

Sustainable Alternative Proposed for the Management of Browns Canyon National Monument



submitted to
U.S. Bureau of Land Management and U.S. Forest Service
for inclusion in the
Browns Canyon National Monument Resource Management Plan

prepared by
Friends of Browns Canyon
and a coalition of stakeholders

June 20, 2019

Executive Summary

Browns Canyon National Monument (BCNM) protects 9,792 acres of land managed by the U.S. Bureau of Land Management (BLM) and 11,811 acres of land managed by the U.S. Forest Service (USFS) in Central Colorado. The agencies are currently undergoing formal planning for the monument to determine the future management of the area.

The Sustainable Alternative was developed by a group of over 20 local Chaffee-county-based citizens representing numerous organizations along with decades of land use and close observation of the area now designated as BCNM. Development of this alternative sought and received technical advice from local, regional and national organizations interested in the area and specializing in public land management. The Sustainable Alternative has broad community support from over 80 local businesses, residents, land owners, and various regional and national organizations.

The overall objective of the Sustainable Alternative is to prioritize the intent and stipulations of Proclamation 9232 (Proclamation), which established BCNM. The Sustainable Alternative draws on existing legislation and agency directives and proposes realistic and sustainable management prescriptions for the BLM and USFS to implement. The Sustainable Alternative affirms the Proclamation's guarantee of continuation of existing uses and rights, including grazing permits and water rights. It generally avoids recommendations concerning the Arkansas River corridor, whose management is acknowledged to remain the responsibility of the State of Colorado and the Arkansas Headwaters Recreation Area (AHRA).

The Sustainable Alternative seeks to address a vast variety of the management issues pertaining to BCNM. Some of the recommendations within are in direct response to the draft alternatives in the agencies' Planning Criteria Report, published in April 2019. Other suggestions are outside of the scope of the Planning Criteria Report. A few suggestions pertain to lands just outside BCNM boundaries. We acknowledge that these suggestions are outside of the current planning effort, but believe it is vital for the agencies to consider them throughout planning within the monument as they both directly and indirectly affect monument access and visitation as well as the resources, objects and values the monument was established to protect.

Our approach in developing the Sustainable Alternative was to review existing land-use designations and recommend how these existing designations could form the basis of a zoning approach for land use within BCNM. This was necessary to ensure the monument is managed appropriately to protect the resources, objects and values that it was designated to protect. We considered known locations of monument objects as well as known areas of recreation and interest. Through this approach, we delineated the following:

- Areas more appropriate for high visitor use (Front Country Zone).
- Areas for reaching areas of high visitor use (Passage Zone).

- Areas more targeted to backcountry use (Backcountry Zone).
- Areas managed for primitive, wilderness characteristics (Primitive Zone).

Examples of general recommendations within the Sustainable Alternative include:

- Emphasis on adequate and timely inventory of monument resources.
- Assurance that the agencies will provide the necessary financial and staffing resources to maintain and enforce proposed actions and infrastructure, along with a caution not to propose more than can be addressed with anticipated resources.
- Support of the agencies' intent to work closely with American Indian tribes to identify areas of tribal cultural significance and to develop strategies to avoid impacts to these resources from recreational use or vandalism.
- Potential closure of some existing non-system spurs off Aspen Ridge Road and potential establishment of designated dispersed camping at others, with parking outside of the monument boundary.
- Potential location for an interpretive/overlook trail off Aspen Ridge Road with accessibility for visitors with limited mobility.
- Resolution of conflict in the Turret area due to private road and property owner issues.
- Providing visitor access from Turret to the Railroad Gulch/Stafford Gulch area.
- Informational kiosks near BCNM entry points along designated routes.

This document is intended to serve as a blueprint for management recommendations and strategies. Our goal in submitting this BCNM Sustainable Alternative is to ensure the monument planning process protects the area's resources, objects, and values for future generations and to give voice to local constituencies and cities. We formally request that the BLM and USFS analyze the impacts of the Sustainable Alternative during the National Environmental Policy Act process in developing a monument resource management plan and adopt this Sustainable Alternative as the core of any future management plan for BCNM.

Browns Canyon National Monument Sustainable Alternative Supporters

146 Taphouse
350 Central Colorado
350 Colorado
A Church
Absolute Bikes
Adobe Park Productions
American Whitewater
Arkansas River Outfitters
Association, representing
29 outfitters
Arkansas Valley Digital
Imaging
Backcountry Hunters and
Anglers
Badfish SUP
Bald Mountain Electrical
Benson's Tavern
Blue Collar Projects
Boathouse Cantina
Braveheart Properties
Café Dawn
Central Colorado
Conservancy
Chaffee County
Circle R Hotel
City of Salida
CO Creative LLC
Collegiate Peaks Chapter
of Trout Unlimited
Colorado Committee of 3
Million
Colorado Headwaters
Colorado Mountain Club
Colorado Trout Unlimited
Conservation Colorado
Conservation Lands
Foundation
Defenders of Wildlife
Dolores River Boating
Advocates
Ecoflight
Elements Composting
Elevation Beer Co.

Evergreen Café
Eye Candy
Fat Tees
First Street Flooring
Friends of Browns Canyon
Friends of Fourmile, a
chapter of the Greater
Arkansas River Nature
Association (GARNA)
Fritz Restaurant
Geosphere International
Great Western Storage
Grit and Thistle Film Co.
High Country Conservation
Advocates
Hittle Landscape Architects
Huddle 4 the Environment
Hunnicut Properties
Hunt to Eat
Itty Bitty Lakes Gallery
jalaBlu Yoga
Kaleidoscope Toys
Katie Maher Fine Art
Lifestream Water Systems
Little Cambodia
McCoy & McCoy, Inc.
Moonlight Pizza
Natural Habitats Design
Oak Construction
On Time Builders
Palace Hotel
Phreckles Photography
Pinon Vacation Rentals
Poncha Mini Storage
Pure Greens
Riverboat Works
Rocky Mountain Live
Rocky Mountain Wild
Rok Skool
Roxy's Bottle Shop
Salida Chamber of
Commerce, representing
524 local businesses

Salida Business Alliance,
representing 57 local
businesses
Salida Dental Hygiene
Salida Dermatology
Salida Fly
Salida River Adventures
Salida Mountain Sports
Salida School of Stringed
Instruments
Salida Walking Tours
Sierra Club Colorado
Chapter
Simple Foods
Soulcraft Brewing
State Farm
Stone Media
SubCulture Cyclery
Sunshine Apothecary
Susan Mayfield Art
Sutty's Records and Art
Tanda CAD Drafting
Taylor, Julie, Turret resident
The Firefly Restaurant
The Hodgepodge
The Iron Shop
The Lettucehead Company
The Link School
The Mixing Bowl
The Trailhead
The Wilderness Society
Tim Brown Photography
Town of Buena Vista
Turret HOA
Vely Agency
Veterans Expeditions
Wenham Design
Western Resource
Advocates
Western Slope Conservation
Center
Wild Connections
Wilderness Workshop
Wood's Distillery

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Acronyms and Abbreviations

ACEC	Area of Critical Environmental Concern
AHRA	Arkansas Headwaters Recreation Area
BCNM	Browns Canyon National Monument
BLM	U.S. Bureau of Land Management
FLPMA	Federal Land Policy and Management Act
LRMP	Land and Resource Management Plan
NCA	National Conservation Area
NEPA	National Environmental Policy Act
NFMA	National Forest Management Act
NLCS	National Landscape Conservation System
OSV	Over-snow vehicle
Proclamation	Presidential Proclamation 9232, establishing Browns Canyon National Monument
RMP	Resource Management Plan
ROW	Right-of-way
SRP	Special recreation permit
UAV	Unmanned aerial vehicle
USFS	U.S. Forest Service
VFMP	Voluntary Flow Management Program
VRM	Visual Resource Management
WSA	Wilderness Study Area

I. Introduction

The purpose of this document is to describe the resources, objects and values that require protection under the Feb. 19, 2015, Presidential Proclamation 9232 (referred to throughout this document as “the Proclamation”) establishing Browns Canyon National Monument (BCNM). This document provides recommendations for the responsible management and protection of monument resources in the development of the BCNM Resource Management Plan (RMP).

II. Background on Sustainable Alternative

A. Purpose for Sustainable Alternative

The Sustainable Alternative was developed with collective input from various stakeholders, including local residents and landowners, business owners, local ranchers and agricultural operators, local and national public interest groups, and public land experts, who represent diverse perspectives in the management and protection of BCNM. This proposal was developed through a consensus-based process that (1) identified key resources, land uses and values within BCNM and (2) formulated recommendations for the consideration of U.S. Bureau of Land Management (BLM) and U.S. Forest Service (USFS) staff in the continuing process of developing a BCNM RMP.

This document is representative of the views of a large cross-section of the community in and near Salida and Buena Vista, Colo. Overall, it represents the goals of the broader community in advocating for the protection of the area as a national monument and the implementation of the Proclamation.

B. General Parameters to Sustainable Alternative

This alternative is consistent with the limitations expressed in the Proclamation with regard to valid existing rights and other specified rights or authorizations. This alternative does not support altering valid existing water rights, agreements governing the management and administration of Arkansas River flows, existing grazing permits or leases, the rights of any American Indian tribe, the State of Colorado’s authority with respect to fish and wildlife management, or valid existing easements, including the railroad corridor.

Generally speaking, the Sustainable Alternative does not cover issues related to the Arkansas River, including Arkansas Headwaters Recreation Area management of recreation along the river corridor.

The Sustainable Alternative does not capture all areas of interest of the undersigned parties. Each signatory may also submit individual comments – through the BCNM planning process and other related planning processes – that must be considered by the federal agencies.

III. Basis for BCNM Management

The Federal Land Policy and Management Act (FLPMA) requires the BLM to manage public lands under multiple-use principles unless an area has been designated by law for specific uses, in which case the BLM must manage the land for those specific uses [43 U.S.C. § 1732(a)]. In the context of BCNM management, this means that Proclamation 9232, which established BCNM, shall take precedence over provisions of FLPMA's multiple-use mandate.

Pursuant to the legal authority granted by Congress in the Antiquities Act of 1906 (16 U.S.C. §§ 431-433), President Obama designated BCNM for the explicit purpose of protecting and preserving identified historic and scientific objects. Accordingly, the standard approach to multiple-use management does not apply to this monument, and any effort to adopt such a management approach to the detriment of its natural and cultural objects and values would be in violation of the Proclamation and the mandates of FLPMA. The BLM must manage the monument for the protection and preservation of its natural, cultural, historic and scientific values. Other than activities needed for protection of monument objects, the BLM must not allow uses in BCNM that conflict with the directives of the Proclamation.

Because of its significance, which merited designation as a national monument and inclusion in the National Landscape Conservation System (National Conservation Lands), the monument requires different management from other BLM lands. The designation of national monuments, together with the establishment of the National Conservation Lands, represents the cornerstone of a new era in land stewardship, in which BLM focuses on a mission of stewardship to: “conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations” [16 U.S.C. § 7202 (2009)].

As stated in the Proclamation, BCNM will be co-managed by the USFS and BLM. According to the agencies, with respect to USFS lands, the BCNM planning process intends to result in an amendment to the current Pike and San Isabel National Forests and Cimarron and Comanche National Grasslands Land and Resource Management Plan (LRMP), which was completed in 1984. (See Browns Canyon Planning Assessment, Feb. 2018, p. 7). Because the existing LRMP is one of the oldest in the country, completed 35 years ago, this approach in the BCNM planning process would undoubtedly require significant changes to the existing 1984 LRMP.

As an alternative approach and as previously stated in Friends of Browns Canyon and The Wilderness Society's comments on the Planning Assessment, submitted in September 2018, it is much more efficient and straightforward to develop the monument management plan under the USFS 2012 planning regulation rather than trying to stitch 2012 rule amendments into a 1982 rule plan. We strongly believe that approach would lead to confusion and potential disagreements over guiding direction. As previously highlighted in the September 2018

comments, we suggest the BCNM planning effort should be a complete and thorough process under the National Environmental Policy Act (NEPA), simultaneously abiding by all current BLM and USFS planning requirements.

The most important aspect of this planning effort is ensuring that the objects that this area was designated to protect are conserved, protected and restored over the life of the plan. While discretionary uses may be allowed to continue if compatible with that charge, the agencies must limit or prohibit such uses if they conflict with the values that the area was designated to protect.

In preparing a management plan for BCNM, the agencies must ensure they have a current inventory of resources, consider the uses of these lands as stated in the Proclamation and consider public input. The FLPMA and National Forest Management Act (NFMA) encourage and provide the agencies authority to consider and implement recommendations suggested in the BCNM Sustainable Alternative.

Providing meaningful opportunities for public involvement in the planning process not only increases the efficiency of the planning process, but is also a necessary step for the managing agencies to fulfill their statutory obligations under NEPA (42 U.S.C. § 4321 et seq). This community-based Sustainable Alternative fits squarely within the mandated public process. It is reasonable, reflects the requirement and intent of the Proclamation, is based in science, is distinct from the agencies' recommendations in the Planning Criteria Report, and is feasible for BLM and USFS personnel to implement. We respectfully suggest the agencies include this alternative for detailed analysis in the BCNM RMP.

IV. General Management Considerations

The Proclamation established BCNM to preserve “prehistoric, historic, and scientific values” by protecting “objects of historic or scientific interest.” These objects are summarized in Appendix B. The monument was designated to protect these objects and values and provide for their proper care and management.

The entire monument, with particular emphasis on the roadless and wilderness quality lands, must continue to be protected for its rural and remote character. The management prescriptions proposed throughout the Sustainable Alternative seek to maintain and protect this character. These Sustainable Alternative recommendations are based upon the best available data, including that provided in previous BCNM public documents, firsthand knowledge (contributed by numerous local stakeholders participating in its preparation) and historical documentation. These recommendations, including some that pertain to public lands adjacent to the monument boundary, represent the most practical and effective actions available to preserve the monument’s “prehistoric and historic legacy and maintain its diverse array of scientific resources,” as required by the Proclamation.

All undesignated non-system travel routes within the monument should be inventoried by the agencies. Following the inventory process, the agencies should effectively close (using signage and physical barriers as needed) and decommission or restore (actively or naturally) the identified non-system routes as necessary. In limited instances, the agencies should consider designating non-system routes as (1) system routes (proposed for a portion of the Austin Trail and for spurs with potential to be designated as scenic overlooks in the Aspen Ridge area) or (2) dispersed campsites (proposed along Aspen Ridge, with parking located in the 100-foot buffer between Aspen Ridge Road and the monument boundary). We have identified several routes through this process that should be closed as well as specific instances where the agency should conduct additional research for future management. (See Map A6.)

In general, the BLM and USFS, in collaboration with cooperating agencies, should provide enough professional staff and law enforcement officers to ensure compliance with BCNM regulations and pertinent laws. The monument should be managed to accommodate current and future uses. Most importantly, the agencies should be careful not to invite more activity than can be sustainably managed, such as by providing maintenance-intensive infrastructure, developments requiring frequent staff patrolling, and by undertaking high-visibility programs to promote visitation to the Monument.

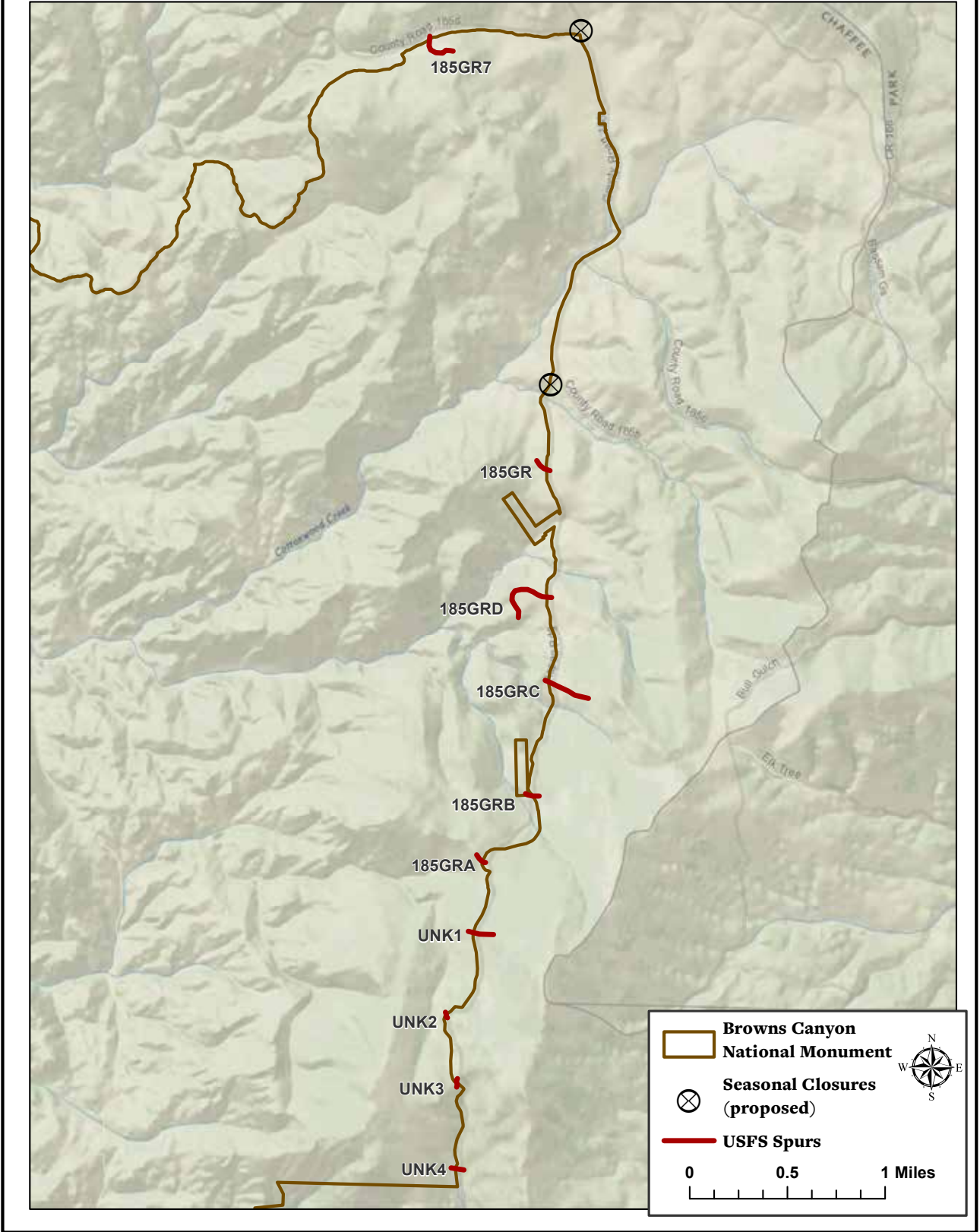
V. Management Zones

A. Proposed Management Zones

The BLM should consider delineating management zones for the entire monument that emphasize certain types of management and experiences for the area as allocated in the RMP based on the Proclamation and the protection and restoration of the monument objects and resources. This allows for other management decisions, such as designated routes for travel or vegetation treatments, to be based on the criteria for that zone. This is also a good way of integrating recreation goals and experiences into the RMP, particularly for management plans for areas included in National Conservation Lands, that include a visitor experience element throughout the entire planning area. Management zones are broadly defined landscapes that describe the type of uses and experiences that will be expected in the specific areas.

There are several examples where the BLM has defined these types of management zones in RMPs. One is the Grand Staircase-Escalante National Monument (GSENM) Management Plan. In this plan, the BLM describes four zones to “provide guidance to help define permitted or excluded activities and any stipulations pertaining to them.” [See GSENM Management Plan, p. 8 (Nov. 1999)]. These zones include: Front Country, Passage, Outback and Primitive zones. The general purpose for visitor experience is unique to each zone, and each zone also has management prescriptions – such as visual resource

Browns Canyon National Monument USFS Spurs



Map A6: Inventory of FS 185 spurs in the BCNM Aspen Ridge area.

management, infrastructure or vegetation management – based on those purposes. (See GSENM Management Plan, pp. 8-9). As stated in the GSENM Management Plan,

Management zones are used in this Plan to display various management emphases and strategies that will best fulfill the established purposes of the Monument and the overall vision. ... These zones, which are delineated by geographic area, provide guidance to help define permitted or excluded activities and any stipulations pertaining to them. In this context, zones are tools that guide decision making on permitting visitor uses and other activities within the Monument.

Another example is the Craters of the Moon National Monument RMP, which includes the Front Country, Passage, Primitive and Pristine zones for the entire planning area. (See Craters RMP, pp. 13-14.) The plan describes the use of zones as a useful way to guide decisions to meet desired conditions for each issue addressed in the plan.

Other management zones for the planning area that BLM has used include titles like “Rustic” and “Wilderness” zones or can parallel labels for RMZs that are designated in Recreation Management Areas. There is currently no standard way to create management zones for a planning area; they are often based on the needs and uses of that particular area. However, once designated, zones can provide guidance not only for travel and transportation management decisions, but also for the management of other resources and management prescriptions, such as visual resource management classifications.

In order to identify management zones for the monument, we completed an analysis of the monument objects of interest and overlaid this with known areas of recreation and areas of interest to delineate the following areas: Front Country, Passage, Backcountry and Primitive zones.

In completing this zoning exercise, we recommend management prescriptions for each zone that represent the purpose of that zone. (See Map A1.) The BLM and USFS should consider designating the following management zones and prescriptions for BCNM.

1. Front Country Zone

The focal point of the Front Country Zone is visitation by providing infrastructure and visitor support services in popular day-use areas. Active management will be more necessary than in other zones. Access is easy and convenient, and the encounter rate is very high. High maintenance and intervention will be required to accommodate concentrated visitor use. Opportunities for challenge and adventure are less important compared to other zones. Education and interpretation will focus on the monument objects of interest and resources or for public safety (e.g., Ruby Mountain, Hecla Junction).

2. Passage Zone

The purpose of the Passage Zone is to provide travel routes which receive use as throughways to allow access to other zones and trailheads or for administrative purposes. The Passage Zone can also provide recreational opportunities, particularly the Arkansas River Passage Zone. Rudimentary facilities should be provided as necessary to protect resources, educate visitors about monument features and enhance public safety. This may include parking, trailheads, primitive campsites, and information kiosks or signs (e.g., the area near the Arkansas River corridor, FS 184, CR 194, CR 300).

3. Backcountry Zone.

The Backcountry Zone provides a less developed, self-directed visitor experience while accommodating motorized and non-motorized access on designated routes. Management is generally passive. Facilities are rare and provided only where essential for monument object and resource protection. Administrative control and the need for maintenance should remain moderate, with trail and route markers as well as designated parking and staging areas. The density of routes may be low to medium in select areas. Other non-motorized routes may exist in these zones at low densities. There will be a low to moderate chance for encounters with other people (e.g., trailheads in the northwest corner of the monument and the Aspen Ridge area).

4. Primitive Zone

The purpose of the Primitive Zone is to provide undeveloped, self-directed areas that serve quiet-use and non-motorized recreation in a primitive setting. Management should generally be passive and consistent with the management of wilderness quality lands. These areas generally have sensitive monument objects and resources; therefore, should have a low density of low-standard, multi-use, non-motorized trails. There will be a low chance for encounters with other people (e.g., the area east of the Arkansas River that is outside of backcountry and passage zones, including the WSA, the area west of the Arkansas River and the area near Stafford and Railroad gulches).

5. Recommendations

The BLM and USFS should designate management zones as proposed in this alternative to help guide management decisions and prescriptions in the RMP based on the protection of monument objects, resources and values. The BLM and USFS should release preliminary maps of management zones for public comment prior to issuing the draft BCNM RMP. The proposed allocation of these various zones throughout the monument is depicted in Map A1. The BLM and USFS should ensure capacity to enforce and manage the zones as designed, especially in areas with new facilities and areas where the ability to enforce the management plan is a top concern cited by the citizens team.

B. Changes to BLM-proposed RMZs

As previously stated, we strongly recommend the agency utilize the proposed management zones suggested above. However, if the agencies choose to retain the proposed RMZs suggested in the BCNM Planning Criteria Report (Appendix A, Map 10), we recommend the following changes to those RMZs.

1. Monument Backcountry – River West RMZ

The western boundary of BCNM should be surveyed and adjusted, as needed, using cadastral mapping. The area should also be surveyed to better understand its resources and evaluate potential future usage. (See Planning Criteria Report, p. 40, and Appendix B, pp. 4-5.)

2. Arkansas River Shore and Bench RMZ

The geography of the Arkansas River Shore and Bench RMZ, as proposed by the agencies in the planning criteria report, varies significantly from the shore area to the bench area. The Arkansas River Shore and Bench RMZ boundaries should be shifted to where the Bench and Turret trails split. This would make the eastern part of the zone part of the Backcountry – River East RMZ, since not many people travel past where the Bench Trail ends. (See Planning Criteria Report, p. 38, and Appendix B, p. 1.)

3. Monument Backcountry – River East RMZ

The Monument Backcountry – River East RMZ should maintain its primitive setting, including no new trailheads or other facilities, and trail management should focus upon resource protection rather than development.

No maps or information should be made available onsite within this area, and staff presence should be minimal in this area. Signage in backcountry and primitive zones should be minimized and should primarily be for visitor safety and resource protection.

FS 1435, a non-motorized system trail, should be shifted to be included in the Backcountry – River East RMZ. The agencies should manage for issues at the current FS 1435 trailhead,



The trailhead for FS 1435, a non-motorized system route, shows evidence of motorized access. Even though the motorized trespass was not recent, the slow rate of revegetation demonstrates the delicate nature of this high-elevation environment; hence, the need for agency attention at the current FS 1435 trailhead, including placement of barriers and/or signage as needed to limit motorized access and implement seasonal closures.



This view from FS 185 spur 185A (see Map A5), encompasses the southern Sawatch Range from Mt. Princeton in the north (right) to Mt. Shavano in the South. From this vantage point, visitors can see the Continental Divide, the highest mountain range in Colorado, the Chalk Cliffs, and the unique geologic features of BCNM, demonstrating the cultural value of providing an accessible scenic overlook at this established site.

including barriers and/or signage as needed to limit motorized access and implement seasonal closures. (See Planning Criteria Report, p. 39, and Appendix B, pp. 3-4.)

4. Aspen Ridge RMZ

There should be no new trails or trailheads in the Aspen Ridge RMZ, except for designating system routes for potential scenic overlook(s), accessible by foot only, in places already suitable. (See Sustainable Alternative maps A5 and A6 for additional information.) The USFS should conduct additional research to explore the potential for these scenic overlook(s). Any new parking or pull-offs along Aspen Ridge Road should be located outside the BCNM boundary, to the west of Aspen Ridge Road, in the 100-foot buffer section. (See Section X.B.1 for more details.)

The area must be surveyed for monument objects and resources prior to the agencies considering any development within the monument's boundaries (e.g., new overlooks and trails). The addition of any scenic overlook(s) will be subject to appropriate NEPA process.

The agencies should aspire to the principle of accessibility for visitors with varying capabilities, including visitors with limited mobility, when considering

new scenic overlook trails with a designed use of hiking. (See Planning Criteria Report, p. 41, and Appendix B, p. 5.)

5. Railroad Gulch RMZ

The Railroad Gulch RMZ should be managed to maintain the area's natural and wild qualities while providing necessary information and amenities, including parking in the proposed location along the Austin Trail outside of the monument's boundary for people to visit with respect. This includes minimizing the potential for conflict between visitors and local residents (as related to Planning Criteria Report, p. 42, and Appendix B, p. 6).

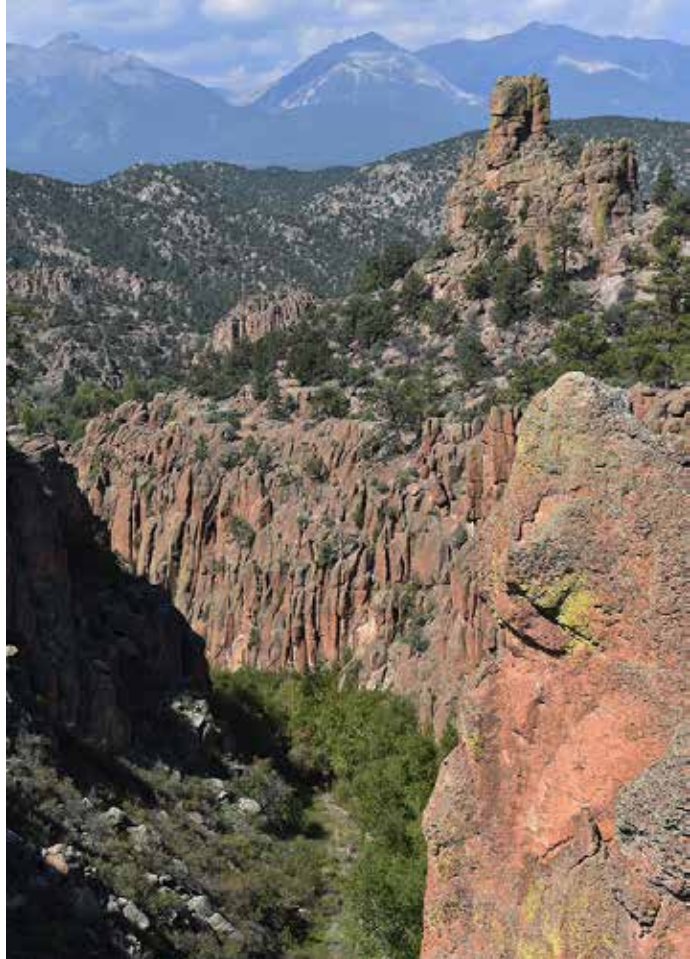
VI. Inventory of Cultural Resources and Monument Objects

The agencies should prioritize further inventorying for monument resources. The monument must be protected to conserve these resources, and it is vital for the agencies to have accurate and detailed information about where certain objects exist. The management actions that are ultimately proposed in the BCNM management plan should reflect the results of such inventories.

A. Cultural

1. Background

The Browns Canyon area of the Upper Arkansas River Valley has long offered both a permanent source of water and a means of transportation for its human inhabitants. The area lies within the transition zone between the cultural traditions of the Great Basin and Plains peoples. As a transportation corridor where stable sources of subsistence resources could be found, both migrating people and permanent inhabitants left traces of their presence in



Railroad Gulch is one of the most iconic areas in BCNM. As such, it attracts visitors who currently risk unwittingly trespassing on private property and subsequent conflict with local residents due to the lack of adequate parking along the Austin Trail.

this area. Ancestors of the Ute, Apache, Eastern Shoshone, and Comanche Indians are known to have traversed this dramatic landscape while hunting and gathering. ...

While most archaeological resources in the Browns Canyon area have not yet been surveyed or recorded, the story of people living in the Upper Arkansas River Valley is told through artifacts dating back over 10,000 years (Presidential Proclamation 9232).

As stated in the Proclamation, the Browns Canyon landscape has provided a home for humans for over 10,000 years. While much of the area has not yet been surveyed for cultural resources, there are 18 known archaeological sites within BCNM, including five prehistoric open lithic sites that have been determined to be eligible for listing in the National Register of Historic Places.

Given the longstanding investment of tribal nations in the lands within BCNM, direct engagement with tribal nations regarding ongoing monitoring and management of cultural resources in the national monument is necessary to appropriately care for and manage monument objects. There are multiple examples across public lands in the U.S. of federal-tribal cooperation and co-management of public lands, such as Santa Rosa-San Jacinto Mountains National Monument in California and Kasha-Katuwe Tent Rocks National Monument in New Mexico. The BLM can look to these and other examples within the scope of existing law and policy to develop the best options for BCNM.

2. Objective

Management of cultural resources and cultural landscape values should be a cooperative effort that encourages collaboration among the BLM, USFS, tribal governments and local governments while respecting confidentiality and tribal sovereignty (as related to the Planning Criteria Report, pp. 14-15).

3. Recommendations

- The agencies should work closely with interested tribes to manage cultural resources and culturally significant sites appropriately.
- The agencies should develop a cultural resource management plan that includes a schedule for required inventories and incorporate the appropriate management actions based on those inventories into the BCNM RMP.
- Broad cultural landscapes and values, as well as more specifically defined sites and locations of cultural importance to tribes, should be addressed throughout the NEPA analysis.
- The agencies should work with tribes to identify which cultural sites are likely to receive (and are appropriate to receive) high-visitor traffic. The agencies should manage these sites using specific prescriptions.
- The agencies should work closely with interested tribes to manage cultural resources and culturally significant sites appropriately. The Sustainable Alternative supports the development of appropriate

educational and science-based programs related to these cultural resources within the national monument.

- The agencies should explore implementing educational programs and materials related to geology, minerals, paleontology and cultural-historical resources important to American Indian tribes. The Sustainable Alternative supports the agencies developing “educational programs and local on-site or community-based interpretation and media (e.g., tours, signs, pamphlets) to foster an appreciation for the unique resources of the region, to create opportunities for public viewing and appreciation of the resources, and to promote scientific and educational use” (as suggested in Alternative B of the Planning Criteria Report, p.16).

B. Biological Resources

1. Background

The area’s unusual geology and roughly 3,000 foot-range in elevation support a diversity of plants and wildlife, including a significant herd of bighorn sheep. ...

The topographic and geologic diversity of Browns Canyon area has given rise to one of the most significant regions for biodiversity in Colorado. ...

The plant community in this area has repeatedly evolved during periods of climate change since the Eocene Epoch. Geologic and climatic changes since the Precambrian have made the area an important site for research on geology and paleoecology as well as the effects of climate change, wildland fire, and other disturbances on plant and animal communities (Presidential Proclamation 9232).



The biological resources in BCNM include a herd of bighorn sheep as well as other wildlife species as well as a unique community plant species.

Browns Canyon National Monument is home to a vast variety of biological resources. These resources are listed in Appendix B, highlighting all the monument objects described in the Proclamation. Because the monument should be managed for the protection of these resources, it is important for the agencies to have a clear understanding of where biological resources are located and concentrated.

2. Recommendations

The agencies should prioritize inventorying and documenting the location and status of all of the monument's biological and ecological objects as well as any endangered or threatened ecological species within the monument.

C. Wilderness Characteristics

1. Background

The Browns Canyon area represents one of the only riparian ecosystems along the Arkansas River that remains relatively undisturbed and contains an intact biotic community (Presidential Proclamation 9232).

The Browns Canyon area is unique in that it is relatively untouched, undisturbed and intact as compared to much of the surrounding landscape. The BLM established the Browns Canyon Wilderness Study Area (WSA), now within the monument boundaries, in recognition of the undisturbed nature of this area. Similarly, the USFS recognizes the undisturbed nature of BCNM lands with a formal designation of the Aspen Ridge Roadless Area.

2. Recommendation

The USFS should use this opportunity to conduct inventory and evaluation for wilderness characteristics throughout all USFS lands in the monument. Because the Pike San Isabel National Forest Plan has not been updated since 1984, the current planning effort could qualify as a “significant amendment” under the NFMA [16 U.S.C. 1604(f)(4)]. As such, this is a prime opportunity to conduct wilderness inventory and evaluation in order to gather a clear understanding of the wilderness characteristics and values that exist within the monument. For all areas found to possess wilderness characteristics, the USFS should recommend management as wilderness.

VII. Special Designations

The BLM and USFS lands within BCNM have been subject to agency planning stretching over many years, including several Congressional efforts to establish Wilderness through the legislative process. These efforts have resulted in several special designations currently in force. The planning process for BCNM should not change any of these designations – the RMP should not override special designations but should consider them to be additional valid complementary layers guiding monument management.

A. Browns Canyon WSA

1. Background

Pursuant to longstanding BLM policy and as briefly highlighted on p. 10 of the Planning Criteria Report, the agency is obligated to continue to implement

measures to protect the wilderness values within the Browns Canyon WSA. There have recently been legislative attempts to generally reduce BLM WSA protection. For example, Representative Greg Gianforte (R-Mont.) recently introduced two bills to release WSAs on hundreds of thousands of BLM-managed acres in Montana. [See H.R. 5148 and H.R. 5149, 115th Cong. (2nd Sess. 2018).] Considering this political landscape, as well as the need for clear management prescriptions for future agency implementation, the BCNM RMP should proactively ensure preservation of the lands within the Browns Canyon WSA by clearly stating management protections for the area in the RMP.

2. Recommendation

The BCNM RMP should provide direction to manage the WSA as if it were designated as Wilderness, even if the WSA designation is released by Congress.

B. Aspen Ridge Roadless Area

1. Background

The USFS lands within BCNM have a long history of being considered for wilderness designation. Approximately 11,185 acres of USFS lands within the monument are designated as the Aspen Ridge Colorado Roadless Areas unit. (See Browns Canyon Final Planning Assessment, p. 7.) The Aspen Ridge Roadless Area is managed under the Colorado Roadless Rule. (See 36 C.F.R. 294, 81 Fed. Reg. 9181, Feb. 19, 2016.)

Similar to recent Federal legislative initiatives to release on WSAs, there are currently state-based pressures to remove roadless area protections. For example, Utah Governor Herbert recently petitioned the U.S. Department of Agriculture to revoke and rewrite the national Roadless Rule as applied to



The Aspen Ridge Roadless Area provides a uniquely undamaged landscape with wilderness qualities.

Utah's forests to open these lands to development. (See <https://governor.utah.gov/2019/03/01/utah-submits-request-to-the-department-of-agriculture-regarding-federal-land-maintenance> and https://ourforests.utah.gov/wp-content/uploads/2019/02/UtahRoadlessRulePetition_28Feb2019.pdf.) In light of these known and anticipated pressures, as well as the need for clear management prescriptions to be outlined in the RMP for future agency officials, it is important for the USFS to consider proactive management to preserve the wilderness character of the lands within the Aspen Ridge Roadless Area, such as those suggested in the following recommendations.

2. Recommendations

- The USFS should use the current planning process as an opportunity to recommend wilderness for the entirety of Aspen Ridge Roadless Area within the monument.
- The USFS should include language in the RMP, providing commitment to manage the Aspen Ridge Roadless Area under the same protections even if the roadless area designation were to be removed.

C. Lands with Wilderness Characteristics

1. Background

In order to possess wilderness characteristics, an area must “possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation” and can also contain supplemental values [BLM Manual 6310.06(C)(2)]. Through this planning process, BLM should recognize the wide range of values associated with lands with wilderness characteristics that supplement and benefit other resources for which the agency manages. Many of these resources within BCNM are specifically identified in Proclamation 9232 as purposes for which the monument was designated. These include scenic values, recreation, cultural resources, wildlife habitat, connectivity and riparian areas. Lands with wilderness characteristics are briefly discussed in the Planning Criteria Report (pp. 17-18).

2. Objective

The BLM should recognize the wide range of values associated with lands with wilderness characteristics, specifically those identified in the Proclamation, and manage for their protection.

3. Recommendation

The BLM should manage the lands identified on Map 3 of the Planning Criteria Report (p. A-3) as having wilderness characteristics, namely Railroad Gulch and Browns Canyon North – Ruby Mountain for their wilderness values. This is consistent with the Sustainable Alternative's recommended Primitive Management Zone, which covers both of these areas. (See Section V.A.)

D. Areas of Critical Environmental Concern

1. Background

In 1993, the Browns Canyon Area of Critical Environmental Concern (ACEC) was recommended for designation for its unique natural character. The area was designated as an ACEC in 1995 and included in the 1996 Royal Gorge Field Office RMP. The area is known for its primitive and water-related recreation that highlights Browns Canyon's unique natural character and scenic and visual qualities. Additionally, the bluffs within Browns Canyon have significant raptor values and provide bighorn sheep habitat. (See Royal George Resource Area, Draft Resource Management Plan and Environmental Impact Statement, Appendix K, p. K-2, Sept. 1993.) The 1996 Royal Gorge RMP states that wildlife values within the Browns Canyon ACEC will be enhanced (pp. 3-18), protection of historical values and resources will be enhanced (pp. 3-23), and archaeological resources will be protected (pp. 3-24).

The obligations of the BLM with regard to ACECs under FLPMA remain in place in conjunction with the duties under the Proclamation. A critical aspect of the statutory language cited above is FLPMA's requirement that BLM "give priority" to ACEC designation and protection [43 U.S.C. § 1712(c)(3)].

Overlapping designations are common in BLM land-use planning, including for National Conservation Lands. For example, just a few of these include:

- Perry Mesa and Larry Canyon ACECs in the Agua Fria National Monument.
- High Rock Canyon and Soldiers Meadows ACECs in the Black Rock Desert – High Rock Canyon Emigrant Trails National Conservation Area (NCA).
- Cow Creek ACEC in the Upper Missouri River Breaks National Monument.
- Appellton-Whittell ACEC in the Las Cienegas NCA.
- Scotch Creek and Oregon Gulch ACECs in the Cascade-Siskiyou National Monument.
- Vekol Valley Grassland ACEC in the Sonoran Desert National Monument.
- Watermelon Mountains ACEC in the Ironwood Forest National Monument.
- San Rafael RNA, San Pedro River RNA and St. David Cienega RNA ACECs in the San Pedro Riparian NCA.

2. Recommendation

The BLM should maintain the Browns Canyon ACEC as it has been managed since 1996 with an emphasis on protecting wildlife and scenery in the area (in contrast to draft Alternatives B and C within the Planning Criteria Report, p. 11).

E. Wild and Scenic Rivers

1. Background

As stated in the Browns Canyon National Monument Final Planning Assessment:

A complete Wild and Scenic River Analysis for the Arkansas River was completed during the BLM's 1996 Royal Gorge RMP process. The Wild and Scenic River Study report was completed in 1992 as part of that process. ... An updated eligibility report was developed in 2015.

In both the 1992 and 2015 reports, all segments of the Arkansas River upstream of the Royal Gorge Park were determined to be eligible ... and met the criteria under the "recreational" classification. An updated suitability report has not yet been finalized but will be incorporated into the revised Eastern Colorado RMP (p. 225).

2. Recommendations

- In absence of protections as defined in Proclamation 9232 and elsewhere in the Sustainable Alternative, management should continue as it has operated, with suitable segments in the Eastern Colorado RMP, due to the continuous nature of the segment upstream and downstream of the monument.
- The agencies should highlight that the Proclamation and the Voluntary Flow Management Program (VFMP) both adequately address management for this river segment.



This view of the Sangre de Cristo Range and the aspen forest (for which Aspen Ridge is named) provides an example of BCNM visual resources.

VIII. Maintaining Wilderness Characteristics, Natural Values

A. Management for the Protection of Visual Resources

1. Background

Various federal laws, including NEPA and FLPMA, require that public lands be managed in such a way as to preserve scenic and aesthetic values. The BLM has created and codified a Visual Resource Management (VRM) system that allows for the identification and classification of a variety of visual values. (See BLM Manual 8400.) Visual resources are inventoried based on scenic quality, public sensitivity to disturbance, and distance from viewer (Manual H-8410-1) and assigned a class (I-IV) defining the level of permissible surface disturbance. In all cases where surface disturbance is to take place, effort should be taken to make the disturbance as low-contrast as possible (Manual 8431); however, the degree of contrast preferred will ultimately depend on the class of the resource being maintained, as defined by BLM Manual 8400.

2. Objective

Inventory visual resources within the monument by following the process outlined in BLM Manual H-8410-1 (1986).

3. Recommendations

- Land with pre-existing management requirements – WSAs, ACECs, and Roadless Areas, etc. – should receive Class I designation, allowing only minimal, if any, surface disturbance. This is pursuant to BLM Manual 6330 and is consistent with management under other RMPs.
- For areas outside of special designations, resource managers should determine visual resource classes, which correspond to the proposed Primitive, Backcountry, Front Country and Passage zones identified earlier in this document.
- Visitor infrastructure at points of interest should maintain a low contrast to the surrounding landscape while complementing the ecological, geological or historical nature of the site, regardless of the VRM classification of the surrounding terrain.

B. Rights-of-way and Utility Corridors

1. Background

Federal agencies may issue land use authorizations, including rights-of-way (ROWs) for the use, occupancy and development of BLM- and USFS-administered lands. Facilities that require ROWs include power lines, pipelines and roads. Surface disturbance activities associated with ROWs can negatively

impact the natural, cultural and historical resources, objects, and values of BCNM.

2. Recommendation

The entire monument should be managed as an ROW exclusion area, precluding any new ROW authorizations.

C. Night Skies Management

1. Background

Night skies unimpaired by light pollution are important for the role they play in visitor perception and experience as well as various ecological and natural processes. Additionally, preventing light pollution saves local residents and business owners money and prevents wasted energy. Night skies are briefly discussed on p. 25 of the Planning Criteria Report.

2. Recommendation

The agencies should actively manage the lands within and surrounding the monument to preserve night-sky resources. This would apply to activities and infrastructure within BCNM but may also include working with the local community to develop policies and actions that minimize or avoid light pollution and glare within BCNM from sources outside of the monument.

D. Soundscapes

1. Background

Soundscapes are managed by the BLM as part of their Air Resource Management plan (BLM Manual 7300), authorized through FLPMA's requirement to "maintain an inventory of all public lands and their resources." The FLPMA makes specific mention of noise as a source of pollution in directing the agency to "provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards." The agency's Air Resource Management plan requires the impacts of noise be considered when development may affect sensitive resources such as wildlife, heritage resources and special value areas like WSAs, ACECs or National Conservation Lands. However, there is no systematic process by which BLM evaluates the impact of noise or through which the agency can promote natural soundscapes.

The U.S. National Park Service has robust management practices for measuring and administering soundscapes and noise pollution that can serve as a starting point for developing a sound management practice in the monument. (See <https://www.nps.gov/subjects/sound/index.htm>.) Soundscapes are briefly addressed in the Planning Criteria Report, p. 26.

2. Objective

Inventory the monument's soundscape and define allowable levels of noise pollution.

3. Recommendations

- Identify and map locations of natural and cultural resources within BCNM (pursuant to inventory recommended in Section VI, above) that may be sensitive to the impacts of noise. Sites may include primitive and wilderness quality areas, which have minimal to no human-source noise present, American Indian cultural areas where noise intrusion would be culturally inappropriate, wildlife areas where sound may have negative impacts, etc.
- Utilize the zoning designations (Backcountry, Front Country, etc.) to describe the maximum allowable amount of human-source noise in each area.
- To the extent possible, the agencies should complete sound modeling to assess management alternatives for the effects of noise on recreation and wildlife.

E. Vegetation

1. Invasive Species Management

a. Background

The spread of invasive species poses a significant threat to conservation values. Invasive species management is addressed in the Planning Criteria Report, p. 19-24.

b. Objective

The agencies should focus on preventing the introduction of invasive species within the monument.

c. Recommendations

- The agencies should explore and implement requirements around visitors using local firewood, weed-free hay for horses and other specific measures as necessary to prevent the introduction and spread of invasive species.
- In the event the agencies determine manual or chemical control of invasive species is required, no spraying of herbicides or pesticides via aircraft should be allowed in BCNM. Any use of all-terrain vehicles to apply herbicides and pesticides should be limited to designated routes, subject to seasonal closures (in contrast to Alternatives B and C in the Planning Criteria Report, p. 21).

2. Restoration

a. Background



This mountain bluebird is just one example of the wide range of bird species found in BCNM.

The 15-Year Strategy for BLM Conservation Lands names restoration of landscape values as being one of the highest priorities in planning and management for National Conservation Lands. BLM Manual 6100 states, “Where practicable, habitat rehabilitation within NLCS [National Landscape Conservation System] units will be accomplished with native plant materials appropriate for restoring or

improving native habitat. In general, native plant materials should be sourced as locally as possible.” [See BLM Manual 6100 at 1.6(N)(6).]

b. Objective

The agencies should explore opportunities to restore the monument’s resources and values, consistent with the Proclamation.

c. Recommendation

Non-native species, including non-native sterile and non-persistent species, should not be used for restoration objectives.

IX. Protection of Wildlife

A. Background

Some of Colorado’s most emblematic animal species call Browns Canyon home. ...

The Browns Canyon area ... provides essential habitat for mammals and birds alike and attracts hunters and wildlife viewers. ...

The area also provides habitat suitable for peregrine falcons, which have been identified for possible future reintroduction here, as well as potential habitat for the threatened Canada lynx. ...

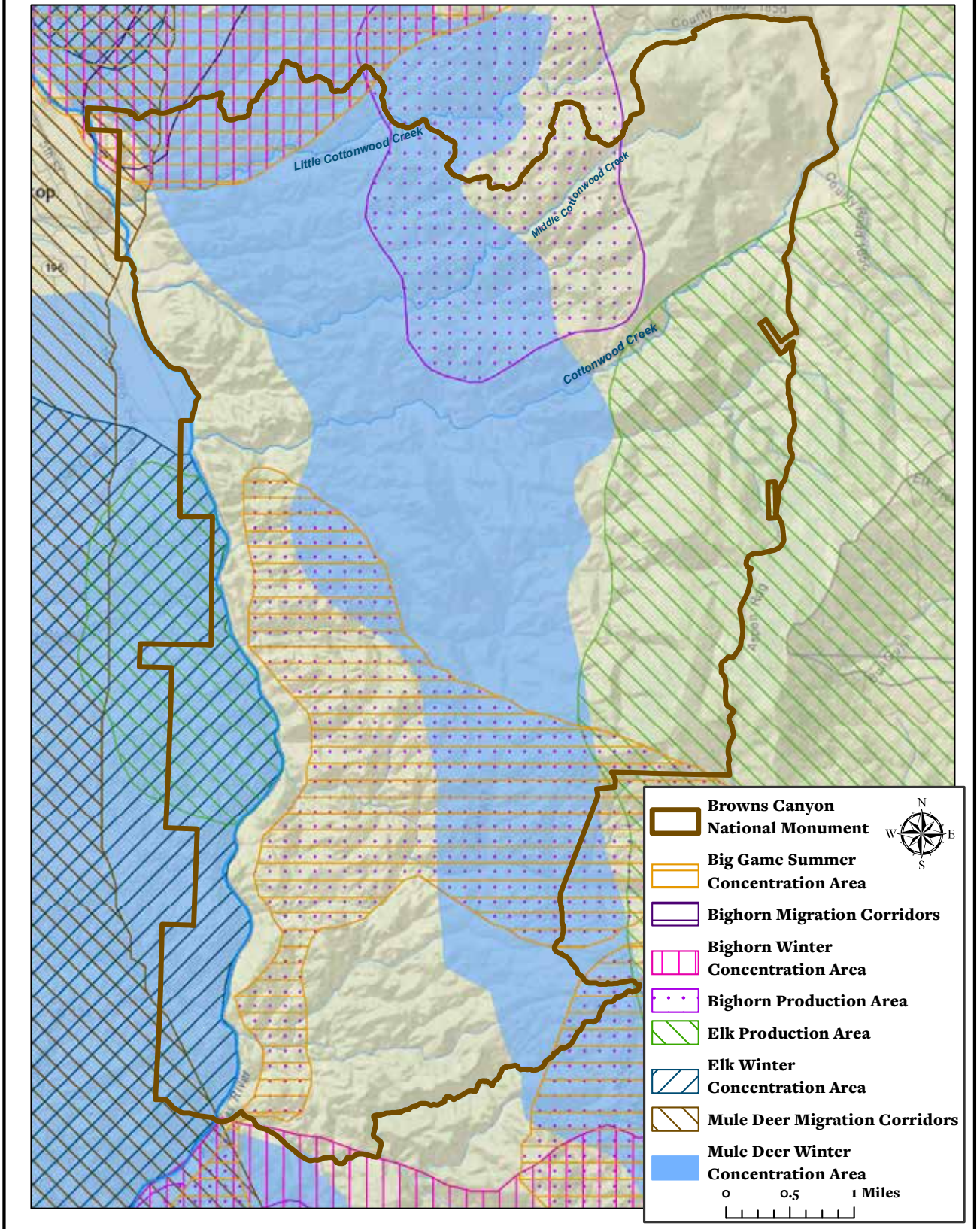
A stunning diversity of other bird species ... attract(s) ornithologists and bird enthusiasts alike to these remote hills (Presidential Proclamation 9232).

As highlighted previously, a large portion of the Proclamation describes the monument’s varied wildlife species, their habitat and the importance of ecological connectivity within BCNM. The current management planning process presents a critical opportunity for the agencies to inventory, monitor and appropriately manage for wildlife within the monument.

B Objective

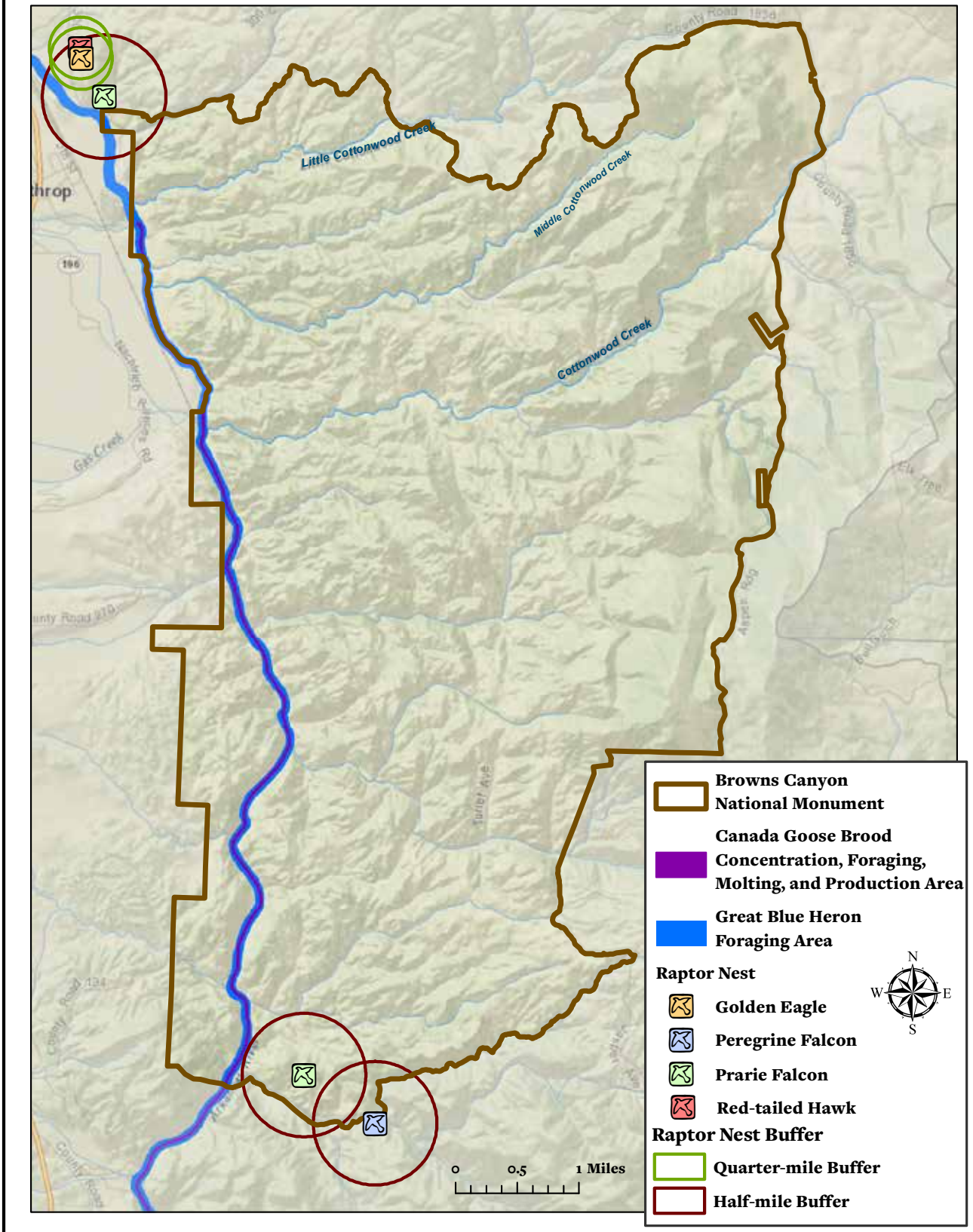
Formalize a monitoring and management program to maintain healthy wildlife populations.

Browns Canyon National Monument Big Game Seasonal Range



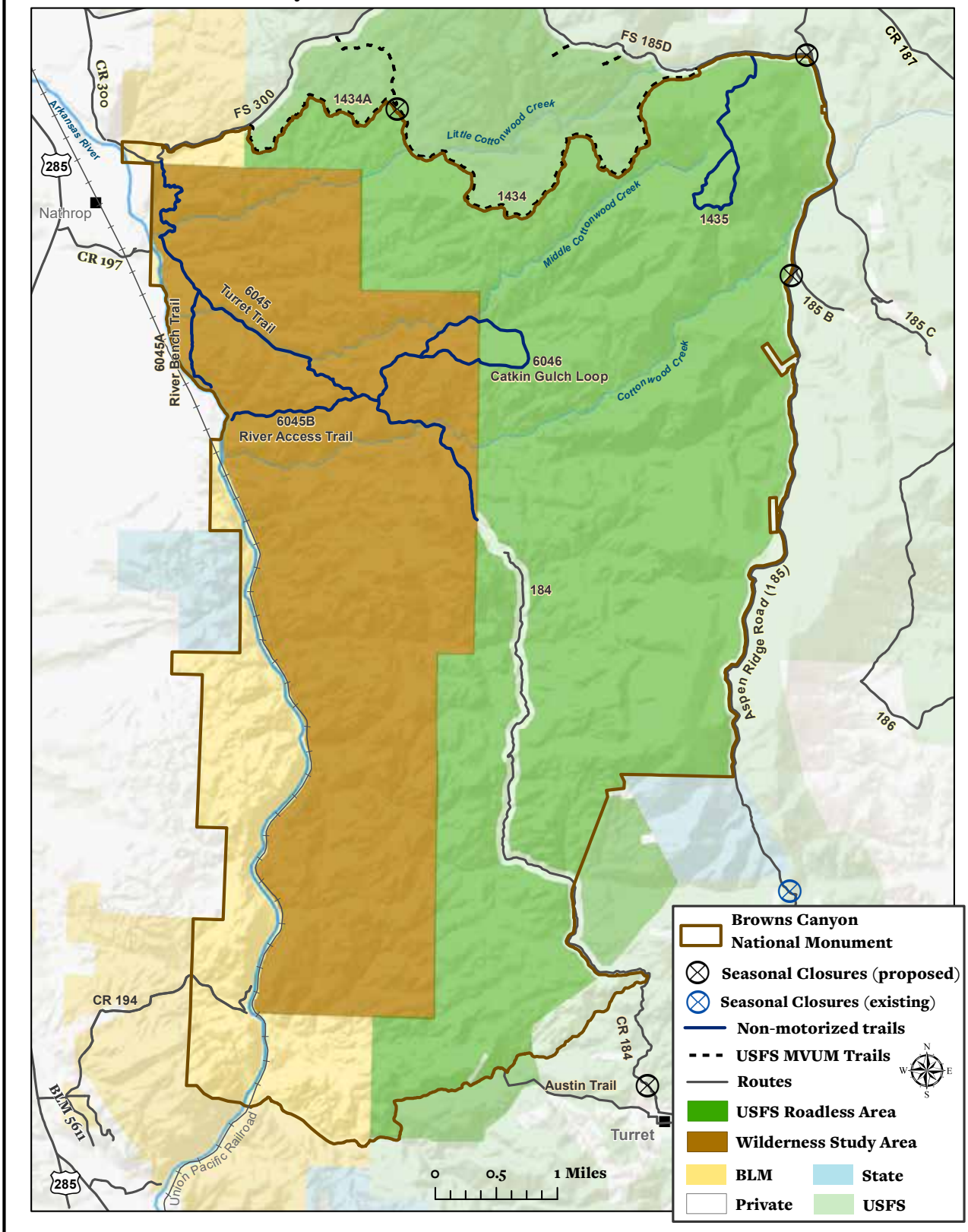
Map A3a: Big Game Seasonal Range within BCNM.

Browns Canyon National Monument Raptor and Waterfowl Habitat



Map A3b: BCNM Raptor Nesting Sites.

Browns Canyon National Monument Routes & Trails



Map A2: BCNM Minimum Route Network map showing proposed seasonal closure gates.

C. Recommendations

- The BCNM plan should adopt planning and decision-making processes (including data collection, analysis and monitoring) that employ measurable planning objectives at multiple biological scales (i.e., wildlife populations, habitat and ecosystem conditions) to ensure viable wildlife populations are sustained.
- Sensitive wildlife habitat should be defined as including raptor nesting areas, big game winter concentration areas, elk and bighorn sheep production areas, fall black bear concentration areas, and other significant and priority habitat areas. (See Maps A3a and A3b.)
- The agencies should particularly investigate raptor nest habitat for peregrine and prairie falcon to analyze potential impacts from visitation as well as potential restrictions to visitation, if necessary.
- The management plan should adopt a strategy of avoid, minimize and/or mitigate when considering management actions (especially new facility development) that may impact significant and priority wildlife habitats and locations. The preferred strategy to consider is avoidance, followed by minimization and mitigation if avoidance is not feasible.
- No new trails should be developed within big game winter range.
- The agencies should implement seasonal closures for special recreation permits and large group events within all sensitive wildlife habitat.
- Seasonal closure gates should be relocated to be more consistent with where travelers are coming from and include realistic places for visitors to turn around (e.g., FS 184, FS 185, FS 185D). (See Maps A1 and A2 for more information.)

X. Maintaining and Managing for Recreation

A. Addressing Increased Visitation and Recreation

1. Background

Browns Canyon National Monument provides world-class recreation opportunities and is frequently accessed by members of the local community as well as visitors from surrounding cities and towns, including Colorado's Front Range population. As noted in the previously published socioeconomic report, Colorado's population is steadily increasing and is expected to continue to increase into the foreseeable future. [See Browns Canyon National Monument Socio-Economic Baseline Assessment, pp. 9-10 (April 2018).] As such, additional visitation is expected to occur within the monument, with emphasis on Front Country and Backcountry sites (as mentioned in the Planning Criteria Report, pp. 36-44).

2. Objective

The agencies should adequately plan for and have the necessary resources to provide sustainable access to the monument.

3. Recommendations

- Additional interpretive resources, developed in collaboration with interested tribal governments, and signage should be developed to manage for expected increase in visitation.
- The agencies should create informational kiosks near BCNM entry points along designated routes. There should be interpretive materials, brochures and maps of the resources in the monument available for visitors. This would be particularly beneficial for Front Country sites.
- The agencies should monitor specific locations that see high visitation and continue to build a database of baseline information to inform triggers that will identify if overuse is becoming an issue.
 - Examples of triggers for overuse: development of new campsites, loss of vegetation cover, clearing land for firewood, increase in bare ground, soil compaction, erosion, decreased wildlife counts and viewing, etc.
- There should be clear signage and education for visitors on rules regarding waste at trailheads and at other locations the agencies determine to be necessary due to impacts.
- Waste receptacles, including pet-specific waste signage should be placed at Front Country sites (Ruby Mountain and Hecla Junction).
- Agencies should provide adequate resources to enforce monument policies and prescriptions, possibly using a similar model to the AHRA.

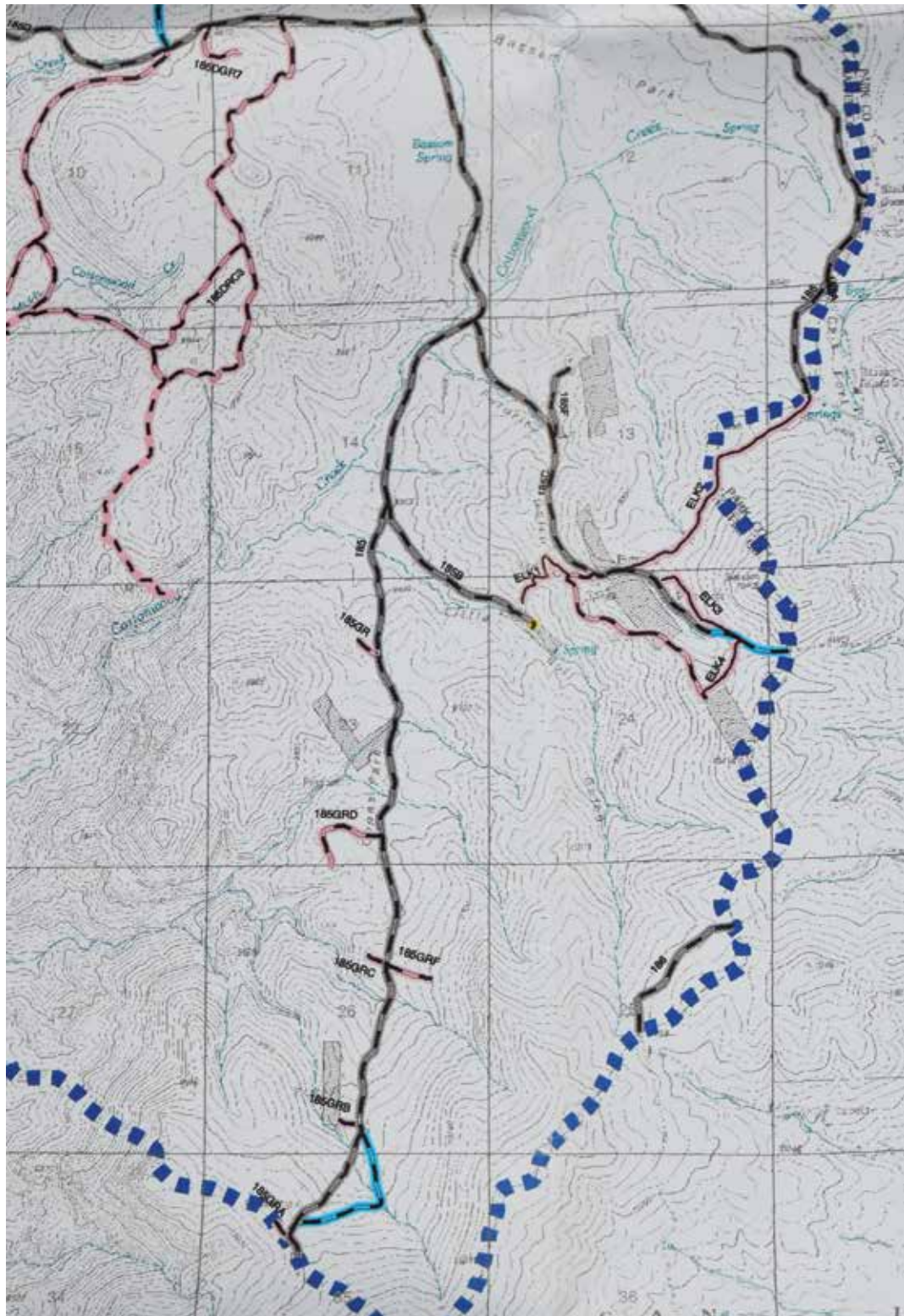


This undesignated campsite is one of several along FS 185 (Aspen Ridge Road). Converting some of these designated campsites and installing permanent fire rings would provide camping opportunities while limiting impacts such as proliferation of fire rings and additional undesignated campsites.

B. Dispersed Recreation

1. Camping

a. Background



Map A5: Detail from a USFS Fourmile Travel Management Plan map (Feb. 28, 2002) showing the northeastern corner of BCNM west of FS 185. The map documents historical use of FS 185 spurs with USFS designations. Additional spurs exist further south, and most of these sites would be appropriate for designated uses with parking permitted within 100 feet of the roadway.

Camping provides various health benefits and is part of an American tradition of spending time in our nation's public lands. Camping provides an opportunity to engage communities, families, businesses, visitors and organized groups to experience BCNM and continues to raise the profile of protected public lands in the area. There are already formally developed designated campsites within the Ruby Mountain and Hecla Junction areas. There is also general dispersed camping, subject to existing agency regulations, in the land surrounding the monument (e.g., USFS lands east of Aspen Ridge Road). There are currently at least nine undesignated dispersed sites, five of which are shown in Map A5, that we have documented to exist west of Aspen Ridge Road (i.e., sites that contain existing fire rings and in many cases evidence of recent visitation). These sites exist either within the 100 ft. buffer between the BCNM boundary and FS 185 or past the 100 ft. buffer and within the monument itself. (See Map A6.)



This designated campsite is at spur 185GR west of FS 185 (Aspen Ridge Road). Establishing more designated campsites along FS 185 within the 100-foot buffer between the road and the monument boundary would minimize impacts to monument objects.

b. Objective

Provide opportunities for individuals, families and organized groups to experience the BCNM through a range of overnight camping experiences, from developed campgrounds to dispersed primitive camping, while prioritizing efforts to ensure that camping is done in a sustainable manner, providing necessary resources, education and support for appropriate visitor behavior. The agencies must seek to minimize impacts to Monument resources by supporting camping just outside Monument boundaries and/or by establishing designated dispersed sites within the 100 ft buffer near Aspen Ridge road.

c. Recommendations

- All undesignated non-system travel routes within the monument should be inventoried by the agencies. Following the inventory process, the agencies should effectively close the identified non-system routes (using signage and physical barriers as needed) and decommission or restore (actively or naturally) the routes as necessary. In limited instances, the agencies should consider designating a few dispersed camping sites and potential scenic overlook(s) on spurs, with the requirement that parking be in the 100-foot buffer between Aspen Ridge Road and the monument boundary, and the sites being accessible by foot only.
 - Generally speaking, the agencies should prioritize designating pre-existing campsites with evidence of use (including existing fire rings) that are fully located within the 100-foot buffer

between the monument boundary and Aspen Ridge Road (FS 185), as camping impacts would be concentrated within the 100 ft. buffer, thereby minimizing impacts to monument objects.

- The agencies should work to clearly indicate with appropriate signage what campsites are within and outside of the monument as well as specific requirements that apply to the various locations.
- The agencies should designate dispersed camping sites, as appropriate, with clearly numbered posts at all designated camping locations, including Ruby Mountain, Hecla Junction and along Aspen Ridge. Designated camping areas should be enforced with adequate agency resources.
- Agency-constructed fire rings, fire bowls, or pits should be included at all designated campsites, whether in formal campgrounds or along roads (e.g., Hecla Junction, Ruby Mountain, Aspen Ridge Road); user-constructed fire rings should be prohibited at these specific designated dispersed sites.
- Except for within the primitive zone, all campfires should be within a contained structure. Within the primitive zone, the agencies should adopt wilderness fire policies for the primitive zones within the monument.
 - Wilderness fire policies include:
 - A lightweight backpacking stove is recommended. If a campfire is desired, build it in a manner that minimizes impact. Campfires should be at least 100 feet from lakes, streams and trails. Collect only dead and downed wood that is less than three inches in diameter. Only use wood that can be broken by hand.
 - Use existing fire rings. Dead wood removed from Krummholz (dwarf trees near timberline) affects their survival.
 - Do not build a fire on exposed rock surfaces to prevent scarring.
 - If possible, use a fire blanket or a fire pan (like a pan used to change motor oil). Place several inches of soil in the bottom of the pan and build the fire on this. Always use extreme caution and avoid building fires in dry or windy conditions.
 - If adverse impacts to monument resources and values occur due to visitation or camping, the BLM and USFS should have specific triggers in place to alert the agencies to implement additional actions to potentially limit or close specific locations to camping.
 - Examples of triggers for adverse impacts: impact to cultural resources or other monument objects, development of new campsites, proliferation of fire rings, increased illegal dumping, increased waste from campsites, loss of vegetation cover, clearing land for firewood, increase in bare ground, soil

compaction, erosion, decreased wildlife counts and viewing, etc.

C. Other Recreation

1. Rockhounding and Casual Rock Collection

a. Background

The creation of the Browns Canyon landscape is attributed to glacial movement that “filled the valley below with masses of sediment, including the gold, silver, and semi-precious gems that fueled the mining booms of the 1800s” (Proclamation 9232).

The Proclamation recognizes that “the garnets that lend their name to Ruby Mountain in the northern part of the Browns Canyon area, continue to interest professional and amateur geologists.” As such, the garnets, gems and other resources within the monument should continue to be protected and present for continued education and enjoyment.

b. Objective

Develop clear guidelines for rockhounding and casual collection within the monument to preserve the resources that BCNM was designated to protect.

c. Recommendations

- The collection of monument resources and objects, rocks and minerals, petrified wood and fossils, or other naturally occurring items should be prohibited at all locations within the monument aside from Ruby Mountain (as suggested in Alternative B in the Planning Criteria Report, p. 17).
- Within Ruby Mountain, garnet collection and rockhounding should be allowed at designated and signed locations. Agencies should develop and clarify specifications around “reasonable use” for rock collection. Suggested specifications include:
 - Collecting nothing for commercial use.
 - No fossil, artifact nor petrified wood collection or removal.
 - No cultural or historical artifacts or artifacts from prehistoric sites.
 - Collection limited to use of hand tools and picks.
 - No more than 25 pounds per day per person, and no more than 100 pounds by any individual in one year. Individuals may not pool daily nor annual limitations.

2. Drones

a. Background

There are now more unmanned aerial vehicles (UAVs) in the United States than manned aircraft. Recreational drone use is increasing exponentially, and

standards are needed to ensure the protection of wildlife and resources as well as public and agency safety. Flying UAVs is permitted on some BLM lands.

b. Objective

Ensure the protection of resources in BCNM, compliance with the Proclamation, as well as safety and visitor experience when considering management prescriptions for UAVs.

c. Recommendation

The use of drones and other UAVs should be prohibited in the monument. The only exception that should be considered is for emergency response purposes, including firefighting and search and rescue operations.

3. Off-road Vehicle Use

a. Background

Per the Proclamation, motor vehicle use should be limited to designated motorized routes within BCNM. There is only one motor vehicle route within the monument, FS 184. As such, motorized vehicle travel is limited to FS 184, subject to the relevant and existing seasonal closures. Off-road vehicle use is addressed in Planning Criteria Report, p. 46. Over-snow vehicle (OSV) use is not currently addressed in the 1996 Royal Gorge RMP.

b. Objective

Ensure the protection of resources in BCNM, compliance with the Proclamation, as well as safety and visitor experience when considering management prescriptions for off-road vehicle use.

c. Recommendations

- Similar to other national monument plans, OSV use in BCNM should be prohibited or limited to designated routes. [See Chimney Rock National Monument Final Management Plan p. 13 (August 2015) and San Gabriel Mountains Monument: Monument Plan pp. 22-23 (April 2018).] If permitted, OSV use would be subject to seasonal closures for wildlife and limited to FS 184.
- While there is frequently not enough snow to consider OSV use within the monument, the agencies should proactively include language to specify the extent of allowing such use along FS 184.

4. Target shooting

a. Background

Target shooting is not currently permitted anywhere within BCNM. The BCNM Planning Criteria Report considers alternatives related to target shooting on p. 37.

b. Objective

Ensure the protection of resources in BCNM, compliance with the Proclamation, as well as safety and visitor experience when considering management prescriptions for recreational target shooting.

c. Recommendation

Target shooting should continue to be prohibited in all areas of the monument, especially since a public shooting range is already in place just west of BCNM.

5. Competitive events

a. Background

Any events hosted within the monument must be managed consistent with the protection of monument objects and subject to group limitations and special recreation permit requirements. Competitive events are briefly addressed in the Planning Criteria Report on p. 19.

b. Objective

Develop clear guidelines for competitive events within the monument to preserve the resources that BCNM was designated to protect.

c. Recommendation

Competitive events should not be allowed in the monument. As previously mentioned, this does not pertain to river recreation.

6. Special Recreation Permits

a. Background

Special recreation permits (SRP) may be issued by managing agencies to businesses, organizations, and individuals to allow organized group use and visitation to public lands. Guidelines for issuing SRPs are important to ensure visitation to the monument is sustainably accounted for and managed. The Planning Criteria Report mentions SRPs on p. 19.

b. Objective

Develop clear guidelines for using SRPs to preserve the resources that Browns Canyon was designated to protect.

c. Recommendations

- Special recreation permits should be classified into distinct classes, ranging from least intensive to most intensive, based on specific factors such as the size of equipment, size of area used, number of participants, frequency of use, compatibility with other uses, etc.
- Special recreation permits should only be issued if the permitted activities would not negatively impact monument objects and values.

XI. Directional and Interpretive Signage

A. Background

Visitors to the area may be travelling through and unaware that they have entered BCNM. There is currently a lack of informational materials, directional signage, and interpretive opportunities available for visitors to the national monument.

Additionally, many visitors to BCNM may benefit from greater accessibility. Considerations may include blindness, deafness/hearing loss, mobility impairments, wheelchair accessibility, etc. The Department of Interior's website states, "Public lands are for everybody, regardless of ability." (See *Accessibility Across America's Public Lands*, U.S. Department of Interior, <https://www.doi.gov/blog/accessibility-across-americas-public-lands>.) By considering ways to increase accessibility to all visitors, the agencies can ensure that BCNM can become a more inclusive place.

B. Objective

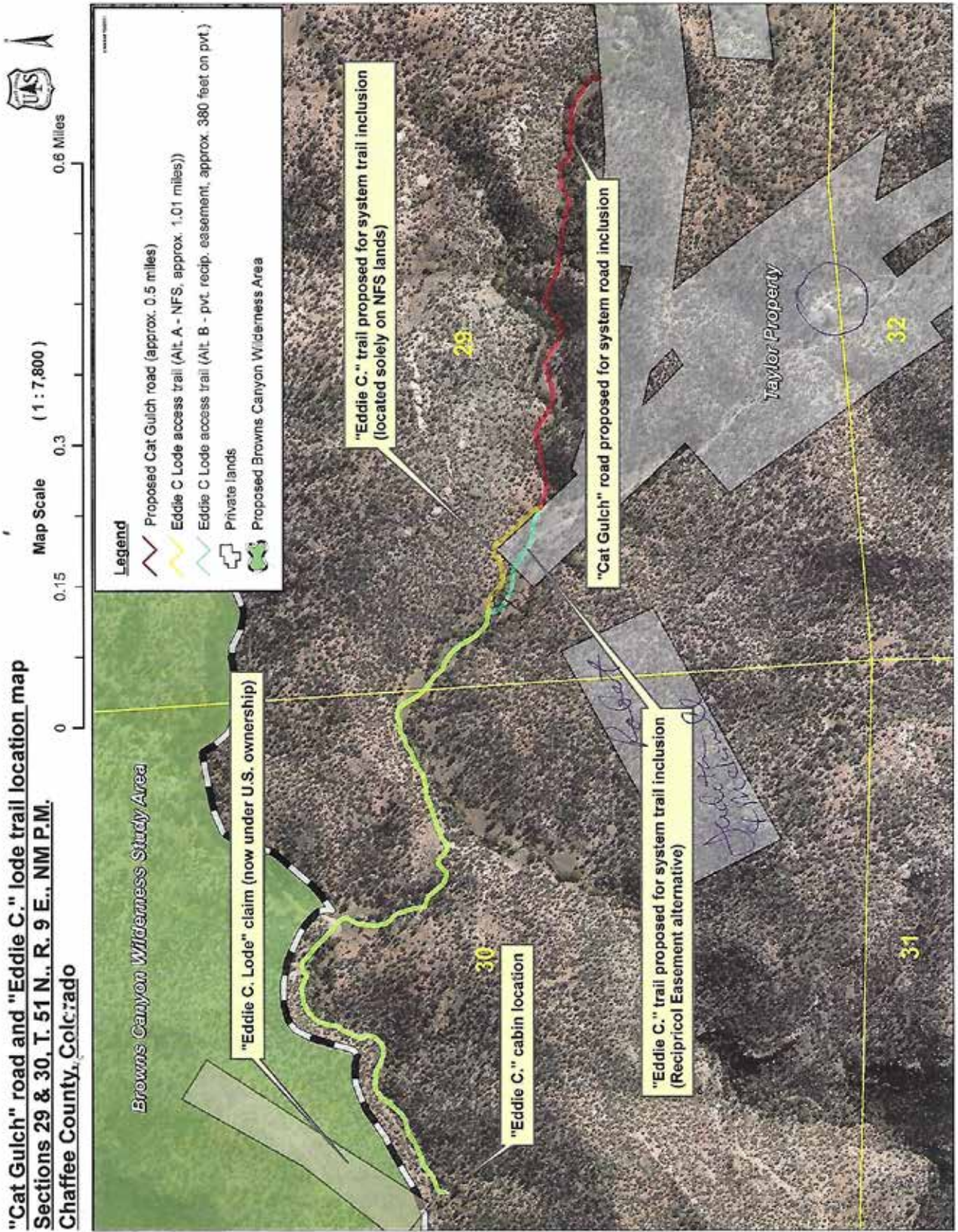
Consider visitor experience and opportunities for additional signage, interpretation and accessibility while ensuring protection of monument resources.

C. Recommendations

- Signage should be limited to trailheads and only in locations as necessary due to impacts (e.g., to direct people to trails, to keep people on trails, to manage illegal/undesignated route usage).
- There should be educational and interpretive materials at key sites, particularly where visitation is expected to substantially increase. This includes Front Country sites (e.g., Ruby Mountain and Hecla Junction), as well as the Aspen Ridge area.
- The BLM should place signage specifying that visitors are "Entering Browns Canyon National Monument" on CR 194 near the Hecla Junction parking area for visitors approaching Hecla Junction.
- The agencies should work to create educational materials focused on Native American cultural information and visiting with respect, developed as appropriate in collaboration with relevant Tribes (as described in Alternative B in the Planning Criteria Report, see p. 14).
- There should be no signage in the WSA nor in primitive areas except as needed for educational, directional, or interpretive purposes related to the trail systems.

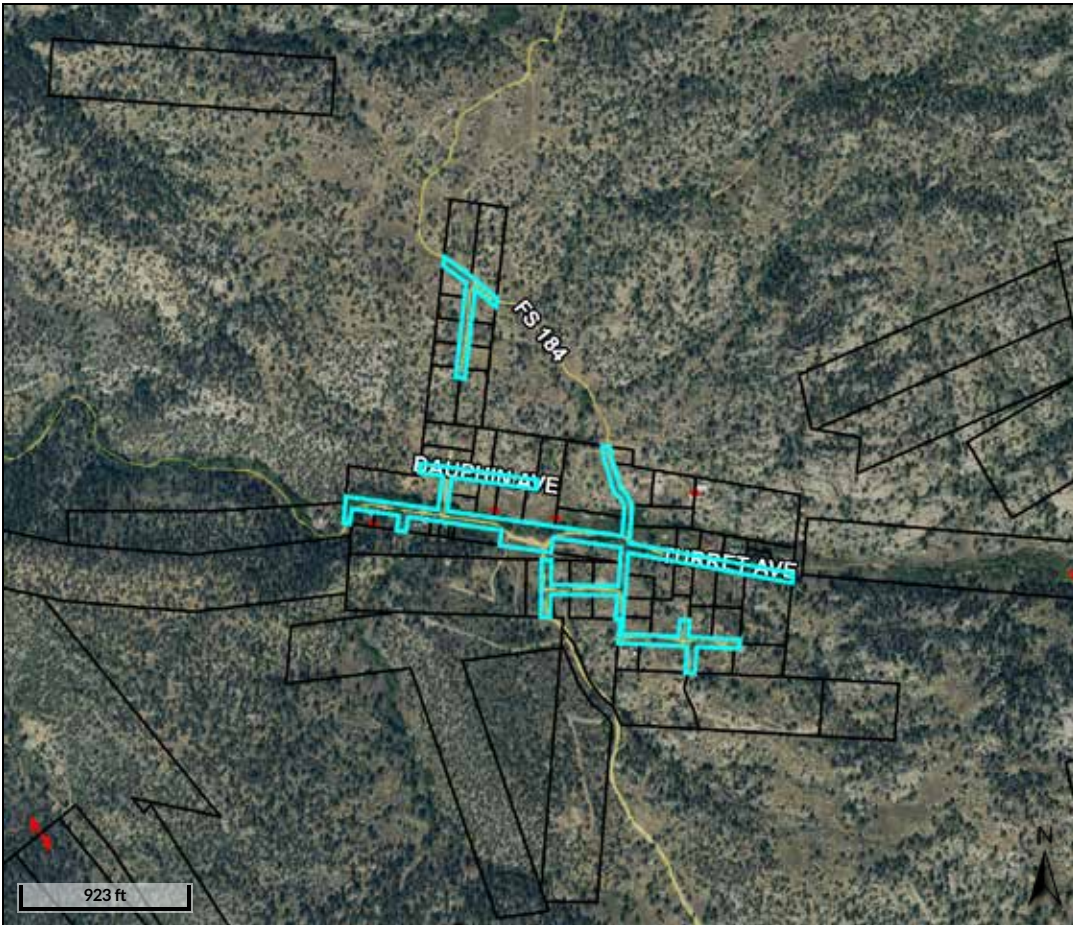
1. Recommendations specific to Turret, access to Railroad Gulch and FS 184

- The agencies should provide support to Turret to place clear signage in and around the town limits to direct visitors along routes



Map A4: USFS map from December 2011 showing proposed Cat Gulch system route along the historic Austin Trail, which currently serves as an administrative route and provides motorized access to a private inholding, the Taylor Property.




Turret HOA street map vert



Overview



Legend

-  Parcels
-  Parcel Joins
-  Roads

Parcel Number	R353529413053	Physical Address		Total Value	\$1,500	Last 2 Sales			
Property Class	n/a	Owner Address	TURRET HOME OWNERS ASSOCIATION INC			Date	Price	Reason	Qual
Taxing District	04		C/O SHERMAN PEGGY			n/a	0	n/a	n/a
Acres	7.42		P O BOX 1528			n/a	0	n/a	n/a
			SALIDA, CO 812017528						

Brief Tax Description BLK 13 LOTS 1 THRU 9
 FOREST SERVICE RD ACROSS
 BLKS 22 & 23 &
 ADJ ALLEYS &
 ACROSS BLKS 26 & 2
 (Note: Not to be used on legal documents)

Date created: 4/30/2019
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Map A7: A map from the Chaffee County Assessor's website showing that all roads in Turret are privately owned by the Turret Homeowners Association. The most direct access to iconic BCNM features like Railroad Gulch is through Turret along the historic Austin Trail. The current location of the gate on Austin Trail leaves insufficient room for visitor parking, contributing to private property trespass in Turret.

through Turret and strongly discourage any parking, visiting or loitering around private property. Because all property in Turret is private property and all the roads within the town limits are owned by the Turret Homeowners Association, signage should make it explicitly clear that there is zero tolerance for parking for any reason within the town limits. (Map A7 shows that even the roads in Turret are private property.)



The current location of the gate on Austin Trail at the edge of Turret does not allow for sufficient parking, leading visitors to park on private property and risk conflict with local residents.

- Clear signage indicating private property in the Turret area and information for visiting with respect should be made clear to minimize the potential for increased visitation to infringe upon property rights of Turret-area residents as well as to minimize the potential for human conflict.
- There should be clear signage indicating access to FS 184, including where parking is allowed and information about the primitive condition of the road – for example, “FS 184 is not maintained, high clearance 4WD essential” directional arrows and mileage, “Public road through private property, please stay on road,” etc.
- The USFS should relocate the existing gate at the edge of Turret to a point on Austin Trail beyond the last private property owner’s driveway (outside BCNM) and develop a new parking area/turnaround at that location. This section of road lies outside the monument boundary and would adhere to the Proclamation’s restrictions on motorized access within the monument. (See Map A4.)
 - This portion of Austin Trail is currently used for motorized access by one private property owner and USFS personnel.
 - Implementing this recommendation would help to minimize social and environmental impacts to the residents of Turret, including private property trespass and damage, illegal parking, and the potential for verbal and physical conflict between visitors and private property owners.
 - This recommendation would facilitate non-motorized access to the key monument attractions (Stafford Gulch, Railroad Gulch and The Reef) along an established, 134-year old trail. According to local historian Dick Dixon, author of “The D&RG’s Calumet Branch and the Turret Mining Area,” Austin Trail existed as early

as 1885, was a mail route by 1897 and was historically used for motorized traffic.

2. Recommendations Specific to Aspen Ridge

- The USFS and BLM should work with interested tribes to develop interpretive signage for the area. Signage should be placed at view-point(s) and should include interpretive information as well as guidelines related to ethics and impacts of off-trail use on Native American sites and artifacts. Signage in the area should only be in places deemed appropriate by the tribes.
- The Aspen Ridge area should have clear signage to delineate differences in camping requirements within the monument, as opposed to camping on the eastern side of FS 185 (outside BCNM). (See also Section X.B.1 related to dispersed camping.)
- The Aspen Ridge area should have designated campsites with permanent fire rings where campers can park in the 100-foot buffer zone and carry gear by foot to the campsite. One such campsite is already in place at a spur off FS 185 designated 185GR on a Fourmile Travel Management Plan map dated Feb. 28, 2002. (See Map A5.)

XII. Minimum Route Network

A. Background

In developing a minimum route network for BCNM, the BLM and USFS must focus on the predominant obligation to protect monument objects, as required by Proclamation 9232, the Antiquities Act of 1906, FLPMA and NEPA.

Overall, this requires the agencies to ensure that the approved system-route network will best fulfill the purposes of managing BCNM for protection and preservation of its natural, cultural, historic, scenic and scientific values while also providing for types of recreational use mentioned in Proclamation 9232. This can be achieved by first considering the presence of objects of interest and bearing in mind that a level and type of travel should be permitted consistent with the protection of those values.

This is an opportunity to design a route system that identifies where, when and how travel should be authorized. The design should provide the minimum route network necessary to support enjoyment of the monument while minimizing impacts and risk of harm to monument objects. The route network should also be sustainable in terms of agency resources for monitoring and management.

A “minimum route network” is defined as the smallest system of routes designed to provide for the enjoyment of the designated area without compromising the conservation, protection and enhancement of the resources that the

area was established to protect. The BLM uses the term “route” to include roads, primitive roads and motorized trails. (See Map A2.)

The BLM should focus travel planning in Key Decision Areas. Key Decision Areas are defined as those areas most important for travel planning decisions because they are:

- Places where the public already has a history or pattern of visiting and where there have already been resource conflicts.
- Places the public already has a history or pattern of visiting and where there have not yet been any apparent resource conflicts, but where there could be resource conflicts if usage and visitation increased.
- Places at which there will likely be an increase in visitation due to the implementation of the management plan (i.e., visitor center/kiosk, interpretive signage, etc.).
- Places that are readily accessible and extremely sensitive such that they require proactive protection regardless of current/expected visitation.
- For key decision areas, the BLM should further focus on a core set of planning actions and principles in addition to the overall priority of protecting monument objects, including:
 - Not designating redundant routes.
 - Re-routing or closing existing routes where they are harming monument objects and/or other sensitive resources (cultural resources, wilderness characteristics, wildlife habitat, riparian areas) or likely to lead to off-route exploration.
 - Preparing and implementing closure and rehabilitation plans for unnecessary routes.
 - Ensuring a robust monitoring plan is in place that provides for tracking whether management actions are succeeding and a method for adjusting management if they are not.
 - Enforcement capacity and approaches to supplement agency capacity (such as volunteers).
 - Managing special designations, including the Aspen Ridge Roadless Area, the Browns Canyon WSA, and the Browns Canyon ACEC to protect the characteristics they were designated to protect.

We have identified some key decision areas in our recommendations.

B. Objective

The agencies should maintain the minimum route network necessary to manage for safe and sustainable visitation to BCNM while preserving the resources the monument was designated to protect. Designating a minimum route network in the monument will not only help curtail the direct impacts of routes but will also help alleviate problems associated with other threats to

conservation values, such as the spread of invasive species and damage to cultural resources.

C. Recommendations

- The agencies must have a budget to fund potential new improvements to access roads, in response to increased visitation. It would be helpful for the RMP to provide clarification on funding and an implementation strategy, including triggers for such improvements.
- The BLM should conduct additional research to evaluate the space connecting the River Access Trail and the River Bench Trail. Because of the proximity of the two trails, there is concern about visitors bushwhacking in an effort to connect the two trails and putting themselves and monument resources at risk. The agency's research should examine tradeoffs of reducing risk to both people and resources, along with impacts to visitor experience, wildlife, vegetation, soils, wilderness characteristics, etc., if a connecting trail were to be developed.
- The USFS should examine designating a 0.5-mile system route for motorized public access down the existing Austin Trail. The Austin Trail is already a motorized route used for USFS administrative purposes and by private property owners for decades but is not currently a system route open to motorized public use. As documented by Dick Dixon, local historian and author of the book "The Calumet Branch and Turret," The Austin Trail has been used since at least 1885. It was a mail route by 1897 and was historically used for motorized traffic and mining equipment. A USFS map dated December 2011 shows the Austin Trail as "Cat Gulch road proposed for system road inclusion." (See Map A4.) This would provide for car parking and a turnaround for access to the Railroad Gulch/Stafford Gulch/Reef area. The parking area is proposed for a location past the last residence on the Austin Trail west of Turret. The route and parking area should meet all wildlife closure requirements.
 - The agencies should consider placing a composting toilet located at the proposed parking area, outside of the monument's boundaries, which we acknowledge is subject to additional NEPA.
- A non-motorized system route should be designated from the proposed Austin Trail parking area (referenced in Section V.B.5, Section XI and the previous bullet point) for public access to the Railroad Gulch/Stafford Gulch/Reef area. This trail would follow the existing, currently non-system Austin Trail, established ca. 1885, and end at the confluence of Stafford Gulch and Railroad Gulch, just short of Hecla Castle.
- There should be a dirt turnaround area after the last private property north of Turret on FS 184 at the same location where the seasonal closure sign and gate are proposed to be located. (See Section IX.)

- The agencies should consider supporting as many as two scenic overlooks in the Aspen Ridge area with parking allowed only within the 100-foot buffer zone along Aspen Ridge Road. The overlooks should be accessible by foot and be designed with accessibility for visitors in mind.

Recommendations Specific to FS 184

- The last 0.38 miles of FS 184 should be closed due to excessive erosion.

Recommendations specific to Ruby Mountain and Hecla Junction

- Parking for Ruby Mountain and Hecla Junction area will soon be outgrown. The BLM should proactively consider solutions to manage for increased visitation.

Recommendations Specific to Aspen Ridge:

- The USFS should prioritize research for determining which spur roads off FS 185 and 185D should be closed due to illegal motorized use. We recommend the agencies use of substantial structural barriers, at or outside the Monument boundary, with minimal intrusion to visual aesthetics to discourage the use of unauthorized routes. The exception to this would be for camping sites and spur roads the agency determines are appropriate for designated dispersed camping or a scenic overlook.

XIII. Conclusion

The Sustainable Alternative presents community-developed recommendations for the future management of BCNM. The BLM and USFS should consider the recommendations and information presented in this Alternative while making decisions throughout the BCNM planning process. If you have any questions or concerns about this proposal, please contact Friends of Browns Canyon at friendsofbrowncanyon@gmail.com or The Wilderness Society at katie_meehan@twso.org.

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