canyon on the Colorado River.

Table B-3. Number of Passengers on Flatwater Sections, Canyonlands National Park (2012–2021)

Year	Total
2021	3,051
2020	1,757
2019	2,631
2018	2,545
2017	2,685
2016	3,139
2015	3,223
2014	3,240
2013	2,388
2012	2,572

Source: Young (2023).

Note: The low counts in 2020 are likely a result of the COVID-19 global pandemic.

The NPS also collects visitor data for the whitewater segment in Canyonlands National Park (Cataract Canyon below The Confluence) (Table B-4). Most Cataract Canyon trips put in at Potash, Moab, Green River State Park, or Mineral Bottom and finish at Lake Powell.

Table B-4. Number of Passengers in Cataract Canyon, Canyonlands National Park (2011–2020)

Year	Private Trips		Commercial Trips		Total
	Number of Passengers	% of Total	Number of Passengers	% of Total	
2020	2,083	55.9%	1,644	44.1%	3,727
2019	1,660	35.9%	2,963	64.1%	4,623
2018	1,328	32.1%	2,814	67.9%	4,142
2017	1,283	28.2%	3,271	71.8%	4,554
2016	1,579	30.9%	3,526	69.1%	5,105
2015	1,756	33.3%	3,515	66.7%	5,271
2014	1,696	37.9%	2,782	62.1%	4,478
2013	1,483	37.9%	2,433	62.1%	3,916
2012	1,653	37.9%	2,712	62.1%	4,365
2011	1,985	37.9%	3,258	62.1%	5,243

Source: Young (2023).

Note: The low total counts in 2020 are likely a result of the COVID-19 global pandemic.

Literature Cited

- Murdock, T.M. 2023a. Outdoor Recreation Planner. Moab BLM/Moab Daily river numbers. Moab, Utah: Bureau of Land Management. Email communication with Gretchen Semerad, SWCA Environmental Consultants. May 10, 2023.
- . 2023b. Outdoor Recreation Planner. The Moab Daily river segment. Moab, Utah: Bureau of Land Management. Telephone communication with Gretchen Semerad, SWCA Environmental Consultants. May 10, 2023.
- . 2023c. Outdoor Recreation Planner. Moab BLM/Labyrinth River numbers. Moab, Utah: Bureau of Land Management. Email communication with Gretchen Semerad, SWCA Environmental Consultants. June 2, 2023.
- Young, S. 2023. River District Ranger. Updated visitor use river data for Canyonlands National Park. Moab, Utah: Canyonlands National Park. Email communication with Gretchen Semerad, SWCA Environmental Consultants. May 25, 2023.

APPENDIX C

Recreation-Related Public Comment Themes

Table C-1 summarizes the approximate number of recreation-related comments submitted during information gathering for the Colorado River and Green River Comprehensive Management Plans (CMPs), during public review of the draft Colorado River and Green River CMPs, and during information gathering for the Colorado River and Green River Recreation Resource Management Plan.

Table C-1. Comment Themes from the Colorado River and Green River Comprehensive Management Plans and the Colorado River and Green River Recreation Resource Management Plan Public Outreach Processes

Comment Theme	Approximate Number of Comments: Colorado River	Approximate Number of Comments: Green River
Support current motorized boating (multiple use)	24	2
Oppose motorized boating	4	0
Oppose jet boats	10	1
Support jet boats	3	1
Oppose upstream motorized commercial travel	1	0
Limit jet boats and other motorized boats to below the U.S. Route 191 bridge	29	N/A
Limit jet boats and other motorized boats to below Takeout Beach	6	N/A
Allow motorized boats upstream to White's Rapid	1	N/A
Allow motorized boats upstream of the U.S. Route 191 bridge at wakeless speeds only	1	N/A
Oppose jet ski use	3	3
Limit motorized and/or non-motorized activity to specific times, areas, or days	5	0
Limit commercial trip size and/or numbers	1	0
Limit the number of motorized users per day or in other ways	1	0
Place restrictions evenly on all user groups	1	0
Implement speed limits for motorized boats passing non-motorized craft	1	0
Cap commercial permits	5	0
Prohibit inner tubes and paddleboards on The Moab Daily segment	1	N/A
Implement a free or low fee permit system (or implement a permit system for high use times)	2	1
Implement more agency monitoring presence	1	0
Develop recreational carrying capacities	2	1
Reconsider permit allocations	1	1
Provide additional education to river users	2	2
Implement formal permit system from Green River to Crystal Geyser	N/A	1
Eliminate all commercial operations	1	1

Note: N/A = not applicable.