

## **Worksheet**

### **Determination of NEPA Adequacy (DNA)**

U.S. Department of the Interior  
Bureau of Land Management

Office: **Vermilion Cliffs National Monument  
Kanab Field Office**

Tracking Number: **DOI-BLM-AZ-A020-2014-0001-DNA**

Casefile/Project Number:

Proposed Action Title/Type **Colorado Mountain College Backpacking Trip Special  
Recreation Permit (SRP)**

Location/Legal Description: **Paria Canyon-Vermilion Cliffs Wilderness: Paria Canyon,  
Buckskin Gulch, and Wire Pass.**

#### **A. Description of the Proposed Action and any applicable mitigation measures**

Description of Proposed Action: The proposed action is to authorize a Special Recreation Permit (SRP) for Colorado Mountain College to conduct a onetime backpacking trip from Wire Pass or Buckskin Gulch down the Paria Canyon to Lee's Ferry.

This is a trip that would take place in Paria Canyon-Vermilion Cliffs Wilderness, which is managed by Vermilion Cliffs National Monument and the Kanab Field Office. Grand Staircase-Escalante National Monument manages the Paria Canyon trailheads of Wire Pass, and Buckskin Gulch. Travel would occur in Buckskin Gulch and/or Wire Pass, through Paria Canyon. (The last three miles of Paria Canyon are within Glen Canyon National Recreation Area. However, the proposed action would only authorize activities on Bureau of Land Management (BLM)-administered land and the co-managed National Park Service (NPS) lands [for overnight backpacking trips down Paria Canyon, exiting at Lee's Ferry] within the Paria Canyon Project Area). If the applicant wishes to provide hikes at Lee's Ferry, they would need to obtain a Commercial Use Authorization from the NPS through Glen Canyon National Recreation Area for this activity.

The backpacking trip would occur in early January. The applicant would utilize no more than two vehicles for the trip to transport equipment and participants between Buckskin Gulch, Wire Pass, and Lee's Ferry trailheads.

The maximum group size for this trip would be 10 people, including guides.

Therefore, under the proposed action, the backpacking trip would begin at one of the northern trailheads and terminate at Lee's Ferry. A through hike would minimize congestion at the Buckskin Gulch and Paria Canyon confluence.

The trip would be restricted to two nights or less at any campsite upstream from Big Spring to provide the public with varied recreation opportunities and decrease the overall competition for the limited number of high water campsites within the upper canyons. Campsites would be located in previously established sites identified in the Paria Hikers Guide in addition to those sites appropriate for high water safety. Campsites would not be located within 200 feet of cultural sites, springs or seeps. Campsites would not be located adjacent to peregrine nests (both active and historic) located in Attachment B. No bouldering or exploring would occur adjacent to these nests.

Participants would utilize human waste bags provided by the applicant. All human waste and trash would be carried out of the canyon. Participants would also be instructed to practice Leave No Trace and standard Outdoor Leadership principles and practices.

Commercial use would be monitored and if it is found to be displacing private users, there may be adjustments to commercial use either seasonally or by restricting the total number of commercial trips into Paria Canyon in the future.

Measures to reduce or eliminate impacts to resources and protect public health and safety would be attached to the permit as stipulations. The stipulations applicable for this SRP are located in Attachment A.

## **B. Land Use Plan (LUP) Conformance**

LUP Name/Date Approved *Vermilion Cliffs National Monument Resource Management Plan (RMP), January 29, 2008*

The proposed action is in conformance with this RMP because it is specifically provided for in the following decisions:

- **DFC-RR-05:** The excellent opportunities that exist to enjoy remote, rustic settings that provide moderate challenge and solitude in the Specialized TMAs will be maintained/enhanced.
- **DFC-RR-06:** In Backways and Specialized TMAs, recreation opportunities associated with somewhat remote settings, such as exploring backcountry roads, vehicle camping, hunting, sightseeing, recreation aviation, and picnicking will be maintained/enhanced on existing roads, provided they will be compatible with the protection and enhancement of sensitive resource values, where appropriate.

- **MA-RR-27:** SRP application packages--- will be considered for authorization on a case-by-case basis upon receipt of application.
- **MA-RR-31:** Commercial, competitive, organized group/event, and special area permits may be authorized when such uses accomplish or are compatible with management objectives and other plan provisions. Recreation activities requiring use authorization may be limited in listed species and other sensitive habitats.
- **MA-TE-27:** Impacts to special status raptors and/or their habitat from recreational activities will be reduced or eliminated. The presence and intensity of allowable recreational activities within special status raptor habitats will be assessed. Seasonal closures of specifically designated recreation activities can be considered where appropriate.

The proposed action would also not conflict with other decisions in this RMP.

LUP Name/Date Approved *Kanab Field Office RMP, October, 2008*

The proposed action is in conformance with this RMP because it is specifically provided for in the following decisions:

- **REC 22:** Management responses to unacceptable resource and/or social conditions will range from least restrictive methods (e.g., information and education) to most restrictive (e.g., visitor limits, supplemental rules, or restrictions). Where feasible, the least restrictive methods will be the first priority.
- **REC 37:** Issue SRPs after evaluation of the various factors including the following:
  - Use conforms to the recreation goals and objectives outlines in the RMP
  - Nature of proposed event or activity (i.e., commercial versus competitive)
  - Size (acreage) and sensitivity of land and resources affected (ACEC, WSA, Wilderness)
  - Compatibility with other uses, activities, and visitors in that area
  - Proposed number of participants and group size
  - Associated vehicle and equipment
  - Time (daily, seasonally) and duration of proposed us
  - Potential social impacts (crowding, group encounters, conflicting activities, and/or experiences)
  - Specific resources impacted (e.g., wildlife, cultural, paleontology, visual, riparian, soil, air and water)
  - Rehabilitation and monitoring needs and feasibility
  - Support needs (people, equipment, supplies, vehicles)
  - Safety issues
- **WL-29:** Non-permanent (short-term) activities would be allowed within the spatial buffer [ $\frac{1}{4}$  to  $\frac{1}{2}$  mile for general raptor species, 1 mile for peregrine] of nests during the nesting season as long as those activities are shown to be non-impacting to nesting raptors.

- Due to the topography of Paria Canyon, a restriction of one-half mile would protect nesting raptors, including peregrine.

The proposed action would also not conflict with other decisions in this RMP.

**C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

List by name and date all applicable NEPA documents that cover the proposed action.

EA-AZ-931-93-001 Special Recreation Permits for Commercial Activities on Public Lands in Arizona.

EA-AZ-010-97-16 Paria Canyon/Vermilion Cliffs Wilderness Management Plan Amendment – this EA amends recreation management within the wilderness from the Paria Canyon – Vermilion Cliffs Wilderness Management Plan (1986).

Other related documents:

Paria Canyon – Vermilion Cliffs Wilderness Management Plan September 1986. Commercial Use, Management Objective: Commercial use will be managed to allow outfitters and guides to meet public needs as appropriate when that use is consistent with the protection of the wilderness resource.

**D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

Documentation of answer and explanation:

EA-AZ-931-93-001 was written specifically for this type of recreational activity. “The purpose of the EA is to allow the use of public lands for commercial recreation activities.” While the EA applies to a large range of guided outdoor activities, hiking is mentioned specifically in the introduction section of the document (page 1), and the activities are analyzed in both of the alternatives.

EA-AZ-010-97-16 analyzes this type of activity, specifically within the same area in which the proposed action would occur. This EA states that, “Commercial services may be authorized for activities that are appropriate to realize recreational or other wilderness purposes of the area.” Any activities authorized in the wilderness must meet the objectives set out in the Paria Canyon-

Vermilion Cliffs Management Plan. The recreation objectives states, “The area will be managed to provide a spectrum of outstanding opportunities for primitive recreation, featuring a natural wilderness environment, solitude, physical and mental challenge, and inspiration consistent with preservation of wilderness values. Commercial use will be managed to allow outfitters and guides to meet public needs as appropriate when that use is consistent with the protection of the wilderness resource.” The management plan also states that the BLM will continue to monitor the impacts of commercial use as it related to Limits of Acceptable Change (LAC) and use adaptive management practices as needed. Thus, the proposed action would not be substantially different then the alternatives analyzed in the existing EAs.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

Documentation of answer and explanation:

The range of alternatives considered in the existing EAs is appropriate with respect to the current proposed action. There are two alternatives analyzed in the existing EA-AZ-931-93-001, the proposed action and no action. The analysis states that resource impacts would be minimal because the proposed action would provide the BLM with the ability to approve, deny, or modify a proposed operation, as well as modify or add to the list of stipulations that commercial operators must comply with. Thus, should monitoring reveal that the proposed action is causing significant conflicts or adverse impacts to other resources or uses, special limits or rules would be developed and implemented through required procedures to mitigate those impacts. The current proposed action is essentially the same as the proposed action analyzed in EA-AZ-931-93-001.

The Paria Canyon/Vermilion Cliffs Wilderness Management Plan Amendment (EA-AZ-010-97-16) has four alternatives, the Proposed Action, Alternative A, Alternative B, and No Action. The proposed action establishes use limits. It adds mandatory reservations, and limited number of permits. Alternative A is similar to the Proposed Action, but it would not change use limits. Alternative B would more aggressively and intensively manage the wilderness with greater use limits. The No Action Alternative would continue current management with fees collected but without use limits or requiring permits.

EA-AZ-010-97-16 provides a range of alternatives regarding limiting visitor use (See EA-AZ-010-97-16). No new concerns have been identified that were not considered in this EA.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new**

**circumstances would not substantially change the analysis of the new proposed action?**

Documentation of answer and explanation:

Since the existing EAs were issued, Vermilion Cliffs National Monument was designated in 2000 through Presidential Proclamation. Designation of the Monument would not change the analysis contained within the existing EAs, because the EAs analyzed impacts to resources that are now considered Monument objects, with the exception of the California condor. The condor reintroduction project began after the completion of EA-AZ-931-93-001, in 1996. The U.S. Fish and Wildlife Service began releasing a non-essential, experimental population of California condors (*Gymnogyps californianus*) as a part of a species recovery effort. EA-AZ-010-97-16 was approved after the first condor release, and condor reintroduction therefore was considered. No additional new impacts to condors are expected from the proposed action.

EA-AZ-010-97-16 states that the BLM will: “restrict Bureau-permitted activities within known/occupied nesting and other crucial use areas of threatened or endangered raptors or other special status species.” Commercial climbing would not be permitted in the canyons. Restrictions on activities that could affect raptors are included as part of the current proposed action and measures addressing special status species would be attached to the permit as stipulations. (The stipulations applicable for this SRP can be located in Attachment A.) Thus, the existing analyses are still valid.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

Documentation of answer and explanation:

The impacts of the proposed action are similar to those contained within the existing EAs in that:

Recreation

The proposed action is typical for a commercial guide service offering backpacking trips. The demand for commercial overnight trips within Paria Canyon has seen a moderate increase within the last few years with the potential for the number of commercial SRPs in the canyon to double in the near future. It is predicted that the overall demand for Paria Canyon backpacking trips will continue to increase over time with the increased trend toward longer overnight trips in the upper canyon rather than through hiking. Current use patterns suggest that the high use seasons of March through June and September through October are highly competitive for private users for which the first-come, first-served permits are purchased within the first few days that the corresponding monthly calendar is available. Commercial use proposed in this action would occur in January which is not within these months but still may displace private users and would

depend on the total number of permits the applicant purchased through the competitive first-come, first-served on-line permit process. Even with the competitive on-line permit process there is a potential for commercial use to reach carrying capacity limitations for the Paria Canyon in which commercial users begins to displace non-commercial users.

EA-AZ-931-93-001 states that “the outfitter does not, by virtue of the permit, have exclusive use of a parcel of public land.” Thus only negligible displacement of private individual use is anticipated as a result of this proposed action which would occur in January and outside the high use seasons. The potential growth of commercial applicants may result in minor displacement of private individual use in the next 10 years. The effects of potential growth in the number of trips per applicant per year would be monitored through the permitting and social survey process. In addition, the steps necessary to minimize social impacts of recreation use in the area have been implemented to include recreation monitoring protocols and recreation use surveys. Thus, the current proposed action which would occur only once would create no direct or indirect impacts to recreation resources in the area that were not analyzed in the existing EA.

### Cultural

Measures addressing cultural and historic resources would be attached to the permit as stipulations. The stipulations applicable for this SRP are located in Attachment A.

There are cultural resources occurring within the area of the proposed action as described in EA-AZ-010-97-16 and EA-AZ-931-93-001, although the proposed action would not increase use or knowledge of these sites that does not already exist through current use patterns. The current proposed action would create no impacts to cultural resources in the area that were not previously analyzed in the existing EAs.

### Rangeland

Paria Canyon does not contain an active allotment although the Paria Canyon borders Bunting Well, Ferry Swale and the Sand Hills Allotments.

There would be no change in season of use or measurable loss of AUMs due to implementation of the proposed action. There should be no disturbance of grazing livestock during the short timeframe in which the participants would travel past any grazing livestock. Thus, the proposed action would create no direct impacts to rangeland resources in the area that were not previously analyzed in the existing EAs

### Wilderness

EA-AZ-010-97-16 includes the goal to manage for use and enjoyment of visitors in a manner that will leave the area unimpaired for future use and enjoyment of wilderness. The wilderness is designated as VRM Class I which included the management objectives to allow for only

natural changes. The wilderness resource is dominant in all management decisions where a choice must be made between preservation of wilderness character and visitor use.

EA- AZ-931-93-001 states “Many wilderness areas have individual wilderness management plans that direct how commercial recreation activities would be administered. In these areas, guidelines in the management plans would be followed. ” The Paria Canyon-Vermilion Cliffs Wilderness Plan states, “Commercial Use, Management Objective: Commercial use will be managed to allow outfitters and guides to meet public needs as appropriate when that use is consistent with the protection of the wilderness resource”.

EA-AZ-010-97-16 states that, “the first and dominant goal is to provide for the long term protection and preservation of the area’s wilderness character under a principle of non-degradation.” Commercial use as proposed in this action would provide the BLM with the increased ability to monitor wilderness conditions and wilderness use through the use of wilderness monitoring forms provided to the applicant. The current proposal with the implementation of monitoring practices and the use of the stipulations for this SRP (located in Attachment A) should mitigate any potential degradation to the wilderness characteristics. If degradation is detected as a result of the proposed action, action would be taken by the BLM to mitigate the practices of the applicant. Thus, the proposed action would create no direct or indirect impacts to resources in the area that were not previously analyzed within the existing EAs.

#### Wildlife (including Threatened/Endangered Species)

In 1996 the condor reintroduction project began and was not included in EA-AZ-931-93-001 but was considered in EA-AZ-010-97-16. The California condor has been successfully reintroduced into the region with no known impacts from the current use of the area. Although condors are seen on occasion in the proposed action area, there are currently no known nests in the immediate areas of the proposed action. There would be no new impacts to condors or the condor reintroduction project from the proposed action. Conservation measures as described in the stipulations in Attachment A would be utilized to minimize any adverse impacts to the experimental population that could occur through the activities of this proposed action.

Paria Canyon contains suitable habitat for Mexican spotted owls (a threatened species), peregrine falcon (de-listed), and desert bighorn sheep. While these species were mentioned in the existing EAs, impacts were not specifically analyzed. The proposed recreation activity should not measurably affect these species due to the small group size and diffused use patterns. Thus, the proposed action would create no impacts to wildlife resources in the area that were not previously analyzed in the existing EAs.

#### Vegetation (including Special Status Species) and Soils

Issuing “permits would not result in any significant overall increase in visitation on the public lands” as stated in EA-AZ-931-93-001. Hiking and backpacking travel would occur on trails, slick rock, designated routes, and within canyon walls decreasing the possibility of causing damage to vegetation and soils. The Paria Canyon permit area has a group size limit of 10 and a maximum group size limit for day use of 10, therefore negligible increased foot traffic or impacts to use patterns would result from the proposed action.

No special status plants occur in the project area. Therefore the proposed action would have no effect on special status plants. Stipulations contained in Attachment A would be utilized to minimize any adverse impacts to vegetation and soils by the proposed action. The current proposed action would thus create no new impacts to vegetation and soils that were not previously analyzed in the existing EAs.

### Socio-Economic

Socio-economic conditions were not analyzed in EA-AZ-931-93-001 and contained only two sentences in EA-AZ-010-97-16: “nearby communities are supported by tourism (including outdoor recreation), construction and light industry. The social aspect involves remote, unpopulated settings with moderate to high opportunities for solitude.” The proposed action would have negligible direct and indirect impacts on the local economy as Paria Canyon overnight permits are limited by the number of available permits and seasonal weather patterns.

It is unlikely that the proposed SRP would result in any cumulative impacts to socio-economic conditions within the competitive nature of obtaining Paria Canyon overnight permits. EA-AZ-931-93-001 recognizes that backcountry recreation is increasing as the population increases, and that many visitors may choose to hire a guide to ease trip planning and enhance their backcountry experience.

Issuing the proposed SRP would not result in any significant overall increase in visitation to the area for overnight canyon travel as a result of the limited amount of permits available. The proposed action would thus create no new cumulative impacts that were not previously analyzed in the existing EA-AZ-010-97-16.

### **5. Are the public involvement and interagency review associated with existing NEPA Document(s) adequate for the current proposed action?**

Documentation of answer and explanation:

Consultation and coordination for these EAs was extensive. During the public review process, over 700 persons and/or organizations received information about EA-AZ-931-93-001 and interested individuals, groups and agencies received information about EA-AZ-010-97-16. Public involvement and interagency review associated with the review of both EAs is adequate

for the current proposed action as there is no deviation of the proposed action outside those areas and activities as stated and analyzed in the existing EAs.

**E. Persons/Agencies /BLM Staff Consulted**

Name, Title

Gloria Benson, Tribal Liaison, Arizona Strip District Office  
Diana Hawks, Recreation/Wilderness/VRM, Arizona Strip Field Office  
Laurie Ford, Lands/Realty/Minerals, Arizona Strip Field Office  
Jeff Young, Wildlife/T&E Wildlife, Grand Canyon Parashant National Monument  
Lorraine Christian, Arizona Strip Field Office Manager  
John Herron, Cultural Resources, Arizona Strip Field Office  
Jace Lambeth, Special Status Plants, Arizona Strip Field Office  
Whit Bunting, Range/Vegetation/Weeds/S&G, Arizona Strip Field Office  
Richard Spotts, Environmental Coordinator, Arizona Strip District Office  
Ray Klein, Supervisory Law Enforcement, Grand Canyon Parashant National Monument  
John Sims, Supervisory Law Enforcement, Arizona Strip District Office  
Kevin Wright, Monument Manager, Vermilion Cliffs National Monument  
Clay Stewart, Outdoor Recreation Planner, Kanab Field Office

Steve Rosenstock, Habitat Program Manager, Arizona Game and Fish Department  
Daniel Bullets, acting Environmental Program Director, Kaibab Paiute Tribe  
Peter Bungart, Cultural Staff, Hualapai Tribe  
Dawn Hubbs, Cultural Staff, Hualapai Tribe

**Conclusion**

Based on the review documented above, we conclude that this proposal conforms to the applicable land use plans and that the NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of the NEPA.



*Acting for*  
Lorraine M. Christian  
Arizona Strip Field Office Manager

12/12/13

Date



Harry Barber  
Kanab Field Office Manager

12/12/13

Date

**Note:** The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, any lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and program-specific regulations.

Attachment A

**SPECIAL RECREATION PERMIT STIPULATIONS**

Failure to comply with the following stipulations can result in permit revocation.

1. Any filming/photography of permitted activities that takes place with the express intent to sell the product back to the guided client(s) as souvenirs or training videos, etc. would be subject to a vending permit being included as part of the Special Recreation Permit. A separate Land Use Permit would be required for other commercial filming on public lands, defined in IM No. 2004-73 as, "The use of motion picture, videotaping, sound recording, or other moving image or audio recording equipment on public lands that involves the advertisement of a product or service, the creation of a product for sale, or the use of actors, models, sets, or props, but not including activities associated with broadcasts for news programs. For purposes of this definition, creation of a product for sale includes a film, videotape, television broadcast, or documentary of participants in commercial sporting or recreation event created for the purpose of generating income."
2. The permittee shall comply with all Federal, State, and local laws, ordinances, regulations, orders, postings, or written requirements applicable to the area or operations covered by the Special Recreation Permit (SRP). The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents of the permittee and by all clients, customers, participants, or spectators under the permittee's supervision.
3. Conviction of violating federal or state statutes relating to the resources on public land (cultural, wildlife laws, etc.) may cause existing permits to be suspended or cancelled. BLM may suspend or cancel an existing SRP if the permittee commits any of the acts prohibited in 43 CFR 8365 (Rules of Conduct), or violates any site specific rules posted in the area.
4. A Special Recreation Permit authorizes special uses of the public lands and should circumstances warrant, the permit may be modified by the BLM at any time, including the amount of use. The authorized officers may suspend or terminate a SRP if necessary to protect public resources, health, safety, the environment, or noncompliance with permit stipulations. Actions by the BLM to suspend or terminate a SRP can be appealed. All guides and employees must carry a copy of the BLM Letter of Authorization and required certifications while conducting operations on public lands.
5. No value shall be assigned to or claimed for the permit, or for the occupancy or use of Federal lands granted thereupon. The permit privileges are not to be considered property on which the permittee shall be entitled to earn or receive any return, income, price or compensation. The use of a permit as collateral is not recognized by BLM.

6. Unless expressly stated, the SRP does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the Federal land by other users. The United States reserves the right to use any part of the area for any purpose.
7. Permittee is responsible for knowing the location of special management areas, such as designated wilderness areas, as well as the use restrictions that apply, and complying with those use restrictions.
8. All advertising and representations made to the public and the authorized officers must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, official agency symbols may not be used. The permittee shall not use advertising that attempts to portray or represent the activities as being conducted by the BLM. The permittee may not portray or represent the permit fee as a special Federal user's tax. The permittee must furnish the authorized officers with any current brochure and price list if requested by the authorized officers.
9. Food, water, and/or equipment caches will not be authorized.
10. The authorized officers, or other duly authorized representative of the BLM, may examine any of the records or other documents related to the permit, the permittee or the permittee's operator, employee, or agent for up to 3 years after expiration of the permit.
11. The permittee must submit a Post-Use Report to the authorized officers by December 15 for every year the permit is in effect. This report will be used to determine if additional fees are required of the permittee based upon total permitted use. If the post use report is not received by the established deadline, the permit will be suspended and/or fines assessed.
12. The applicant/permittee is required to provide the authorized officers with a copy of a valid insurance policy or proof thereof covering the periods of use prior to being issued a SRP authorizing any use. The U.S. Government and the permittee must be named as additional insured on the policy. Permittee must keep insurance in effect; during any period when the insurance is not in effect or cancelled, the SRP is suspended.
13. Collection of prehistoric or historic artifacts is prohibited on federal lands and is prosecutable under the Archaeological Resources Protection Act. (Historic artifacts are those more than 50 years old). Disturbance, defacement, or excavation of prehistoric and historic sites is also prohibited. Disturbance of human graves of natives is a violation of the Native American Graves Protection and Repatriation Act.
14. Harassment of livestock, wildlife, or destruction of private and public improvements such as wildlife catchments, fences and gates is prohibited. Gates will be left open or closed, as they are found.
15. The permittee shall notify the authorized officers of any accident which occurs while involved in activities authorized by this permit which results in: death, personal injury requiring hospitalization or emergency evacuation, or in property damage greater than

\$2,500. Reports must be submitted to the Arizona Strip Field Office within 48 hours in the case of death or injury, and within 10 days in accidents involving property damage.

16. "Leave No Trace" principles must be followed. (See enclosed reference materials).
17. If California condors visit a specific hiking destination or campsite while activities are underway, the permit holder must notify the BLM Arizona Strip Field Office wildlife team lead (Jeff Young) at (435) 688-3373 within 5 days of completion of the trip.
18. California condors are highly susceptible to the effects of micro-trash. Micro-trash is defined as small and easily ingestible materials such as bottle caps, pull tabs, broken glass, cigarette butts, small plastic bits, bullets and bullet casings, even food materials. Campsites/lunch sites would be cleaned up at the end of each day of use (e.g., trash removed, scrap materials picked up). The accidental ingestion of micro-trash is a leading threat to the continued existence of the California condor. Participants will need to be educated on the importance of immediately picking up micro-trash from the site as part of the clients "Leave No Trace" training.

#### **OVERNIGHT CAMPING STIPULATIONS**

19. All camps will be located at least 200 feet from any known archaeological sites, including prehistoric camps, rock shelters, caves, and historic buildings.
20. All camps will be located at least 200 feet from natural water holes, springs and seeps, or man-made facilities or features (ARS regulation 17-308) in a manner that will not prevent wildlife access to waters.
21. All refuse must be carried out of the area and disposed of in a county approved disposal site. Burying or burning garbage is prohibited.

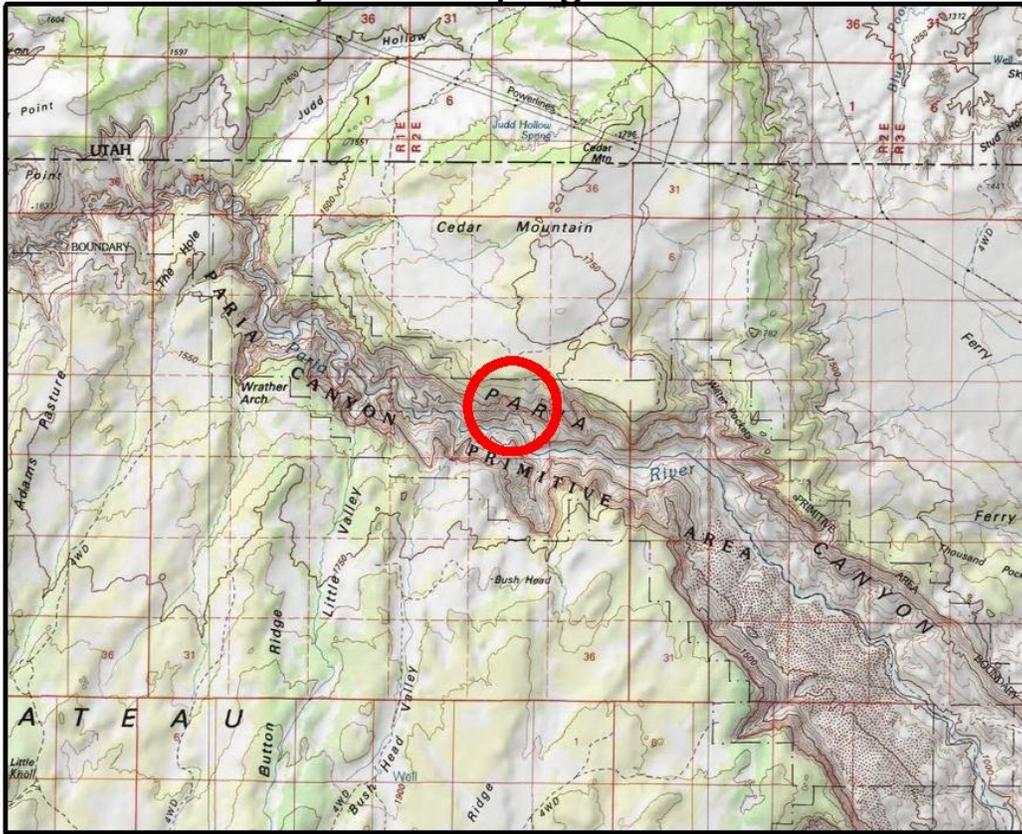
#### **SPECIAL STIPULATIONS THAT APPLY TO MONUMENTS**

22. Collection of Monument resources, objects, rocks, petrified wood, fossils, plants, parts of plants, animals, fish, insects, or other invertebrate animals, and other items is prohibited. Recreational collection of animals and animal parts in ecologically non-sensitive areas is allowed, if in compliance with AGFD and federal regulations. This SRP does not give authorization to appropriate, injure, destroy, or remove any feature of this monument, or to locate or settle upon any of the lands thereof, without authorization or associated permits.

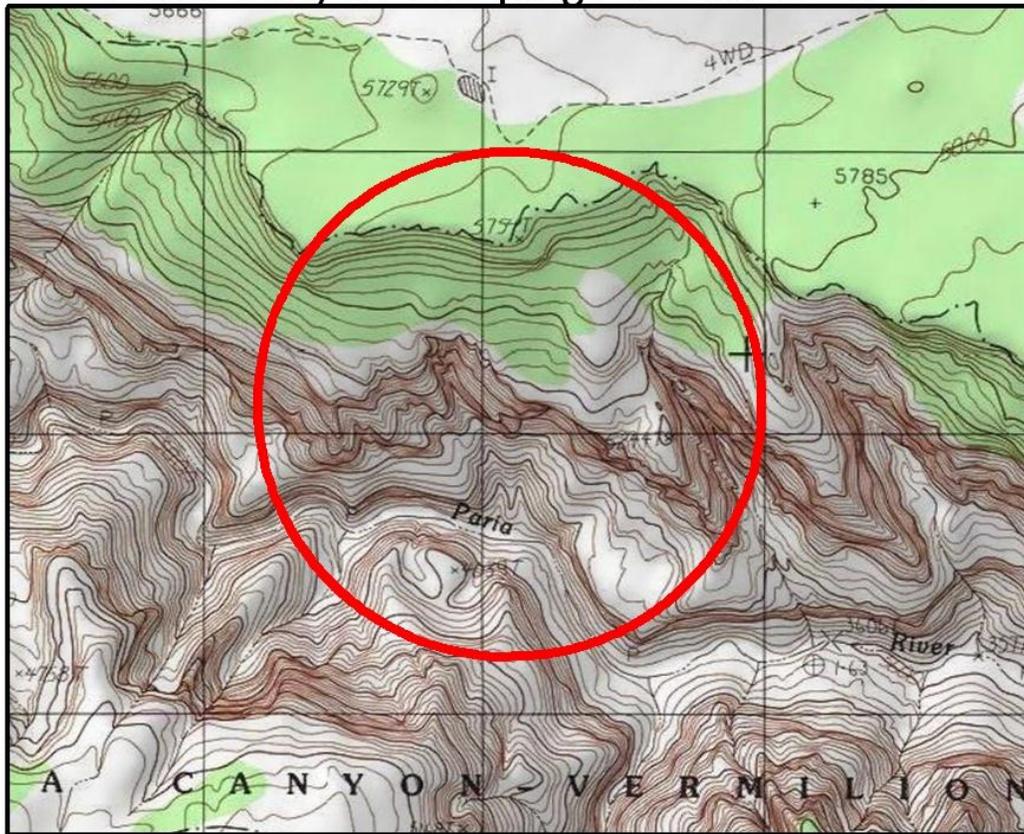
#### **SPECIAL STIPULATIONS THAT APPLY TO THE PARIA CANYON-VERMILION CLIFFS WILDERNESS**

23. Adequate first aid and safety equipment (i.e. satellite phone, SPOT satellite GPS messenger, or radio), shall be in possession of each permittee while performing the permitted activities. All guides must possess at minimum current Wilderness First-Aid and CPR certifications. Copies of all certifications must be submitted to the Outdoor Recreation Planner at Vermilion Cliffs National Monument.
24. A human waste bag will be provided by the permittee for each customer at overnight camps in Paria Canyon. All bags must be packed out of the wilderness area and properly disposed of in a trash receptacle.
25. No permits are reserved for commercial use. If the permittee chooses to obtain a permit in advance, they must obtain a permit for both themselves and their clients and pay for the fees in advance. Individual Special Recreation Permits are not refundable. The group size is limited to a maximum of ten individuals in Paria Canyon, Wire Pass, White House and Buckskin Gulch.
26. Campfires are prohibited.

# Paria Canyon Camping Avoidance Area



# Paria Canyon Camping Avoidance Area



**DECISION MEMORANDUM**

**DOI-BLM-AZ-A020-2014-0001-DNA**

**Colorado Mountain College Backpacking Trip Special Recreation Permit (SRP)**

U.S. Department of the Interior

Bureau of Land Management

Vermilion Cliffs National Monument

Kanab Field Office

**Approval and Decision**

Based on a review of the project described in the attached Determination of NEPA Adequacy (DNA) documentation and Field Office and Monument staff recommendations, we have determined that the project is in conformance with the Vermilion Cliffs National Monument Resource Management Plan and Kanab Field Office Resource Management Plan. The DNA is based on EA-AZ-931-93-001, *Special Recreation Permits for Commercial Recreation Activities* and EA-AZ-010-97-16, *Paria Canyon/Vermilion Cliffs Wilderness Management Plan Amendment*, and these EAs specifically address outfitting and guiding services. It is our decision to approve the action as proposed.

**Administrative Review or Appeal Opportunities**

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4 and the attached Form 1842-1. If an appeal is taken, your notice of appeal must be filed at the Arizona Strip Field Office, 345 East Riverside Drive, St. George, Utah 84790, within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

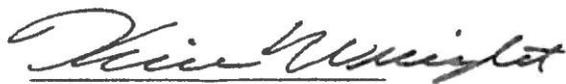
In accordance with 43 CFR 2931.8 (b) this decision remains in effect pending appeal unless a stay is granted. If you wish to file a petition (pursuant to regulation 43 CFR 4.21 (58 FR 4939, January 19, 1993) (request) for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on

the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the Office of the Solicitor (Department of the Interior, Office of the Field Solicitor, Sandra Day O'Connor U.S. Court House #404, 401 West Washington Street SPC44, Phoenix, AZ 85003-2151) (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

Standards for Obtaining a Stay

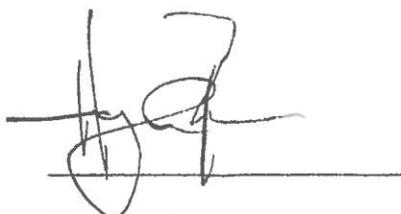
1. The relative harm to the parties if the stay is granted or denied,
2. The likelihood of the appellant's success on the merits,
3. The likelihood of immediate and irreparable harm if the stay is not granted, and
4. Whether the public interest favors granting the stay.



Acting for  
Lorraine M. Christian  
Arizona Strip Field Office Manager

12/12/13

Date



Harry Barber  
Kanab Field Office Manager

12/12/13

Date

Attachment: Form 1842-1

Form 1842-1  
(September 2006)

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

**INFORMATION ON TAKING APPEALS TO THE INTERIOR BOARD OF LAND APPEALS**

**DO NOT APPEAL UNLESS**

1. This decision is adverse to you,  
AND
2. You believe it is incorrect

**IF YOU APPEAL, THE FOLLOWING PROCEDURES MUST BE FOLLOWED**

<b>1. NOTICE OF APPEAL</b> .....	A person who wishes to appeal to the Interior Board of Land Appeals must file in the office of the officer who made the decision (not the Interior Board of Land Appeals) a notice that he wishes to appeal. A person served with the decision being appealed must transmit the <i>Notice of Appeal</i> in time for it to be filed in the office where it is required to be filed within 30 days after the date of service. If a decision is published in the FEDERAL REGISTER, a person not served with the decision must transmit a <i>Notice of Appeal</i> in time for it to be filed within 30 days after the date of publication (43 CFR 4.411 and 4.413).	
<b>2. WHERE TO FILE</b>	Field Manager, Arizona Strip Field Office Bureau of Land Management 345 East Riverside Drive St. George, Utah 84790	
NOTICE OF APPEAL.....		
WITH COPY TO SOLICITOR...	Office of the Field Solicitor Sandra Day O'Connor US Courthouse, Suite 404 401 West Washington Street, SPC-44 Phoenix, Arizona 85003-2151	
<b>3. STATEMENT OF REASONS</b>	Within 30 days after filing the <i>Notice of Appeal</i> , file a complete statement of the reasons why you are appealing. This must be filed with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. If you fully stated your reasons for appealing when filing the <i>Notice of Appeal</i> , no additional statement is necessary (43 CFR 4.412 and 4.413).	
WITH COPY TO SOLICITOR.....	Office of the Field Solicitor Sandra Day O'Connor US Courthouse, Suite 404 401 West Washington Street, SPC-44 Phoenix, Arizona 85003-2151	AND COPY TO.....Field Manager, Arizona Strip Field Office Bureau of Land Management 345 East Riverside Drive St. George, Utah 84790
<b>4. ADVERSE PARTIES</b> .....	Within 15 days after each document is filed, each adverse party named in the decision and the Regional Solicitor or Field Solicitor having jurisdiction over the State in which the appeal arose must be served with a copy of: (a) the <i>Notice of Appeal</i> , (b) the Statement of Reasons, and (c) any other documents filed (43 CFR 4.413).	
<b>5. PROOF OF SERVICE</b> .....	Within 15 days after any document is served on an adverse party, file proof of that service with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. This may consist of a certified or registered mail "Return Receipt Card" signed by the adverse party (43 CFR 4.401(c)).	
<b>6. REQUEST FOR STAY</b> .....	Except where program-specific regulations place this decision in full force and effect or provide for an automatic stay, the decision becomes effective upon the expiration of the time allowed for filing an appeal unless a petition for a stay is timely filed together with a <i>Notice of Appeal</i> (43 CFR 4.21). If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Interior Board of Land Appeals, the petition for a stay must accompany your <i>Notice of Appeal</i> (43 CFR 4.21 or 43 CFR 2801.10 or 43 CFR 2881.10). A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the <i>Notice of Appeal</i> and Petition for a Stay <b>must</b> also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.  <b>Standards for Obtaining a Stay.</b> Except as otherwise provided by law or other pertinent regulations, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards: (1) the relative harm to the parties if the stay is granted or denied, (2) the likelihood of the appellant's success on the merits, (3) the likelihood of immediate and irreparable harm if the stay is not granted, and (4) whether the public interest favors granting the stay.	

Unless these procedures are followed, your appeal will be subject to dismissal (43 CFR 4.402). Be certain that all communications are identified by serial number of the case being appealed.

**NOTE:** A document is not filed until it is actually received in the proper office (43 CFR 4.401(a)). See 43 CFR Part 4, Subpart B for general rules relating to procedures and practice involving appeals.

(Continued on page 2)

**43 CFR SUBPART 1821—GENERAL INFORMATION**

Sec. 1821.10 Where are BLM offices located? (a) In addition to the Headquarters Office in Washington, D.C. and seven national level support and service centers, BLM operates 12 State Offices each having several subsidiary offices called Field Offices. The addresses of the State Offices can be found in the most recent edition of 43 CFR 1821.10. The State Office geographical areas of jurisdiction are as follows:

**STATE OFFICES AND AREAS OF JURISDICTION:**

Alaska State Office ----- Alaska  
Arizona State Office ----- Arizona  
California State Office ----- California  
Colorado State Office ----- Colorado  
Eastern States Office ----- Arkansas, Iowa, Louisiana, Minnesota, Missouri  
and, all States east of the Mississippi River  
Idaho State Office ----- Idaho  
Montana State Office ----- Montana, North Dakota and South Dakota  
Nevada State Office ----- Nevada  
New Mexico State Office ---- New Mexico, Kansas, Oklahoma and Texas  
Oregon State Office ----- Oregon and Washington  
Utah State Office ----- Utah  
Wyoming State Office ----- Wyoming and Nebraska

(b) A list of the names, addresses, and geographical areas of jurisdiction of all Field Offices of the Bureau of Land Management can be obtained at the above addresses or any office of the Bureau of Land Management, including the Washington Office, Bureau of Land Management, 1849 C Street, NW, Washington, DC 20240.

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(Form 1842-1, September 2006)