

**United States Department of the Interior  
Bureau of Land Management**

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**Environmental Assessment  
DOI-BLM-UT-Y010-2016-0003 EA**

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**October 2015**

**Special Recreation Permit Amendment/Modification for  
Moab Half Marathon, Inc.**

*Locations:* Grandstaff Trailhead Parking Area, Take Out Beach Parking Area, Highway 128, including developed recreation facilities and campground restrooms (Canyonla Half Marathon and Five Mile Race); Ida Gulch Gravel Parking Area and Highway 128, including developed recreation facilities and campground restrooms (The Other Half).

*Applicant/Address:* Ranna Bieschke, PO Box 743, Moab, UT 84532

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Moab Field Office  
82 East Dogwood  
Moab, UT 84532  
435-259-2100

BLM



## Special Recreation Permit Amendment for Moab Half Marathon

DOI-BLM-UTY010-2016-0003 EA

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### CHAPTER 1 INTRODUCTION AND NEED FOR THE PROPOSED ACTION

#### INTRODUCTION

Ranna Bieschke, on behalf of Moab Half Marathon, Inc. seeks authorization to conduct commercial and competitive running races on lands managed by the Moab Field Office. The Moab Bureau of Land Management (BLM) Field Office has ascertained that an amendment to Bieschke's current Special Recreation Permit (SRP) is the appropriate authorization. Moab Half Marathon, Inc. holds a current SRP for the Thelma and Louise event and this SRP is valid through December 31, 2018. The proposed amendment would authorize the addition of two events: The Other Half Marathon and the Canyonlands Half Marathon (including the five mile race) which are held in October and March respectively. The use would be day use only with the course set-up taking place the day prior to the event.

#### PURPOSE AND NEED FOR THE PROPOSED ACTION

Ranna Bieschke, on behalf of Moab Half Marathon, Inc., seeks authorization to conduct commercial and competitive running races on lands managed by the BLM. The BLM has ascertained that an amendment to her current SRP is the appropriate authorization. The proposed action would authorize the addition of two events: The Other Half Marathon and the Canyonlands Half Marathon (including the five mile race) which are held in October and March respectively. The proponent would coordinate with Utah Department of Transportation for a road closure as she has in the past. In addition, the proponent would coordinate with the commercially permitted outfitters that utilize the developed recreation facilities and trailheads along Highway 128, the BLM campground hosts and campers within BLM-managed campgrounds and facilities that will be closed to access for the duration of the race; as well as the local communities of Moab and Castle Valley in order to notify and inform them of the event and possible traffic delays.

#### CONFORMANCE WITH BLM LAND USE PLAN(S)

The proposed action has been determined to be in conformance with the terms and conditions of the Moab Resource Management Plan (approved in October, 2008) as required by 43 CFR 1610.5.

Moab's RMP states the following:

- **REC-46** "Special Recreation Permits are issued as a discretionary action as a means to: help meet management objectives, provide opportunities for economic activity, facilitate

recreational use of public lands, control visitor use, protect recreational and natural resources, and provide for the health and safety of visitors.” (page 97)

**and**

- **REC-47**“All SRPs will contain standard stipulations appropriate for the type of activity and may include stipulations necessary to protect lands or resources, reduce user conflicts, or minimize health and safety concerns....Issue and manage recreation permits for a wide variety of uses to enhance outdoor recreational opportunities, provide opportunities for private enterprise, manage user-group interaction, and limit the impacts to such uses upon natural and cultural resources.” (page 98).

## **RELATIONSHIPS TO STATUTES, REGULATIONS AND OTHER PLAN**

The proposed action is consistent with the Grand County Master Plan (2012 page 56):  
“Chapter 3 Visions, Goals and Strategies:

3.2 Economic Use of Public Lands- *Public Lands Policy 1*. Encourage the expeditious processing of permits for the economic use of public lands that benefit the local economy and are consistent with the policies of this plan, especially permits for the film industry, mineral extraction and recreation.

3.2 Special Uses, Events and Activities- *Public Lands Policy 10*. Work in cooperation with public land-management agencies to permit and promote special uses, events and activities, that support the local economy. Special uses, events and activities should mitigate adverse impacts.

3.2 High-Use Areas- *Public Lands Policy 11*. Promote cooperation with federal and state agencies to identify and implement appropriate management of high-use and special-value areas, including areas such as: Sand Flats, Mill Creek, Potato Salad Hill, the Highway 128 corridor, the Kane Creek corridor, and Moab Rim Trail.

E - Maintain and enhance the recreational, scenic, and cultural amenities unique to Grand County to attract and sustain economic activity.”

## **CHAPTER 2 DESCRIPTION OF ALTERNATIVES**

### **INTRODUCTION**

This Environmental Assessment focuses on the Proposed and No Action alternatives. No other alternatives were considered. The No Action alternative is considered and analyzed to provide a baseline for comparison of the impacts of the proposed action.

### **PROPOSED ACTION**

Ranna Bieschke on behalf of Moab Half Marathon, Inc. seeks authorization to conduct commercial and competitive running races on lands managed by the BLM, Moab Half Marathon,

Inc. holds a current SRP for the Thelma and Louise event and is valid through December 31, 2018. The proposed amendment would authorize the addition of two events: The Other Half Marathon and the Canyonlands Half Marathon (including the five mile race) which are held in October and March respectively. The use would be day use only with the course set-up taking place the day prior to the event. The permittee would coordinate with Utah Department of Transportation, the commercially permitted outfitters, the BLM campground hosts and campers as well as the local communities of Moab and Castle Valley to inform them of the event and possible traffic delays. The analysis of the Proposed Action assumes compliance with the attached Permit Stipulations.

#### **NO ACTION**

The No Action Alternative is to not amend the SRP for Moab Half Marathon, Inc. and not to authorize The Other Half Marathon and the Canyonlands Half Marathon.

### **CHAPTER 3 AFFECTED ENVIRONMENT**

#### **INTRODUCTION AND GENERAL SETTING**

The affected environment was considered and analyzed by an interdisciplinary team as documented in the Interdisciplinary Team Checklist. The checklist indicates which resources of concern are either not present in the project area or would not be impacted to a degree that requires detailed analysis; see Appendix A. Resources which could be impacted to a level requiring further analysis are described in Chapter 3 and impacts on these resources are analyzed in Chapter 4 below.

#### **Recreation**

There is a very high volume of use along the Dinosaur Diamond National Scenic Byway also known as Highway 128. UDOT 2014 Traffic on Utah Highways reports an average of 890 vehicles per utilize the Highway 128 from Highway 191 to the Castle Valley Road and an average of 4050 vehicles utilize the portion from Castle Valley to Interstate 70; use is higher during spring and fall (and less during winter) which is when the events would occur. The area is utilized by both private recreationists and commercial outfitters

The BLM has twelve campgrounds along Highway 128, with 193 individual sites and 12 reservable group campsites. These campgrounds are the most popular camping spots in the Moab Field Office. In 2014 there were approximately 94,909 camper nights in these individual campsites. In 2014 there were approximately 23,175 camper nights that occurred at the reservable group campsites.

The BLM has six other developed recreational facilities along Highway 128, including two of its most popular hiking trails and their associated trailheads (Grandstaff and Fisher Towers), as well as four boat ramps serving 22 commercial outfitters and private boaters.

## **CHAPTER 4**

### **ENVIRONMENTAL IMPACTS**

#### **DIRECT AND INDIRECT IMPACTS**

#### **PROPOSED ACTION**

This section analyzes the impacts of the proposed action to those potentially impacting resources described in the affected environment, Chapter 3, above.

#### **Recreation**

The proposed commercial and competitive activity would provide a positive economic benefit to the community and a unique recreational opportunity to the participants.

The events would provide a challenge and inconvenience to campers in the 12 BLM-managed campgrounds (193 individual campsites) and twelve BLM-managed reservable group campgrounds. Visitors who normally utilize the Highway 128 corridor would be denied access to the recreational facilities, including campgrounds, trailheads and boat ramps, for the duration of the two events. The commercially permitted outfitters, staff and clients at Red Cliffs Lodge and Sorrel River Ranch and Castle Valley residents would also be impacted by the road closure.

#### **Mitigation**

To mitigate the impact of the events on other users of Highway 128, Moab Half Marathon, Inc. would be required to post event information at recreation facilities along Highway 128 at least five days in advance of the event.

To mitigate the impact of the events on other users, Moab Half Marathon, Inc. would be required to notify the public about the event through local newspapers at least one week in advance of the event.

To mitigate impacts, Moab Half Marathon, Inc. would develop a parking plan to park approximately 1,000 vehicles at the Ida Gulch gravel storage area. Staff would be provided at the parking area to keep vehicles within the existing disturbed area. The perimeter of the parking area would be marked. There would be no camping at the gravel storage area.

To mitigate impacts, additional toilet facilities would be provided along the route. All trash and refuse would be removed.

#### **NO ACTION**

The No Action alternative would not meet the need for the proposed action; the benefits of proposed activity would be foregone.

## Recreation

The recreation benefit of the proposed activity would be foregone because use would not be authorized. Other recreationists, commercially permitted outfitters, staff and clients and local residents would not be inconvenienced by the events.

## CUMULATIVE IMPACTS

The proposed action is not expected to have a cumulative impact on past, present or future actions in the affected areas within the Moab Field Office.

## CHAPTER 5 PERSONS, GROUPS, AND AGENCIES CONSULTED

### List of BLM Preparers

Name	Title	Responsible for the Following Section(s) of this Document
Ann Marie Aubry	Hydrologist	Air Quality, Greenhouse Gas Emissions, Floodplains, Soils, Wetlands/Riparian Zones, Water Resources
Katie Stevens	Outdoor Recreation Planner	Areas of Critical Environmental concern, Visual Resources, Wild and Scenic Rivers, Recreation
Jared Lundell	Archeologist	Cultural Resources, Native American Religious Concerns
David Pals	Geologist	Wastes, Geology
Jan Denney	Realty Specialist	Lands/Access
Bill Stevens	Outdoor Recreation Planner	BLM Natural Areas, Socioeconomics, Wilderness/WSA, Lands with Wilderness Characteristics, Environmental Justice
Pam Riddle	Biologist	Fish and Wildlife, T&E Animal Species, Migratory Birds, Utah Sensitive Species
Jordan Davis	Rangeland Management Specialist	Invasive Species, Woodland/Forestry
Kim Allison	Rangeland Management Specialist	Rangeland Health Standards, Livestock Grazing, Vegetation
Dave Williams	Rangeland Management Specialist	T and E Plants
ReBecca Hunt-Foster	Paleontologist	Paleontology

## INTERDISCIPLINARY TEAM CHECKLIST

**Project Title:** Special Recreation Permit Amendment for Moab Half Marathon Inc.

**NEPA Log Number:** DOI-BLM-UT-Y010-2016-0053 EA

**File/Serial Number:** MFO-Y010-14-036R

**Project Leader:** Jennifer Jones

**DETERMINATION OF STAFF:** *(Choose one of the following abbreviated options for the left column)*

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that need to be analyzed in detail in the EA

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale column may include NI and NP discussions.

The following elements are not present in the Moab Field Office and have been removed from the checklist:  
Farmlands (Prime or Unique), Wild Horses and Burros.

Determi- nation	Resource	Rationale for Determination*	Signature	Date
<b>RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)</b>				
NI	Air Quality Greenhouse Gas Emissions		Am Ahly	9-30-15
NI	Floodplains		Am Ahly	9-30-15
NI	Soils		Am Ahly	9-30-15
NI	Water Resources/Quality (drinking/surface/ground)		Am Ahly	9-30-15
NI	Wetlands/Riparian Zones		Am Ahly	9-30-15
NP	Areas of Critical Environmental Concern	SU 2008 RMP	K Stevens	9/30/15
PI	Recreation	would provide opportunity would inconvenience others	K Stevens	9/30/15
NI	Wild and Scenic Rivers		K Stevens	9/30/15
NI	Visual Resources		K Stevens	9/30/15
NP	BLM Natural Areas		J Stevens	9-30-15
NI	Socio-Economics		J Stevens	9-30-15
NP	Lands with Wilderness Characteristics		J Stevens	9-30-15
NP	Wilderness/WSA		J Stevens	9-30-15
NI	Cultural Resources		J Stevens	9-30-15

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Native American Religious Concerns		[Signature]	9/30/15
NI	Environmental Justice		[Signature]	9/30/15
NP	Wastes (hazardous or solid)		[Signature]	9/30/15
NI	Threatened, Endangered or Candidate Animal Species	Activities will not greater than activities on the road	[Signature]	9/30/15
NI	Migratory Birds	Therefore resident animals	[Signature]	9/30/15
NI	Utah BLM Sensitive Species	and the habitat will not	[Signature]	9/30/15
NI	Fish and Wildlife Excluding USFW Designated Species	be impacted to a degree that needs analyzed	[Signature]	9/30/15
NI	Invasive Species/Noxious Weeds		[Signature]	9/30/15
NI	Threatened, Endangered or Candidate Plant Species		[Signature]	9/30/15
NI	Livestock Grazing		[Signature]	9/30/15
NI	Rangeland Health Standards		[Signature]	9/30/15
NI	Vegetation Excluding USFW Designated Species		[Signature]	9/30/15
	Woodland / Forestry			
	Fuels/Fire Management			
NP	Geology / Mineral Resources/Energy Production		[Signature]	9/30/15
NI	Lands/Access	Subject to valid existing rights	[Signature]	9/30/15
NP	Paleontology		[Signature]	9/30/15

**FINAL REVIEW:**

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	K. Stevens [Signature]	10/15/15	
Authorized Officer	B. Ransel [Signature]	10/15/15	

**UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT**

**COMMERCIAL AND COMPETITIVE  
SPECIAL RECREATION PERMIT STIPULATIONS**

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**Special Recreation Permit Details**

Name of Company: Moab Half Marathon, Inc.

Special Recreation Permit Number: MFO-Y010-14-0063R

Pre-trip Itineraries Required? No, unless requested by BLM

Deductions or Discounts Applicable: N/A

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In addition to the General Terms listed on page two of Form 2930-2, this permit is subject to the following additional stipulations:

**BLM Utah Terms and Stipulations**

**A. General**

- (1) Permits issued for more than one year are subject to annual validation. To secure validation the permit holder must:
- (a) have performed satisfactorily under the terms and conditions of this permit and be in conformance with applicable Federal, State, and local laws, ordinances, regulations, orders, postings, and written requirements applicable to the area and operation covered by the permit,
  - (b) ensure that all persons operating under the permit have obtained all required Federal, State, and local licenses or registrations,
  - (c) have on file, with the office issuing the permit, current insurance that meets or exceeds the BLM's minimum insurance requirements for the event or activity and identifies the United States Department of the Interior – Bureau of Land Management as additional insured, and
  - (d) have no outstanding, past due, or unpaid billing notices.
- (2) Permittees may not leave unattended personal property on public lands administered by the Bureau of Land Management for a period of more than 48 hours without written permission of the authorized officer, with the exception that vehicles may be parked in designated parking areas for up to 14 consecutive days. Unattended personal property is subject to disposition under the Federal Property and Administrative Services Act of 1949 as amended.
- (3) The permit only authorizes the use for the activity, the time(s) and in the area(s) specifically described in the approved area(s) of operation section of this permit (page one of Form 2930-2) or on the list of authorized routes or maps attached to the SRP.
- (4) The permittee must maintain on file with the BLM a current and correct list of employees who will be conducting services for the company on public land. Persons providing services under this permit must be an employee of the permittee.

(5) Placement of caches of supplies and food or equipment for future activities is not allowed without written permission of the authorized officer.

(6) The permittee and any persons providing services under this permit must present or display a copy of the Special Recreation Permit (Form 2930-2) to an authorized officers-representative, or law enforcement personnel upon request to determine the validity of the permit, ascertain if the group has a copy of the permit and are operating within authorization (locations and activities), check all required equipment, and to orient trip participants about the use of public lands and safety.

(7) The permittee shall post a copy of the Special Recreation Permit (Form 2930-2) and these special stipulations in prominent view where all participants and public may view them (e.g., at the start of an event, staging area, in a commercial outfitters office or on their website, etc.).

(8) If the permittee wishes to sell or otherwise terminate his or her business and desires that permit privileges be transferred to a new owner, the permittee shall notify the authorized officer in advance, in writing, and receive advance written approval for the permit transfer. Additionally, the permittee shall advise the authorized officer in advance of any action that would result in a change in ownership or controlling business interest.

(9) When a non-permitted company/group (e.g., booking agent, advertiser) is working with a commercially permitted company to provide a service on public lands, the advertising must reflect this partnership. For example, Company Y is not permitted but they work with Company X who is permitted. Company Y must include 'working in conjunction with Company X, a commercially permitted outfitter on all advertisements.

## **B. Financial**

(1) All fees associated with commercial use are established by the BLM Director, updated every three years based on the Implicit Price Deflator Index, and published in the Federal Register. Commercial use fees are based on a percentage (3% as of March, 2014) of the adjusted gross revenue derived from use authorized under the Special Recreation Permit. The permittee will pay at least the minimum annual fee (\$105.00 as of March, 2014), plus any commercial use fees due in excess of the minimum fee. Additionally, if more than 50 hours of BLM staff time is required for processing the permit, cost recovery of direct expenses related to the permit will be charged. If the 50-hour cost recovery threshold is anticipated to be exceeded, then recovery of costs begins with the first hour.

(2) When Special Area fees are applicable, commercial operators must collect the fees from their guests, spectators, or participants, and list the Special Area fee as a separate item assessed by BLM on trip invoices. At the end of each use season, the permittee must include a trip by trip accounting of the number of guests using the Special Areas in their year-end post use report.

(3) A minimum annual fee or prepayment of estimated use fees is due prior to use occurring. This amount is based on either the amount of fees paid the previous year or an annual revenue estimate agreed to by both the permittee and the authorized officer. For commercial use, periodic payments are allowed if the prepayment amount due exceeds \$1,000.00. At least 25% of the total amount due must be paid prior to use.

(4) The permittee must submit a post use report (see Appendix A) thirty days after the last use of the permit in a calendar year, or as agreed upon with the field office administering the permit. Alternative reporting arrangements may be established by written agreement with the authorized officer. An extension of this due date may be approved by the issuing office on a case-by-case basis. The report must contain a trip-by-trip log of: trip location, beginning and ending dates of each trip, number of clients, number of guides, and gross receipts for the trip. In reporting gross receipts, the outfitter will report all payments made by the customer including, but not limited to, activity-related equipment rental, gratuities, donations, and gifts, with the only exceptions being state and local sales tax and retail sales of durable goods that remain the property of the customer and have utility after the activity. The request for deductions based on pre- and post- trip transportation and lodging expenses and percentage of time on public land, if being claimed, must also be submitted at this time. Requests for transportation and lodging deductions must be accompanied by copies of supporting receipts documenting proof of payment.

(5) The permittee must submit a post use report to the authorized officer for every year the permit is in effect. If the post use report is not received by the established deadline, the following late fee schedule, set by the Utah BLM Director, will be initiated:

- More than 15 calendar days but less than 30 calendar days after the due date: \$125
- More than 30 calendar days after the due date, but less than 45 calendar days: \$250

Post use reports submitted more than 45 calendar days after the due date may result in criminal, civil, and/or administrative action to protect the interest of the United States.

(6) The permittee must maintain the following internal accounting records pertaining to the permit for a minimum of three years after the expiration of the permit:

- (a) W-2 records or a similar record of employment for all employees conducting activities under the permit,
- (b) a record of all financial relationships with booking agents or advertisers,
- (c) a record of all receipts or compensation including payments, gratuities, donations, gifts, bartering, etc., received from any source during activities conducted under the permit, and
- (d) a record of all payments made by the permittee and claimed as a deduction in the permittee's fee submission.
- (e) a complete and reconcilable accounting system that includes the following items:
  - 1) customer cash receipt deposit ledger or statements. These include the deposit transactions with continuous sum totals.
  - (2) bank statements/ledgers, or the deposit slip ledger receipts

### **C. Insurance**

(1) Self-insured, Federal, and State Government agencies are not required to list the United States Department of the Interior – Bureau of Land Management as an additional insured. In lieu of insurance, a written statement is required from the comptroller or risk manager that the SRP activity is in fact agency sponsored and the agency accepts liability. If a state or state subdivision, or quasi-governmental agency is not self-insured, all insurance requirements apply.

(2) At a minimum, the permittee shall have in force a property damage, personal injury, and comprehensive public liability insurance policy that meets or exceeds the BLM’s minimum insurance requirements for the event or activity.

*General Guidelines for Minimum Insurance Requirements*

SRP Event or Activity	Per Occurrence	Per Annual Aggregate
Low Risk: general non-competitive and non-commercial activities such as group camping, group activities, mounted orienteering, backpacking, or dog trials.	\$300,000	\$600,000
Moderate Risk: whitewater boating, horse endurance rides, OHV events, mountain bike races, rock climbing (with ropes), ultra-light outings, rodeos	\$500,000	\$1,000,000
High Risk: bungee jumping, speed record events, unaided rock climbing, aerial or aerial delivery	\$1,000,000	\$2,000,000 - \$10,000,000

(3) The policy shall state that the insurance company shall have no right of subrogation against the United States of America.

(4) Such insurance must name the United States Department of the Interior – Bureau of Land Management as an additional insured and provide for specific coverage of the permittee's contractually assumed obligation to indemnify the United States.

(5) The permit is not valid unless the permittee maintains a current authenticated certificate of the required insurance on file with the office issuing the permit. The insurance need only be valid during periods of actual use (which may include a set-up and break-down period).

(6) The permittee shall indemnify and hold harmless the United States against any responsibility or liability for damage, death, injury, or loss to persons and property which may occur during the permitted use period or as a result of such use.

(7) The name of the insured on the insurance policy must be the same as the name on the permit. Those permittees holding insurance policies which only insure the permittee and not the permittee’s employees must ensure that their employees also have the required insurance in effect, and that a certificate of insurance is furnished to the authorized officer.

**D. Marking of Outfitter Vehicles**

Every street-legal motor vehicle used to transport clients or equipment shall be marked with at least one sign, decal, or placard on each side of the vehicle. The sign shall at a minimum include the company name and must be readable from a distance of 50 feet.

#### **E. Pre-Trip Itinerary**

If required, the permittee will file a notice of intent in writing with the BLM prior to each trip. The notice of intent must specify the intended dates of the trip, number of clients, number of guides, name of the lead guide and area to be visited, including the location of camps. See Special Recreation Permit Details on page one of this document for itinerary requirements for this permit.

#### **F. Environmental and Resource Protection**

All activities must conform to *Leave No Trace* principles.

(1) For all activities and at all base camps with locations served/supported by a motorized vehicle, the permittee must have a toilet system that allows for the proper carry-out and disposal of solid human body waste in a responsible and lawful manner that is adequate for the size of the group and length of the trip. Toilets must be accessible for use by passengers and crew at all sites where a company motorized vehicle is present, except in developed locations where public restrooms are provided. In locations remote from a permittee's vehicle, solid human waste must be cat holed in a sunny location in bare soil or carried out (unless otherwise stipulated). Toilet paper must be carried out and not buried or burned.

(2) Cans, rubbish, and other trash shall not be discarded, buried, or dumped on public lands or related waters. Wet garbage such as egg shells, orange peels, leftover solid food, bones, melon rinds, etc., must be carried out. Trash cleanup at campsites and day use areas will include all litter or discarded items including small items such as bottle caps, cigarette butts and micro-trash.

(3) Washing or bathing with soap is not permitted in tributary streams, springs or other natural water sources. Dishwater must be strained prior to dispersal (scattering). Dishwater and bathwater may not be dispersed within 100 feet of streams, springs, or other natural water sources.

(4) The permittee will be responsible to ensure that historical, archaeological, cultural, or ecological values are not damaged, destroyed, or removed by any participants during authorized activities.

(5) The permittee must conduct operations authorized by the permit in accordance with applicable BLM management plans and the permittee's own operating plan submitted to the BLM in support of this permit.

(6) The number of participants on any trip, including guides, may not exceed the number specified in the permittee's operating plan and approved permit. The exception to this requirement is over-the-road bus tours using state and Federal highway and class B county roads.

(7) No camping is permitted within 300 feet of a known prehistoric or historic site.

(8) No camping is permitted within 300 feet of a water source other than perennial streams unless prior written permission is received from the authorizing officer.

#### **G. Fires**

This permit does not waive any applicable fire restrictions and orders that may affect the use of camp fires, charcoal or cooking fires. The following stipulations apply unless specifically waived by written permission of the authorized officer:

- (1) At sites accessed by the permittee's motor vehicle(s), the permittee must provide its own fuel wood.
- (2) At sites accessed by the permittee's motor vehicle(s), the permittee must use a fire pan to contain the fires, ash, and charcoal. Charcoal and ash from the fire pan must be hauled out.
- (3) Gathering wood from standing trees, live or dead, is prohibited.
- (4) Use of dead and down wood is permitted only at backcountry sites not accessed by the permittee's motor vehicle(s). In such cases, if a fire pan is not used, burn all wood to ash and naturalize the area before leaving.
- (5) Scatter fuel wood piles and rock lined fire rings before leaving the site.

#### **H. Informed Risk**

- (1) The permittee shall inform clients of the inherent risks involved with the activity.
- (2) The permittee shall review potential safety concerns, contingency plans and potential consequences with its clients prior to operations.
- (3) The permittee shall utilize the appropriate and proper equipment and gear for the activity.
- (4) The permittee shall ensure that all persons operating under the authorization are made aware of the physical safety hazards associated with abandoned mine openings and the potential for encountering abandoned mines within the permitted area. The permittee must present or display a copy of the attached *Utah Abandoned Mine Safety: Stay Out and Stay Alive!* brochure in prominent view where all participants and public may view it. To obtain additional copies of the brochure, contact your local BLM office.

#### **I. Safety and Equipment**

- (1) The permittee will ensure that activities are conducted in compliance with all laws and regulations relating to vehicle operations, land use restrictions, food handling, and any other applicable regulations.
- (2) Every person serving as a guide on public land must at a minimum be trained and currently certified in Basic First Aid and Cardio-pulmonary Resuscitation (CPR). Each guide must have legible copies of certification cards in his/her possession while operating under a BLM Special Recreation Permit in Utah. In addition, certification cards must be filed at the permittee's headquarters and available for BLM review if requested.
- (3) The following equipment must be carried on all commercial trips:
  - (a) A first aid kit adequate to accommodate each activity, group, or subgroup will be carried on all trips.
  - (b) Adequate repair kits and spare supplies appropriate for the trip and activity.

- (4) The following procedures must be followed during all commercial activities:
- (a) Unless specifically authorized in the permit, discharge of firearms is allowed only for legal pursuit of game animals by a licensed hunter.
  - (b) Use of explosives and fireworks is prohibited.

**MOAB FIELD OFFICE SUPPLEMENTAL STIPULATIONS**

- (1) The permittee will prepare and submit to BLM a safety and public information plan at least two weeks prior to the event. The plan will be subject to BLM approval and at a minimum contain first aid, traffic, fire suppression, and spectator control provisions.
- (2) Event information must be provided to local media and recreation-related services (such as Grand County Sheriff, Search and Rescue and Emergency Medical Services) at least two weeks prior to the event: 435-259-8115.
- (3) The permittee must provide minimum impact practices information to participants and spectators as a part of race registration materials and/or promotional materials.
- (4) The start and finish location (when either is located on BLM land, including the highway) will be signed at least one week prior to the event to inform other public land visitors of the event and possible travel delays. Signs must be visible from a distance and be printed on a durable, weather-resistant surface.
- (5) The permittee must flag and/or sign the route to ensure participant safety.
- (6) The permittee will be held responsible for any resource damage including but not limited to repairing any road damage or off-road travel damage caused by the event, including spectator-caused damage.
- (7) Aid stations and spectator areas will be located in previously disturbed areas adjacent to the approved course.
- (8) Course marshals will be located along the course, at areas that the permittee has determined to have safety concerns.
- (9) All flags, route markers and signs will be removed from the course within 24 hours following the event. All event-related trash, signage, and flagging will be removed from the course immediately following the event. In the event that evidence of the competitive event remains along the course, the permittee will coordinate with the BLM to develop a timeline for corrective actions that will restore the course to the condition that existed prior to the competitive event.
- (10) The permittee will provide the BLM with a complete list of items that will be for sale on BLM lands and will report gross revenue for any sales.
- (11) Permittee requested to remove a portion of the fence in Gold Bar C and has agreed to replace the fence to the original condition.
- (12) Moab Half Marathon, Inc. is required to post event information at recreation facilities along the highways at least five days in advance of the event.

(13), Moab Half Marathon, Inc. is required to develop a parking plan to park approximately 1,000 vehicles at the Ida Gulch gravel storage area. Staff would be provided at the parking area to keep vehicles within the existing disturbed area. The perimeter of the parking area would be marked. There would be no camping at the gravel storage area.

(14) Moab Half Marathon, Inc. will provide additional toilet facilities along the route and ensure that all trash and refuse is removed timely.



**FINDING OF NO SIGNIFICANT IMPACT  
AND  
DECISION RECORD**

**Moab Half Marathon Inc. (Commercial and Competitive Running Events)**

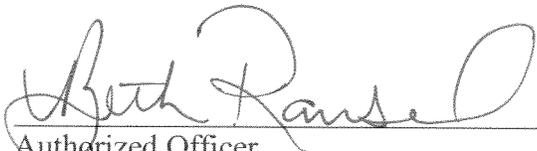
DOI-BLM-UT-Y010-2016-0003 EA

**FONSI:** Based on the analysis of potential environmental impacts contained in the present document, I have determined that the action will not have a significant effect on the human environment and an environmental impact statement is therefore not required.

**DECISION:** It is my decision to amend the current Special Recreation Permit for Moab Half Marathon, Inc. to operate in the following areas *Grandstaff Trailhead Parking Area, Take Out Beach Parking Area, Highway 128, including developed recreation facilities and campground restrooms (Canyonlands Half Marathon and Five Mile Race); Ida Gulch Gravel Parking Area and Highway 128, including developed recreation facilities and campground restrooms (The Other Half)*. These locations are in addition to the Gold Bar group campground and State Route 279 locations previously permitted (*Thelma and Louise Half Marathon*).

This decision is contingent upon meeting all stipulations and monitoring requirements attached to the Environmental Assessment.

**RATIONALE:** The decision to authorize the amendment for the Special Recreation Permit held by Moab Half Marathon, Inc. has been made in consideration of the environmental impacts of the proposed action. The action is in conformance with the Moab Resource Management Plan, which allows for recreation use permits for a wide variety of uses to enhance outdoor recreational opportunities, provide opportunities for private enterprise, manage user-group interaction, and limit the impacts to such uses upon natural and cultural resources.

  
\_\_\_\_\_  
Authorized Officer

  
\_\_\_\_\_  
Date