

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

**Environmental Assessment
DOI-BLM-UT-Y020-2012-0001**

December 2015

Hole-in-the-Rock Foundation Trekking SRP

Location:

Salvation Knoll Route
T. 37 S., R. 18 E., Sections 10, 11, 13 & 14
T. 37 S., R. 19 W., Section 16 and
Protraction Blocks 49, 50, 51, 53, 54 & 55

Long Flat Route
T. 38 S., R. 18 E., Sections 11, 12 & 13
T. 38 S., R. 19 E., Section 32 and
Protraction Blocks 50, 51, 60 & 61

San Juan Hill Route
T. 40 S., R. 20 E., Sections 35 & 36
T. 41 S., R. 20 E., Sections 2, 10, 11 & 15

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Hole-in-the-Rock Foundation Trekking SRP
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1.0 PURPOSE & NEED

1.1 Introduction

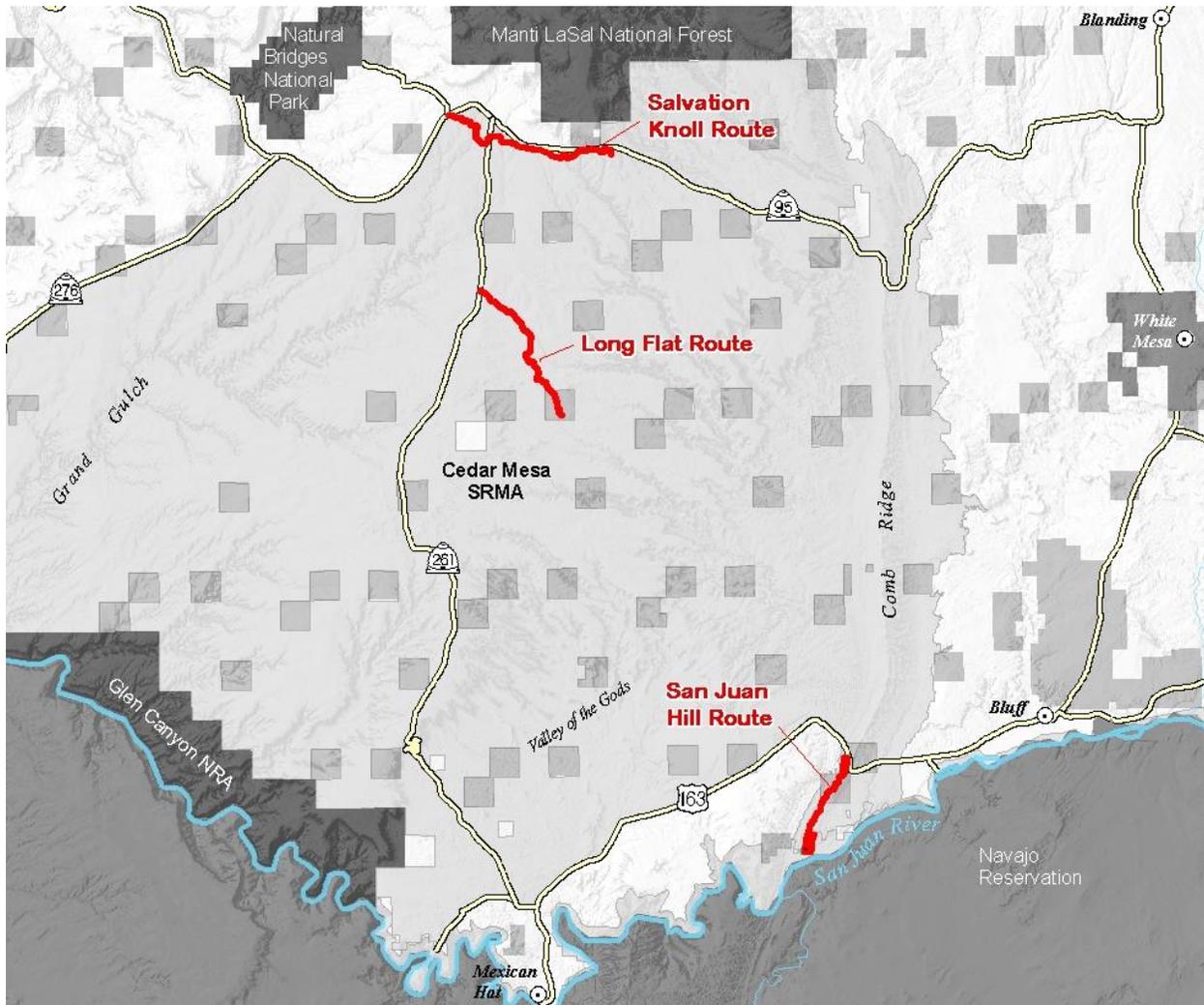
This Environmental Assessment (EA) has been prepared to disclose and analyze the environmental consequences of the issuance of a Special Recreation Permit (SRP) for guided hikes and trekking in the Cedar Mesa and Comb Wash area as proposed by the Hole-in-the-Rock (HIR) Foundation. The EA is a site-specific analysis of potential impacts that could result with the implementation of a proposed action or alternatives to the proposed action. The EA assists the BLM in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination as to whether any “significant” impacts could result from the analyzed actions. “Significance” is defined by NEPA and is found in regulation 40 CFR 1508.27. An EA provides evidence for determining whether to prepare a statement of “Finding of No Significant Impact” (FONSI) or an Environmental Impact Statement (EIS). If the decision maker determines that this project has “significant” impacts following the analysis in the EA, then an EIS would be prepared for the project. If not, a Decision Record (DR) may be signed for the EA approving a selected alternative, whether the proposed action or another alternative, or some variation thereof. A Decision Record, including a FONSI statement, documents the reasons why implementation of the selected alternative would not result in “significant” environmental impacts (effects) beyond those already addressed in Monticello Field Office Resource Management Plan (November 2008).

1.2 Background

The Hole-In-The-Rock Foundation (the proponent) proposes to conduct guided hiking and handcart treks (collectively termed “treks”) as day use only on BLM lands at various locations associated with the HIR Trail in three general areas consisting of the Salvation Knoll/Cedars, upper Snow Flat Road/Long Flat, and the lower Comb Wash/San Juan Hill (Map 1). The Salvation Knoll route parallels the northern edge of Cedar Mesa, and mostly follows an abandoned alignment of Highway 95. This route alternates between designated hiking trail, Class B and D roads, undesignated old highway segments, and the Salvation Knoll Hiking Route. The Long Flat route follows road D0089 as it crosses the Mesa Top from Highway 261 to the Snow Flats Road (B237). Because these two routes are located entirely on Mesa tops, they do not intersect or overlap permitted canyons within Cedar Measa. The San Juan Hill route follows existing roads D0167 and D4587 from Highway 163 towards the San Juan River, eventually climbing San Juan Hill on a designated hiking trail. The routes identified in the proposal were selected for their close cultural associations with important historical events related to pioneer history and the settlement of this area during the Hole in the Rock Expedition of 1879.

The treks are intended as experiential learning opportunities for up to 250 participants at a time focused on historical events of the HIR Expedition in 1879 and 1880. Use would be authorized year-round, but would be concentrated in a “high use” season from June 1st to August 31st. Special recreation permits of this type are typically initially authorized for a probationary term of one year and would then be considered for authorization for a period of five to ten years. Activities authorized on BLM land would include hiking, limited vehicle and equestrian support, handcart use, and parking. Organized group

camping would take place on lands administered by the Utah School and Institutional Trust Lands Administration (SITLA).



Map 1. Vicinity Map for Proposed Salvation Knoll, Long Flat, and San Juan Hill Routes

1.3 Need for the Proposed Action

The need for the proposed action is to allow Hole-in-the-Rock Foundation to facilitate heritage tourism opportunities for visitors to San Juan County. BLM’s response to the Special Recreation Permit application per 43 CFR 2932.25 will analyze the proposal and a range of alternatives in order to ensure compliance with land use plans and to minimize or eliminate impacts to Area of Critical Environmental Concern (ACEC) values, cultural resources, raptors and migratory birds, recreational users, threatened and endangered species, and wildlife.

1.4 Purpose(s) of the Proposed Action

The purpose for analyzing this action in an EA is established by Bureau of Land Management’s (BLM’s) responsibility under the Federal Land Policy and Management Act (FLPMA). FLPMA establishes outdoor recreation as one of the principal uses of public lands and directs the Department Of Interior to

regulate through permits or other instruments the use of the public lands, which includes commercial recreation use. Heritage tourism is recognized as an appropriate use of public lands in the Monticello Resource Management Plan (RMP). Specifically, the RMP states that Hole in the Rock Trail is managed for Heritage Tourism.

The decision to be made is whether or not to issue an SRP to Hole-in-the-Rock Foundation, and if a permit is issued, what the terms and conditions on the permit **would be**. BLM will consider approval of the proposed recreational activity in a manner that avoids or reduces impact on resources and activities as identified in the Monticello BLM RMP, best meets the objectives of the San Juan River ACEC, the San Juan River **Special Recreation Management Area** (SRMA), and the Cedar Mesa SRMA, and prevents unnecessary or undue degradation of the public lands.

1.5 Conformance with BLM Land Use Plan(s)

The Proposed Action and alternative are subject to and have been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3).

Plan: Monticello Field Office Resource Management Plan (RMP) November 17, 2008 (BLM 2008a).

Plan Analysis: Monticello Field Office Draft Resource Management Plan and Final Environmental Impact Statement (EIS) August 2008 (2008b).

Page 126 and Appendix B (page 8) of the RMP (2008a) identify the following decisions regarding the San Juan River ACEC that relate to the activity:

1. Decision ACEC-53: “The ACEC will be managed with the following prescriptions:
 - Managed to limit recreation use if wildlife values are being adversely impacted.
 - Designated access trails to cultural sites as necessary to protect cultural resources.
 - Recreation management prescriptions identified under the San Juan River SRMA in the Recreation Section of this Chapter will also be followed and is consistent with the management outlined above.”
2. Appendix B: “No surface-disturbing activities are allowed. Exception: An exception could be granted if activities are short term or after an analysis the authorized officer determines that the project would benefit the relevant and important values. Small signs, kiosks, route designators, etc. used to manage activities or resources could also be allowed.”

Pages 59-61 of the RMP (2008a) identify the following decisions regarding Cultural Resources that relate to the activity:

1. Decision CUL-4: Impacts to any NRHP-listed or eligible cultural resource sites, objects, or districts will be mitigated in accordance with 36 CFR 800, generally through avoidance of cultural sites. Should it be determined that cultural resources eligible or listed on the NRHP cannot be avoided, consultation with the State Historic Preservation Officer (SHPO) will be initiated and the procedures identified in the National Programmatic Agreement and the Utah State BLM Protocol for meeting the BLM's responsibilities under the NHPA will be followed.
2. Decision CUL-10: The BLM will work with tribes and other communities with traditional linkage to public lands to identify places of traditional cultural and religious importance. To the extent

allowed by statute, regulation, and policy, such locations will be managed to minimize impacts to important values and to allow continued access for traditional purposes.

3. Decision CUL-13: The BLM will work with local communities and other groups to foster heritage tourism throughout the Monticello PA.

Page 135 of the RMP (2008a) identifies the following prescriptions regarding Historic Trails that relate to the activity:

1. Decision HT-2: "Hole in the Rock Trail is managed for Heritage Tourism in consultation with the Utah State Historic Preservation Office and Native American Tribes, as well as interested stakeholder groups."
2. Decision HT-9: "Landmark (structures, features) will be interpreted only if the action will not impact the values of the site/landmark."

Page 88 of the RMP (2008a) identifies the following Goals and Objectives for Recreation: to provide for multiple recreational uses of the public lands and to sustain a wide range of recreation opportunities and potential experiences for visitors and residents while supporting local economic stability and sustaining the recreation resource base and other sensitive resource values. Decisions found in the RMP that relate to the activity are as follows:

1. Decision REC-17: "Special Recreation Permits will be issued as a discretionary action as a means to help meet management objectives, control visitor use, protect recreational and natural resources, and provide for the health and safety of visitors."
2. Decision REC-18: "Special Recreation Permits will contain standard stipulations appropriate for the type of activity and may include additional stipulations necessary to protect lands or resources, reduce user conflicts, or minimize health and safety concerns."
3. Decision REC-19: "Special Recreation Permits will be used to manage different types of recreation associated with commercial uses, competitive events, organized groups, vending and special services. These recreation uses can include, for example, large group events, river guide services, and commercial recreation activities."
4. Decision REC-23: "Commercial motorized/mechanized events/tours are allowed on designated routes, except in WSAs."
5. Decision REC-145: "Encourage "Leave No Trace" and "Tread Lightly" principles throughout the Extensive Recreation Management Area (ERMA)".

Page 103 of the RMP (2008a) identifies the following Goals and Objectives for Cedar Mesa SRMA: to provide outstanding recreational opportunities and visitor experiences while protecting natural and cultural resource values through integrated management between the BLM and NPS. Provide a safe, natural well-designed accessible recreational experience for all visitors to enjoy the world renowned cultural resources and scenic values. Use visitor information and interpretation as a primary tool to protect sensitive resources, discourage vandalism, and encourage visitor appreciation of public lands. Decisions found in the RMP that relate to the activity are as follows:

Cedar Mesa SRMA Comb Ridge Recreation Management Zone

1. Decision REC-111: "This area is a RMZ within the SRMA due to easy vehicular accessibility, high level of visitation and popularity, and density of significant cultural ruins and rock art."

Specific management is needed to resolve conflicts between recreation use and protection of cultural resources. The objective is to manage for heritage tourism and traditional cultural values in a regulated manner.”

2. Decision REC-112: “The Cedar Mesa SRMA limitations described above for Mesa Top Day Use, Mesa Top Camping, In Canyon Private/Commercial Day Use, and In Canyon Permitted Overnight Camping do not apply to the Comb Ridge RMZ.”
3. Decision REC-113: “The following management prescriptions apply in this RMZ:
 - Private and commercial group size limited to 12 people”
4. Appendix B (p. 7): “Cedar Mesa SRMA (Comb Ridge Mgt. Zone) 30,752 acres - No surface-disturbing activities are allowed. Exceptions: An exception could be granted if after an analysis the authorized officer determines that the project would be in the public interest.”

Page 95 of the RMP (2008a) identifies the following Goals and Objectives for the San Juan River Special Recreation Management Areas (SRMAs): To provide outstanding river related recreational opportunities and visitor experiences while protecting natural and cultural resource values with integrated management between the BLM, NPS, and the Navajo Nation.

1. Appendix B (p. 9): “No surface-disturbing activities are allowed. Exceptions: An exception may be granted if, after an analysis, the authorized officer determines that the disturbance is related to or can be shown to benefit recreational experiences.”

Page 141 of the RMP (2008a) identifies the following Goals and Objectives for Travel Management: The BLM will provide opportunities for a range of motorized recreation experiences on public lands while protecting resources and minimizing conflicts among various users. Decisions found in the RMP that relate to the activity are as follows:

1. Decision TM-20: “Provide opportunities for non-mechanized travel (hiking) on all routes open to mechanized use. Manage routes to exclude motorized and mechanized use and provide opportunities for non-mechanized travel independent of motorized and mechanized routes.”

1.6 Relationship to Statutes, Regulations, or Other Plans

This EA was prepared in conformance with NEPA and with all applicable regulations and policies subsequently implemented, including Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), BLM NEPA Handbook H-1790-1, and U.S. DOI Department Manual [DM] 516, Environmental Quality. Other federal laws that apply to this proposal are listed in Table 1.

Table 1. Regulatory Authorities and Guidance

Federal Authorities and Responsibilities	
Cultural Resources	
BLM Native American Trust Resource Policies (303 DM 2 and 512 DM 2); BLM H-8120-1 – General Procedural Guidance for Native American Consultation; BLM Manual 8120, Tribal Consultation under Cultural Resources; Executive Order (EO) 13175 Consultation and Coordination with Indian Tribal Governments (65 FR 67249, November 2000); EO 13007 Indian Sacred Sites (61 FR 26671, May 1996); American Indian Religious Freedom Act of 1978 (Public Law [PL] 95-341; 42 United States Code [USC] 1996)	Native American consultation regarding possibly affected traditional cultural properties.

Archaeological and Historic Data Preservation Act of 1974 (PL 86-253, as amended by PL 93291; 16 USC 469); Archaeological Resources Protection Act of 1979 (PL 96-95; 16 USC. 470aa-mm); National Historic Preservation Act of 1966, Section 106, (PL 89-665; 16 USC 407(f) and 36 CFR Part 800)	Requirement for cultural resource inventories to determine the presence of cultural resources and protection of sites discovered during project operations.
Native American Graves Protection and Repatriation Act of 1990 (PL 101-601)	Procedures to be followed in the event of discovery of human remains.
Paleontological Resources	
Paleontological Resources Preservation Act of 2009	Requirement for paleontological resource inventories to determine the presence of fossil resources and protection of sites discovered during project operations.
Land Management and Use	
Federal Land Policy and Management Act of 1976, Section 201(a) (PL 94-579; 43 USC 1701 et seq.) National Environmental Policy Act of 1969 (PL 91-190; 42 USC 4321); 40 CFR Parts 1500-1508 CEQ implementation of NEPA; BLM Handbook H-1790-1; U.S. Department of the Interior Department Manual 516, Environmental Quality	Management of federal lands under principles of multiple use and sustained yield while protecting environmental resources. Evaluation of impacts to environmental resources that may result from a proposed action prior to its implementation.
Travel Management	
43 CFR 8342.1(a)(b)(c)(d)	Criteria used to locate proposed parking areas.
Wildlife	
Bald Eagle and Golden Eagle Protection Act of 1940 (16 USC 668-668d, 54 Stat. 250) as amended [PL 95-616 (92 Stat. 3114)] November 8, 1978.	Coordination, consultation and impact review regarding eagles.
Endangered Species Act of 1973 (PL 85-624; 16 USC 661, 664 1008)	Coordination, consultation and impact review regarding federally listed threatened and endangered species.
Migratory Bird Treaty Act of 1918 (16 USC 703-712, as amended); EO 13186 Responsibilities of Federal Agencies to Protect Migratory Birds; BLM Memorandum of Understanding WO-230-2010-04 To Promote the Conservation of Migratory Birds	Migratory bird impact coordination and protection of nesting migratory birds.
State of Utah Authorities and Responsibilities	
Cultural Resources	
Section 106 of National Historic Preservation Act of 1966, as amended (16 USC 470 et seq.) and Advisory Council Regulations on the Protection of Historic and Cultural Properties, as amended (36 CFR Part 800)	Utah State Historic Preservation Office consultation on cultural resource survey, evaluation, and mitigation.
Wildlife	
Utah Division of Wildlife Resources (UDWR) Rules and Regulations, Rule 657 series; UAC Title 23, Wildlife Resources of Utah.	Coordination on wildlife and state-sensitive species; management of big game and wildlife.

1.7 Identification of Issues

Scoping is a process used to define the scope of the analysis by identifying issues related to a proposed project. An issue is defined as a point of disagreement, debate, or dispute with a Proposed Action based on some anticipated environmental effect. Issues point to environmental effects and may lead to identification of design features incorporated into a Proposed Action Alternative, mitigation measures, or other alternatives.

The BLM utilized an interdisciplinary team (IDT) and public scoping comments to identify issues. The resources and issues considered by the IDT are provided in the IDT Checklist (Appendix A). The IDT Checklist includes a discussion of resources and issues not present (NP) and a discussion of resources/issues where no impact (NI) is anticipated. The resources/issues identified as NP and NI will not be analyzed further in this environmental assessment. Any resource issue carried forward for further analysis is identified on the Checklist where a potential impact (PI) is anticipated.

Public scoping is used to refine BLM-identified issues and identify new issues or possible alternatives. The BLM posted the proposed action on the Environmental Notification Bulletin Board (ENBB) on October 8, 2014, to solicit public input and concerns. A 30-day public scoping period was announced to the public in a press release issued for the Proposed Action on October 8, 2014. As a result of this press release 68 comment responses from 65 individuals and groups were received. Of those, 34 responses were determined to have no substantive comments as per BLM Utah NEPA Guidebook (p106). Two responses contained comments which provided specific alternatives, analyzed below as Alternative D and Alternative E. As a result of public and internal scoping, the issues carried forward for further analysis are: ACECs, Cultural Resources, Recreation, Raptors/Migratory Birds, Threatened and Endangered Species, and Wildlife, which are stated as follows:

1.7.1 ACECs

- *Does the proposed 0.31 acres of new ground disturbance conform with the No Surface Occupancy stipulation for the San Juan River ACEC?*
- *Could an exception be granted because activities are short term or because after an analysis the authorized officer determines the project would benefit the relevant and important values?*

1.7.2 Cultural Resources

- *To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?*
- *To what extent will proposal foster heritage tourism throughout the Monticello PA?*

1.7.3 Recreation/RMZ

- *To what extent could this proposal potentially impact other recreational users?*
- *Does the proposed group size of 250 on the roads exceed the stipulated commercial group size limit for Comb Ridge RMZ?*

1.7.4 Wildlife

- *To what extent will the Proposed Action and Alternatives impact raptors and migratory birds?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate wildlife species?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate species habitat?*
- *To what extent could this proposal potentially impact crucial mule deer winter range?*

1.8 Issues Considered but Eliminated from Further Analysis

Some issues brought up in internal and external scoping were considered, but eliminated from analysis based upon design features incorporated within the action alternatives. These included the potential for wild land fire impacts and potential impacts to livestock grazing operations. See the Interdisciplinary Team Checklist (Appendix A) for the full rationale for eliminating these resources from analysis.

1.9 Summary of EA Organization

Chapter 1 has presented the purpose and need for the proposed SRP, as well as the relevant issues; i.e., those elements or resources that could potentially be affected by the implementation of the Proposed Action. In order to meet the purpose and need of the proposed project in a way that resolves the issues, the BLM has considered and/or developed a range of action alternatives. These alternatives are presented in Chapter 2. The setting or description of the affected environment is presented in Chapter 3. The potential environmental impacts or consequences resulting from the implementation of each alternative considered in detail are analyzed in Chapter 4 for each of the identified issues brought forward from the checklist analysis. Chapters 5 and 6 provide information Consultation and References respectively.

2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION

2.1 Introduction

The BLM IDT rigorously explored a reasonable range of alternatives that meets the underlying purpose and need for the proposed project and that respond to the issues. Six alternatives are carried forward for full analysis within this EA: Alternative A, which is the Proposed Action; Alternative B, an alternative where changes to their original application was provided by Hole-in-the-Rock Foundation; Alternative C, a proposal to limit group size to a total of 12 participants trekking at any one time in the Comb Ridge RMZ; Alternative D, a proposal to limit recreational conflicts by limiting the season of use to a single month; Alternative E, a proposal to limit recreational conflicts by limiting treks to one per trail per month; and Alternative F, the No Action alternative, which is required by the CEQ regulations (40 CFR 1502.14) and provides important baseline information. Alternative A is described in Section 2.2. Alternative B is described in Section 2.3, and so on. Section 2.7 presents one alternative that was considered but eliminated from further analysis.

2.2 Alternative A – Proposed Action

Hole-in-the-Rock Foundation proposes to conduct guided hiking and handcart treks as day-use only on BLM lands, and organized group camping on lands administered by the Utah School and Institutional Trust Lands Administration (SITLA). Collectively, these activities referred to as “treks”, are proposed at three locations associated with the HIR Trail. These three general areas are the Salvation Knoll/Cedars area, upper Snow Flat Road/Long Flat area, and the lower Comb Wash/San Juan Hill area (Photos 1 – 4 and Appendix B). Camping would not be authorized on BLM lands, but might occur on adjacent SITLA property. The proponent has consulted with the (SITLA) and the Utah Department of Transportation (UDOT) and will obtain appropriate permitting and authorizations as needed for the use of SITLA lands and UDOT highway right-of-way (ROW).



Figure 1. Proposed Salvation Knoll Route on designated hiking trail (left) and on Class D Road (right)

2.2.1 *Schedule and User Days*

Year round use consisting of a maximum of 28,800 user days is proposed. Approximately 90% of use would occur during a ‘high use’ season. The high use season would occur over 13 weeks from June 1st through August 31st of each year when a maximum of 26,000 user days could be utilized. Weekly limits of 2,000 user days from Sunday through Saturday would apply to combined use of all activity on the three routes during the high use season. The maximum use on any one of the three routes would not exceed 1,750 user days per week. The remaining 2,880 user days (maximum) would be utilized during the rest of the calendar year. Itineraries for all trips will be provided in advance to the Monticello BLM and subject to approval to avoid conflicts with other uses of the proposed routes.



Figure 2. Proposed Long Flat Route on D0087 (left) and Proposed San Juan Hill Route on D0167 (right)

2.2.2 *Activity Details*

The Proposed Action utilizes 2.9 miles of designated hiking route, 0.9 miles of designated ATV route, 12.6 miles of designated roads (Class B and D), and 10.2 acres of existing disturbed areas on BLM (Table 2). The proposed action proposes construction of 0.1 miles of new hiking trail and 0.9 acres of new disturbance for parking areas. Hole-in-the-Rock Foundation proposes using four acres of SITLA land for parking, staging, and camping.

Activities during the treks consist of guided hiking but could include handcart trekking, with support provided by vehicles and horses in certain locations. Participants would congregate in parking and activity areas (Reference Appendix C for detailed breakdown of Proposed Action by Route). Group size would be limited to 250 people at any single location on BLM lands with the exception of the San Juan Hill Route and the Salvation Knoll hiking trail. San Juan Hill trekkers would be divided into two groups of 125; one group would travel from north to south, and after they have completed, the second group would travel south to north. Groups hiking the Salvation Knoll designated hiking trail would be limited to 25 at a time.

Table 2. Alternative A - Proposed Use Numbers, Locations, and Parking Areas

		Salvation Knoll		Snow Flat/ Long Flat	San Juan Hill		All Routes
		Old Highway	Hiking Trail		Class D Road	Hiking Trail	
Proposed Use Numbers	users on routes (concurrently)	250	250	250	250	250	750
	people/group	250	25	250	125	125	250
	max user days/week	1750	1750	1750	1750	1750	2000
	max handcars	0	0	30	15	0	
	max vehicles	0	0	6	25	0	
	max horses	4	0	4	4	0	
Proposed Routes (Travel Management Plan)	designated pedestrian trail	2.68 miles Y020-12-006	0.22 miles Y020-10-15	0	0	0	2.90
	designated ATV trail	0.93 miles 090-06-06 SK	0	0	0	0	0.93
	Class B or Class D Road	1.67 miles D3658,D3659, D3663,D3661, D3665,D3666, B2331	0	6.17 miles D0089	4.79 miles D0167, D4587	0	12.63
	newly designated route (on existing disturbance)	1.97 miles (1.30 BLM, 0.67 SITLA)	0	0	0	0.51 miles	2.48
	new trail construction	0	0.09 miles	0	0	0	0.09
TOTAL MILES		7.25 miles	0.31 miles	6.17 miles	4.79 miles	0.51miles	19.03
Proposed Parking/ Activity Areas	total number of parking areas, activity areas and campsites	7 (6 on BLM, 1 on SITLA)		2 (1 on BLM, on 1 SITLA)	5 (4 on BLM, 1 on SITLA)		14
	new disturbance on BLM lands	0.30		0.34 acres	0.22 acres		0.86
	existing BLM disturbance	7.89 acres		none	2.40 acres		10.29
	SITLA parking areas and camps	2.45 acres		1.12 acres	0.47 acres		4.04 acres
	tree removal	12 junipers removed		none	none		12 trees
	TOTAL ACRES	10.64 acres		1.46 acres	3.09 acres		15.19

2.2.3 Design Features

The following are measures/features that would be implemented to minimize environmental impacts on BLM-managed lands:

- The SRP would be issued for a one year probationary period with potential for a five year renewal based on satisfactory performance review and compliance with stipulations. Permits issued for more than one year are subject to annual validation.
- The permit holder will be held legally and financially responsible for historical, archaeological, cultural, or ecological values damaged, destroyed, or removed by trip participants. Responsibility includes wildfire caused by members of the party. Visitors must report all wildfire to the nearest BLM office. Cultural artifacts located on the surface of an archaeological site or isolated artifacts

are not to be disturbed. Moving or disturbing cultural artifacts from any location is a violation of federal law.

- The permittee must provide an itinerary to the Authorized Officer in advance of any use involving stock animals and must abide by the Cedar Mesa Stock use stipulations.
- Participants must stay on designated routes or in approved parking/staging areas at all times to prevent damage to cryptobiotic soil crusts, water sources, wildlife, and cultural resources.
- All motorized or mechanized vehicle travel is limited to designated roads.
- 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). A first aid kit adequate to accommodate each activity, group, or subgroup must be carried on all trips.
- The permittee must PACK IT IN-PACK IT OUT. All trash, including toilet paper must be carried out. All liquids must be strained before disposal, then discarded at least 200 feet away from water sources, camps, and trails. The permittee must have a toilet system that allows for the proper carry-out and disposal of solid human waste in a responsible and lawful manner that is adequate for the size of the group and length of the trip.

2.3 Alternative B – Hole-in-the-Rock Foundation Revisions

Alternative B was provided by Hole-in-the-Rock Foundation in response to public comments and to clarify the Foundation’s request. Under Alternative B, the Foundation expects to only host up to two parties of 250 per week at their Bluff facility. Each of the hosted parties may complete a maximum of two treks per stay, with an expected use of one trek per group.

Alternative B includes all activities and design features described in Alternative A including parking and disturbance with the following additional design features provided by Hole-in-the-Rock Foundation in response to public comments:

- Only one trail would be used per day.
- Trips would take place Monday – Saturday only.
- Trips would be limited to a maximum of four per week, with an expected use of two per week.
- Approximately 75% of trips would occur in the busy season, with up to 25% of use in the off season.
- Larger parties would be broken into groups of 12 or less participants to ensure compliance with RMP regulations. Ratio of adults to youth participants would be at least 1:5.
- Stationary portable toilets at parking areas would be supplemented by “luggable loos” which would be transported by vehicles on designated routes only. Participants would be required to use the loos and would not be allowed to leave the trail.
- Group leaders would receive training on BLM Permit requirements.
- Vehicles traveling to the base of the dugway would be limited to 25 at a time. Vehicles traveling to the base of San Juan Hill would be limited to 2 at a time.

2.3.1 Schedule and User Days

- Year round use consisting of a maximum of 17,100 user days is proposed. Approximately 75% of use would occur during a ‘high use’ season. The high use season would occur over 13 weeks from June 1st through August 31st of each year when a maximum of 13,000 user days could be

utilized. Weekly limits of 1,000 user days from Monday through Saturday would apply to combined use of all activity on the three routes during the high use season. The remaining 4,100 user days (maximum) would be utilized during the rest of the calendar year (41 weeks).

- Participants would be divided into groups of 12. The ratio of adults to youth would be about 1:5. Up to 21 groups, with a maximum of 250 people, may be assembled at any single location on BLM lands with the exception of the San Juan Hill Route and the Salvation Knoll Hiking trail. At Salvation Knoll Hiking Route, 25 participants might be on the trail at any given time. At San Juan Hill route, up to eleven groups with a maximum group size of 12 might be on the route at any given time.

Table 3. Alternative B – Proposed Use Numbers and New Disturbance

		Salvation Knoll		Snow Flat/ Long Flat	San Juan Hill		All Routes
		Old Highway Segment	Hiking Trail Segment		Class D Road Segment	Hiking Trail Segment	
Proposed Use Numbers	users on routes (concurrently)	250	25	250	125	125	250
	people/group	12	12	12	12	12	12
	max users/day	250	250	250	250	250	250
	max user days/week	1750	1750	1750	1750	1750	1750
	max handcars	30	0	30	0	0	
	max vehicles	0	0	6	25	0	
	max horses	4	0	4	4	0	
parking on existing disturbance on BLM		7.89 acres		none	2.40 acres		10.30
parking on new disturbance on BLM		0.30 acres		0.34 acres	0.22 acres		0.86

2.4 Alternative C – Reduction of Group Size in Comb Wash RMZ

Alternative C includes all features and activities described in Alternative B with the following design features proposed by the BLM based on public comment as an alternate method to conform with the group size limits in the Comb Ridge RMZ of the RMP:

- Proposed group size numbers in the San Juan Hill route would be 12 trekkers at any given time. Use at San Juan Hill could be up to six days a week, with an estimated feasible four trips per day on long summer days. Maximum weekly use on the San Juan Hill route might be as high as 288 (12 participants x 4 trips per day x 6 days per week) or more, depending on the abilities of the participants.
- Proposed group size and use numbers would remain the same for Salvation Knoll and Long Flat.
- Handcarts would not be allowed at the San Juan Hill route, but would be allowed on designated routes on the eastern half of the Salvation Knoll section.
- Staggering the groups on the San Juan Hill route would reduce the need for vehicle support at the base of the dugway at San Juan Hill to 12 vehicles at any time, thus eliminating the need to construct the new larger (0.31 acre) parking area. Parking would be limited to two existing

disturbed areas at the base of the dugway at San Juan Hill (two 0.09 acre existing disturbed areas on either side of D0167).

- Vehicles traveling to the base of the dugway would be limited to 10 at a time. Vehicles traveling to the base of San Juan Hill would be limited to two at a time.

2.4.1 Schedule and User Days

Year round use consisting of a maximum of 17,100, with a maximum of 1,000 weekly user days during the high season. Use would occur Monday – Saturday, with two to four trips scheduled each week. No more than 360 weekly visitors are anticipated on the San Juan Hill Route, but maximum numbers would be limited by the speed of the participants.

Table 4. Alternative C – Proposed Use Numbers and New Disturbance

		Salvation Knoll		Snow Flat/ Long Flat	San Juan Hill		All Routes
		Old Highway Segment	Hiking Trail Segment		Class D Road Segment	Hiking Trail Segment	
Proposed Use Numbers	users on routes (concurrently)	250	25	250	12 total	125	250
	people/group	12	12	12	12	12	12
	max users/day	250	250	250	250	250	250
	max user days/week	1750	1750	1750	1750	1750	1750
	max handcarts	30	0	30	0	0	
	max vehicles	0	0	6	10	0	
	max horses	4	0	4	4	4	
Total Use Areas		9		2	6		17
BLM Parking/Staging Areas		8		1	5		14
SITLA Parking Areas		1		1	1		3
parking on new disturbance on BLM		0.30 acres		0.34 acres	none		0.64
parking on existing disturbance on BLM		7.89 acres		none	2.49 acres		10.38
TOTAL BLM ACRES		8.19 acres		0.34 acres	2.49 acres		11.02 acres
New construction on SITLA		None		1.12 acres	none		1.12 acres
Existing SITLA disturbance		2.45 acres		none	0.47 acres		2.92 acres
TOTAL ACRES		10.64 acres		1.46 acres	2.96 acres		15.06 acres

2.5 Alternative D – Reduce Recreation Conflict through Restrictions on Season of Use

Alternative D includes all features and activities described in Alternative B with the following design features proposed by the BLM based on public comments to reduce recreation conflicts:

- Proposed group size numbers would remain the same, but use would occur only one month per year.

2.5.1 Schedule and User Days

Year round use consisting of a maximum of 4,000, with a maximum of 1,000 weekly user days during the high season. Use would occur Monday – Saturday, with two to four trips scheduled each week. The season of use would be determined by BLM, but would likely be August 1- 31 in order to curtail potential visitor and wildlife conflicts.

2.6 Alternative E – Reduce Recreation Conflict through Restrictions on Number of Trips

Alternative E includes all features and activities described in Alternative B with the following design features proposed by the public to reduce recreation conflicts:

- Proposed group size numbers would remain the same, but only one group would be allowed on each trail per month.

2.6.1 Schedule and User Days

Year round use consisting of a maximum of 4,500, with a maximum of 750 weekly user days during the high season. Use would occur Monday – Saturday, with up to three trips scheduled each month.

2.7 Alternative F – No Action Alternative

Under the No Action Alternative the proposed SRP application for Hole-in-the-Rock Foundation would be rejected, and no permit would be granted to use BLM lands for purposes of guided trekking.

2.8 Alternatives Considered, but Eliminated from Detailed Analysis

BLM considered one additional alternative proposed by the public during the scoping period. In this alternative, potential conflicts between recreational users would be reduced by limiting the permit operations to weekdays, resulting in a total of 17,875 authorized user days per year. This alternative was determined to be substantially similar in design and effects to Alternatives C and D, and thus was not analyzed in detail.

2.9 Summary Comparison of Environmental Impacts

The following table summarizes relevant differences among the four action alternatives.

Table 5. Alternative Comparison Matrix

	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
Maximum User Days Per Year	28,800	17,100	17,100	4,500	4000
High Use Season Max Weekly User Days (approx. 13 weeks June 1- Aug 31)	2,000 (8 trips/week x 250/trip)	1,000 (2 stakes/week x 1-2 trip/stake x 250/stake)	1000 (2 stakes/week x 1-2 trip/stake x 250/stake)	750	1,000 (250/day x 4 days)
High Use Season Total User Days (June 1- Aug 31)	26,000 (about 90%)	13,000 (76%)	13,000 (76%)	2250 (3 trails x 250 = 750/month)	4,000 (1000/week x 4 weeks)

	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
Remaining 41 Weeks Total User Days	2,880 (about 10%)	4,100 (24%)	4,100 (24%)	2250 (3 months of off-season use)	0
Group Size	250/125 (per group)	SL & LF: 250 SJH: groups of 12 (within a larger party of 250/125)	SJH: 12 SL & LF: 250	250/125 (per group)	250/125 (per group)
Vehicle Support	SK Route: 4 LF route: 6 SJH route: 25	SK Route: 4 LF route: 6 SJH route: 25	SK Route: 4 LF route: 6 SJH route: 10	SK Route: 4 LF route: 6 SJH route: 25	SK Route: 4 LF route: 6 SJH route: 25
New Disturbance (on BLM Lands)	0.09 miles 0.86 acres	0.09 miles 0.86 acres	0.09 miles 0.64 acres	0.09 miles 0.86 acres	0.09 miles 0.86 acres
Justification/ Source	ENBB	Hole-in-the-Rock Updated Design Features	Based on Public Comments	Based on Public Comments	Based on Public Comments

3.0 AFFECTED ENVIRONMENT

3.1 Introduction

This chapter presents the potentially affected existing environment (i.e., the physical, biological, social, and economic values and resources) of the impact area as identified in the Interdisciplinary Team Checklist found in Appendix A and presented in Chapter 1 of this assessment. This chapter provides the baseline for comparison of impacts/consequences described in Chapter 4.

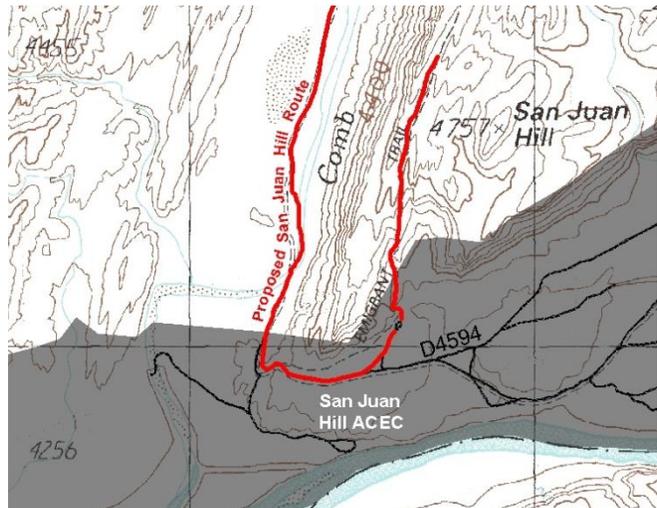
3.2 General Setting

The permitted guided hiking and trekking would take place in San Juan County, Utah. This county is located within the Great Sage Plain and Blanding Basin subprovinces of the larger Colorado Plateau physiographic province. Elevations at Salvation Knoll and Long Flat Routes range between just over 6,000 ft. and just over 7,000 ft., while the San Juan Hill route has a fairly constant elevation of about 4,300 ft. Geologically, the Salvation Knoll area consists of the Permian Cutler Group and the Triassic Moenkopi Formation, with alluvium and colluvium covering the bedrock units in much of the area. In the San Juan Hill Area bedrock is comprised of Triassic Chinle Formation. Vegetation communities include Upland Shallow Loam (Pinyon and Utah Juniper), Upland Loam (Big Sagebrush), and Alkali Bottom (Greasewood) ecological sites. The Upland Shallow Loam sites, primarily in the Salvation Knoll and Long Flat area, have an overstory primarily consisting of pinyon and juniper woodlands with a dispersed understory of Indian ricegrass, galleta grass, squirrel tail, serviceberry, and mountain mahogany. The Alkali Bottom sites at the San Juan Hill route have plants consisting primarily of greasewood, four-wing saltbush, Indian ricegrass, galleta grass, alkali sacaton, tamarisk, and sand dropseed. Fauna includes mule deer, coyote, mountain lion, cottontail and jackrabbit, fox, bobcat, rodents, and various bird species; black bear and elk can occur at higher elevations. Precipitation in this high desert environment is limited, with an average of 8 to 12 inches per year.

3.3 Resources/Issues Brought Forward for Analysis

3.3.1 ACECs

The Proposed San Juan Hill Route crosses ½ mile of the San Juan River ACEC just north of the San Juan river. The ACEC approximates the twists and bends of the San Juan River from Bluff Bench to the Glen Canyon National Recreation Area, extending north from the river approximately 0.25 to 1.5 miles throughout its span. The ACEC is bounded on the south by the Navajo Indian Reservation on the south side of the River's center line. Relevant and Important Values for the ACEC include Scenic, Cultural, Fish and Wildlife, Natural Systems and Processes, and Geologic Features.



Map 2. San Juan Hill Route in San Juan River ACEC

Scenic – The scenery along the San Juan River includes tilted formations as the river crosses Comb Ridge, steep vertical cliffs hundreds of feet high with walls of interbedded sandstone and limestone, and the 1,200 foot high walls define the Goosenecks, one of the best examples of entrenched meanders in the United States. Riparian areas with various hues of green set off the water course and rock, presenting a diverse and varied scenic viewing area. Breathtaking views of Monument Valley and the San Juan River are available from numerous landforms within the ACEC. Segments of the Proposed Action are situated within Visual Resource Management (VRM) Class I and II portions of the ACEC (RMP Appendix A, Map 16).

Cultural – Cultural sites are present along the river banks and within the tributaries of the San Juan River. The quality of the rock art along the San Juan River is unsurpassed, recognized as “Type Sites” for their specific rock art motifs.

Fish and Wildlife – The San Juan River has a unique endemic fish population and designated habitat for the endangered Colorado pikeminnow and the Razorback sucker, as well as the state sensitive Flannelmouth sucker. Bighorn sheep inhabit the rocky precipices of the lower river. The corridor is used by migrating Southwestern willow flycatcher (T&E), and Yellowbilled cuckoo (candidate species).

Natural Systems and Processes – Extensive riparian areas are rare in the desert climate and provide habitat for T&E and sensitive species, wildlife and for neo-tropical migratory birds.

Geologic Features / Goosenecks – Visitors from the world over stop to view the entrenched meanders of the San Juan River from more than 1,000 feet above at the Goosenecks State Park overlook. Boaters float within the confines of these thousand foot rock walls for approximately 30 miles.

3.3.2 Cultural Resources

The Area of Potential Effect (APE) for the Proposed Action is defined as an area 30 meters wide centered on each of the routes and an area extending 15 meters from the edge of each parking and activity area. For

two short segments, the route is particularly steep, and for those two segments the APE is 15 meters wide centered on the routes. The proposed action would occur in an area known for its cultural resources, specifically archaeological sites affiliated with primarily Ancestral Puebloans, Navajo, Paiute, and Ute groups. Historical sites from Native Americans, Anglo-Europeans, and other ethnic groups are also found in the area and consist of the remains of homesteads, ranches, mines, roads, and trails such as the Hole-in-the-Rock Trail.

The prehistory of this region begins with the Paleoindian and Archaic periods. Paleoindian hunters-gatherers of the Clovis type were present about 13,000 years ago or 11,000 B.C. The Lime Ridge site is just west of San Juan Hill and is the best documented Clovis site in Utah. Clovis sites are named for a distinctive type of spear point. Clovis people gathered wild foods and hunted large Pleistocene mammals such as Mammoths that are now extinct. More represented, but still ephemeral in terms of overall frequency in the archaeological record of the region, is the Archaic period (8,000 to 4,000 years before present). The Archaic period is characterized by broad-spectrum hunting and gathering populations who used ground stone technology (mano/metate) to process vegetal resources and the atlatl to hunt with.

The transition from the Archaic period to the Ancestral Puebloan begins with the Early Agricultural period, 4,000 to 2,500 years ago, when some groups first began to grow maize (corn). This period is followed by the Basketmaker II period, 500 B.C. to A.D. 500. People became dependent upon corn and became sedentary farmers living in pithouses. Basketmaker III period (A.D. 500–750) traits include plain gray and early decorated white ware ceramics, slab-lined storage pits and surface structures, and burned jacal concentrations. During the Pueblo I period in southeastern Utah (ca. A.D. 700–900), use of pit structures continued, but jacal surface rooms were also constructed. Sites of this period indicate large-scale population aggregation, which tended to be located at higher elevations than sites of later time periods. The Pueblo II period is divided into early (A.D. 900–1050) and late (A.D. 1050–1150) periods. Architectural sites are predominantly the Prudden unit pueblo consisting of a kiva and an associated above-ground masonry pueblo, often arranged linear to curvilinear north of the kiva. The Pueblo III period (A.D. 1150–1290) is best known for the Mesa Verde style cliff dwellings of southwestern Colorado. Settlements were located on mesa tops during the late 1100s where arable land could be found. By the latter half of the period (post-A.D. 1200), settlements shifted to cliffs, canyon heads and large alcove sites where Ancestral Puebloan populations were tightly aggregated for the remainder of their presence in the Four Corners region. The post-Puebloan occupation of the region (A.D. 1300–1840) is marked by the abandonment of the area by Ancestral Puebloans, a probable settlement hiatus, and the arrival of Numic (Ute) and Athabaskan (Navajo) speakers from the west and north, respectively.

In 1854, the LDS church dispatched William Huntington and Jackson Stewart to explore the Four Corners region for possible expansion of Brigham Young's burgeoning religious state, Deseret. As a result of information obtained during the Huntington Expedition, the Elk Mountain Mission of 1855 was executed in the La Sal Mountains. As the Elk Mountain Mission began spreading south into the San Juan River drainage to establish relations with the Navajo Nation, the resources of the mission became spread thin. Many of the tribes grew disdainful of the LDS presence, and after a number of the mission party members were killed the project was generally abandoned.

In 1879, the LDS church attempted a second conversion of the native inhabitants at the Hole-in-the-Rock Mission on the benches of the San Juan River (Pierson 1980). This community grew into the modern community of Bluff, which was one of the major population centers of the region. By 1888, Mormon settlers had established the San Juan Colony which was subsequently renamed Bluff, and by 1903 the community of Grayson, later renamed Blanding, was off to a successful start. As settlements began to formalize, the routes between them became more firmly established. (Pierson 2001:3) Today, the area is still grazed and explored for minerals, but is increasingly used for recreation activities.

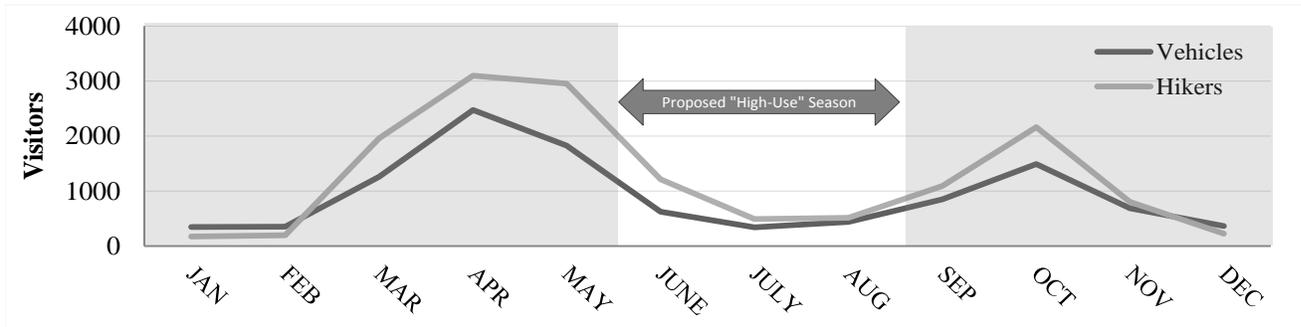
All areas of the APE were subjected to a record search. Generally all areas were covered by previous inventory except some of the parking and activity areas, San Juan Hill, the route from the Long Flat parking area to the campsite on the Snow Flat Road, and a short section of Class B road (B2331) extending from near Salvation Knoll to a nearby parking area. New intensive inventory was conducted on all previously non-inventoried areas with the exception of the southern three miles of the Long Flat route, the two parking areas associated with the Long Flat Route, and B2331. Twenty-two previously recorded archeological sites were found in the record search to be within or immediately adjacent to the APE. Of these, two previously recorded sites were encountered in new intensive inventory for this project. No unrecorded sites were encountered by the new intensive survey.

Sites within or immediately adjacent to the APE include the Hole in the Rock Trail (42SA8029), a Puebloan habitation site with a great kiva, three Puebloan structural sites, three historic highway segments, a Navajo summer Hogan, 12 prehistoric artifact scatters, and a historic corral. 42SA8029 is listed on the National Register of Historic Places, 19 of the sites were determined eligible for listing, while the historic corral and remaining artifact scatter have been determined ineligible.

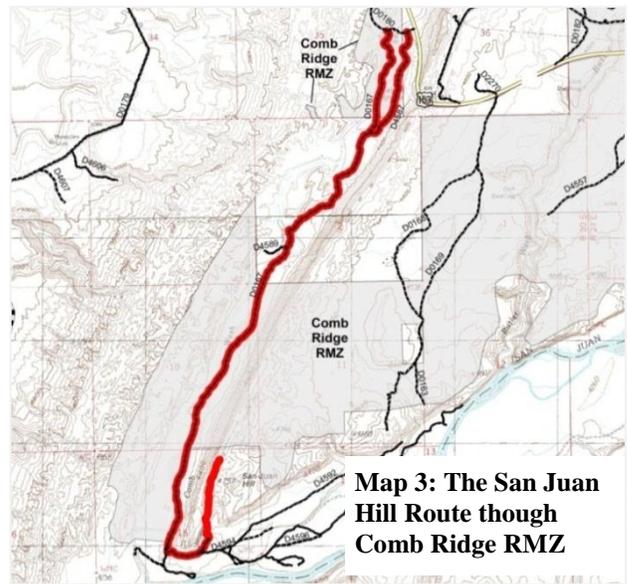
3.3.3 Recreation and the RMZ

Two of the proposed routes consisting of the Salvation Knoll/Cedars area and upper Snow Flat Road/Long Flat area occur within the Cedar Mesa SRMA. Cedar Mesa SRMA (407,098 acres) is an area of regional, national and international significance for recreational use. Principal recreational uses of the canyons on Cedar Mesa include day hiking, backpacking, and visiting cultural sites. Day use and overnight permits are required to hike in the canyons at Cedar Mesa. To disperse use, eliminate crowding during the peak season, and to ensure a primitive recreation experience, the number of private and commercial overnight users starting each day from each trailhead entrance point is limited to 20. The greater Cedar Mesa area has an estimated average visitation of 75,000 visitor use days each year, mostly concentrated in the spring and fall. Visitation declines significantly during the summer months due to the relatively hot and dry conditions.

Figure 3. Visitor Use Trends by Month on Cedar Mesa (Raw Counter Data)

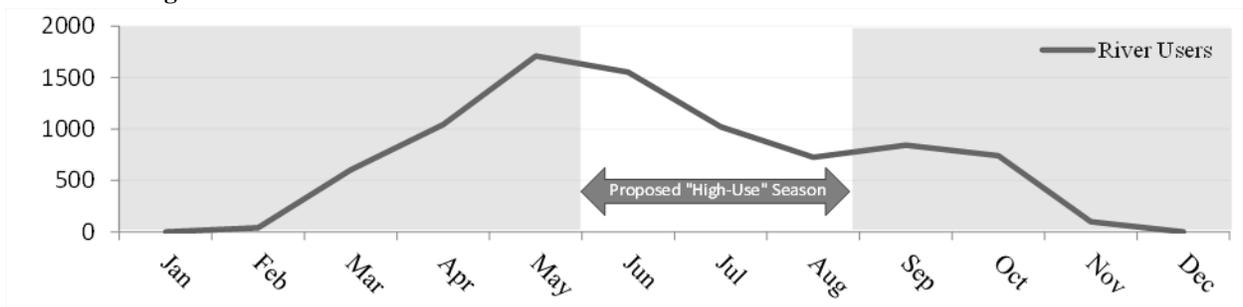


The third proposed route crosses the Cedar Mesa Special Recreation Management Area (SRMA) through the Comb Ridge Recreation Management Zone (RMZ) before entering the San Juan River SRMA (Map 3). The Comb Ridge RMZ was designated in the RMP (2008) due to easy vehicular accessibility, high level of visitation and popularity, and density of significant cultural ruins and rock art. The objective for the RMZ is to manage for heritage tourism and traditional cultural resources in a regulated manner. The San Juan River ACEC is managed to maintain an environment of isolation insofar as allowed by river permit and patrol system. (RMP 2008a, page 98). The ACEC overlaps a small portion of both the San Juan River SRMA and the Comb Ridge RMZ.

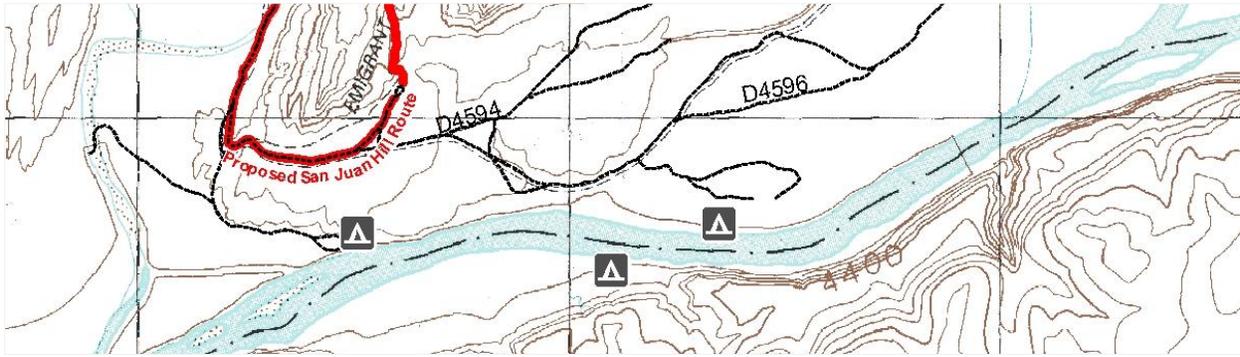


Map 3: The San Juan Hill Route through Comb Ridge RMZ

Figure 4. Average Visitor Use by Month on Affected San Juan River Segment



Use in the San Juan River SRMA is generally higher during the summer months and consists primarily of river based recreation (Figure 5). Both River users and an increasing component of land based four wheel drive casual use focuses on visits to San Juan Hill, Barton’s trading post, and River House Ruin. Peak use on the San Juan River occurs during the months of May and June which overlaps the proposed high use season by 30 days. Three popular river campsites utilized by San Juan River boaters are in close proximity to the route (Map 4). The Comb Ridge and River House campsites are on BLM lands, while the Cottonwood campsite is on the south bank of the San Juan, in lands managed by the Navajo Nation.



Map 4: San Juan River Campsites

3.3.4 Wildlife

3.3.4.1 Raptors/Migratory Birds

A variety of migratory song bird and raptor species use habitats within the proposed project area for breeding, nesting, foraging, and migratory habitats. Migratory birds are protected under the Migratory Bird Treaty Act of 1918 (MBTA). Unless permitted by regulations, the MBTA makes it unlawful to pursue, hunt, kill, capture, possess, buy, sell, purchase, or barter any migratory bird, including the feathers or other parts, nests, eggs, or migratory bird products. In addition to the MBTA, Executive Order 13186 sets forth the responsibilities of Federal agencies to further implement the provisions of the MBTA by integrating bird conservation principles and practices into agency activities and by ensuring that Federal actions evaluate the effects of actions and agency plans on migratory birds. The Bald and Golden Eagle Protection Act (Eagle Act); 16 U.S.C. 668, which makes it illegal to take, possess, sell, purchase, barter, or transport any bald or golden eagle, alive or dead, any part, nest, or egg thereof. “Take includes to pursue, shoot, shoot at, wound, poison, kill, capture, trap, collect, molest, or disturb” (50 CFR 22.3)

Executive Order (EO) 13186, which establishes a process for Federal Agencies to conserve migratory birds by avoiding or minimizing unintentional take and taking actions to benefit species to the extent practicable. Agencies are expected to take reasonable steps that include restoring and enhancing habitat. A Memorandum of Understanding (MOU) between the BLM and United States Fish and Wildlife Service (USFWS) (BLM MOU WO-230-2010-04) provides direction for the management of migratory birds to promote their conservation. At the project level, the MOU direction includes evaluating the effects of the BLM’s actions on migratory birds during the NEPA process; identify potential measurable negative effect on migratory bird populations, focusing first on species of concern, priority habitats, and key risk factors. In such situations, BLM would implement approaches to lessen such take. Identifying species of concern, priority habitats, and key risk factors includes identifying species listed on the USFWS Birds of Conservation Concern (BCC) that are most likely to be present in the project area and evaluating and considering management objectives and recommendations for migratory birds resulting from comprehensive planning efforts, such Utah Partners in Flight American Landbird Conservation Plan. The Utah Partners in Flight (UPIF) Working Group completed a statewide avian conservation strategy identifying “priority species” for conservation due to declining abundance distribution, or vulnerability to various local and/or range-wide risk factors. One application of the strategy and priority list is to give these birds specific consideration when analyzing effects of proposed management actions and to implement recommended conservation measures where appropriate.

The UPIF Priority Species List, the BCC list for Region 16 (Colorado Plateau) and the Utah Conservation Data Center database (Utah Division of Wildlife Resources 2015) were used to identify potential habitat for priority species that could utilize habitats within the Monticello Field Office and within the proposed project area. Appendix E lists the UPIF Priority Species and the FWS BCC species that are a concern within the Monticello Field Office. These species could occur anywhere within the Field Office at any given time.

3.3.4.2 Threatened, Endangered and Candidate Species

The Endangered Species Act (ESA) 1973 (16 U.S.C. 1531-1544, 87 Stat. 884), as amended, directs all Federal agencies to work to conserve endangered and threatened species and to use their authorities to further the purposes of the Act. Section 7 of the Act, called "Interagency Cooperation," is the mechanism by which Federal agencies ensure the actions they take, including those they fund or authorize, do not jeopardize the existence of any listed species. The following endangered and threatened species do occur, or may occur, within the proposed project area.

Mexican Spotted Owl

Mexican spotted owl was listed as a threatened species March 16, 1993 and a recovery plan was adopted in December of 1995. On the Colorado Plateau, Mexican spotted owls (MSOs) tend to select narrow, steep-walled canyons as preferred nesting and roosting sites. They often nest within the canyon walls in small clefts, cracks, and depressions and make use of the canyons and adjacent uplands as foraging habitat. MSOs also have a strong association with steep canyon terrain that is cooler and often more humid than surrounding areas. MSO habitat includes high canopy closure, high stand density, and multi-layered canopies of uneven-aged mixed conifer stands. Breeding season typically begins as early as March and the fully developed owlets are independent by early October. Nesting typically occurs in April, but eggs have been observed as early as March. The eggs are usually hatched by the end of March and owlets fledge in June, 34-36 days after hatching. When the owlets first fledge the nest they are unable to fly and remain in the nesting area. By early October the fully developed owls become independent of the parents.

MSO critical habitat was designated in August of 2004. Critical Habitat, as delineated and defined by the Mexican Spotted Owl Recovery Plan, contains primary constituent elements essential for the conservation of the species. These constituent elements can be summarized as: (1) space needed for growth and normal behavior; (2) food, water, air, light, and nutritional or physiological requirements; (3) cover and shelter; (4) sites for breeding and rearing young; and (5) habitat protected from disturbance or representative of distribution. The primary constituent elements for the MSO include, but are not limited to, those habitat components providing for nesting, roosting, and foraging activities that are needed for the conservation and recovery of the species. Although the Fish and Wildlife Service designated 4.6 million acres of critical habitat for the MSO, these critical habitat boundaries were not drawn to include only the owls' preferred canyon nesting and roosting habitat, but also the surrounding uplands used for foraging.

Southwestern Willow Flycatcher

The southwestern willow flycatcher (SWFL) was listed as endangered by the U.S. Fish and Wildlife Service on February 27, 1995 (60 FR 10695). The U.S. Fish and Wildlife Service has identified critical habitat for this species on the San Juan River January 3, 2013 (78 FR 343 534).

The southwestern willow flycatcher is a small passerine bird associated with riparian habitats. In Utah, the SWFL is typically found in mixed native and exotic riparian vegetation, generally dominated by coyote willow, tamarisk, and Russian olive associated with streams, rivers, lakes, springs and other watercourses and wetlands. Suitable habitat or potentially suitable habitat exists for the flycatcher in larger riparian area throughout the Monticello Field Office. SWFLs are known to migrate through the planning area. Birds have been documented along the San Juan River and within Comb Wash.

Yellow-billed Cuckoo

The yellow-billed cuckoo was listed as threatened by the U.S. Fish and Wildlife Service on November 3, 2014 (79 FR 59991 60038). Yellow-billed cuckoos are considered riparian obligates and are usually found in large tracts of cottonwood/willow habitats with dense sub-canopies (below 33 feet). Nesting habitat is classified as dense lowland riparian characterized by dense sub-canopy or shrub layer (regenerating canopy trees, willows, or other riparian shrubs) within 333 feet of water. Overstory in these habitats may either be large, gallery forming trees or developing trees, usually cottonwoods. Suitable habitat or potentially suitable habitat exists for the flycatcher in larger riparian area throughout the Monticello Field Office. SWFLs are known to migrate through the planning area. Birds have been documented along the San Juan River and within Comb Wash.

3.3.4.3 Wildlife (Crucial Mule Deer Habitat)

The Monticello Field Office contains 383,098 acres of crucial habitat for mule deer. Crucial habitat is considered to be part of the habitat necessary to sustain a wildlife population at critical periods of its lifecycle. This is often a limiting factor on the populations such as breeding habitat, winter habitat, etc. High quality forage on winter range helps slow the rate of decline of the accumulated fat reserves, and helps deer survive harsh winters. The size and condition of mule deer populations are primarily determined by the quantity and quality of these habitats as they provide the necessary nutrition to sustain deer throughout the year. Lack of quality habitat has been associated with decreased survival and recruitment of fawns, increased age at first reproduction, decreased reproductive output, and decreased survival by adults (Monteith et. al. 2014).

The proposed project is within habitat considered crucial winter range for mule deer. Winter range habitat primarily consists of shrub-covered, south-facing slopes and is often considered a limiting factor for mule deer. Because of learned behavioral use patterns passed on from one generation to the next, deer migrate for the winter into the same areas every year, regardless of forage availability or condition. These are generally areas lacking in snow depth which allows for easier movement, within pinyon-juniper and sagebrush vegetation types that provide forage as well as escape and thermal cover.

BLM uses the UDWR crucial habitat boundaries because UDWR is the entity with jurisdiction and expertise over wildlife in Utah. The BLM and the state recognize that some of the land within the defined area, depending on season and timing, may not support the respective species for various reasons. The BLM coordinates with the state on issues related to crucial habitat to determine stipulations necessary to address impacts to the species.

4.0 ENVIRONMENTAL IMPACTS

4.1 Introduction

This section details the environmental impacts to resources expected to occur as a result of the Proposed Action, the No Action Alternative, and Alternatives C-E. This analysis incorporates application of all the design features and monitoring requirements identified in the description of the alternatives and the IDT checklist in Appendix A. Monitoring will provide the necessary data to track use and resource issues. Design features within all alternatives incorporate standard stipulations and identified foreseeable issues for these activities.

4.2 Direct and Indirect Impacts

Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Direct and indirect impacts to Cultural Resources, Recreation, ACECs, Deer/Elk Habitat, and Raptors/Migratory Birds from the Proposed Action are limited in scope because all the permitted activities take place within defined travel corridors and SITLA camp locations.

4.3.1 Alternative A – Proposed Action

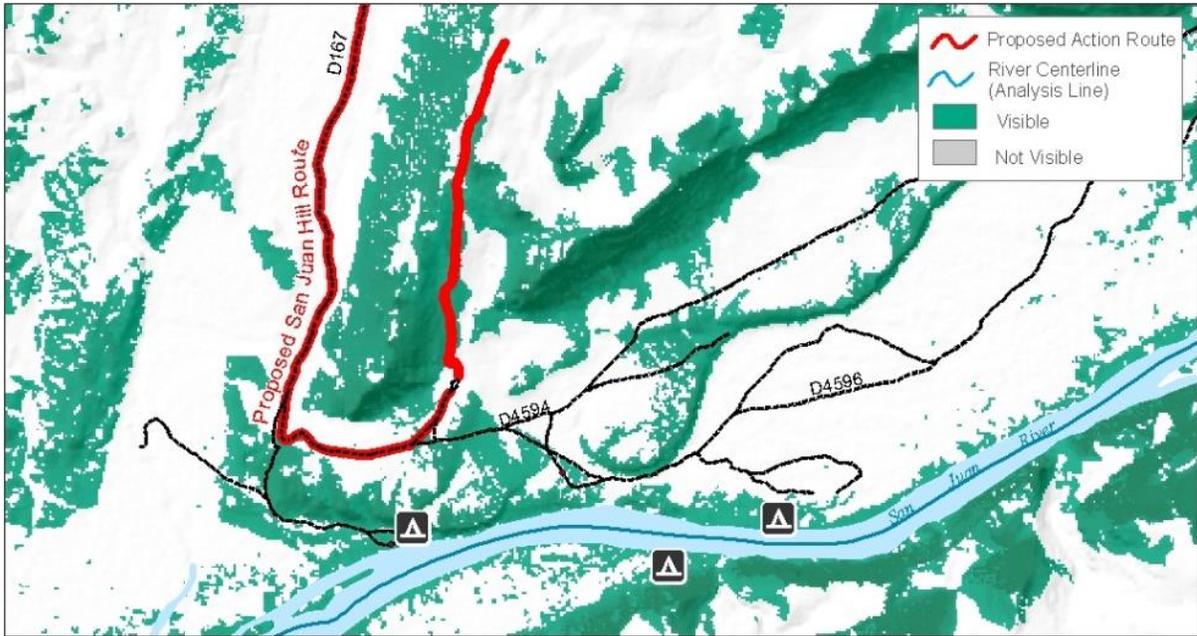
4.3.1.1 ACECs

- *Issue: Does the proposed 0.31 acres of new ground disturbance conform with the No Surface Occupancy stipulation for the San Juan River ACEC?*
- *Could an exception be granted because activities are short term or because after an analysis the authorized officer determines the project would benefit the relevant and important values?*

Under Alternative A, an existing 0.09 disturbed area would be expanded by on 0.22 acres of new ground disturbance to allow for parking 25 vehicles within the San Juan River ACEC.

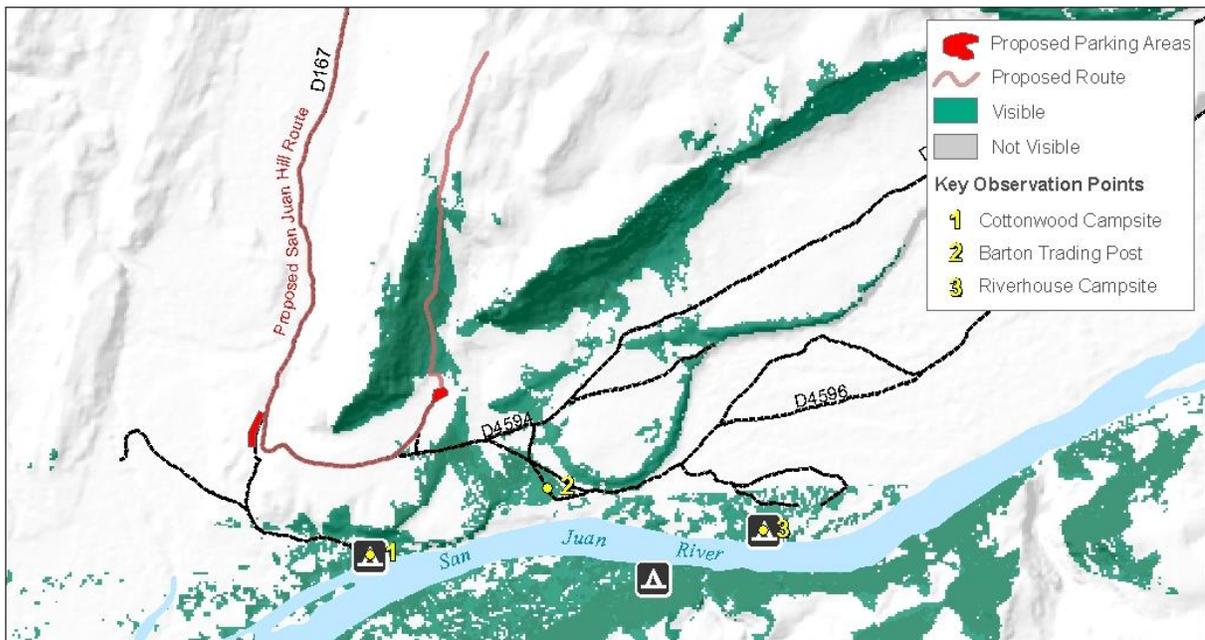
The parking area is situated within VRM Class II, in which the objective is to retain the existing character of the landscape. The addition of 0.22 acres of new disturbance to an existing 0.09 acre disturbed area. The parking area would use on-site natural materials, the basic elements of form, line, color, and texture already found in the landscape would be repeated in the parking area.

A visual analysis (Map 5) was completed for “Visible” and “Not Visible” areas from the San Juan River. The viewshed analysis assesses whether the surface of the ground is visible from the "analysis line" down middle of the river. There are approximately 60 points along on the analysis line that the visibility assessment is made. This modelling provides an over-conservative estimate of the visible areas because it does not take into account vegetative screening that is available anywhere between the analysis line and visible areas. Two parking areas are proposed within the boundaries of the ACEC. Neither parking area would be visible from the San Juan River.



Map 5. View-shed or Visible Areas from San Juan River

A visual analysis (Map 6) was completed for “Visible” and “Not Visible” areas from three Key Observation Points that include Cottonwood Campsite, Barton Trading Post and the Riverhouse camp area. None of the parking areas are visible from these points. Proposed trekking participants on the San Juan Hill will be visible to visitors hiking from the river to the historic site and to campers at the Cottonwood Site.



Map 6. View-shed or Visible Areas from Key Observation Points

The parking area at the bottom of the dugway is adjacent to 42SA8029, the Hole in the Rock Trail, which has been determined eligible under NHPA Criteria A, B, C, and D. The segment of 42SA8029 climbing out of Comb Wash and up the dugway at San Juan Hill is already a well-used designated vehicle route, with parking occurring on both sides of D0167 at its intersection with D4597. Adding 0.22 acres of new disturbance to an existing 0.09 acre disturbed area would not substantively impact the setting, integrity, or data potential of 42SA8029. A segment of the trail containing original cribbing, which contributes to eligibility under Criteria C, is located about 100 feet northeast of the proposed parking area extension. Mitigation in the form of a 75 foot construction buffer for all tools and equipment would protect the integrity of the contributing cribbing elements (Appendix C).

The parking area is sited 0.25 miles from the San Juan River, and is thus unlikely to affect Fish and Wildlife or riparian Natural Systems and Processes. The parking area is located entirely on quaternary deposits and would not affect Geologic Features.

The parking area as proposed under Alternative A would not conform to the No Surface Occupancy stipulation for the San Juan River ACEC. Because it would require new construction, the parking area would not be considered short term. Although the new construction does not benefit the values of scenic, cultural, fish and wildlife, natural systems and processes, and geological features, the parking area would benefit cultural resources in that it would facilitate interpretation of heritage resources in the San Juan River ACEC. For that reason, an exception to the stipulation could be granted at the discretion of the Authorized Officer.

4.3.1.2 Cultural Resources

- *Issue: To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?*

Direct Effects

Of the 21 sites near or within the APE, two were determined to be ineligible and 10 would be entirely avoided by the Proposed Action, causing no effects to these sites. In the case of 42SA29938, although the Proposed Action avoids the site, the permit will include a stipulation stating that participants will not climb down into the site. The Proposed Action on historic highway segments 42SA28373 and 42SA28735 is compatible with historic use, and would cause no adverse effects to these sites. The proposed action crosses 42SA28736, 42SA29293, 42SA29915, 42SA29916, and 42SA29931 entirely within existing disturbance on those sites, and would cause no adverse effects. The remaining sites, 42SA5332 and 42SA8029, will not be avoided by the Proposed Action. Potential effects to these sites are described below.

42SA5332: A deeply entrenched road cuts through the cultural deposits of this site completely to sterile soil. The road is wide enough to accommodate one vehicle, but does not allow for two vehicles to pass without driving on intact cultural deposits. Pedestrians and handcarts staying on the road would not affect the site, but vehicles pulling off the route to pass could cause substantial additional damage to intact cultural deposits adjacent to the route. SRP stipulations would state that motor vehicles must stay away from edges of road and trip leaders and drivers would be educated about the

importance of staying within the road boundaries in order to avoid further damage to the site. All leaders would be educated about the importance of leaving artifacts in place, avoiding collection or display piles by not allowing participants to leave the road at the site. 42SA5332 would be monitored by a qualified archeologist on an annual basis.

42SA8029: Two sections of the historic Hole in the Rock Trail would be traversed by the Proposed Action. The San Juan Hill section is in an area of bedrock. The proposed undertaking would consist of foot traffic in this area. The site would be quite resilient to this type of activity at the proposed level of use, so the proposed undertaking would result in No Adverse Effect to this section of the site. The second section climbing out the east side of Comb Wash is proposed for handcart and some vehicle use on the portion still used as a four wheel drive road. Again, the proposed undertaking would result in No Adverse Effect to this section of the site.

Indirect Effects

Indirect effects on cultural resources outside the project area will not occur because the Proposed Action is a structured activity that does not allow participants to leave designated routes. This is addressed in SRP stipulations.

- *Issue 2: To what extent will proposal foster heritage tourism throughout the Monticello RA?*

The Hole in the Rock Trail is managed for Heritage Tourism (RMP 2008a), a subset of tourism defined as “traveling to experience the places, artifacts and activities that authentically represent the stories and people of the past” (National Trust, 2015). Heritage tourism in particular is increasingly driven by social media and word of mouth. As images and descriptions of the exceptional historic and prehistoric resources found in the Monticello Field Office circulate on the internet, interest grows and visitation increases. In this way, heritage tourism can create positive economic outcomes for individual companies and the community as a whole. Paradoxically, while heritage tourism can educate individual visitors about site etiquette, over-visitation spurred by increased visibility of sites can cause irreversible damage to fragile cultural resources.

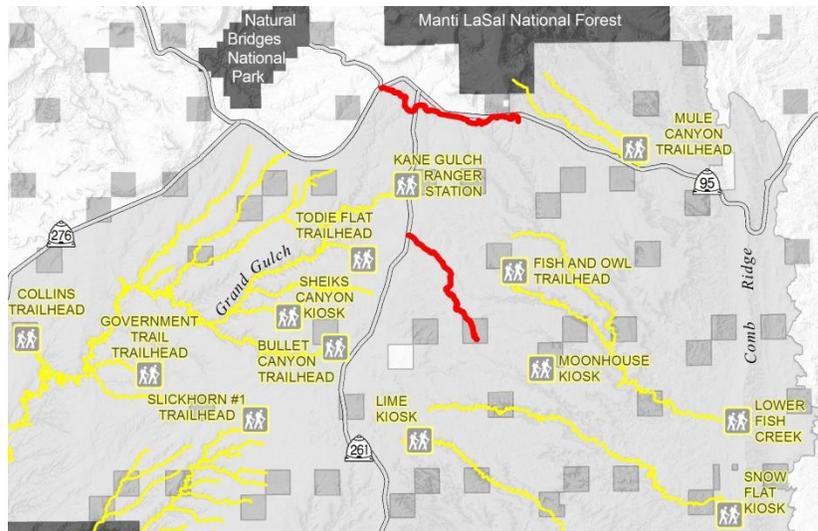
The Proposed Action would enhance the proponent’s ability to interpret the regionally and nationally significant events and figures associated with the Hole in the Rock Trail (NHPA Criteria A and B) by providing Heritage Tourism opportunities for up to 28,800 participants per year. The primary means by which the Hole-in-the-Rock Foundation educates their visitors regarding this chapter in their cultural history is through re-creating the experience on segments of the historic trail corridor. Group experience in the form of Heritage Tourism is a powerful way to reinforce community and impart history. The group size of 250 would allow participants to emulate the experience of the pioneers who undertook the 1879-80 Expedition.

4.3.1.3 Recreation and the RMZ

- *Issue 1: To what extent could this proposal potentially impact other recreational users?*

In the Cedar Mesa SRMA, an estimated 1,250 users may be accessing trailheads and traveling routes throughout June, which is the only month when high-use seasons overlap (Figure 3). Although a considerable majority of recreational use at Cedar Mesa is concentrated within permitted canyons and would therefore have little to no direct contact with activities under the Proposed Action, it is likely that some mesa-top users may encounter some increased traffic on roads or observe groups of trekkers staging at the Cedars overflow parking area and the campsite at the SITLA section at the intersection of B0237 and D0089.

Because the proposed routes do not enter or overlap the allocated canyon systems in the Cedar Mesa SRMA (Map 7), the proposal will not trigger any reduction or adjustment of existing day use permits or overnight trailhead allocations. Visual and auditory screening provided by canyon walls will prevent most effects on the recreational experience of backpackers or hikers while they are within the allocated canyons.



Map 7. Allocated Canyons and Trailheads Highlighted in Yellow

Because multiple trails may be used concurrently under this alternative, and because up to 40 vehicles may be used to shuttle participants from Bluff to either the Long Flat route or Salvation Knoll route, highway users might encounter up to 80 additional vehicles up to 7 days a week under this alternative. On Highway 95, Highway 163, and the northern section of Highway 261, this traffic would be negligible given the existing traffic between regional towns, parks, and recreational centers. However, this amount of additional traffic on the Moki Dugway, at the south end of Highway 261 may pose a substantial public safety concern to both the Hole-in-the-Rock Foundation visitors and to the general public. Large 16 passenger vans on the steep, unpaved route may also slow traffic up the route for other visitors and increase the risk of collisions.

Impacts to visitors traveling on road B0237 in the Proposed Action high-use season would be negligible. Moonhouse has a visitation limit of 20 people per day, which is further reduced in summer months due to heat. Register counts indicate that monthly

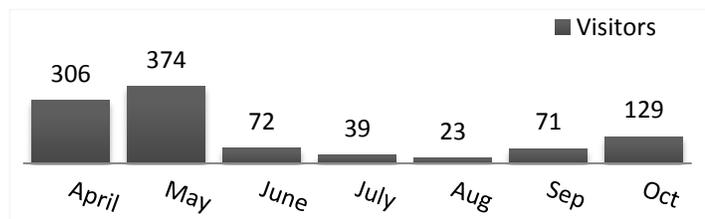


Figure 5. Average Monthly Moonhouse Visitation 2010-2013

visitation to Moonhouse ranges from 72 visitors in June to 23 visitors in August, meaning less than five people per day on average (Figure 6). Those few visitors who did encounter treks on the Long

Flat route would likely feel a high degree of impact, as expectations of isolation in the summer months are assumed to be high.

The Cedars Overflow parking area is a 2.28 acre disturbed area which is often used by RVs too large for the campsites at Natural Bridges and by campers who were unable to find open campsites at Natural Bridges. The parking area is large enough to accommodate both Natural Bridges overflow parking and the Proposed Action if parking by Hole-in-the-Rock Foundation vehicles is confined to a limited area. An SRP stipulation specifies that Hole-in-the-Rock Foundation concentrate parking in a 0.5 acre area at the northern end of the Cedars Overflow parking area to allow other visitors an undisturbed camping experience.

The number of visitors affected by the Proposed Action on the Salvation Knoll section or D0089, which follow rough, seldom-used 4x4 roads, designated ATV trails, abandoned highway segments, and designated hiking routes would be very low. Observation by Kane Gulch rangers indicated very low use throughout the year of the Cedar Mesa ATV trail. Also, D0089 is a remote and rough road which results in low use from the general public. Interaction between the general public and HIR users would be low with no to little user conflicts expected. Although visitors encountering 250 hikers on the Cedar Mesa ATV trail or D0089 would be rare, they would be likely to experience inconvenienced with delays of ½ hour or more as they pass the large group. To mitigate this impact, SRP stipulations require that the permittee clearly post, via a fully removable system such as sandwich boards, a notice of the activity when in progress at both terminus points and any common entrances onto the routes.

Existing San Juan Hill visitors include both river runners and 4x4 users. The high use season of the Proposed Action is partially coincident with the high season for use on the San Juan River in early June. During this time visitation is approximately 75 river runners per day on the affected river segment. It is not uncommon for users of the four river campsites to walk up to the adjacent cultural sites early mornings or later afternoon and evenings. Impacts to river runners include the potential for extra traffic when visiting sites on the San Juan Hill route, auditory or visual intrusions when visiting adjacent sites (Barton Trading Post, Riverhouse Ruin, and San Juan Hill), or loss of the feeling of isolation for the four river campsites near the San Juan Hill route. Impacts to 4x4 users primarily include increased complexity of use and additional traffic on the rugged Comb Wash 4x4 road.

It is likely that a small percentage of San Juan River visitors will experience some degree of impact from the Proposed Action. Visits by river groups to sites near the river are typically brief, about three hours, while treks will be in the area an estimated two hours on use days, making some degree of overlap likely. Treks would not include side trips to Riverhouse Ruin or Barton Trading Post, so impacts for those two sites would be minimal. For San Juan Hill itself, direct encounters with two groups of 125 people per day would present a substantial visual and auditory impact any river visitors taking a side trip to the site. However, the HIR groups would typically be at San Juan Hill in the late morning hours whereas river campers would typically be at the site early mornings or later afternoon and evenings. As estimated use for the San Juan Hill route is one to two treks per week, the number of visitors actually impacted is likely to be small, but the impact felt by those visitors could be considered by them to be substantial.

Auditory and visual intrusions at the Cottonwood and River House campsites would be minimal due to distance from the proposed action. However, the popular Comb Ridge campsite is in direct line of sight of the San Juan Hill hike. The auditory and visual impacts of an atypically large early morning trek would eradicate the feeling of isolation for campers at the Comb Ridge campsite. This effect could be mitigated through timing restrictions on the SRP requiring that trekking activities at San Juan Hill would be limited to late morning and afternoon hours.

The Proposed Action includes use of handcarts, motor vehicles, and pedestrian traffic on the San Juan Hill route with up to two groups of 125 people per day. For San Juan Hill, up to 25 vehicles may be used to shuttle participants from Bluff along Highway 163, bringing total shuttles on any given day to 105 vehicles under Alternative A. These numbers add to the complexity of uses, on route D0167 (Comb Wash Road). Additional two-way traffic on the road is likely to contribute to conflicts in recreational uses and cause disruptive effects to ATV and 4x4 drivers. Blind corners and hills may make simultaneous use of the route by pedestrians and motorized users more dangerous for all users.

- *Issue 2: Does the proposed group size of 250 on the roads exceed the stipulated commercial group size limit for Comb Ridge RMZ?*

The Proposed Action includes groups of 125 people traveling together within the Comb Ridge RMZ. This would be out of compliance with Decision REC-113 in the RMP (2008a) which states: “The following management prescriptions apply in this RMZ: Private and commercial group size limited to 12 people”, and selection of this alternative would thus necessitate an amendment to the Monticello RMP.

4.3.1.4 Wildlife

- *To what extent will the Proposed Action and Alternatives impact raptors and migratory birds?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate wildlife species?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate species habitat?*
- *To what extent could this proposal potentially impact crucial mule deer winter range?*

4.3.1.4.1 Migratory Birds and Raptors

Human activities can greatly disrupt normal behaviors resulting in disturbances at wintering locations and aborted or reduced nesting attempts. Human disturbances have also been documented to cause threats to wintering eagle populations causing them to move to less disturbed areas and interfering with foraging behavior (Shea 1973, Stalmaster 1976, Stalmaster and Newman 1978, and Brown and Stevens 1997).

Human disturbances near nest sites have resulted in the abandonment of the nest; high nestling mortality due to overheating, chilling or desiccation (drying) when young are left unattended; premature fledging; and ejection of eggs or young from the nest (Suter and Jiness 1981, Porstovit and Postovit 1987, Palmer 1988, Tella et al. 1996, Anderson and Squires 1997). Raptors that successfully nest during a disturbance may abandon the nesting territory the year following the disturbance (White and Thurow 1985).

Responses of nesting raptors to human disturbances are generally determined by type, duration, magnitude, noise level, and timing of activity relative to nesting phenology (Suter and Jones 1981, Gotmark 1992, Richardson and Miller 1997).

Overall, raptors display a high degree of fidelity to nest sites and nesting territories (Newton 1979).

Certain physiographic features such as elevation, slope, aspect, habitat diversity, prey availability, nest height, and nest substrate have been measured in attempts to characterize site selection by nesting raptors (MacLaren 1986, Kirmse 1994). The majority of raptor species are firmly fixed on a special type of nest site according to a narrow genetical disposition (Kirmse 1994).

Flushing responses of adult birds during breeding season may be related to the duration and frequency of disturbed events, and may vary between species (White and Thurow 1985). Some level of habituation to continuous or repetitive disturbances may occur. Repeated flushing responses by adults due to disturbance may increase energy expenditures during foraging and decrease energy ingestion. Accelerated depletion of energy reserves may result in premature mortality during harsh conditions (Stalmaster 1983, Knight and Skagen 1987).

Sensitivity of adults and young to disturbance may vary during the nesting cycle (Holms 1994). Courtship, nest construction, incubation, and early brooding are considered higher risk periods during which adults are easily prone to desert temporarily or permanently abandon nests in response to disturbance, leaving eggs and/or young susceptible to the effects of inclement weather, solar radiation, and predation. The days immediately before and during egg laying and early incubation are the most critical stages of the nesting cycle with respect to abandonment. Disturbance of even limited duration this time can result in immediate and permanent departure by adults from the breeding territory (Romin and Muck 2002). During post-brooding and post fledging dependency periods, feather development of the young is sufficiently advanced to provide some protection from the elements. Nevertheless, even temporary flushing from nests by adults due to disturbance during these periods can still result in mortality of the young which continue to be dependent on parental care and are at risk for predation.

The type of disturbance can determine to some degree the response of birds. Dispersed recreational activities can deter nesting success. Out-of-vehicle recreational activities are generally considered more disturbing to raptors than in-vehicle activities (French 1972, Skagen 1980, Holmes et al. 1993, Holmes 1994). Associated high noise levels and increased human activities may preclude use of otherwise acceptable habitat. Tolerance levels to disturbance can also be species specific. Species such as falcons and owls are more tolerant of human disturbance. Golden eagles, turkey vultures, Cooper's hawks, and sharp-shinned hawks are less tolerant of disturbance. Ferruginous hawks and red-tailed hawks vary in tolerance (Herron et al. 1985 and Bloom and McCrary 1996).

Alternative A proposes to conduct guided day-use hiking along three designated routes that traverse through several habitat types. There would be year round use on these trails with high use occurring from June 1st-August 31st, which is also migratory bird and raptor breeding and nesting season. Any of the three trails is likely to be used one or two times a week by up to 250 people daily. Users are required to stay on the existing routes, which will prevent habitat destruction. Because the proposed action would occur on an existing route that is currently being used for recreational use, it is anticipated that most species have moved to more suitable locations (Communication with M. Burns USFWS 3/12/15). The

general area contains highly suitable nesting habitat that the birds may move to if disturbed. The design features of the proposed action that confine users to designated routes or in approved parking/staging areas and that confines motorized or mechanized vehicle travel to designated roads, reduce impacts to migratory birds and habitat.

Raptor and nest surveys were conducted along the Salvation Knoll and Snow Flat/Long Flat routes in 2008 and in 2013. For both surveys the broadcast calling survey method was used (BLM Tech Note 435). During both surveys no raptors or nests were located along the routes.

4.3.1.4.2 Threatened Endangered and Candidate Species

Mexican Spotted Owl

None of the routes are within designated critical habitat or run within one half mile of potential nesting habitat using a predictive Mexican spotted owl habitat model (Spotskey and Willey 1997 and 2000). There is no nesting habitat indicated by the Spotskey and Willey 2000 model, which is more refined and accurate for indicating potential nesting habitat. The roads are located on mesa tops and in a wash, there is not adequate developed vegetative cover for the spotted owl in these areas to be considered good nesting habitat. With aerial photos and field visits, these areas were found to be lacking the common vegetation communities found within spotted owl habitat in Utah such as Douglas fir, mixed conifer, pinyon/juniper with large trees and deciduous riparian or deciduous upland trees. They also lack microclimatic features such as cooler and more humid conditions.

The routes for Salvation Knoll and Long Flat Route would occur on existing routes that do traverse through potential foraging habitat for Mexican spotted owls as indicated by the predictive models. Much of the research indicates that owls in Utah will forage from rim to rim in the canyon bottoms and benches, they potentially could use the mesa tops. These routes would be used during the day, which would reduce impacts to the owls, which are predominantly most active at night.

Southwestern Willow Flycatcher and Yellow-billed Cuckoo

Southwestern willow flycatchers (SWFL) have been documented in the Upper Colorado Recovery Unit, migrating along the San Juan River, potentially migrating in Comb Wash and possibly nesting in the Cross Canyon area. The western yellow-billed cuckoo is proposed for listing due to loss of riparian habitat. They have been found in the Monticello Field Office only during migration along the San Juan River. There is also potentially suitable habitat for the flycatchers and cuckoos in larger riparian areas throughout the Monticello Field Office. Much of the habitat is dominated by non-native, invasive tamarisk and Russian olive. The San Juan River has a high amount of recreational use and has been impacted by agricultural use and grazing. SWFL and cuckoo populations declines are attributed to numerous, complex, and interrelated factors such as habitat loss and modification, invasion of exotic plants into breeding habitat, brood parasitism by cowbirds, vulnerability of small population numbers, and winter and migration stress.

The routes for the event are existing traveled routes open to the public, including motorized vehicles. The proposed project will have insignificant impacts on these species because the Long Flat and Salvation Knoll routes are not near any potential habitat for Southwestern willow flycatchers or yellow-billed cuckoo. The San Juan Hill route traverses down Comb Wash to the San Juan River. This is an existing

route that does contain willow, tamarisk and Russian olive. The route comes within 0.13 miles of Southwestern willow flycatcher critical habitat. Survey data to date indicates that these species are migrants within this area.

4.3.1.4.3 Crucial Mule Deer Habitat

Mule deer are adaptable to a wide variety of habitats, but are especially reliant on shrubs for forage during critical winter months. Vegetation communities vary throughout mule deer habitat, but habitat is typically characterized by areas with thick brush or trees interspersed with small openings. The thick brush and trees are used for escape and thermal cover, whereas the small openings are used for foraging.

The Long Flat and Salvation Knoll existing routes traverse through pinyon-juniper and sagebrush openings within the identified crucial winter habitat. Alternative A would allow for up to 250 people per route with support staff to conduct treks through these areas, with the highest amount of use occurring from June 1st-August 31st. During this time period there may be some mule deer within the area, but typically the deer will have moved into higher elevations where they will summer. For the population remaining within the area during the high use period, noise disturbance may impact the use of the immediate area of the activities, but because there is existing habitat that the deer can move to, the impacts would be insignificant.

4.3.1.5 Monitoring and/or Compliance

The following resources would be monitored to ensure compliance with the stipulations of the RMP. No specific monitoring of the ACEC is necessary so it is not listed below.

4.3.1.5.1 Cultural Resources

A prehistoric archeological site near San Juan Hill would be monitored by a qualified archeologist annually.

4.3.1.5.2 Recreation

Comprehensive baseline photos of the routes have been taken for comparison purposes. These photos were taken in each direction every ¼ mile along the route, and photo locations were recorded with GPS. The photos will be used in monitoring possible effects to the routes and adjacent lands on a **periodic** basis.

4.3.1.5.3 Wildlife

Wildlife populations will be monitored seasonally or as needed for disturbance caused by the proposed activity.

4.4.1 Alternative B – Hole-in-the-Rock Foundation Modifications

4.4.1.1 ACECs

- *Issue: Does the proposed 0.31 acres of new ground disturbance conform with the No Surface Occupancy stipulation for the San Juan River ACEC?*

- *Could an exception be granted because activities are short term or because after an analysis the authorized officer determines the project would benefit the relevant and important values?*

Under Alternative B, the impacts to the ACEC would remain the same as those for Alternative A.

4.4.1.2 Cultural Resources

- *Issue: To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?*

Under Alternative B, impacts to cultural resources would remain the same as those for Alternative A.

- *Issue 2: To what extent will proposal foster heritage tourism throughout the Monticello PA?*

Under Alternative B, Hole-in-the-Rock Foundation would have the ability to provide Heritage Tourism opportunities for up to 17,100 participants per year. The benefits to Heritage Tourism provided by trekking in a group of 250 peers would remain intact for the Salvation Knoll and Long Flat segments. The group experience benefits of Heritage Tourism would be slightly reduced by the division into subgroups of 12 at the San Juan Hill route, but because a hosted group could still complete the trip in a single day the impacts to community cohesion would be minor.

4.4.1.3 Recreation and the RMZ

- *Issue 1: To what extent could this proposal potentially impact other recreational users?*

Under Alternative B, the impacts to other recreational users (highway, OHV, and hikers) at the Salvation Knoll and Long Flat routes would be similar to those described under Alternative A except the total number of user days would be reduced by about 40%. The stipulation stating that only one trail may be used at a time, limiting days of operation to Monday – Saturday, and reducing expected trips to four per week substantially decreases the amount of traffic on state highways, including Moki Dugway, to no more than 40 at one time.

The large group size of 125 on the San Juan Hill Route would be subdivided into discreet groups of no more than 12 traveling together. The overall numbers of trekkers and vehicles would add to the complexity of uses on the route, and could cause auditory and visual impacts to river-runners visiting San Juan Hill or camping in nearby sites; however, the staggering of groups should mitigate the impacts by more closely mimicking existing use patterns. Visitors to the Comb Ridge campsite might experience more sustained auditory and visual intrusions, as the staggering of groups would necessitate earlier starts, and consequently, more overlapping use in the early morning when campers may still be occupying the site. Additional two-way vehicle traffic on the Comb Wash four wheel drive road might contribute to conflicts in recreational uses, but staggering of trips will likely cause less conflict than a large group of support vehicles traveling down the road at one time analyzed in other alternatives.

- *Issue 2: Does the proposed group size of 250 on the roads exceed the stipulated commercial group size limit for Comb Ridge RMZ?*

Under Alternative B, the large group size of 125 on the San Juan Hill Route would be subdivided into discreet groups of 12 traveling together within the Comb Ridge RMZ. Although this would technically bring the action into compliance with Decision REC-113 in the RMP (2008a); it would be very difficult to actually keep up to eleven groups of 12 separated throughout the trip. Separate groups would have to travel at the same speed, and if any group had to stop, such as to allow vehicles to pass, it could be “caught” by the following group.

4.4.1.4 Wildlife

- *To what extent will the Proposed Action and Alternatives impact raptors and migratory birds?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate wildlife species?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate species habitat?*
- *To what extent could this proposal potentially impact crucial mule deer winter range?*

Under Alternative B, impacts to Wildlife would remain the same; however the total number of user days would be reduced by about 40%. There is a potential reduction in the disturbance to wildlife because only one trail would be used per day, trips would take place Monday-Saturday and trips would be limited to a maximum of four per week. There would still be heavy use during breeding and nesting season as 75% of the use is expected during this time.

4.5.1 Alternative C – Reduced Group Size for San Juan Hill Route to 12 at One Time

4.5.1.1 ACECs

- *Issue: Does the proposed 0.31 acres of new ground disturbance conform with the No Surface Occupancy stipulation for the San Juan River ACEC?*

Under Alternative C, the need for new parking area construction at the base of the dugway at San Juan Hill would be eliminated. Instead, up to ten vehicles would park in two 0.09 acre existing disturbed areas on either side of D0167. One of the 0.09 acre parking areas would be located in VRM Class I. The objective of this class is to preserve the existing character of the landscape; however, it does not preclude very limited management activity. Use of the existing 0.09 acre disturbed area for parking would not constitute a change to the characteristic landscape.

A visual analysis was completed for “Visible” and “Not Visible” areas from the San Juan River (Map 5). The viewshed analysis assesses whether the surface of the ground is visible from the "analysis line" down middle of the river. There are approximately 60 points along on the analysis line that the visibility assessment is made. This modelling provides an over-conservative estimate of the visible areas because it does not take into account vegetative screening that is available anywhere between the analysis line and visible areas. A visual analysis (Map 6) was completed for “Visible” and “Not Visible” areas from three Key Observation Points that include Cottonwood Campsite, Barton Trading Post and the Riverhouse camp area. The two parking areas are not visible from these points. Proposed trekking on the San Juan Hill will be visible to visitors hiking from the river to the historic site.

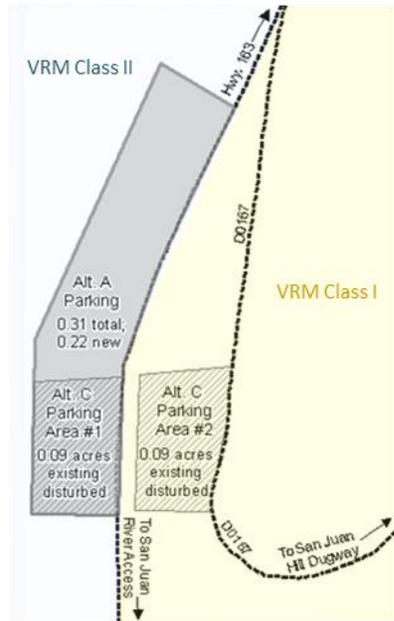


Figure 6. Parking Area in ACEC Alternatives A and C

Because no new construction would be needed, impact to relevant ACEC values would be eliminated under this alternative. Alternative C would therefore be in compliance with RMP Decision ACEC-53 and Appendix B NSO Stipulations (2008a).

4.5.1.2 Cultural Resources

- *Issue: To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?*

Under Alternative C the impacts to the ACEC would remain the same as those for Alternative A.

- *Issue 2: To what extent will proposal foster heritage tourism throughout the Monticello PA?*

Under Alternative C impacts to Heritage Tourism on the Salvation Knoll and Long Flat routes would remain the same as those for Alternative A. The community benefits of Heritage Tourism at San Juan Hill would be disrupted due to the hosted groups having to split into groups of 12. The requirement to stagger the reduced groups would also diminish Hole-in-the-Rock Foundation’s ability to use San Juan Hill as an effective Heritage Tourism site for large hosted groups.

4.5.1.3 Recreation and the RMZ

- *Issue 1: To what extent could this proposal potentially impact other recreational users?*

Under Alternative C, the impacts to other recreational users (highway, OHV, and hikers) would be reduced overall from Alternative A because of an overall reduction in user days of about 40%. For the Salvation Knoll and Long Flat routes would be the same as those described under Alternative B. At San Juan Hill, the reduced group size of 12 would reduce potential conflicts among recreational users, but might slightly increase conflicts on the other two routes. River-runners visiting San Juan Hill or camping in nearby sites may encounter some additional traffic, but the small group sizes would keep disturbance to a minimum. River runners and 4x4 users encountering the Proposed Action would experience a group size within expected norms. In addition, the reduction in vehicle numbers and need for vehicle support would limit two-way traffic interaction on the Comb Wash four wheel drive road. Those trekkers not able to visit San Juan Hill within the reduced visitor numbers would likely be pushed to one of the two other routes. This would effectively concentrate traffic at Salvation Knoll and Long Flat routes, but still be within the limits analyzed in this EA.

- *Issue 2: Does the proposed group size of 250 on the roads exceed the stipulated commercial group size limit for Comb Ridge RMZ?*

Reducing group sizes to 12 at one time would also be in compliance with Decision REC-113 in the RMP (2008a).

4.5.1.4 Wildlife

- *To what extent will the Proposed Action and Alternatives impact raptors and migratory birds?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate wildlife species?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate species habitat?*
- *To what extent could this proposal potentially impact crucial mule deer winter range?*

Under Alternative C, the type of impacts to Wildlife would remain the same; however there is a potential reduction in the disturbance to wildlife because only one trail would be used per day, trips would take place Monday-Saturday and trips would be limited to a maximum of four per week. There would still be heavy use during breeding and nesting season as 75% of the use is expected during this time.

4.6.1 Alternative D – Limit Season of Use to One Month per Year

4.6.1.1 ACECs

- *Issue: Does the proposed 0.31 acres of new ground disturbance conform with the No Surface Occupancy stipulation for the San Juan River ACEC?*

- *Could an exception be granted because activities are short term or because after an analysis the authorized officer determines the project would benefit the relevant and important values?*

Under Alternative D, the impacts to the ACEC would remain the same as those for Alternative A because the full sized (expanded) parking would still be needed.

Due to the new construction, an exception could not be granted because the activity is short term. After analysis, the authorized officer determined that the project does not benefit the values of scenic, cultural, fish and wildlife, natural systems and processes, and geological features to such a degree that an exception could be applied.

4.6.1.2 Cultural Resources

- *Issue: To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?*

Under Alternative D the impacts to the ACEC would remain the same as those for Alternative A.

- *Issue 2: To what extent will proposal foster heritage tourism throughout the Monticello PA?*

Under Alternative D, Hole-in-the-Rock Foundation's ability to provide heritage tourism opportunities would be substantially reduced to 4,000 individuals per year.

4.6.1.3 Recreation and the RMZ

- *Issue 1: To what extent could this proposal potentially impact other recreational users?*

Under Alternative D, the reduced season of use could potentially substantially diminish conflicts among recreational users depending on the month chosen. If the season of use was limited to the month of August 1 – August 31, impacts on users at Cedar Mesa would be negligible. An average 500 users per month spread across the entire Cedar Mesa Area are unlikely to be impacted by increased traffic on the routes. Highway congestion at Moki Dugway caused by shuttle vehicles would occur in the season of least use on Cedar Mesa, which would result in less traffic impacts for the general public. River use also decreases substantially in the month of August, which is generally a shoulder season to the high-use season with an average visitation of less than 750 per month. Although river-runners and 4x4 users would still encounter some additional traffic caused by the Proposed Action, the impact would be felt by far fewer users. If the season of use was June 1 – June 31, impacts would remain similar to those for Alternative A, but the impacts would only last for a one-month period.

- *Issue 2: Does the proposed group size of 250 on the roads exceed the stipulated commercial group size limit for Comb Ridge RMZ?*

Under Alternative D, the commercial group size limit would be exceeded.

4.6.1.4 Wildlife

- *To what extent will the Proposed Action and Alternatives impact raptors and migratory birds?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate wildlife species?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate species habitat?*
- *To what extent could this proposal potentially impact crucial mule deer winter range?*

Under Alternative D, impacts to Wildlife would be reduced due to season of use.

4.6.1.4.1 Migratory Birds and Raptors

Under Alternative D, limiting the season of use to August 1-August 31 would prevent disturbance to nesting birds and raptors. By this time, late August, the young have begun to fledge and there would be a reduced risk of nest abandonment and loss of young.

4.6.1.4.2 Threatened Endangered and Candidate Species

Under Alternative D, limiting the season of use to August 1-August would prevent disturbance to Mexican spotted owls, Southwestern willow flycatchers and yellow-billed cuckoos. Southwestern willow flycatchers and yellow-billed cuckoos will have migrated through the area. If the three species are present within the area, the young have begun to fledge by August and there would be a reduced risk of nest abandonment and loss of young.

4.6.1.4.3 Crucial Mule Deer Habitat

Under Alternative D, impacts would remain the same as those analyzed under Alternative A.

4.7.1 Alternative E – Limit to One Trip per Trail per Month

4.7.1.1 ACECs

- *Issue: Does the proposed 0.31 acres of new ground disturbance conform with the No Surface Occupancy stipulation for the San Juan River ACEC?*
- *Could an exception be granted because activities are short term or because after an analysis the authorized officer determines the project would benefit the relevant and important values?*

Under Alternative E, the impacts to the ACEC would remain the same as those for Alternative A.

4.7.1.2 Cultural Resources

- *Issue: To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?*

Under Alternative E, the impacts to Cultural Resources would remain the same as those for Alternative A.

- *Issue 2: To what extent will proposal foster heritage tourism throughout the Monticello PA?*

Under Alternative E, Hole-in-the-Rock Foundation's ability to provide heritage tourism opportunities would be substantially reduced to 4,000 individuals per year.

4.7.1.3 Recreation and the RMZ

- *Issue 1: To what extent could this proposal potentially impact other recreational users?*

Under Alternative E, the reduced number of trips would potentially substantially reduce the number of recreational users (highway, OHV, hikers, and river runners) impacted by the proposed action. Any group who did encounter treks would experience the same recreational conflicts described in Alternative A, however, the potential for these conflicts would be limited to one day per trail per month, rather than eight trips per week as described in Alternative A. Shuttle use for this alternative is a substantial reduction from alternative A and B and therefore may result in no travel stipulations on the Moki Dugway.

- *Issue 2: Does the proposed group size of 250 on the roads exceed the stipulated commercial group size limit for Comb Ridge RMZ?*

Under Alternative E, the commercial group size would be exceeded.

4.7.1.4 Wildlife

- *To what extent will the Proposed Action and Alternatives impact raptors and migratory birds?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate wildlife species?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate species habitat?*
- *To what extent could this proposal potentially impact crucial mule deer winter range?*

Under Alternative E, impacts to Wildlife would remain the same; however there is a potential reduction in the disturbance to wildlife because only one trail would be used per day, trips would take place Monday-Saturday and trips would be limited to a maximum of four per week. There would still be heavy use during breeding and nesting season as 75% of the use is expected during this time.

4.8.1 Alternative F – No Action Alternative

4.8.1.1 ACECs

- *Issue: Does the proposed 0.31 acres of new ground disturbance conform with the No Surface Occupancy stipulation for the San Juan River ACEC?*

Under Alternative F, there would be no ground disturbance caused in the ACEC by the Proposed Action.

4.8.1.2 Cultural Resources

- *Issue: To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?*

Under Alternative F, there would be no direct impact caused to historic properties by the Proposed Action.

- *Issue 2: To what extent will proposal foster heritage tourism throughout the Monticello PA?*

Under Alternative F, none of the economic or cultural benefits of heritage tourism under the Proposed Action would be realized. Social media and word of mouth would continue to increase heritage tourism in the area of the Proposed Action, but tourists might be less likely to base trips out of Bluff and surrounding communities.

4.8.1.3 Recreation and the RMZ

- *Issue 1: To what extent could this proposal potentially impact other recreational users?*

Under Alternative F, Hole in the Rock Foundation would not directly offer trips. However, it is likely that the Hole in the Rock Foundation or other groups may suggest the proposed trekking routes to individuals and small groups visiting the Foundation's facilities. The impacts to other recreational users would likely be more dispersed; but visitation to important cultural sites along the Hole in the Rock trail would still increase as visitation to the Bluff area grows.

- *Issue 2: Does the proposed group size of 250 on the roads exceed the stipulated commercial group size limit for Comb Ridge RMZ?*

Under Alternative F, the stipulated commercial group size would not be exceeded.

4.8.1.4 Wildlife

- *To what extent will the Proposed Action and Alternatives impact raptors and migratory birds?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate wildlife species?*
- *To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate species habitat?*
- *To what extent could this proposal potentially impact crucial mule deer winter range?*

4.8.1.4.1 Migratory Birds and Raptors

Under Alternative F, No Action, there would be no impacts from the Proposed Action to migratory birds and raptors.

4.8.1.4.2 Threatened Endangered and Candidate Species

Under Alternative F, No Action, there would be no impacts from the Proposed Action on threatened, endangered or candidate species.

4.8.1.4.3 Crucial Mule Deer Habitat

Under Alternative F, No Action, there would be no impacts from the Proposed Action crucial mule deer habitat.

4.9 Cumulative Impacts Analysis

“Cumulative impacts” are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions. Note that there are no cumulative impacts to ACECs so that section is not included below.

4.9.1 Cultural Resource Cumulative Impacts

4.9.1.1 Cumulative Impact Area

The Cumulative Impact Area (CIA) for Heritage Tourism is identified as the Cedar Mesa SRMA and the San Juan River SRMA, which encompass a total 416,957 acres. The timeframe for cumulative impacts would be the length of the permit.

4.9.1.2 Past and Present Actions

Past or ongoing actions that affect the same components of the environment as the proposed action are:

- *San Juan River and Cedar Mesa Visitation*

Total visitation to Cedar Mesa SRMA, including day use and overnight visitation, is estimated by BLM to average about 75,000 visits per year (BLM Online Recreation Management Information System), with a slight upward trend in the last five years. Cultural tourism is a primary focus at Cedar Mesa, with most trips including visits to one or more cultural sites. Visitation to the affected segment of the San Juan River is about 10,500 per year. Heritage tourism is a secondary focus on the San Juan River, but it is not uncommon for river visitors to visit one or more cultural sites outside the San Juan Hill area during a trip.

- *Commercial Heritage Tourism (San Juan River and Cedar Mesa SRPs)*

Monticello BLM currently permits 56 Special Recreation Permits for River and Land Based use in the CIA. These range from school groups who typically take 12 participants on one annual trip to Cedar Mesa to companies that report guiding 900 or more clients on the San Juan River each year. In 2014, commercial groups accounted for an estimated 700 visitors in Cedar Mesa SRMA and an estimated 2,000 visitors in San Juan River SRMA. San Juan River SRPs are capped at 12, but there has been some increase in total number of Cedar Mesa SRPs issued over the last five years. Most, if not all, Cedar Mesa and San Juan River SRPs guide clients to cultural sites as part of their business. Properly regulated, guided heritage tourism allows business owners to promote respect for history and reinforce appropriate site etiquette while creating economic benefits within the community.

- *Hole-in-the-Rock-Foundation: Bluff Fort and Camp Stikiety-ta-tudy*

The Hole-in-the-Rock Foundation is a 501c3 nonprofit organization whose stated mission is to preserve, perpetuate and promote the historical legacy of the Hole-in-the-Rock/San Juan Mission Pioneers. In addition to the proposed treks, Hole-in-the-Rock Foundation runs Bluff Fort Historic Site and Camp Stickiety-ta-tudy, in San Juan County, UT. Bluff Fort interprets the historic Hole-in-the-Rock Trail and the early years of the Bluff settlement for hosted groups and other visitors. Bluff Fort had over 19,000 visitors in 2013, many of whom received information about heritage tourism opportunities on BLM lands outside of Bluff. Camp Stickiety-ta-tudy is a five-acre primitive campsite outside of Bluff provided by Hole-in-the-Rock Foundation to host large groups. Although the current focus area of Hole-in-the-Rock Foundation visitors is the area in and immediately adjacent to Bluff, the interpretive activities Hole-in-the-Rock Foundation increase the desirability of HITR Trail segments within the SRMAs as settings for experiential heritage tourism.

4.9.1.3 Reasonably Foreseeable Action Scenario (RFAS)

- *Future SRP applicants for trekking on Hole in the Rock Trail*

Monticello BLM has received one application from a group other than Hole-in-the-Rock Foundation to conduct trekking activities in the same area as the Proposed Action. In addition, Grand Staircase Escalante National Monument has received multiple applications for similar activities in the last five years. BLM anticipates that interest in the Hole in the Rock Trail will grow, regardless of whether visitation is facilitated by Hole-in-the-Rock Foundation. If permits for large groups are not issued, future applicants have expressed interest in visiting in smaller groups to avoid permitting thresholds. These visitors may not have the benefit of site etiquette education as provided by Hole-in-the-Rock Foundation.

4.9.1.4 Cultural Resource Cumulative Impact Analysis

At current known visitation levels, the cumulative effect of an additional 4,000 to 28,000 visitors per year to the SRMAs caused by the Proposed Action would cause a substantial increase to both in commercial guided heritage tourism and total heritage tourism levels.

Under Alternative A, the SRMAs would experience a 20% increase to total existing heritage tourism visitation levels from the Proposed Action. Although the Proposed Action would cause no direct or indirect impact to cultural resources, cumulatively heritage tourism visitation in San Juan County is increasing. It is reasonable to expect some additional impacts to cultural heritage sites resulting from increased unregulated visitation to heritage sites, but these impacts could be mitigated to some degree through visitor education and monitoring. The Foundation would have the ability to “direct” many of their visitors to less sensitive areas, and the day-long trips to trekking areas would leave little time for unstructured visits to more sensitive sites. The organized nature of the trips would provide an economic benefit to San Juan County as groups choose to base trips out of Bluff and the surrounding communities.

Under Alternative B and C, the SRMAs would experience a 16% increase in total existing heritage tourism visitation from the Proposed Action alone. Both economic benefits to the community and potential effects to sites would be slightly reduced under these two alternatives. Under Alternative C in particular, visitation would be concentrated at the less sensitive Salvation Knoll and Long Flat routes, further protecting the more fragile resources found near the San Juan Hill route.

Under Alternative D and E, the SRMAs would have approximately 4% increase in total heritage tourism visitation from the Proposed Action alone. Although effects to cultural sites as a direct consequence of heritage tourism might be reduced, there would be a corresponding loss in revenue potential for surrounding communities. In addition, BLM anticipates that groups who were unable to fit into Hole-in-the-Rock Foundation’s trip dates might choose to visit more sensitive sites on a self-directed trip. This unstructured visitation would likely spill into heritage tourism areas not associated with the Proposed Action, such as Comb Ridge and Butler Wash.

Under Alternative F, there would be no increase in heritage tourism visitation from the Proposed Action alone. Word-of-mouth and social media are known drivers of heritage tourism, but BLM anticipates that suggestions made by Bluff Fort will likely cause a concentration of heritage tourism visitation to the SRMAs, specifically San Juan Hill area, within the next ten years regardless of permit issuance. Without guidance from Bluff Fort, visitors are less likely to confine their trips to the routes defined by the Proposed Action, and might choose to visit more sensitive sites.

Annual Use Categories	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Current Permitted San Juan River and Cedar Mesa Visitation	18,000	18,000	18,000	18,000	18,000	18,000
Current Commercial San Juan River and Cedar Mesa Visitation	2,700	2,700	2,700	2,700	2,700	2,700
Bluff Fort Visitation (Bluff City, outside SRMAs)	19,000	19,000	19,000	19,000	19,000	19,000
Hole in the Rock Trail Future SRP Applications	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Proposed Action User Days (Additional)	28,800	17,100	17,100	4,500	4000	0
Percentage Increase Overall Use in SRMAs	20%	16%	16%	4%	4%	0%

Table 6. Alternative Comparison Matrix for Cumulative Impacts to Heritage Tourism

4.9.2 Recreation Cumulative Impacts

4.9.2.1 Cumulative Impact Area

The Cumulative Impact Area (CIA) for recreational river use is identified as the San Juan River SRMA and the Comb Ridge RMZ, 47,987 total acres. Analysis above demonstrates a negligible impact to other recreational users on the Cedar Mesa SRMA outside of the Comb Ridge RMZ, and cumulative impacts are therefore also determined to be negligible for that group.

4.9.2.2 Past and Present Actions

Ongoing actions that affect the same components of the environment as the proposed action include casual use from visitors accessing the Comb Ridge RMZ and San Juan River SRMA on motorized vehicles, and private and commercial river running through the San Juan River SRMA. Combining the existing permitted river use, casual vehicular use, and new use in the form of treks will likely diminish the sense of isolation that the SRMA is managed for to some degree. It is reasonable to expect that some cumulative impact to the recreation experience will be felt by all recreational users in the San Juan River SRMA near the San Juan Hill Route.

4.9.2.3 Reasonably Foreseeable Action Scenario

BLM does not currently keep records of private motorized visitation to lower Comb Ridge, but due to the rough nature of the route, visitation is assumed to be less than 50 per day. The river permit system sets a daily cap of 75 permitted individuals for launches in the affected river segment. These caps are typically filled for the high-use season of the Proposed Action. Current daily visitation to the affected segment of the SRMA is therefore assumed to be less than 125 on busy days.

4.9.2.4 Recreation Cumulative Impact Analysis

Under Alternative A, B, D, and E, on days when treks occurred, permitted use would increase from approximately 125 to 375, or an increase of 300%. Under Alternative A, this dramatic increase would take place a maximum of two days per week, but would have a substantial impact on visitors to the SRMA. Under Alternative B, the impacts would be spread out throughout the day, but would still result in a net decrease in feeling of isolation. Under Alternative D and E, timing limitations would reduce the overall number of other visitors impacted.

Under Alternative C, visitation to the San Juan River SRMA on busy days would increase from 125 to 173, or 27%. This increase would be spread out into groups that would more closely mimic current visitation. However, because this visitation could occur throughout the week, a larger percentage of overall visitors to the SRMA might experience the affects.

4.9.3 Wildlife Cumulative Impacts

4.9.3.1 Cumulative Impact Area

The Cumulative Impact Area (CIA) for Wildlife is identified as the Cedar Mesa SRMA and the San Juan River SRMA, which encompass a total 416,957 acres. The timeframe for cumulative impacts would be the length of the permit if renewed, or 10 years.

4.9.3.2 Past and Present Actions Reasonably Foreseeable Action Scenario

Past, present, and reasonably foreseeable actions ongoing in the cumulative impact area for wildlife resources are livestock grazing, wood gathering, and recreational activities such as hunting, camping, hiking, and off-highway vehicle (OHV) use. Except for OHV use, most of these activities have been occurring over the past 80-100 years, and all activities will likely continue into the foreseeable future.

4.9.3.4 Wildlife Cumulative Impact Analysis

The cumulative effects to wildlife from the past, present, and reasonably foreseeable actions consist primarily of those actions described above. These activities, in addition with the proposed SRP, may noticeably impact wildlife resources over the time. Increased human activities are associated with noise and visual disturbances that can adversely affect wildlife during breeding, foraging and nesting activities. Potential vegetation disturbances or vegetation removal can decrease the availability and quality of habitat. Disturbance can lead to an increase in predation, decrease breeding success, reduced survival of young and cause wildlife to use other areas that may contain less suitable habitat.

5.0 CONSULTATION AND COORDINATION

5.1 Introduction

The issue identification section of Chapter 1 identifies those issues analyzed in detail in Chapter 4. The ID Team Checklist provides the rationale for issues that were considered but not analyzed further. The issues were identified through the public and agency involvement process described in sections 5.2 and 5.3 below.

5.2 Persons, Groups, and Agencies Consulted

Table 7. List of all Persons, Agencies and Organizations Consulted for Purposes of this EA

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Utah State Historic Preservation Office (SHPO)	Consultation for undertakings as required by National Historic Preservation Act (NHPA) (16 USC 470)	Letters were sent to the SHPO on April 1, 2015 contained the BLM's determination that the undertaking would have no effect on historic properties.
Native American Tribal Entities that include: <ul style="list-style-type: none"> • Pueblo of Laguna • Pueblo of Acoma • White Mesa Ute Council • Ute Mountain Ute Tribe • Navajo Nation Historic Preservation Department • Pueblo of Zuni • Pueblo of Santa Clara • Pueblo of Zia • Pueblo of Hopi • Pueblo of Jemez • Uintah and Ouray Ute Tribe 	Consultation as required by the American Indian Religious Freedom Act of 1978 (42 USC 1531) and NHPA (16 USC 1531)	Native American Consultation with relevant tribes was completed. Letter was sent to 04/02/2015.
US Fish and Wildlife Service	Consultation as required by Endangered Species Act of 1973	ESA Section 7 consultation (letter sent on 09/23/14). Concurred with BLM Determination of Effect that issuance of the SRP is "not likely to adversely affect" listed species on 10/04/2014.

5.3 Summary of Public Participation

The BLM posted the proposed action on the Environmental Notification Bulletin Board (ENBB) on October 8, 2014, to solicit public input and concerns. A 30-day public scoping period was announced to the public in a press release issued for the project on October 8, 2014. As a result of this press release 68 comment responses from 65 individuals and groups were received. Of those, 34 responses were determined to have no substantive comments as per BLM Utah NEPA Guidebook (p106). Two responses

contained comments which provided suggestions for design of specific alternatives, analyzed as Alternatives C, D and E. A summary of scoping comments and responses may be found in Appendix F.

A 30 day public comment period was announced in a press release issued April 24, 2015. During the comment period BLM received comments from 1,193 individuals and groups. Of these, many were considered non-substantive because they expressed only general support or opposition, or were substantively identical to the text provided in a Southern Utah Wilderness Alliance (SUWA) Alert. Three groups and 63 individuals presented a total of 143 substantive responses.

A summary of public comments and specific BLM responses may be found in Appendix G. The EA has been modified to clarify “groups” versus “parties” in response to a comment from Friends of Cedar Mesa. Two comments regarding wildlife sections which were omitted due to editing errors have been addressed by adding the missing text back into the document. Clarification has been added to the EA to address several comments which indicated confusion about existing permitted areas in relation to the location of the area of operation for the Proposed Action. Comments regarding wild land fire, public notification, signage, waste disposal, route maintenance and WSA boundaries were incorporated into the SRP Stipulations (Appendix D). Comments that were identical to the SUWA Alert proposed text, or those that differed only in biographical or other non-substantive details, have been addressed under the general heading “SUWA Alert Letter Text”. Those comments that were similar to the SUWA Alert text but incorporated specific additional comments are noted as “SUWA Alert Addendum” in the table.

5.4 List of Preparers

Table 8. List of Preparers

Name	Title	Responsible for the Following Section(s) of the Document
BLM		
Brian Quigley	Assistant Field Office Manager	NEPA coordination
Misti Haines	Recreation Technician	Recreation Team Lead; ACECs; Environmental Justice; Recreation Management , Wild and Scenic Rivers; Socioeconomics
Rebecca Doolittle	District Planner and Environmental Coordinator Canyon Country District	NEPA review
Jed Carling	Range Management Specialist	Floodplains; Wetlands/ Riparian; Invasive Species; Livestock Grazing; Rangeland Health Standards; Vegetation;
Mandy Scott	Wildlife Biologist	Water Resources; Wildlife; Special Status Plant and Wildlife Species; Migratory Birds Woodlands/Forestry
Laird Naylor	Archaeologist	Cultural Resources; Paleontology
Cliff Giffen	Natural Resource Specialist	Air Quality; Soils
Don Simonis	Archaeologist	Native American Concerns
Jeff Brown	Hazardous Material Coordinator/Safety	Hazardous and Solid Wastes; Public Safety
Ted McDougall	Geologist	Mineral Resources/Energy Production

6.0 REFERENCES

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APPENDIX A

INTERDISCIPLINARY TEAM CHECKLIST

INTERDISCIPLINARY TEAM CHECKLIST

OFFICE: **Monticello Field Office**

TRACKING #: DOI-BLM-UT-Y020-2012-001	CASEFILE #:2930
PROPOSED ACTION TITLE: Hole in the Rock Foundation Handcart Trekking SRP for Guided Group Handcart Trekking and Hiking	LOCATION: Cedar Mesa, Township 37S Range 18E Sections 10, 11, 13, 14 Range 19E Sections 15, 17, 18, 20, 21, 22 Township 38S Range 18E, 19E Comb Wash, Township 40S Range 20E, Township 41S Range 20E.
APPLICANT: Hole in the Rock Foundation	APPLICANT ADDRESS: PO Box 476 Bluff, UT 84512

Project Description:

The Hole-In-The-Rock (HIR) Foundation (the proponent) has submitted a Special Recreation Permit (SRP) application to the Monticello Field Office. The proponent proposes to conduct guided handcart treks and guided hiking as day use only on BLM lands, and organized group camping on lands administered by the Utah School and Institutional Trust Lands Administration (SITLA) (collectively these activities are referred to as “treks”) at various locations associated with the HIR Trail in three general areas consisting of the **Salvation Knoll/Cedars** area, upper **Snow Flat Road/Long Flat** area, and the lower **Comb Wash/San Juan Hill** area. The treks are intended as experiential learning opportunities for up to 250 participants at a time focused on historical events of the HIR Expedition in 1879 and 1880. The SRP would initially be authorized for a probationary term of one year and would then be considered for renewal for a period of five years. The proponent has consulted with the (SITLA) and the Utah Department of Transportation (UDOT) and will obtain appropriate permitting and authorizations as needed for the use of SITLA lands and UDOT highway right-of-way (ROW).

Year round use consisting of a maximum of 28,800 user days is proposed. Approximately 90% of use would occur during a ‘high use’ season. The high use season would occur over 13 weeks from June 1st through August 31st of each year when a maximum of 26,000 user days could be utilized. Weekly limits of 2000 user days from Sunday through Saturday would apply to combined use of all use on the 3 routes during the high use season. The maximum use on any one of the three routes would not exceed 1750 user days per week. The remaining 2800 user days (maximum) would be utilized during the rest of the calendar year. Itineraries for all trips will be provided in advance to the Monticello BLM and subject to approval to avoid conflicts with other uses of the proposed routes. Group size would be limited to 250 people at any single location on BLM lands with the exception of the San Juan Hill Route where groups will be limited to 125 people on the route at one time.

2. Summary Table for Proposed Use Numbers, TMP Miles, and Affected Acres Included in Proposal

		Salvation Knoll		Snow Flat/ Long Flat	San Juan Hill	
		Old Highway Segment	Hiking Trail Segment		Class D Road Segment	Hiking Trail Segment
Proposed Use Numbers	people/group	250	25	250	125	125
	max users/day	250	250	250	250	250
	max user days/week	1750	1750	1750	1750	1750
	max handcars	0	0	30	15	0
	max vehicles	0	0	6	25	0
	max horses	4	0	4	4	0
Proposed Routes (Travel Management Plan)	designated pedestrian trail	2.68 miles Y020-12-006	0.22 miles Y020-10-15	0	0	0
	designated ATV trail	0.93 miles 090-06-06 SK	0	0	0	0
	Class B or Class D Road	1.67 miles D3658,D3659, D3663,D3661, D3665,D3666, B2331	0	6.17 miles D0089	4.79 miles D0167, D4587	0
	new route designation (existing disturbance)	1.97 miles (1.30 BLM, 0.67 SITLA)	0	0	0	0.51 miles
	new trail construction	0	0.09 miles	0	0	0
	TOTAL MILES	7.56 miles		6.17 miles	5.31 miles	
Proposed Parking/Activity Areas	total number of parking areas, activity areas and campsites	7 (6 on BLM, 1 on SITLA)		2 (1 on BLM, on 1 SITLA)	4 on BLM	
	new disturbance on BLM	0.30		0.34 acres	0.31 acres	
	existing parking area on BLM	7.89 acres		none	2.31 acres	
	parking areas and campsites on SITLA	2.45 acres		1.12 acres	0.47 acres	
	tree removal	12 junipers removed		none	none	
	TOTAL ACRES	10.64 acres		1.46 acres	3.09 acres	

Proposed activities for the Salvation Knoll Route include:

- **Day use only.**
- **Guided hikes (250 participants)** along a 7.25 mile section of old highway roadbed between the parking area on the south side of Highway 95 at the turnoff to Natural Bridges National Monument and the parking area east of Road B-2331. This section includes 2.68 miles of designated pedestrian/equestrian trail (EA UT-Y020-2012-006), 1.67 miles of designated road segments (D3658, D3659, D3663, D3661, D3665, D3666 and B2331), 0.93 miles of designated ATV Trail (EA UT-090-06-06 SK), and 1.97 miles of non-designated route. No handcarts or motorized vehicles will travel on this route. Access points for hikes include an existing 0.38 acre parking area on the south side of Highway 95 at the turnoff to Natural Bridges National Monument, The Cedars overflow camping area (2.28 acres existing disturbance) and the parking area east of County Road B-2331 (3.31 acres existing disturbance). Additional vehicle support to hiking groups will be provided where D0122 (Cyclone Flat Road) and D3662 intersect the proposed route. Up to 4 horses may accompany the group on this trail segment. The segments of this trail which are not included in the Monticello BLM Travel Plan would be designated for pedestrian use. One 1.30 mile segment is located on BLM land and two segments totalling 0.67 miles are located on SITLA land.
- **Guided hiking (groups of 25)** from the base of Salvation Knoll to the existing trailhead (0.09 miles), and up the Salvation Knoll Trail on the existing 0.22 mile trail (EA UT-Y020-2010-015) to the top, returning by the same route. As a means to limit conflicts with other recreational visitors, groups hiking to the top of Salvation Knoll would be limited to 25 participants with no more than two groups on this trail segment at any one time. The rest of the group will congregate on the leased SITLA campsite to the west of Salvation Knoll or in the designated activity area (see Salvation Knoll Hiking Route East Map). The construction of a foot trail 0.09 miles long from the activity area to the parking area at the base of Salvation Knoll and adjacent to Highway 95 is proposed as labelled on the Salvation Knoll East map. HIR Foundation will seek approval from UDOT as needed for the trail. This trail would be designated for pedestrian use in the Monticello BLM Travel Plan.
- **One activity area** is proposed on BLM managed lands. This area is a 1.14 acre previously disturbed area near the Salvation Knoll trail, adjacent to D3666. This area would be used by participants waiting to go up the Salvation Knoll trail.
- **Seven parking areas** are proposed on BLM managed lands as labelled on the Salvation Knoll Hiking Route maps. These would be approved as parking areas/trailheads and improvements to these areas may involve the use of heavy equipment and placement of road base or gravel. An eighth parking area is proposed for SITLA land.
 - Up to 40 vehicles will utilize 0.5 acres east of Road B-2331 in a large previously disturbed area (3.31 acres of existing ground disturbance).
 - Up to 6 vehicles in a .09 acre pullout adjacent to Highway 95 at the base of Salvation Knoll.
 - Up to 8 vehicles in undisturbed area adjacent to Road D-3662 (as shown on the Salvation Knoll East map) located adjacent to SITLA Section 16 located in T37S and R19E. Proposed new surface disturbance totals 0.11 acres. Buck and rail fencing may be installed to define parking area and limit impacts.

- Up to 8 vehicles in an undisturbed area adjacent to the D-0122 Cyclone Flats Road. Proposed new surface disturbance would total 0.19 acres. Approximately 12 Juniper trees may be removed to facilitate parking. Post and rail fencing may be installed as needed to define parking area and limit impacts.
- Up to 40 vehicles will utilize .5 acres at The Cedars camping area located at the end of D-0098 (2.28 previously disturbed acres).
- Alternate parking for 20 vehicles utilizing .2 acres in a previously disturbed area adjacent to corral near The Cedars overflow camping area (0.69 acres existing disturbance). No parking will occur adjacent to the Mormon Flat Corral near The Cedars overflow camping area during the permitted livestock grazing period (October 1 through June 30).
- Parking for 12 vehicles at the west end of the designated pedestrian trail across from the Natural Bridges National Park access road in a previously disturbed area along Highway 95 (0.38 acres existing disturbance in highway ROW).
- An eighth parking area which may also be used as a campsite would be located on SITLA land leased by the Hole in the Rock Foundation in Section 16 located in T37S and R19E.
- **Vehicle support and portable toilets** may be provided by the Hole-in-the-Rock Foundation to hiking groups at any of the seven parking areas where the proposed hiking trails intersect designated routes open to motor vehicles. The toilets could remain in place throughout the season of use with mitigation to reduce visual impacts. The toilets would be serviced as needed on a regular basis.
- **Use of up to 4 horses would be in compliance with the Cedar Mesa Stock Use Stipulations and require the use of weed free hay.**
- **Trail maintenance** for Salvation Knoll would occur only under BLM supervision, as part of official volunteer projects. Work would occur as follows:
 - On the existing Salvation Knoll Trail, maintenance would be conducted as previously authorized in DOI-BLM-UT-Y020-2010-015.
 - On the connecting sections of existing trail from the HIR Trail to The Cedars overflow camping area and to an existing parking area on Highway 95, maintenance would be conducted as previously authorized in DOI-BLM-UT-Y020-2012-006.
 - Maintenance of the section of the HIR Trail west of Highway 261 and south of Highway 95 would be subject to approval and site specific analysis to preserve the historic integrity of the trail.
 - For the remainder Salvation Knoll segments along the old highway, Hole-in-the-Rock Foundation would perform maintenance each year as needed. Maintenance actions may include:
 - Use of hand tools to break down the banks of washouts and clear flash flood debris
 - Appropriate erosion control action which would be taken as needed where the permitted activity causes an erosion problem.

Proposed activities for the Snow Flat/ Long Flat Route include:

- **Day use only.**
- **Handcart treks (up to 250 participants)** on a 6.17 mile segment of the HIR Trail coinciding with D-0089 which intersects the B-237 Snow Flat Road to the east and Highway 261 to the west. Up to 30 handcarts may be pulled by participants walking on the road. Up to four horses would be allowed to travel the route.
- **Vehicles (up to 6)** may be used on D-0089 to provide support for handcart groups.
- **Use of up to 4 horses would be in compliance with the Cedar Mesa Stock Use Stipulations and require the use of weed free hay.**
- **One parking** area for up to 40 vehicles located on BLM land is proposed as labelled on the Long Flat map. This parking area is adjacent to D-0089 and is located on a level area of undisturbed sagebrush (0.34 acres). The parking area would be established with use, and may be additionally improved with heavy equipment, placement of road base, and gravel. Post and rail fencing may be erected to define parking area and limit area of impact. This would be approved as a parking area/trailheads. A second 1.1 acre parking area which may also be used as a campsite would be located on SITLA land leased by the Hole in the Rock Foundation in Section 32 located in T38S and R19E.
- **Portable toilets** may be provided by Hole-in-the-Rock Foundation at the BLM parking area adjacent to D-0089. The toilets could remain in place throughout the season of use with mitigation to reduce visual impacts. The toilets would be serviced as needed on a regular basis.
- Trail maintenance would occur only under BLM supervision, as part of official volunteer projects. Work would occur **along the Long Flat Road as needed:**
 - Using hand tools to breakdown the banks of washouts and clear flash flood debris
 - Appropriate erosion control action which would be taken as needed where the permitted activity causes an erosion problem.

Proposed activities for the lower Comb Wash/ San Juan Hill Route include:

- **Day use only.**
- **Handcart treks (up to 125 participants per group; 2 groups per day with a maximum of 250 per day)** on 4.05 miles of the HIR Trail coinciding with the designated route D-0167 south of Highway 163 in lower Comb Wash to where the designated road approaches the base of San Juan Hill. Up to 15 handcarts may be pulled by participants walking on the road. Up to 4 horses and 25 vehicles may travel the route from Highway 163 to the designated parking area. Six motor vehicles and up to 15 handcarts may proceed to the parking area at the base of San Juan Hill (DOI-BLM-UT-Y020-2013-021) . When the parking area at the north end of D-0167 is not available, participants may use an alternate starting location along 0.75 miles of D-4587.
- **Guided hiking (up to 125 participants per group)** along a section of the HIR Trail where it climbs from the base of San Juan Hill to a point up to 1000 feet beyond the “We thank thee...” inscription at the top of the hill. This segment of trail would be 0.51 miles long on existing ground disturbance and would be designated in the Monticello BLM Travel Plan for pedestrian use only.
- **Four parking areas** on BLM lands are proposed as labelled on the San Juan Hill map. Three of these would be designated as parking areas/trailheads in the Monticello BLM

Travel Plan; the fourth was designated in DOI-BLM-UT-Y020-2013-021 as described below. A fifth parking area is proposed for SITLA land. Improvements may occur as allowed in the 2008 Monticello RMP and may include road base, gravel, and post and rail fencing as needed.

- Up to 40 vehicles would utilize .5 acres in the large previously disturbed area adjacent to the corral on D-0167 near Highway 163. (1.37 acres of existing disturbance). No parking will occur adjacent to the Comb Wash Corral during the permitted livestock grazing period (September 25 through June 7) unless preapproved by the BLM and the allotment is not being used by authorized livestock. If the area is not available, participants would be dropped off at the staging area near the intersection of D-0180 and D-4597 and vehicles would proceed to a 0.73 acre alternate parking area on the west shoulder of D-0180 (the old SR163 alignment).
- Up to 25 vehicles will park on the west side of D-0167/D-4597 at the base of the bench where San Juan Hill is located to avoid driving on an original section of the HIR trail where the road climbs on steep and rough terrain alongside historic cribbing. Proposed parking area would include 0.31 acres of new ground disturbance (see San Juan Hill Map).
- Up to six vehicles, 15 handcars, and four horses may proceed on the designated road in support of groups hiking up to a proposed parking area at the base San Juan Hill. The proponent requests the use of this designated road, and would use a 0.21 acre disturbed area at the base of San Juan Hill for parking as per the decision in the Five Designated Routes EA (DOI-BLM-UT-Y020-2013-021).
- The proponent would obtain approval from SITLA for a fourth 0.47 acre parking area located as shown on the San Juan Hill map in Section 36 , T 40S R 21E adjacent to D-4587/D-0180.
- **Portable toilets** may be provided by Hole-in-the-Rock Foundation at the BLM parking areas adjacent to D-0167. The toilets could remain in place throughout the season of use with mitigation to their reduce visual impacts. The toilets would be serviced as needed on a regular basis.
- **Use of up to 4 horses would be in compliance with the Cedar Mesa Stock Use Stipulations and require the use of weed free hay.**
- **Trail maintenance** of Comb wash trail segments by Hole-in-the-Rock Foundation would occur only under BLM supervision, as part of official volunteer projects. Work would occur as follows each year as needed and may include:
 - Use of hand tools to break down the banks of washouts and clear flash flood debris
 - Appropriate erosion control action which would be taken as needed where the permitted activity causes an erosion problem.
 - Maintenance of the San Juan Hill Trail would be subject to approval and site specific analysis to preserve the historic integrity of the trail.

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 are either not present, not applicable or not measurable issues in the Monticello Field Office and have been removed from the checklist: Farmlands (Prime or Unique), Wild Horses and Burros, Greenhouse Gas and Geology. The word “Religious” was removed from the Native American Concerns heading.

Determination	Resource	Rationale for Determination*	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)				
NI	Air Quality	<p>The proposed action conforms to the Monticello RMP through Recreation Management Action REC-2 (RMP p. 88) to control activities through specialized management tools such as permit issuance. Recreation Management Action REC-3 (RMP p. 89) allows development of hiking paths and trails subject to site-specific NEPA.</p> <p>Impacts to air quality from recreation management were adequately analyzed in the Monticello FO Proposed RMP/Final EIS. The PRMP/FEIS (p. 4-30) for the proposed plan states recreations management decisions are likely to produce negligible short term impacts to air quality and negligible to slightly beneficial long term impacts to air quality. The PRMP/FEIS further states that recreational use at current levels is not likely to result in a long term exceedance of the ambient air quality standards.</p> <p>The proposed action would designate a hiking and hand cart trail that will be primarily on existing trails or the abandoned old highway 95 road bed. New trail established or construction would amount to less than 500 feet. There would be essentially no emissions associate with construction activities. Activities emissions would include operation of vehicles on unpaved surfaces. Emissions would be minor, temporary, would rapidly disperse, and are unlikely to cause or contribute to a violation of the National Ambient Air Quality Standards.</p> <p>Air quality is not analyzed in detail in the EA.</p>	CGiffen	5/5/2014
NI	Floodplains	<p>The proposed Salvation Knoll Hiking Route West Part has up to 250 people hiking and 4 horses utilizing a designated pedestrian trail across the floodplain of upper Kane Gulch, and utilizing a designated ATV trail across the floodplain of upper Grand Gulch. The San Juan Hill Route has up to 250 people, 15 handcarts, 25 motorized vehicles, and 5 horses utilizing a designated vehicle route that traverses along the Comb Wash floodplain. Other proposed routes do not cross any defined floodplains.</p> <p>All proposed use in floodplains associated with handcart trekking and hiking will occur along designated routes in the Travel Management Plan. Thereby, these routes are currently constructed and available for public use. As defined in Appendix B of the 2008 MFO RMP, travel on designated routes is not considered a surface disturbing activity, thus floodplain stipulations do not apply.</p> <p>0.99 acres of proposed new ground disturbance occur within the uplands outside of any active floodplains. The proposed action does not result in any permanent fills or diversions, or placement of permanent facilities in floodplains or special</p>	Jed Carling	07/03/14

Determination	Resource	Rationale for Determination*	Signature	Date
		<p>flood hazard areas.</p> <p>Overall, for reasons listed above, there are no further impacts to floodplains to a degree that detailed analysis is required.</p>		
NI	Soils	<p>The proposed action conforms to the recreation and soil/water resource management decisions in the RMP. Recreation Management Action REC-3 (RMP p. 89) allows development of hiking paths and trails subject to site-specific NEPA. Soil and Water Resource management decision SOLW-7 (RMP p. 116) requires uses to be managed to minimize and mitigate damage to soils.</p> <p>The NRCS soil survey for San Juan County, Utah, Central Part identifies the soils that the trail traverses primarily as Barx very fine sandy loam and Rizno-Barx-Yarts complex. These soils range from shallow (4 to 20 inches) to deep (up to 60 inches) and on slopes from 1 to 30 %. The soil survey provides a detailed description of these soils.</p> <p>The main impact to soils would be the high number of participants anticipated each year. The pedestrian and hand cart traffic would wear a significant path. However, the total area to be used is approximately 4 acres of existing surface disturbance and 1 acre of new disturbance. The area and nature of disturbance will not significantly impact on the overall soil stability and productivity of the general area. The area of the trail is not within RMP designated sensitive (hydric, saline, gypsiferous or highly erodible) soils. The proposed action includes maintaining the trail usable for foot and hand cart traffic and appropriate erosion control action which would be taken as needed where the permitted activity causes an erosion problem.</p> <p>The soil resource will not be impacted to the degree that would require detailed analysis in the EA.</p>	CGiffen	7/1/14
NI	Water Resources/Quality (drinking/surface/ground)	<p>The Proposed Action would use existing designated routes and routes existing but undesignated and existing disturbed areas for parking and staging. Approximately 0.99 acres would be newly disturbed to create parking and a small section of pedestrian trail. Trail maintenance would occur that would include constructing erosion control structures that would reduce sedimentation into drainages. The San Juan Rivers is the nearest perennial water source near the project area.</p>	M. Scott	7/2/14
NI	Wetlands/Riparian Zones	<p>The proposed Salvation Knoll Hiking Route West Part has up to 250 people hiking and 4 horses utilizing a designated pedestrian trail across a potential riparian zone in upper Kane Gulch. The San Juan Hill Route has up to 250 people, 15 handcarts, 25 motorized vehicles, and 5 horses utilizing a designated vehicle route that traverses along riparian zones in Comb Wash. Other proposed routes are within the uplands and outside of any defined wetlands and/or riparian zone.</p> <p>All proposed use in riparian zones associated with handcart trekking and hiking will occur along designated routes in the Travel Management Plan. Thereby, these routes are currently constructed and available for public use. As defined in Appendix B of the 2008 MFO RMP, travel on designated routes is not considered a surface disturbing activity, thus riparian stipulations do not apply.</p> <p>0.99 acres of proposed new ground disturbance and 3.69 acres of existing ground disturbance utilized in the proposed action occur within the uplands outside of any defined wetlands and/or riparian zones.</p> <p>Overall, for reasons listed above, there are no further impacts to wetlands / riparian zones to a degree that detailed analysis is required.</p>	Jed Carling	07/03/14
PI	Areas of Critical	<p>The proposal includes parking for 25 vehicles on 0.22 acres of new ground disturbance and .09 acres of existing disturbance within the San Juan River</p>	Todd Parker	7/3/14

Determination	Resource	Rationale for Determination*	Signature	Date
	Environmental Concern	<p>ACEC. The ACEC is designated in the 2008 Monticello RMP/ROD as No Surface Occupancy.</p> <p>Exception criteria for surface disturbing activities as shown in Appendix B of the 2008 Monticello RMP/ROD allow for surface disturbance when activities are short term or after an analysis the authorized officer determines that the project will benefit the relevant and important values. The San Juan River ACEC is designated for scenic, cultural, and wildlife values therefore impacts to the San Juan River ACEC will be analyzed in further detail in the EA.</p>		
PI	Recreation	<p>The Proposed Action would provide guided opportunities for up to 250 participants at a time to experience three segments of the historic Hole in the Rock Trail where it crosses Cedar Mesa and in Comb Wash to San Juan Hill adjacent to the San Juan River. Opportunities for historical interpretation and guided experiences on the trail would be a benefit to recreational visitors who desire experiences focused on historical events.</p> <p>Two of the proposed routes consisting of the Salvation Knoll/Cedars area and upper Snow Flat Road/Long Flat area occur within the Cedar Mesa SRMA and would pose minimal conflicts with other recreational uses of the area during the proposed high use season of June 1st through August 31st. Visitation to Cedar Mesa declines significantly during the same summer months due to the relatively hot and dry conditions.</p> <p>The third proposed route crosses the Cedar Mesa SRMA, Comb Ridge RMZ and enters the San Juan River SRMA where use is generally higher during the summer months and consisting primarily of river based recreation with an increasing component of land based four wheel drive casual use focused on visits to San Juan Hill, Barton’s trading post, and River House Ruin. Peak use on the San Juan River occurs during the months of May and June which overlaps the proposed high use season by 30 days. The proposed use of handcarts, motor vehicles, and pedestrian traffic on this route with up to two groups of 125 people per day adds to the complexity of uses while two-way traffic on the rugged Comb Wash four wheel drive road is likely to contribute to conflicts in recreational uses and effects to recreational experiences. Due to the increasing and diverse recreational uses occurring on the proposed Comb Wash/San Juan Hill route, impacts to recreational experiences will be analyzed in further detail in the EA.</p>	Todd Parker	7/3/14
NP	Wild and Scenic Rivers	This project would not affect any eligible Wild and Scenic River segments.	Todd Parker	5/5/14
NI	Visual Resources	<p>VRM management classes as described in BLM Manual H-8410-1 Visual Resources were established for the project area in the 2008 Monticello RMP.</p> <p>The San Juan Hill segment is proposed on designated routes in VRM I and VRM II management classes. VRM I proposed use is on a designated trail and no new ground disturbance is proposed in this area. Parking areas in VRM I are existing disturbance. The parking areas that would be designated are in VRM I and VRM II. A visual analysis was completed (San Juan Rincon Visual Assessments, Knight, March 2015) showing what sections of the San Juan Hill route would be visible from the San Juan River and river users. A small section of the designated route below San Juan Hill would be visible from the river and the San Juan Hill trail location is visible. The proposed parking areas are not visible. River users would have minimal visibility of the proposed activity.</p>	B.Quigley	6/16/14

Determination	Resource	Rationale for Determination*	Signature	Date
		<p>Visible Areas from Key Observation Points (KOP) in the San Juan ACEC can be found in the EA as Map 6. This analysis has three KOPs that include Cottonwood Campsite, Barton Trading Post and the Riverhouse camp area. None of the parking areas are visible from these points. Proposed trekking on the San Juan Hill will be visible to visitors hiking from the river to the historic site.</p> <p>The Long Flat proposed use is on a designated route and located in VRM III. The proposed parking .34 acre parking area is located in VRM III.</p> <p>Salvation Knoll East segment route, proposed .1 mile trail and proposed parking areas are located in VRM III.</p> <p>Salvation Knoll West segment is located in VRM III. All proposed parking areas for this segment are located in VRM III.</p> <p>The proposed action would be compliant with all Visual Resource Management Classes as established in the 2008 Monticello Field Office RMP.</p>		
NP	BLM Natural Areas	The Proposed Action would utilize designated routes that are in the Monticello Field Office Travel Management Plan.	Todd Parker	5/5/14
NI	Socio-Economics	There would be no negative effects to socio-economics with this proposal.	Todd Parker	7/3/14
NI	Wilderness/WSA	The Proposed Action would utilize designated routes that are in the Monticello Field Office Travel Management Plan for use of motorized and mechanized vehicles. Pedestrian and equestrian use would occur on previously disturbed existing routes located outside of WSAs. There would be no impact to Wilderness/ WSAs with the approval of the Proposed Action.	Todd Parker	6/18/14
NI	Lands with Wilderness Characteristics	The Proposed Action would utilize designated routes that are in the Monticello Field Office Travel Management Plan for use of motorized and mechanized vehicles. Pedestrian and equestrian use would occur on previously disturbed existing routes located outside of Land with Wilderness Characteristics.	Todd Parker	7/3/14
PI	Cultural Resources	<p>In the Salvation Knoll area, this project would result in No Adverse Effect to the Hole-in-the-Rock Trail through “The Cedars” if participants are not allowed to congregate in large groups and if they and their guides are educated about the fragile nature of trailside resources. The project would result in No Adverse Effect to the historic highway if the trail maintenance is limited and the trail surface is not bladed. The Hole-in-the-Rock Trail and the Salvation Knoll Trail are already designated routes and use of these routes as proposed would result in No Historic Properties Affected. The old highway has previously destroyed other cultural resources along its route as has overflow campground pad construction, consequently use of this route and area as proposed would result in No Historic Properties Affected for these areas. Other areas would require inventories for cultural resources, including: along the proposed marked routes and new hiking trail, the proposed Salvation Knoll camping area, and in areas of new handcart trail on SITLA/UDOT lands (T37S, R19E, Section 16). (Update – The cultural identification effort is adequate except at one proposed parking area which would be excluded from the SRP unless as adequate identification effort is completed in the future. Brian Quigley 4/14/15)</p> <p>In the San Juan Hill area, the project would result in No Adverse Effect to the Hole-in-the-Rock Trail due to extensive bedrock exposures if use levels are limited to 100 people at a time. The proposed parking area would require inventory for cultural resources. (Update - The proposed parking area has been inventoried. Brian Quigley 4/14/15)</p> <p>Long Flat/Snow Flat Route –The cultural identification for this route is not</p>	<p>Laird Naylor</p> <p>Brian Quigley updated 4/14/15</p>	

Determination	Resource	Rationale for Determination*	Signature	Date
		adequate and this route will be excluded from the proposed SRP at this time. Brian Quigley 4/14/15 Consultation with the State Historic Preservation Officer was initiated on April 1, 2015.		
	Native American Concerns	Native American consultation was initiated on April 2, 2015.		
NI	Paleontology	Bedrock in the Salvation Knoll area consists of the Permian Cutler Group and the Triassic Moenkopi Formation, both of which are Class 3 units with moderate or unknown potential. Alluvium and colluvium with low potential cover the bedrock units in much of the area. The proposal in this area is not likely to affect paleontological resources. Bedrock in the San Juan Hill Area is comprised of Triassic Chinle Formation, which is a Class 4 unit with high potential. Use of the trail is unlikely to affect paleontological resources. While the RMP does not require inventory in Class 4 areas, the Chinle Formation is more sensitive locally. The parking area would be examined by a paleontologist for possible conflicts prior to construction. Paleontological resources will not be collected under a commercial Special Recreation Permit. All collection of paleontological resources will otherwise be in accordance with the Paleontological Resources Preservation Act of 2009 and a permit may be required. All vertebrate fossils are prohibited from collection, and require a valid permit. Common invertebrate and plant fossils may be collected without a permit. Collection of petrified wood is limited to 25 pounds a day, 250 pounds a year, for non-commercial purposes. The permittee must contact the Monticello BLM in advance for determination of permit requirements.	R. Hunt-Foster	10/29/2014
NI	Environmental Justice	There would be no negative effects to Environmental Justice with this proposal.	Todd Parker	7/3/14
NI	Wastes (hazardous or solid)	The Special Recreation Permit standard stipulations provide adequate mitigation to prevent impacts from solid wastes. No hazardous wastes would be produced, stored, treated or transported.	J. Brown	7/14/14
PI	Threatened, Endangered or Candidate Animal Species	The Proposed Action would use existing designated routes and routes existing but undesignated and existing disturbed areas for parking and staging. Approximately 0.99 acres would be newly disturbed to create parking and a small section of pedestrian trail. The proposed special recreation would be year round use with a maximum of 28,800 user days. There would be a maximum of 250 people on Salvation Knoll and Long Flat and 125 people on San Juan Hill. The permit would also allow for handcarts, horses and the use of motorized vehicles on designated routes. The highest use would occur from June 1 st -August 31 st . The proposed activities would occur near or in threatened, endangered or candidate species habitat. Given that the activities are year round with the highest use occurring during critical months for wildlife and the high amount of human disturbance that may impact these species; this resource will be analyzed further in the EA. Formal Section 7 consultation will be initiated with the USFWS.	M. Scott	7/2/14
PI	Migratory Birds	The Proposed Action would use existing designated routes and routes existing but undesignated and existing disturbed areas for parking and staging. Approximately 0.99 acres would be newly disturbed to create parking and a small section of pedestrian trail. The proposed special recreation would be year round use with a maximum of 28,800 user days. There would be a maximum of 250 people on Salvation Knoll and Long Flat and 125 people on San Juan Hill. The permit would also allow for handcarts, horses and the use of motorized vehicles on designated routes. The highest use would occur from June 1 st -August 31 st . The proposed activities would occur in raptor and	M. Scott	7/2/14

Determination	Resource	Rationale for Determination*	Signature	Date
		migratory bird species habitat. Given that the activities are year round with the highest use occurring during critical months for wildlife and the high amount of human disturbance that may impact these species; this resource will be analyzed further in the EA.		
PI	Utah BLM Sensitive Species	The Proposed Action would use existing designated routes and routes existing but undesignated and existing disturbed areas for parking and staging. Approximately 0.99 acres would be newly disturbed to create parking and a small section of pedestrian trail. The proposed special recreation would be year round use with a maximum of 28,800 user days. There would be a maximum of 250 people on Salvation Knoll and Long Flat and 125 people on San Juan Hill. The permit would also allow for handcarts, horses and the use of motorized vehicles on designated routes. The highest use would occur from June 1 st -August 31 st . The proposed activities would occur in Utah BLM sensitive species habitat. Several species are known to occur in this area. Given that the activities are year round with the highest use occurring during critical months for wildlife and the high amount of human disturbance that may impact these species; this resource will be analyzed further in the EA.	M. Scott	7/2/14
PI	Fish and Wildlife Excluding USFW Designated Species	The Proposed Action would use existing designated routes and routes existing but undesignated and existing disturbed areas for parking and staging. Approximately 0.99 acres would be newly disturbed to create parking and a small section of pedestrian trail. The proposed special recreation would be year round use with a maximum of 28,800 user days. There would be a maximum of 250 people on Salvation Knoll and Long Flat and 125 people on San Juan Hill. The permit would also allow for handcarts, horses and the use of motorized vehicles on designated routes. The highest use would occur from June 1 st -August 31 st . The proposed activities would occur in critical range for elk and mule deer. Additionally, due to the amount of human disturbance associated with the activity that may impact other wildlife species; this resource will be analyzed further in the EA.	M. Scott	7/2/14
NI	Invasive Species/Noxious Weeds	<p>There are no known infestations of State of Utah listed noxious weeds along the direct routes used for handcart trekking and hiking. Russian knapweed and camelthorn occur in the vicinity of the San Juan Hill route along the San Juan River and are listed as a Class B noxious weed in Utah, which requires action to control their populations. San Juan County Weed Department, in conjunction with the BLM, actively implements control measures on known noxious weed infestation in these areas. Invasive species in the area of the proposed activities include tamarisks, Cheatgrass, and tumbleweed (a.k.a. Russian thistle). The proposed action incorporates mitigation measures from the RMP that horses are required to be supplied weed free hay on public lands.</p> <p>Ground disturbance is the primary vector for weed establishment and spread. The limited scope of new surface disturbance (0.99 acres) spread across 4 separate localities should curtail the opportunity for the establishment and propagation of invasive and noxious weed species. The use of 2.43 acres of existing ground disturbance should not enable new weed establishment.</p> <p>In the unlikely event that noxious weeds establish as a result of the activities connected to the proposed action, the applicant, in coordination with the BLM, will be responsible to control these weeds utilizing BLM's integrated pest management strategies.</p> <p>Overall, the MFO does not anticipate any significant changes in the proportion of controllable spreading agents to contribute in the establishment and spread of invasive and/or noxious plants as a result of the proposed action. Thereby, invasive species and noxious weeds are not impacted to a degree that detailed</p>	Jed Carling	07/03/14

Determination	Resource	Rationale for Determination*	Signature	Date
		analysis is required.		
NP	Threatened, Endangered or Candidate Plant Species	There are no know threatened, endangered or candidate species within or near the proposed routes.	M.Scott	7/2/14
NI	Livestock Grazing	<p>Proposed handcart trekking and hiking would occur in the Slickhorn, Texas Muley, and Perkins South Allotments. Two parking areas are proposed adjacent to corrals for permitted livestock grazing. A stipulation is included that these corral parking areas are not to be used during the authorized grazing season, thereby mitigating potential impacts of vehicle parking and livestock management. The amount of new ground disturbance (0.99 acres) is nominal in relation to the scale of the allotments and would not measureable influence available forage. The use of 3.69 acres of existing ground disturbance would have no influence to livestock grazing as the areas have already been disturbed.</p> <p>A maximum of 28,800 user days per year are proposed. This level of use and group sizes of 250 people could negatively influence livestock grazing management and cattle distribution where these multiple uses (e.g. grazing / trekking) overlap. Yet this influence would be minimal as 90% (26,000 user days) of the proposed trekking use would occur during high use season (June 1 through August 31). High use season does not overlap the grazing season on the Perkins South and Texas Muley Allotment, and overlaps the grazing season on the Slickhorn allotment for 15 days (June 1 – 15). The other 2,800 user days would be dispersed during non high use season (September 1 – May 31), which does overlap the grazing season on these allotments. This 2,800 user days of trekking would be confined to the proposed routes and dispersed across 3 separate localities (Salvation Knoll, Long Flat, and San Juan Hill), thereby minimizing potential impacts to livestock grazing.</p> <p>Thereby, for reasons listed above, there are no impacts to a degree that detailed analysis is required,</p>	Jed Carling	07/03/14
NI	Rangeland Health Standards	Utah Standards for Rangeland Health are individually addressed as separate resources for determination of impacts in this checklist (Standard #1-Soils, #2-Riparian, #3-Biotic (vegetation/wildlife), and #4-Water Quality). Thereby, there are no impacts that require detailed analysis to Rangeland Health Standards and Guidelines that are not already being considered by the individual resource.	Jed Carling	07/03/14
NI	Vegetation Excluding USFW Designated Species	<p>The proposed handcart trekking and hiking would primarily occur within the Upland Shallow Loam (Pinyon and Utah Juniper), Upland Loam (Big Sagebrush), and Alkali Bottom (Greasewood) ecological sites. The Upland Shallow Loam sites have an overstory primarily consisting of pinyon and juniper woodlands with a dispersed understory of Indian ricegrass, galleta grass, squirrel tail, serviceberry, and mountain mahogany. The Upland Loam sites have generally been previously treated and seeded to crested wheatgrass with pinyon and juniper re-invasion. The Alkali Bottom sites have plants consisting primarily of greasewood, four-wing saltbush, Indian ricegrass, galleta grass, alkali sacaton, and sand dropseed.</p> <p>The main impact to vegetation would occur with the high numbers of participants each year (28,800 user days per year) in group sizes of 125-250 people. This level of pedestrian traffic and use of handcarts would create a substantial path by trampling / crushing of vegetation along the routes. Yet majority of the use is along designated routes already constructed / disturbed and available for public use. Proposed new ground disturbance of these ecological sites includes 0.99 BLM acres of vegetation removal across 4 separate sites. There would be minimal impacts in connection with 3.69 acres of existing ground disturbance utilized in the proposed action as these areas have previously been cleared of vegetation. Future maintenance of the trails would not</p>	Jed Carling	07/03/14

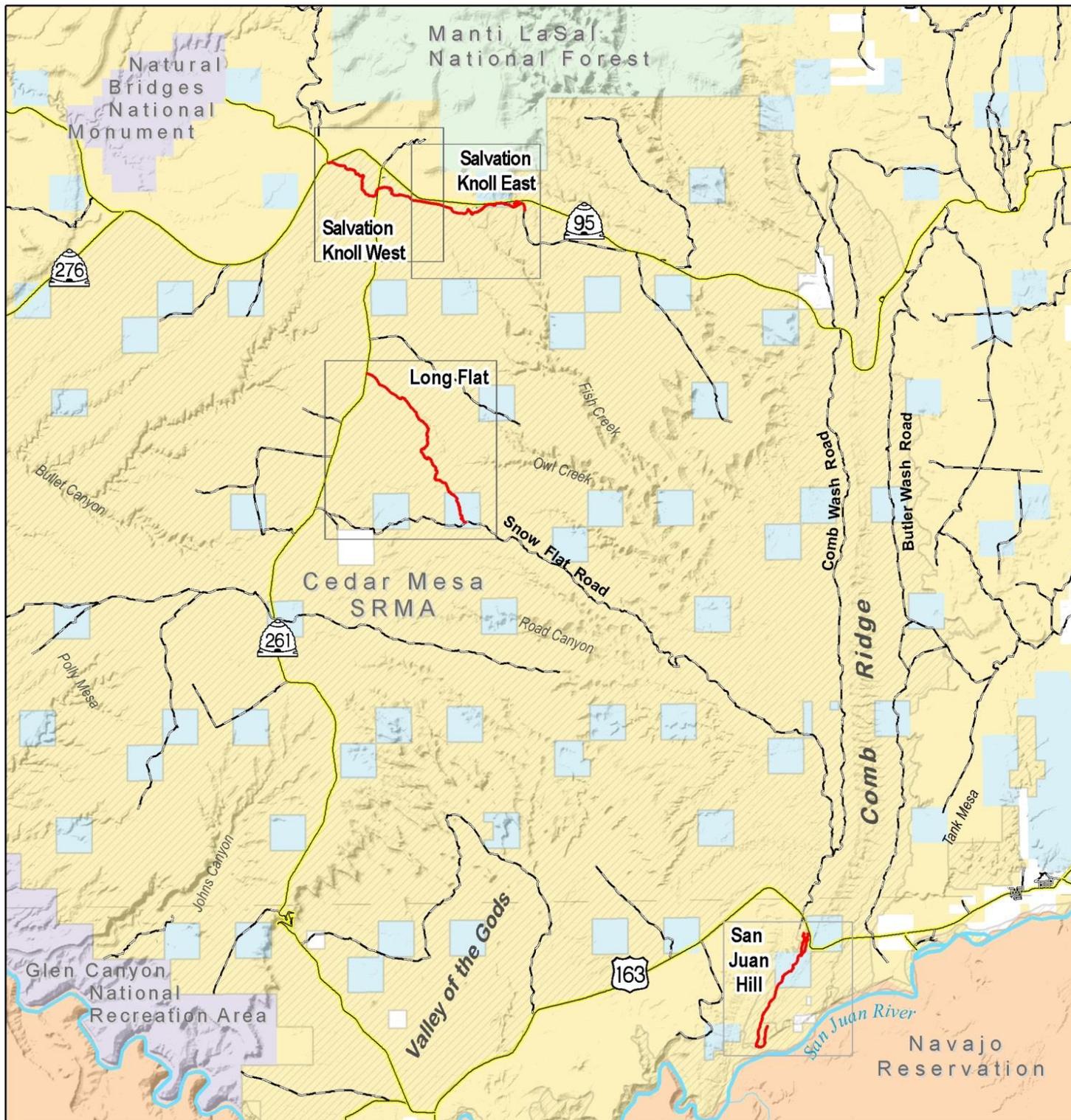
Determination	Resource	Rationale for Determination*	Signature	Date
		negatively influence vegetation because it would include appropriate erosion control measures to reduce off-site impacts to vegetation, they have a small linear footprint, and maintenance would keep the routes established and useable for the intended use. Overall, these proposed actions would not impact vegetation to a degree that detailed analysis is required, for reasons listed above and because the scale of new disturbance (1.0 acre) is nominal in relation to available ecological site and other vegetation in the immediate area, biotic integrity would continue and be maintained at a level appropriate for the site and species involved, and it would have no negative influence on the landscape's ability to achieve the Standards for Rangeland		
NI	Woodland / Forestry	The Proposed Action would use existing designated routes and routes existing but undesignated and existing disturbed areas for parking and staging. Approximately 0.99 acres would be newly disturbed to create parking and a small section of pedestrian trail. 12 juniper trees would be removed to create a parking area on the Salvation Knoll route. Trees cut during the parking lot construction will be removed from the site and made available to the public for firewood.	M. Scott	7/2/14
NI	Fuels/Fire Management	The SRP will not be detrimental to fire response activities. It is expected that the group can easily disperse and vacate the area should a fire occur. Authorized activities associated with this SRP are not expected to have any impacts to future hazardous fuels removal projects taking place in the areas. Contractors should be able to easily mitigate conflicts by working in different portions of the treatment units or adjusting scheduled work times during SRP activities. Trees cut during parking lot construction will be removed from the site either by an organized fire wood removal project or the proponent will remove the slash and tree bowls as part of the construction process alleviating the possibility of a large "jackpot" of fuels becoming a fire hazard. Public fire restrictions will apply to the group regardless of where they camp resulting in no increase of accidental fire ignitions. No further analysis is required in the E.A.	P.Plemons	6/4/14
NI	Mineral Resources/ Energy Production	According to the 2008 Monticello Field Office RMP (Maps 6, 18 and 19), the proposed action would occur within areas which are available for leasable, locatable and saleable mineral resource development. The proposed action would not interfere with future development of these mineral resources because legal access to public lands for purposes of mineral prospecting, exploration and development would be maintained.	T. McDougall	6/16/14
NI	Lands/Access	Project would use existing road for access to staging and camping sites. The proposed action would not interfere with the Lands and Realty program and it would not interfere with future proposals.	B. Quigley	6/16/14

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	/s/Brian T. Quigley	4/23/15	
Authorized Officer	/s/Donald K. Hoffheins	4/23/15	

APPENDIX B

AREA MAPS



Utah BLM Field Office Boundaries



Date: 4/23/2015

Grid: UTM Zone 12 NAD 83

Transportation

- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)

Ownership

- Bureau of Land Management
- US Forest Service
- USFS Wilderness Area
- National Park Service
- Indian Reservation
- State
- State Parks
- Private



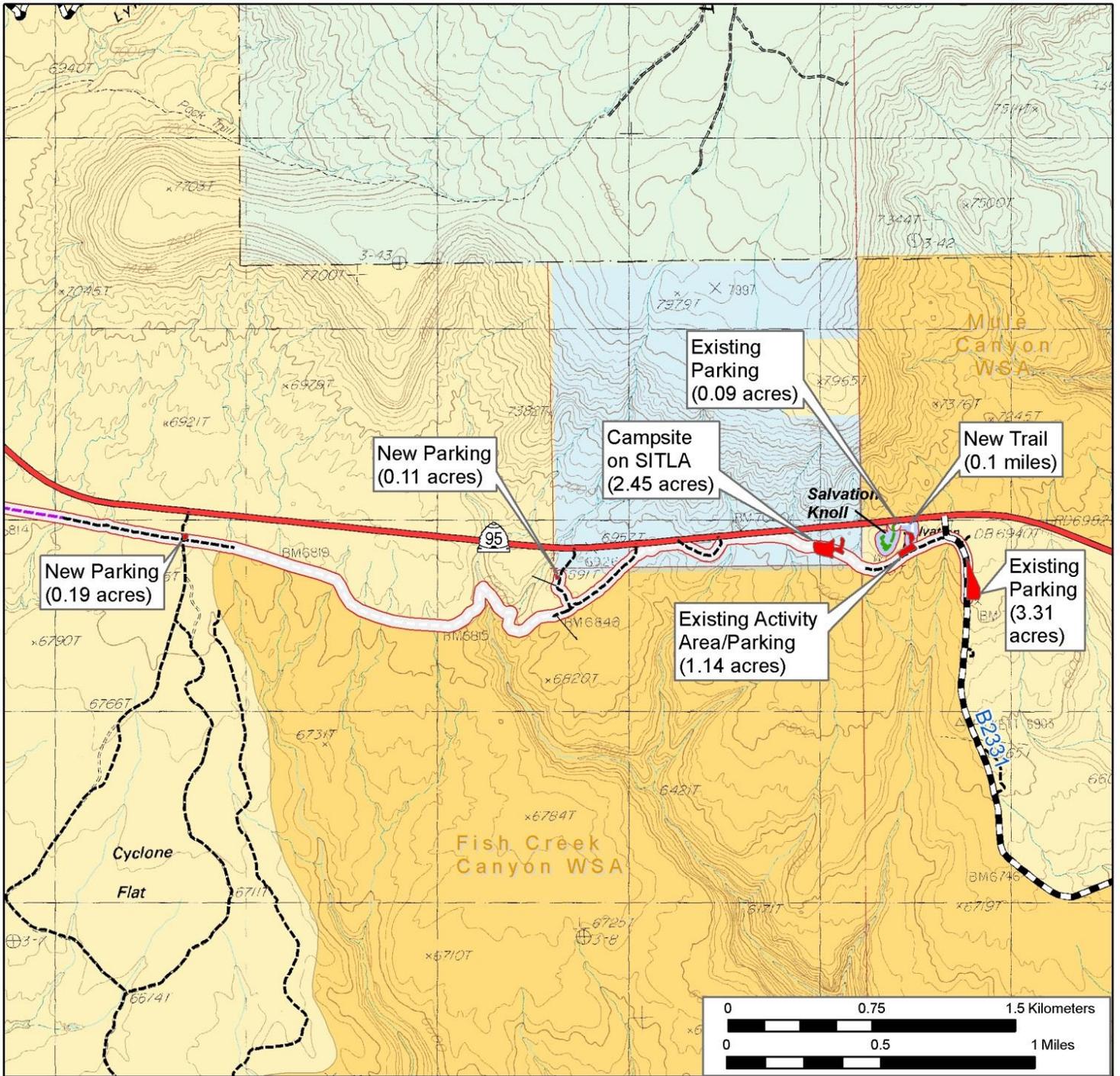
1:250,000 Scale

0 0.3 0.6 Kilometers

0 0.3 0.6 Miles



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Hole-in-the-Rock Foundation Proposed Use Areas

SRP Proposal

-  proposed hiking/equestrian route (up to 250 hikers and 4 horses)
-  proposed hiking route (up to 25 hikers)
-  proposed parking areas

Transportation Plan

-  D Roads (Unmaintained)
-  designated pedestrian/equestrian trail
-  designated ATV trail
-  non-designated route
-  State and Federal Highways
-  B Roads (Maintained)

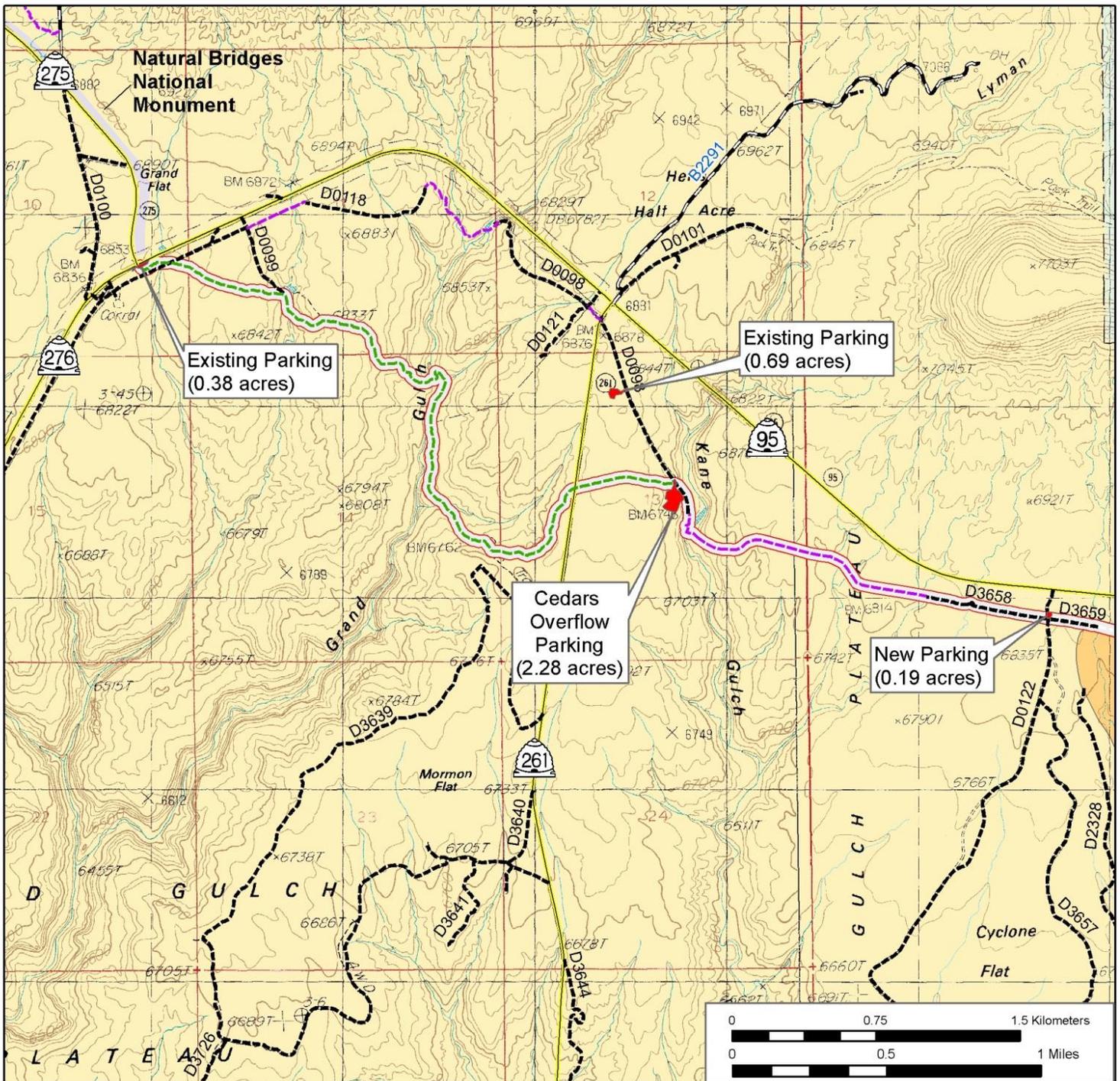
Ownership

-  Bureau of Land Management
-  BLM Wilderness Study Area
-  US Forest Service
-  National Park Service
-  State
-  State Parks
-  Private



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Hole-in-the-Rock Foundation Proposed Use Areas

SRP Proposal

- proposed hiking/equestrian route (up to 250 hikers and 4 horses)
- proposed parking areas

Transportation Plan

- D Roads (Unmaintained)
- designated pedestrian/equestrian trail
- designated ATV trail
- non-designated route
- State and Federal Highways
- B Roads (Maintained)

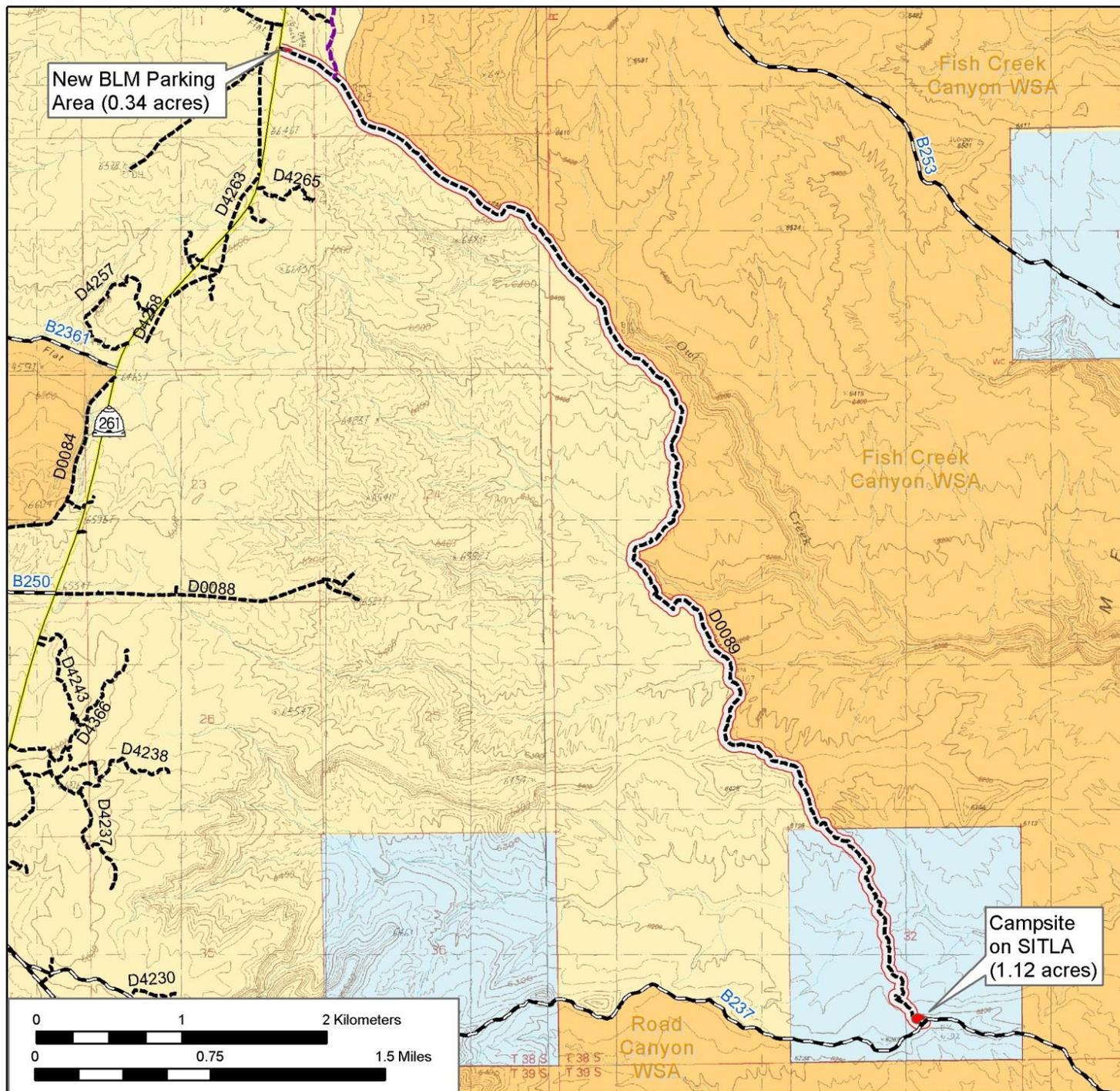
Ownership

- Bureau of Land Management
- BLM Wilderness Study Area
- US Forest Service
- National Park Service
- State
- State Parks
- Private



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Hole-in-the-Rock Foundation Proposed Use Areas

SRP Proposal

-  proposed route for:
 250 hikers
 30 handcarts
 4 horses
 6 support vehicles
-  proposed parking areas

Transportation Plan

-  D Roads (Unmaintained)
-  designated ATV trail
-  B Roads (Maintained)
-  State and Federal Highways

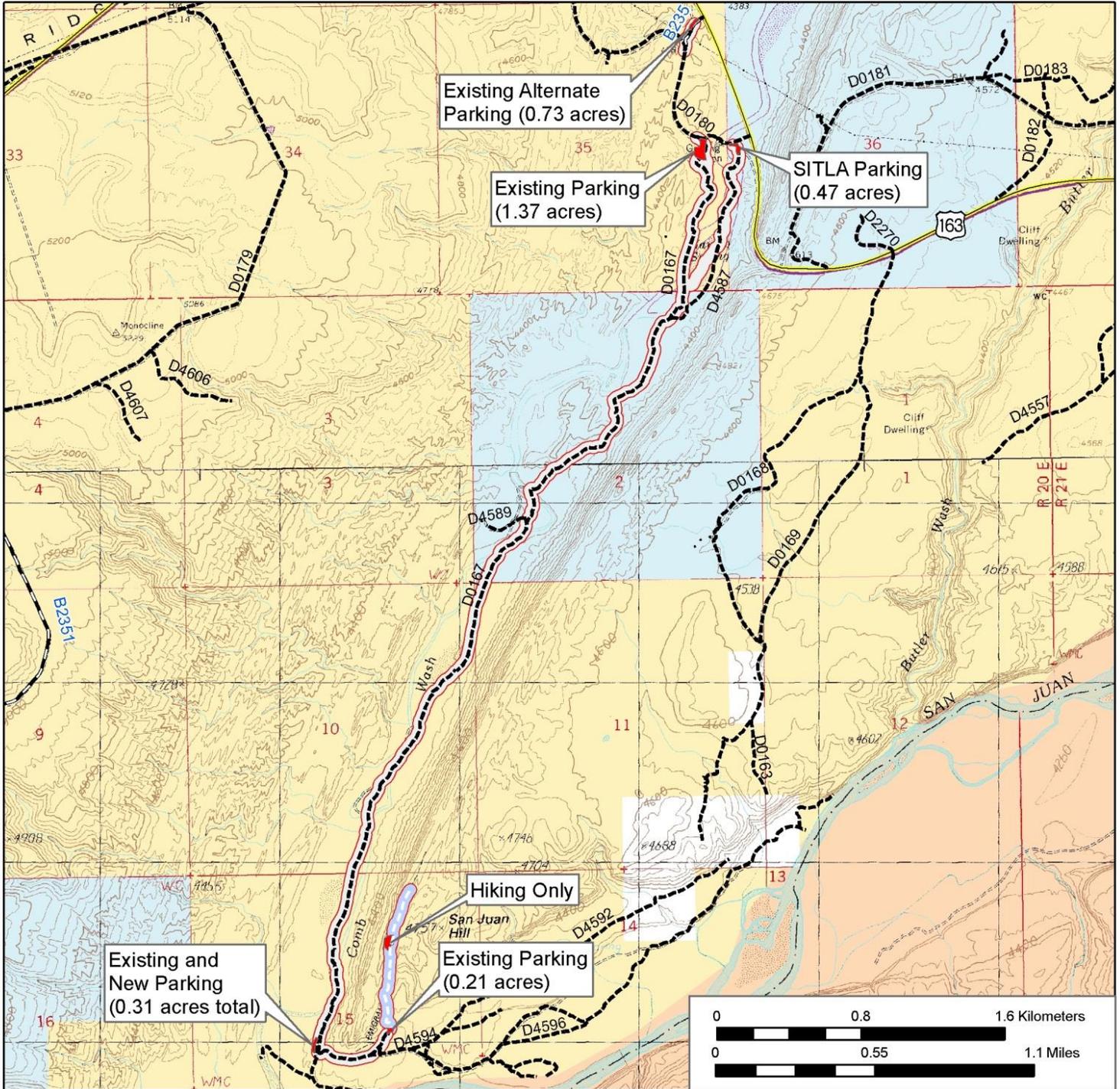
Ownership

-  Bureau of Land Management
-  BLM Wilderness Study Area
-  US Forest Service
-  National Park Service
-  State
-  State Parks
-  Private



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Hole-in-the-Rock Foundation Proposed Use Areas

SRP Proposal

-  proposed route for:
125 hikers
15 handcarts
4 horses
25 support vehicles
-  proposed hiking only route
-  proposed parking areas

Transportation Plan

-  D Roads (Unmaintained)
-  non-designated route
-  State and Federal Highways
-  B Roads (Maintained)

Ownership

-  Bureau of Land Management
-  BLM Wilderness Study Area
-  US Forest Service
-  National Park Service
-  State
-  State Parks
-  Private



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APPENDIX C

DETAILED BREAKDOWN OF LAND USE AND ACTIVITIES BY ROUTE

Salvation Knoll:

- **Guided hikes (250 participants)** along a 7.25 mile section of old highway roadbed between the parking area on the south side of Highway 95 at the turnoff to Natural Bridges National Monument and the parking area east of Road B-2331. This section includes 2.68 miles of designated pedestrian/equestrian trail (EA UT-Y020-2012-006), 1.67 miles of designated road segments (D3658, D3659, D3663, D3661, D3665, D3666 and B2331), 0.93 miles of designated ATV Trail (EA UT-090-06-06 SK), and 1.97 miles of non-designated route. No handcars or motorized vehicles will travel on this route. Access points for hikes include an existing 0.38 acre parking area on the south side of Highway 95 at the turnoff to Natural Bridges National Monument, The Cedars overflow camping area (2.28 acres existing disturbance) and the parking area east of County Road B-2331 (3.31 acres existing disturbance). Additional vehicle support to hiking groups will be provided where D0122 (Cyclone Flat Road) and D3662 intersect the proposed route. Up to 4 horses may accompany the group on this trail segment. The segments of this trail which are not included in the Monticello BLM Travel Plan would be designated for pedestrian use. One 1.30 mile segment is located on BLM land and two segments totalling 0.67 miles are located on SITLA land.
- **Guided hiking (groups of 25)** from the base of Salvation Knoll to the existing trailhead (0.09 miles), and up the Salvation Knoll Trail on the existing 0.22 mile trail (EA UT-Y020-2010-015) to the top, returning by the same route. As a means to limit conflicts with other recreational visitors, groups hiking to the top of Salvation Knoll would be limited to 25 participants with no more than two groups on this trail segment at any one time. The rest of the group will congregate on the leased SITLA campsite to the west of Salvation Knoll or in the designated activity area (see Salvation Knoll Hiking Route East Map). The construction of a foot trail 0.09 miles long from the activity area to the parking area at the base of Salvation Knoll and adjacent to Highway 95 is proposed as labelled on the Salvation Knoll East map. HIR Foundation will seek approval from UDOT as needed for the trail. This trail would be designated for pedestrian use in the Monticello BLM Travel Plan.
- **One 1.14 acre previously disturbed activity area** near the Salvation Knoll trail, adjacent to D3666. This area would be used by participants waiting to go up the Salvation Knoll trail.
- **Seven parking areas** are proposed on BLM managed lands as labelled on the Salvation Knoll Hiking Route maps. These would be approved as parking areas/trailheads and improvements to these areas may involve the use of heavy equipment and placement of road base or gravel. An eighth parking area is proposed for SITLA land.
 - Up to 40 vehicles will utilize 0.5 acres east of Road B-2331 in a large previously disturbed area (3.31 acres of existing ground disturbance).
 - Up to 6 vehicles in a 0.09 acre pullout adjacent to Highway 95 at the base of Salvation Knoll.
 - Up to 8 vehicles in undisturbed area adjacent to Road D-3662 (as shown on the Salvation Knoll East map) located adjacent to SITLA Section 16 located in T37S and R19E.

Proposed new surface disturbance totals 0.11 acres. Buck and rail fencing may be installed to define parking area and limit impacts.

- Up to 8 vehicles in an undisturbed area adjacent to the D-0122 Cyclone Flats Road. Proposed new surface disturbance would total 0.19 acres. Approximately 12 Juniper trees may be removed to facilitate parking. Post and rail fencing may be installed as needed to define parking area and limit impacts.
- Up to 40 vehicles will utilize 0.5 acres at The Cedars camping area located at the end of D-0098 (2.28 previously disturbed acres).
- Alternate parking for 20 vehicles utilizing 0.2 acres in a previously disturbed area adjacent to corral near The Cedars overflow camping area (0.69 acres existing disturbance). No parking will occur adjacent to the Mormon Flat Corral near The Cedars overflow camping area during the permitted livestock grazing period (October 1 through June 30).
- Parking for 12 vehicles at the west end of the designated pedestrian trail across from the Natural Bridges National Park access road in a previously disturbed area along Highway 95 (0.38 acres existing disturbance in highway ROW).
- An eighth parking area which may also be used as a campsite would be located on SITLA land leased by the Hole in the Rock Foundation in Section 16 located in T37S and R19E.
- **Vehicle support and portable toilets** may be provided by the Hole-in-the-Rock Foundation to hiking groups at any of the seven parking areas where the proposed hiking trails intersect designated routes open to motor vehicles. The toilets could remain in place throughout the season of use with mitigation to reduce visual impacts. The toilets would be serviced as needed on a regular basis.
- **Use of up to 4 horses** would be in compliance with the Cedar Mesa Stock Use Stipulations and require the use of weed free hay.
- **Trail maintenance** for Salvation Knoll would occur as a BLM-supervised volunteer project as follows:
 - On the existing Salvation Knoll Trail, maintenance would be conducted as previously authorized in DOI-BLM-UT-Y020-2010-015
 - On the connecting sections of existing trail from the HIR Trail to The Cedars overflow camping area and to an existing parking area on Highway 95, maintenance would be conducted as previously authorized in DOI-BLM-UT-Y020-2012-006.
 - Maintenance of the section of the HIR Trail west of Highway 261 and south of Highway 95 would be subject to approval and site specific analysis to preserve the historic integrity of the trail.
 - For the remainder Salvation Knoll segments along the old highway, Hole-in-the-Rock Foundation would perform maintenance each year as needed. Maintenance actions may include:
 - Use of hand tools to break down the banks of washouts and clear flash flood debris
 - Appropriate erosion control action which would be taken as needed where the permitted activity causes an erosion problem.

Snow Flat/ Long Flat:

- **Handcart treks (up to 250 participants)** on a 6.17 mile segment of the HIR Trail coinciding with D-0089 which intersects the B-237 Snow Flat Road to the east and Highway 261 to the west. Up to 30 handcarts may be pulled by participants walking on the road. Up to four horses would be allowed to travel the route.
- **Vehicles (up to 6)** may be used on D-0089 to provide support for handcart groups.
- **Use of up to 4 horses** would be in compliance with the Cedar Mesa Stock Use Stipulations and require the use of weed free hay.
- **One parking** area for up to 40 vehicles located on BLM land is proposed as labelled on the Long Flat map. This parking area is adjacent to D-0089 and is located on a level area of undisturbed sagebrush (0.34 acres). The parking area would be established with use, and may be additionally improved with heavy equipment, placement of road base, and gravel. Post and rail fencing may be erected to define parking area and limit area of impact. This would be approved as a parking area/trailheads. A second 1.1 acre parking area which may also be used as a campsite would be located on SITLA land leased by the Hole in the Rock Foundation in Section 32 located in T38S and R19E.
- **Portable toilets** may be provided by Hole-in-the-Rock Foundation at the BLM parking area adjacent to D-0089. The toilets could remain in place throughout the season of use with mitigation to reduce visual impacts. The toilets would be serviced as needed on a regular basis.
- Hole-in-the-Rock Foundation may perform trail maintenance along the Long Flat Road as a BLM-supervised volunteer project as needed:
 - Using hand tools to breakdown the banks of washouts and clear flash flood debris
 - Appropriate erosion control action which would be taken as needed where the permitted activity causes an erosion problem.

Comb Wash/ San Juan Hill:

- **Handcart treks (up to 125 participants per group; 2 groups per day with a maximum of 250 per day)** on 4.05 miles of the HIR Trail coinciding with the designated route D-0167 south of Highway 163 in lower Comb Wash to where the designated road approaches the base of San Juan Hill. Up to 15 handcarts may be pulled by participants walking on the road. Up to 4 horses and 25 vehicles may travel the route from Highway 163 to the designated parking area. Six motor vehicles and up to 15 handcarts may proceed to the parking area at the base of San Juan Hill (DOI-BLM-UT-Y020-2013-021). When the parking area at the north end of D-0167 is not available, participants may use an alternate starting location along 0.75 miles of D-4587.
- **Guided hiking (up to 125 participants per group)** along a section of the HIR Trail where it climbs from the base of San Juan Hill to a point up to 1000 feet beyond the “We thank thee...” inscription at the top of the hill. This segment of trail would be 0.51 miles long on existing ground disturbance and would be designated in the Monticello BLM Travel Plan for pedestrian use only.
- **Four parking areas** on BLM lands are proposed as labelled on the San Juan Hill map. Three of these would be designated as parking areas/trailheads in the Monticello BLM Travel Plan; the fourth was designated in DOI-BLM-UT-Y020-2013-021 as described below. A fifth parking area is proposed for SITLA land. Improvements may occur as allowed in the 2008 Monticello RMP and may include road base, gravel, and post and rail fencing as needed.

- Up to 40 vehicles would utilize 0.5 acres in the large previously disturbed area adjacent to the corral on D-0167 near Highway 163. (1.37 acres of existing disturbance). No parking will occur adjacent to the Comb Wash Corral during the permitted livestock grazing period (September 25 through June 7) unless preapproved by the BLM and the allotment is not being used by authorized livestock. If the area is not available, participants would be dropped off at the staging area near the intersection of D-0180 and D-4597 and vehicles would proceed to a 0.73 acre alternate parking area on the west shoulder of D-0180 (the old SR163 alignment).
- Up to 25 vehicles will park on the west side of D-0167/D-4597 at the base of the bench where San Juan Hill is located to avoid driving on an original section of the HIR trail where the road climbs on steep and rough terrain alongside historic cribbing. Proposed parking area would include 0.09 acres of existing ground disturbance and 0.21 acres of new ground disturbance (see San Juan Hill Map), with no new materials imported. New construction would stipulate a 100 foot buffer from the existing cribbing in order to avoid damage.
- Up to six vehicles, 15 handcarts, and four horses may proceed on the designated road in support of groups hiking up to a proposed parking area at the base San Juan Hill. The proponent requests the use of this designated road, and would use a 0.21 acre disturbed area at the base of San Juan Hill for parking as per the decision in the Five Designated Routes EA (DOI-BLM-UT-Y020-2013-021).
- The proponent would obtain approval from SITLA for a fourth 0.47 acre parking area located as shown on the San Juan Hill map in Section 36 , T 40S R 21E adjacent to D-4587/D-0180.
- **Portable toilets** may be provided by Hole-in-the-Rock Foundation at the BLM parking areas adjacent to D-0167. The toilets could remain in place throughout the season of use with mitigation to their reduce visual impacts. The toilets would be serviced as needed on a regular basis.
- **Use of up to 4 horses.** Stipulations and require the use of weed free hay.
- **Trail maintenance** of Comb wash trail segments by Hole-in-the-Rock Foundation would occur as a BLM-supervised volunteer project each year as needed and may include:
 - Use of hand tools to break down the banks of washouts and clear flash flood debris
 - Appropriate erosion control action which would be taken as needed where the permitted activity causes an erosion problem.
 - Maintenance of the San Juan Hill Trail would be subject to approval and site specific analysis to preserve the historic integrity of the trail.

APPENDIX D

**SPECIAL RECREATION PERMIT STIPULATIONS
FOR HOLE-IN-THE-ROCK FOUNDATION GUIDED TREKKING**

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ORGANIZED GROUP
SPECIAL RECREATION PERMIT STIPULATIONS

Special Recreation Permit Details

Name of Event: **Hole-in-the-Rock Foundation Guided Trekking**

Special Recreation Permit Number: **MFO-15-XXX**

Discounts Applicable: **No**

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) 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
- (c) 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 areas(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 and any persons providing services under this permit must present or display a copy of 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.

(5) 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, website, etc.).

B. Financial

(1) All fees associated with organized group use are established by the Director, updated every three years based on the Implicit Price Deflator Index, and published in the Federal Register. Organized group use fees are charged on a per person basis (\$5.00/person/day as of March, 2014). The permittee will pay at least the minimum annual fee (\$105.00 as of March, 2014) plus any organized group use fees due in excess of the minimum fee. If more than 50 hours of BLM staff time is required for processing the permit and the BLM anticipates that the permit fees on the fee schedule for the year will be less than the costs of processing the permit, cost recovery of direct expenses related to the permit will be charged instead of the organized group use fee.

(2) 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.

(3) 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 permission of the authorized officer. An extension of this due date may be approved by the issuing office on a case-by-case basis.

(4) 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 (see above), the following late fee schedule 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

(a) 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	\$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. 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 mico-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 or trips.

(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.

E. Fires

This permit does not waive any applicable fire restrictions and orders that may affect the use of camp fires 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, 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.

F. Informed Risk

(1) The permittee shall inform participants of the inherent risks involved with the activity.

(2) The permittee shall review potential safety concerns, contingency plans and potential consequences with its participants 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.

G. Safety and Equipment

(1) The permittee will ensure that activities and trips are conducted in compliance with all laws and regulations relating to vehicle operations, land use restrictions, food handling, and any other applicable regulations.

(2) The following equipment must be carried during all activities:

(a) A first aid kit adequate to accommodate each activity, group, or subgroup will be carried during all activities and trips.

(b) Adequate repair kits and spare supplies appropriate for the trip and activity.

(3) The following procedures must be followed during all activities:

(c) Unless specifically authorized in the permit, discharge of firearms is not allowed.

(d) Use of explosives and fireworks is prohibited.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES USING RIDING OR PACKSTOCK

- (1) Livestock use must be specifically provided for in the permit and operating plan.
- (2) All riding and pack animals must be fed certified weed-free feed for 48 hours in advance of and for the duration of the trip on public lands.
- (3) Riding and pack animals may not be tied for more than one hour to live trees.
- (4) Livestock shall not be tied, hobbled, or picketed for more than one hour within 300 feet of a natural water source other than perennial streams.
- (5) Permittees may not clean out stock trucks or trailers onto public land.
- (6) All animals will be under control en route and in camp to protect wildlife, other livestock, and range forage.
- (7) Corrals located on public lands may not be available for public or permittee use. Written permission of the authorized officer is required for the use of such corrals.
- (8) Lost or dead animals shall be reported within 48 hours of end of trip. An appropriate response will be determined by the Authorized Officer.

SUPPLEMENTAL STIPULATIONS FOR HOLE-IN-THE-ROCK FOUNDATION

- (1) Permit allows for guided trekking on approved designated routes only. Trekking shall consist of hiking, handcart use, equestrian support, and vehicle support as defined in 2014-DOI-BLM-UT-Y020-2012-001 EA. No off-route or cross county travel is allowed.
- (2) Parking will occur only in areas stipulated in 2014-DOI-BLM-UT-Y020-2012-001 EA, and will stay within the limits established for each area in Appendix E. In the Cedars Overflow parking area, Hole-in-the-Rock activities will be limited to a 0.5 acre area at the north end of the parking area, in order to accommodate other visitors in large RVs or trailers wishing to camp in the area.
- (3) Group size will be a maximum of 250, inclusive of participants and guides, on the Salvation Knoll and Long Flat routes. Groups size will be 125 inclusive of participants and guides, on the San Juan Hill route. Groups will be subdivided into smaller traveling groups of 12. The ratio of youth participants to adult supervisors will not exceed 5:1.
- (4) Prior to each event, the permittee will file a notice of intent in writing with the BLM. The notice of intent must specify the intended dates of the event, as well as number of participants, number of guides, and name of the lead guide for each route and trip.
- (5) All guides will be informed of permit stipulations. All participants will attend an orientation for "Tread Lightly," with an emphasis on cultural resource protection. There will be a required review of stipulations and authorized routes of all drivers authorized under the permit.
- (6) The permit does not give any privileges on private, state, reservation or other federal agencies land.

(7) Prior to each event, the permittee will post fully removable, reversible signage at both terminus points and any common entry points for a given route, indicating to the public that a large trekking event is in progress. Signage will be removed promptly within 2 hours of the conclusion of the event, but after all participants are off BLM routes.

(8) The permittee will take precautions to protect natural resource values, cultural or historical objects, aesthetic values, and any improvements on public land involved. Permittee further shall abate any conditions existing which may cause harm or damage to any person, structure, property, land, stream and wildlife. The permit holder will be held legally and financially responsible for historical, archaeological, cultural, or ecological values damaged, destroyed or removed by trip participants. Cultural artifacts located on the surface of an archaeological site or isolated artifacts are not to be disturbed. Moving or disturbing cultural artifacts from any location is a violation of federal law. The major federal laws, which protect surface and subsurface cultural property, including artifacts and rock art, from any type of disturbance, are as follows:

- The Archeological Resource Protection Act of 1979
- The Antiquities Act of 1906
- The Historic Sites Act of 1935
- The Archeological Resource Protection Act of 1979 (as amended)
- The Native America Graves Protection and Repatriation Act of 1990
- The National Historical Preservation Act of 1966 (as amended)

(9) The permittee will take all reasonable measures to prevent and discourage vandalism or disorderly conduct, and when necessary, will call the appropriate law enforcement officer.

(10) The permittee agrees to assume responsibility for public safety and health during any phase of this operation, including first aid, retrieval and evacuation operations. A safety monitor will be posted at the top of the blind hill on the San Juan Hill route whenever trekkers are in the vicinity. The monitor will communicate with trekkers to stand back and wait if vehicles are approaching the hill.

(11) All vehicles use will be in accordance with state law.

(12) Permittee shall not build campfires on BLM lands. Permittee will be held financially and legally responsible for any wildfires caused by this party. The permittee will report any fires to the nearest BLM office after emergency services have been notified.

(13) Permits shall not be exclusive. The BLM reserves the right to use or permit others to use any part of the permitted areas for any purpose.

(14) Personal sanitation and disposal of human waste will be in pit toilets, portable toilets, or "luggable loos" only. Participants will not leave designated routes for the purpose of personal sanitation or disposal of human waste. Permittee will be responsible for appropriate disposal of contents of portable toilets or luggable loos in appropriate municipal facilities as according to Utah State laws and regulations.

(15) Observe wildlife from a distance. No vehicle or foot pursuit allowed.

(16) Vehicles must avoid damage to cultural sites. If an oncoming vehicle is encountered between the San Juan Hill dugway and the parking area at the base of San Juan Hill, vehicles will not pass each other at this point. One vehicle will reverse to a suitable, passable location.

(17) The permittee will be responsible for ensuring that all guides and/or group leaders will be educated about the threatened and endangered species that could be present in the activity area. This education will include the potential penalties for taking a species listed under the Endangered Species Act.

(18) Camping and campfires are not permitted on BLM land. Participants will camp in private campgrounds or on leased SITLA land.

(19) Any trail maintenance will be completed in coordination with BLM.

APPENDIX E

**UPIF PRIORITY SPECIES AND THE FWS BCC SPECIES
IN THE PROJECT AREA**

Species	BCC	UPIF	DWR Habitats	1st Breeding Habitat	2nd Breeding Habitat	Winter Habitat
Acorn Woodpecker		X	Critical	Desert Oak	Desert Oak	Desert Oak
American 3-toed Woodpecker		X	Winter/Primary Breeding	Sub-Alpine Conifer	Mountain Riparian	Sub-Alpine Conifer
American Avocet		X	Critical	Wetland	Playa	Migrant
American Bittern	X	X	Critical	Wetland	Wetland	Migrant
American Coot		X	Critical	Wetland	Water	Migrant
American Crow		X	High Value	Lowland Riparian	Agriculture	Lowland Riparian
American Goldfinch		X	Substantial	Lowland Riparian	Mountain Riparian	Lowland Riparian
American Kestrel			Critical/High Value	Lowland Riparian	Agriculture	Agriculture
American Pipit		X	Critical/High Value	Alpine	Wet Meadow	Agriculture
American Redstart		X	High Value	Lowland Riparian	Mountain Riparian	Migrant
American Robin		X	Critical/High Value	Lowland Riparian	Urban	Urban
American Tree Sparrow			Critical/High Value			
American Wigeon			Substantial			
Ash-Throated Flycatcher		X	Critical/Substantial	Pinyon-Juniper	Low Desert Scrub	Migrant
Bald Eagle	X	X	Winter	Lowland Riparian	Agriculture	Lowland Riparian
Band-Tailed Pigeon		X	High Value/Substantial	Ponderosa	Mixed Conifer	Migrant
Barn Owl		X	High Value	Agriculture	Agriculture	Agriculture
Barn Swallow		X	Critical	Lowland Riparian	Cliff	Migrant
Belted Kingfisher		X	Critical/Substantial	Lowland Riparian	Wetland	Lowland Riparian
Bendire's Thrasher	X	X	Secondary Breeding	Low Desert Scrub	Low Desert Scrub	Migrant
Bewick's Wren		X	Critical	Lowland Riparian	Pinyon-Juniper	High Desert Scrub
Black Phoebe		X	Critical	Lowland Riparian	Cliff	High Desert Scrub
Black Rosy-Finch	X	X	Substantial	Alpine	Alpine	Grassland
Black-billed Magpie		X	High Value/Critical	Lowland Riparian	Pinyon-Juniper	Agriculture
Black-Capped Chickadee		X	High Value/Critical	Mountain Riparian	Lowland Riparian	Lowland Riparian
Black-Chinned Hummingbird		X	High Value/Critical/Substantial	Pinyon-Juniper	Mountain Shrub	Migrant
Black-Chinned Sparrow		X	High Value	Low Desert Scrub	High Desert Scrub	Migrant
Black-Crowned Night Heron		X	Critical	Wetland	Lowland Riparian	Wetland
Black-Headed Grosbeak		X	Critical	Lowland Riparian	Mountain Riparian	Migrant
Black-Throated Gray Warbler		X	Primary Breeding	Pinyon-Juniper	Mountain Shrub	Migrant
Black-throated sparrow		X	Critical	High Desert Scrub	Low Desert Scrub	Low Desert Scrub

Species	BCC	UPIF	DWR Habitats	1st Breeding Habitat	2nd Breeding Habitat	Winter Habitat
Blue Grosbeak		X	Primary breeding	Lowland Riparian	Lowland Riparian	Migrant
Blue Grouse		X	High Value	Sub-Alpine Conifer	Mountain Shrub	Mixed Conifer
Blue-gray Gnatcatcher		X	Critical/High Value	Pinyon-Juniper	Lowland Riparian	Migrant
Blue-Winged Teal			Critical			
Bobolink		X	Wintering/Primary Breeding	Wet Meadow	Agriculture	Migrant
Bonaparte's Gull			Critical			
Brewer's Blackbird		X	Substantial	Agriculture	Wet Meadow	Agriculture
Brewer's Sparrow	X	X	High Value/Critical	Shrubsteppe	High Desert Scrub	Migrant
Broad-tailed Hummingbird		X	Critical	Lowland Riparian	Mountain Riparian	Migrant
Brown Creeper		X	High Value	Mixed Conifer	Sub-Alpine Conifer	Lowland Riparian
Brown-headed Cowbird		X	Critical	Agriculture	Urban	Agriculture
Bufflehead			Critical			
Bullock's Oriole		X	Critical	Lowland Riparian	Urban	Migrant
Burrowing Owl	X	X	Primary breeding	High Desert Scrub	Grassland	Migrant
Bushtit		X	Critical/High Value	Pinyon-Juniper	Mountain Riparian	Mountain Riparian
California Condor						
California Gull			Critical/High Value			
California Quail		X	Critical	Norther Oak	Urban	Urban
Calliope Hummingbird		X	Critical	Mountain Riparian	Mountain Shrub	Migrant
Canada Goose			High Value			
Canvasback			Critical			
Canyon Wren			Critical	Cliff	Rock	Cliff
Cassin's Finch	X	X	High Value	Aspen	Sub-Alpine Conifer	Lowland Riparian
Cassin's Kingbird		X	High Value	Lowland Riparian	Pinyon-Juniper	Migrant
Cedar Waxwing		X	High Value	Mountain Riparian	Lowland Riparian	Lowland Riparian
Chipping Sparrow		X	Critical/Substantial	Mountain Shrub	Mountain Riparian	Migrant
Chukar		X	Substantial	High Desert Scrub	Shrubsteppe	High Desert Scrub
Clark's Grebe		X	Critical			
Clark's Nutcracker		X	Critical/Substantial	Mixed Conifer	Sub-Alpine Conifer	Mixed Conifer
Cliff Swallow		X	High Value	Lowland Riparian	Cliff	Migrant
Common Goldeneye			Critical			
Common Loon			Critical			

Species	BCC	UPIF	DWR Habitats	1st Breeding Habitat	2nd Breeding Habitat	Winter Habitat
Common Merganser			Critical			
Common Nighthawk		X	High Value/Substantial	Pinyon-Juniper	Lowland Riparian	Migrant
Common Poorwill		X	Critical	Pinyon-Juniper	Lowland Riparian	Migrant
Common Raven		X	High Value/Critical	Cliff	Pinyon-Juniper	Agriculture
Common Teal			Substantial			
Common Yellowthroat		X	Primary Breeding	Wetland	Lowland Riparian	Migrant
Cooper's Hawk		X	High Value	Lowland Riparian	Mountain Riparian	Urban
Cordilleran Flycatcher		X	Critical	Sub-Alpine Conifer	Mountain Riparian	Migrant
Dark-Eyed Junco		X	Critical	Sub-Alpine Conifer	Aspen	Lowland Riparian
Double-Crested Cormorant		X	Critical	Water	Lowland Riparian	Migrant
Downy Woodpecker		X	High Value/Critical	Aspen	Lowland Riparian	Lowland Riparian
Dusky Flycatcher		X	Critical/High Value	Mountain Riparian	Aspen	Migrant
Eurasian Collared-Dove						
European Starling		X	High Value/Critical	Agriculture	Lowland Riparian	Agriculture
Evening Grosbeak		X	Critical/High Value	Mixed Conifer	Sub-Alpine Conifer	Lowland Riparian
Ferruginous Hawk	X	X	Primary Breeding	Pinyon-Juniper	Shrubsteppe	Grassland
Flammulated Owl		X	Critical	Ponderosa	Sub-Alpine Conifer	Migrant
Fox Sparrow			Critical	Mountain Riparian	Mountain Shrub	Migrant
Franklin's Gull			High Value	Wetland	Wetland	Migrant
Gadwall			High Value/Substantial			
Gambel's Quail		X	High Value	Low Desert Scrub	Lowland Riparian	Low Desert Scrub
Golden Eagle	X	X	High Value/Critical	Cliff	High Desert Scrub	High Desert Scrub
Golden-Crowned Kinglet		X	Critical	Sub-Alpine Conifer	Aspen	Mountain Shrub
Grace's Warbler	X	X	Critical	Ponderosa	Mixed Conifer	Migrant
Gray Catbird		X	Critical/high Value	Lowland Riparian	Mountain Riparian	Migrant
Gray Flycatcher		X	Critical	Pinyon-Juniper	High Desert Scrub	Migrant
Gray jay		X	Substantial	Mixed Conifer	Sub-Alpine Conifer	Mixed Conifer
Gray Vireo	X	X	Primary Breeding/Winter	Pinyon-Juniper	Northern Oak	Migrant
Great Blue Heron			Critical	Wetland	Lowland Riparian	Agriculture
Great Horned Owl		X	High Value	Mountain Riparian	Lowland Riparian	Agriculture
Greater Yellowlegs			Critical			
Green-Tailed Towhee		X	Critical/high Value	Mountain Shrub	High Desert Scrub	Migrant

Species	BCC	UPIF	DWR Habitats	1st Breeding Habitat	2nd Breeding Habitat	Winter Habitat
Green-Winged Teal			High Value/Substantial			
Gunnison Sage-Grouse	X	X	Critical	Shrubsteppe	Shrubsteppe	Shrubsteppe
Hairy Woodpecker		X	High Value/Substantial	Mountain Riparian	Lowland Riparian	Lowland Riparian
Hammond's Flycatcher		X	High Value	Sub-Alpine Conifer	Aspen	Migrant
Hermit Thrush		X	Critical/high Value	Sub-Alpine Conifer	Mountain Riparian	Mountain Riparian
Horned Grebe			Critical			
Horned Lark		X	Critical/Substantial	Grassland	High Desert Scrub	Grassland
House Finch		X	Critical/Substantial/High Value	Lowland Riparian	Urban	Agriculture
House Sparrow		X	High Value	Urban	Lowland Riparian	Urban
House Wren		X	High Value	Mountain Riparian	Lowland Riparian	Migrant
Indigo Bunting		X	Primary Breeding	Lowland Riparian	Mountain Shrub	Migrant
Juniper Titmouse	X	X	Critical	Pinyon-Juniper	Pinyon-Juniper	Pinyon-Juniper
Killdeer			Critical	Wetland	Wet Meadow	Agriculture
Lark Bunting		X	Critical	Grassland	High Desert Scrub	Migrant
Lark Sparrow		X	Critical/Substantial	Lowland Riparian	High Desert Scrub	Migrant
Lazuli Bunting		X	Critical	Lowland Riparian	Mountain Shrub	Migrant
Lesser Goldfinch		X	High Value/Substantial	Lowland Riparian	Urban	Lowland Riparian
Lesser Scaup			High Value			
Lewis's Woodpecker	X	X	Primary Breeding	Ponderosa	Lowland Riparian	Northern Oak
Lincoln's Sparrow		X	Critical	Mountain Riparian	Wet Meadow	Lowland Riparian
Loggerhead Shrike		X	Critical/high Value	High Desert Scrub	Pinyon-Juniper	High Desert Scrub
Long-billed Curlew	X	X	Primary/Secondary Breeding	Grassland	Agriculture	Migrant
Long-eared owl		X	Critical/high Value	Lowland Riparian	Mountain Riparian	Lowland Riparian
MacGillivray's Warbler		X	Critical/High/Substantial	Lowland Riparian	Mountain Shrub	Migrant
Mallard			High/Substantial			
Marbled Godwit			Critical			
Marsh Wren			High Value	Wetland	Wetland	Wetland
Mexican Spotted Owl		X	Critical	Cliff	Lowland Riparian	Cliff
Mountain Bluebird		X	Critical/high Value	Mountain Riparian	High Desert Scrub	Shrubsteppe
Mountain Chickadee		X	High Value/Critical	Mixed Conifer	Pinyon-Juniper	Mountain Riparian
Mourning Dove		X	Critical	Lowland Riparian	Agriculture	Agriculture
Nashville Warbler			Critical/high Value			

Species	BCC	UPIF	DWR Habitats	1st Breeding Habitat	2nd Breeding Habitat	Winter Habitat
Northern Flicker		X	High Value	Lowland Riparian	Mountain Riparian	Lowland Riparian
Northern Goshawk		X	Primary Breeding	Lodgepole Pine	Aspen	Lowland Riparian
Northern Harrier		X	High Value	Wet Meadow	High Desert Scrub	Agriculture
Northern Mockingbird		X	Critical	High Desert Scrub	Low Desert Scrub	Urban
Northern Pintail			Substantial			
Northern Pygmy-owl		X	Critical	Mountain Riparian	Mixed Conifer	Lowland Riparian
Northern Saw-Whet Owl		X	High Value	Mountain Riparian	Aspen	Mountain Riparian
Northern Shoveler			High Value			
Northern Shrike			High Value			
Northern Waterthrush			Critical/High Value			
Olive-sided-Flycatcher		X	Primary Breeding	Sub-Alpine Conifer	Ponderosa	Migrant
Orange-Crowned Warbler		X	Critical/High Value	Mountain Riparian	Mountain Shrub	Migrant
Osprey		X	Primary Breeding	Water	Water	Migrant
Pacific Loon			Critical			
Peregrine Falcon	X	X	Primary Breeding	Cliff	Lowland Riparian	Wetland
Pied-Billed Grebe		X	Critical	Wetland	Water	Wetland
Pine Grosbeak		X	Critical	Sub-Alpine Conifer	Sub-Alpine Conifer	Mixed Conifer
Pine siskin		X	High Value/Substantial	Sub-Alpine Conifer	Mixed Conifer	Lowland Riparian
Pinyon Jay	X	X	Critical	Pinyon-Juniper	Ponderosa	Pinyon-Juniper
Plumbeous Vireo		X	High Value/Substantial	Mixed Conifer	Mountain Riparian	Migrant
Prairie Falcon	X	X	Critical/high Value	Cliff	High Desert Scrub	Agriculture
Pygmy Nuthatch		X	High Value/Substantial	Ponderosa	Aspen	Ponderosa
Red Breasted Merganser			Critical			
Red Crossbill		X	High Value	Ponderosa	Mixed Conifer	Mixed Conifer
Red-Breasted Nuthatch		X	Critical/high Value	Ponderosa	Ponderosa	Mixed Conifer
Redhead			Critical			
Red-Naped Sapsucker		X	Substantial	Aspen	Mixed Conifer	Mountain Riparian
Red-Necked Phalarope			Critical			
Red-Tailed Hawk		X	Critical/high Value	Lowland Riparian	Aspen	Agriculture
Red-Winged Blackbird		X	Critical	Wetland	Wet Meadow	Agriculture
Ring-billed gull			High Value	Water	Water	Water
Ring-necked duck			critical			
Ring-necked pheasant			Critical	Agriculture	Grassland	Wetland

Species	BCC	UPIF	DWR Habitats	1st Breeding Habitat	2nd Breeding Habitat	Winter Habitat
Rock Dove		X		Urban	Agriculture	Urban
Rock Pigeon			Critical			
Rock Wren		X	Substantial	Rock	Playa	Rock
Rose-Breasted Grosbeak			Critical			
Rough-legged hawk			Critical/high Value			
Ruby-crowned kinglet			High/Substantial/critical	Sub-Alpine Conifer	Mixed Conifer	Mixed Conifer
Ruddy duck			High Value			
Rufous Hummingbird			Substantial			
Sage Sparrow		X	Critical	Shrubsteppe	High Desert Scrub	Low Desert Scrub
Sage Thrasher		X	High Value/Critical	Shrubsteppe	Shrubsteppe	Migrant
Savannah Sparrow		X	Critical/High Value	Grassland	Wet Meadow	Grassland
Say's Phoebe		X	High Value	High Desert Scrub	Low Desert Scrub	Low Desert Scrub
Scaled Quail		X		High Desert Scrub	Low Desert Scrub	Low Desert Scrub
Scott's Oriole		X	Critical/High Value	Low Desert Scrub	Pinyon-Juniper	Migrant
Sharp-Shinned Hawk		X	Critical/High Value	Mixed Conifer	Mountain Shrub	Urban
Short-eared owl		X	Wintering	Wetland	Grassland	Agriculture
Snowy Egret			Critical	Wetland	Agriculture	Migrant
Song Sparrow		X	Critical	Lowland Riparian	Mountain Riparian	Lowland Riparian
Sora		X	Critical	Wetland	Wetland	Wetland
Southwestern Willow Flycatcher	X	X	Critical	Lowland Riparian	Lowland Riparian	Migrant
Spotted Sandpiper			Critical	Wetland	Lowland Riparian	Migrant
Spotted Towhee		X	High/Substantial/critical	Mountain Shrub	Lowland Riparian	Mountain Shrub
Steller's Jay		X	High value	Mountain Shrub	Northern Oak	Mountain Shrub
Swainson's Hawk		X	Primary breeding/Winter	Agriculture	Aspen	Migrant
Swamp Sparrow			Critical			
Townsend's Solitaire		X	High value	Sub-Alpine Conifer	Mountain Riparian	Migrant
Townsend's Warbler			Substantial			
Tree Swallow		X	High/Substantial	Aspen	Mountain Riparian	Migrant
Tundra Swan			High value			
Turkey Vulture		X	High/Substantial	Cliff	Cliff	Migrant
Vesper Sparrow		X	Critical/High Value	High Desert Scrub	Shrubsteppe	Migrant
Violet-green Swallow		X	Critical/High Value	Mountain Riparian	Aspen	Migrant
Virginia Rail		X	Critical	Wetland	Wetland	Wetland

Species	BCC	UPIF	DWR Habitats	1st Breeding Habitat	2nd Breeding Habitat	Winter Habitat
Virginia's warbler		X	Primary Breeding/Winter	Northern Oak	Pinyon-Juniper	Migrant
Warbling Vireo		X	Critical/High Value	Lowland Riparian	Mountain Riparian	Migrant
Western Bluebird		X	High Value	Ponderosa	Pinyon-Juniper	Pinyon-Juniper
Western Grebe			Critical	Wetland	Water	Water
Western Kingbird		X	Critical/High Value/substantial	Lowland Riparian	Agriculture	Migrant
Western Meadowlark		X	Critical	High Desert Scrub	Grassland	Agriculture
Western Screech-owl		X	High value	Mountain Riparian	Lowland Riparian	Lowland Riparian
Western Scrub Jay		X	Critical	Mountain Shrub	Pinyon-Juniper	Mountain Shrub
Western Tanager		X	Critical/high value	Mountain Riparian	Ponderosa	Migrant
Western Wood-Pewee		X	High Value/Critical	Lowland Riparian	Mountain Riparian	Migrant
White-breasted nuthatch		X	Substantial	Ponderosa	Mixed Conifer	Mixed Conifer
White-crowned sparrow		X	Substantial/high/critical	Alpine	Mountain Riparian	Lowland Riparian
White-faced ibis		X	critical	Wetland	Agriculture	Migrant
White-throated swift		X	High value	Cliff	Cliff	Migrant
Wild Turkey (Merriam's)		X		Ponderosa	Mountain Shrub	Mountain Shrub
Wild Turkey (Rio Grande)		X		Lowland Riparian	Northern Oak	Lowland Riparian
Williamson's Sapsucker		X	Primary Breeding	Sub-Alpine Conifer	Aspen	Migrant
Willow Flycatcher		X	Primary Breeding	Lowland Riparian	Mountain Riparian	Migrant
Wilson's Phalarope		X	Critical	Wetland	Water	Migrant
Wilson's Snipe			High Value			
Wilson's Warbler		X	Critical/Substantial	Mountain Riparian	Alpine	Migrant
Yellow Warbler		X	High Value/substantial	Lowland Riparian	Mountain Riparian	Migrant
Yellow-Billed Cuckoo	X	X	Critical	Lowland Riparian	Agriculture	Migrant
Yellow-breasted chat		X	critical/high value	Lowland Riparian	Mountain Riparian	Migrant
Yellow-headed blackbird		X	Critical	Wetland	Wet Meadow	Agriculture
Yellow-Rumped Warbler		X	High Value/substantial	Mixed Conifer	Sub-Alpine Conifer	Lowland Riparian

‡Utah Partners in Flight Avian Conservation Strategy Version 2.0 (Parrish et al., 2002), §Birds of Conservation Concern 2008 (USFWS, 2008) †Utah Conservation Data Center (UDWR 2011)

APPENDIX F

RESPONSE TO SCOPING COMMENTS

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
SUWA 1	Alternatives	SUWA	Limit permitted activities to weekdays. This will meet the purpose and need of the proposed permit and will greatly reduce the instance of user conflicts, and will decrease impacts to cultural and natural resources.	Other alternatives were designed to potentially greatly reduce the instance of user conflicts. This option was considered but eliminated from detailed analysis due to overall numbers being substantially similar in design and effects to Alternatives C and D.	None
SUWA 2	Alternatives	SUWA	Reduce the amount of motorized vehicles permitted under the proposed SRP.	Alternative C reduces the number of motorized vehicles on the San Juan Hill Route from 25 to 10, with only two vehicles allowed to go up the dugway.	To what extent could this proposal potentially impact other recreational users?
SUWA 3	Alternatives	SUWA	Limit group frequency of use (i.e., 1 group per month). This will meet the purpose and need of the proposed permit yet reduce interference with the use and enjoyment of other user groups, and will decrease impacts to cultural and natural resources.	Addressed in Alternative E - Reduce Recreation Conflict through Restrictions on Number of Trips	To what extent could this proposal potentially impact other recreational users?
SUWA 4	Alternatives	SUWA	Limit the length of the permit to less than year-round (i.e., 1 month per year). This will meet the purpose and need of the proposed permit yet reduce interference with the use and enjoyment of other user groups, and will decrease impacts to cultural and natural resources.	Addressed in Alternative D - Reduce Recreation Conflict through Restrictions on Season of Use	To what extent could this proposal potentially impact other recreational users?
SUWA 5	Alternatives - Group Size	SUWA	<i>BLM must fully analyze a reasonable range of alternatives for the HITS SRP. A reasonable range of alternatives includes alternatives that:</i> Decreases the permitted group size under the SRP to a level in conformance with limits set in the 2008 Monticello RMP.	Six Alternatives, including the No Action Alternative, were considered in this analysis. Alternatives B and C analyze two methods to reduce group sizes.	None
6	Camping	David L. Wegner	If camping is allowed, will it be low or minimal impact or will there be supported camping (i.e. additional people cooking, setting up tents, etc.)?	Camping will occur entirely on SITLA lands. The Proposed Action does not include camping on any BLM lands.	None
7	Consultation	David L. Wegner	Will other agencies be consulted with in respect to potential impacts?	The US Fish and Wildlife Service, the State Historic Preservation Office, and eleven tribal entities were consulted.	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
8	Cultural	Janet Leverwood	Rock Art: The Comb wash, San Juan Hill, is particularly vulnerable. That much traffic, foot, cart, car etc. is unimaginable. The BLM needs to support the careful work being done to understand and appreciate the rock art of the area that is enjoyed by so many river rafters, hikers, explorers.	Addressed in Chapter 4, the Environmental Impacts analysis. Specifically, impacts to cultural resources at San Juan Hill is analyzed in the context of large groups of 125, discrete groups of 12 within a larger party of 125, and a strict limit of 12 participants within the Comb Ridge RMZ at any given time.	To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?
9	Cultural - Historical Resources	David L. Wegner	How will historically significant items be preserved in the areas of the routes? Specifically any rock carvings, caches, etc.	See response to comment number 8.	To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?
10	Cultural / Recreation Conflict (River)	Friends of Cedar Mesa	In the San Juan Hill area, we would ask the BLM to limit the number of vehicles that go up the rough hill out of Comb Wash toward the east be limited to four vehicles.	Alternative C analyses a reduction of motorized vehicles on the San Juan Hill Route from 25 to 10, with only two vehicles allowed to go up the dugway.	To what extent could this proposal potentially impact other recreational users?
SUWA 11	Cultural and Historical Resources - Consultation	SUWA	Pursuant to the NHPA, BLM must initiate consultation with the state Historic Preservation Officer, relevant and affected Tribes and other interested parties, conduct a Class III cultural resource inventory of the portions of the project area that it proposes to treat, and protect any cultural resources that it discovers.	Consultation has been initiated with the State Historic Preservation Officer and 11 Native American tribes. See section 5.2 of the EA for more details. Class III inventories have been completed for the Area of Potential (APE) effect on two of the proposed project areas. No activity will take place in the third area until a Class III survey is completed for the APE.	None
12	Cultural Resources	Wes Shook	Will any arch sites be disturbed by the activities of the foundation?	Cultural resources were carried forward for analysis in the EA in Section 4.0. The BLM has determined that due to the design features detailed in the document this proposal will have no adverse impacts on cultural resources.	To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?
13	Cultural Resources - Consultation	David L. Wegner	Will the impacted tribes be consulted with? This is traditional cultural areas to several tribes and artifacts and culturally important aspects may be located within the three proposed routes. If tribal issues are noted, will the permit be adjusted to avoid impacting these culturally significant properties?	Several Tribes were consulted regarding the proposal. See Section 5.2 for additional information. If resources are noted by a tribal representative, the BLM may analyze this in the EA. See Chapter 5.2 of the EA.	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
15	Cumulative Impacts	David L. Wegner	Will all three routes be used concurrently? If so what is the potential use impact of the cumulative use of the trails?	Under Alternative A, all routes would be used concurrently. Alternatives B - E analyze impacts of only one trail to be used at a time.	None
SUWA 15	Cumulative Impacts	SUWA	Pursuant to NEPA, BLM must address the cumulative impacts from the HITS SRP in conjunction with impacts from activities such as other SRPs issued in the vicinity of the project.	Cumulative impacts of the Proposed Action in combination with other Heritage Tourism SRPs are addressed in Section 4.4.1	None
16	Designated Routes	David L. Wegner	Are the three routes of historical significance or were they delineated based on ease of trekking or known trails/routes? In other words will the impact be to an existing road or trail or will it be cut on virgin ground? Impacts will be different	The routes are within the Hole in the Rock Historic Trail corridor. The proposed routes make use of 2.9 miles of designated pedestrian trail, 0.93 miles of designated ATV trail, and 12.63 Class B and D roads. The route includes 2.48 miles of newly designated pedestrian trail on existing disturbance (old highway alignment). There are 0.09 miles of new trail construction proposed.	None
17	Fire Risk	Wes Shook	This large increase of visitors brings added fire risk to the Cedar Mesa since, the map shows additional campsites. This increased risk not only to the living organisms on the mesa but what about arch sites that might be impacted.	Use of fire would not be authorized under this SRP. The campsites are located on lands managed by the State of Utah. The BLM has no jurisdiction on lands managed by the State.	None
18	Group Leaders	Friends of Cedar Mesa	Group leaders should receive some sort of training about stipulations and preservation of natural and cultural resources.	Group leaders will receive training about stipulations and preservation of natural and cultural resources. Refer to SRP Stipulations attached to EA as an Appendix D.	None
19	Group Size	Friends of Cedar Mesa	The standard land-based group size limitation should be upheld, with groups of no more than 12 people traveling together. In order to avoid inevitable co-mingling and growth of 3 group sizes, individual groups of 12 should be separated by geography or time.	The Monticello RMP has no standard land-based group size limitations for the area of the proposed action beyond those for Cedar Mesa in-canyon permits and the Comb Ridge RMZ. The Comb Ridge RMZ group size limitations are addressed in Alternatives B and C.	None
20	Group Size	Friends of Cedar Mesa	We have also been provided the "Proposal Design Features" document submitted to the BLM by the HIRTF, which calls for dividing participants into small groups of 10 youth with two adults per group (12-total participants). The design proposal submitted by the HIRTF also calls for a number of reasonable stipulations, which the group itself has suggested. These include prohibiting pets, littering, firearms, radios, and model airplanes, among several	Addressed in Alternative B	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
			others. The design proposal also includes the use of portable waste containers (luggable loos).		
SUWA 21	Group Size - RMP Conformance	SUWA	If the proposed HITR SRP does not conform to the 2008 Monticello RMP, BLM cannot approve the permit without amending the RMP. Any revision to the RMP requires an EA or Environmental Impact Statement to assess the impacts of the proposed change of use, and a public process as set out in 43 C.F.R. § 1610.2. With regard to the HITR SRP, the 2008 Monticello RMP involved a determination of the appropriate day use group size limits for the Cedar Mesa SRMA, with a focus on ensuring protection of cultural and natural resources. Amending the RMP solely to accommodate a large, specific user group negates BLM's previous analysis and ultimate determination that a 12 person group size limit was appropriate for the area.	Already decided by law, regulation, Resource Management Plan, or other higher-level decision. RMP decisions for Cedar Mesa state a 12 person limit in-canyon, but not on mesa-tops.	None
22	Group Size – Total Numbers	Vaughn Hadenfelt	The demand of logistics for set-up, support equipment, safe passage and sanitation just to mention a few things will make a huge stamp on the fragile landscape involved. The BLM RMP states that 12 people at a time is a maximum number for commercial groups to visit Cedar Mesa in order to maintain some control on site impact	The EA considered a range of alternatives for protecting natural and cultural resources as well as the experiences of other recreational users. The 2008 Monticello BLM RMP does not specify group size limitations for Cedar Mesa SRMA, with the exception of Comb Ridge RMZ and specific limitations for permitted in-canyon use.	None
23	Group Size – Total Numbers	Wes Shook	Concerned about the numbers the foundation is asking to be allowed to put on the trail, how does that compare to the visitor ship on the Cedar Mesa now what does that increase due to the WSA lands in the area.	See Section 4.9 for cumulative impacts.	None
24	Group Size – Total Numbers	David L. Wegner	Will there be minimum and maximum size of groups limits?	Addressed in Alternatives A - E.	None
25	Group Size – Total Numbers	Janet Leverwood	The numbers are just too big. Even with guides, the number of 12 participants is more that challenging for the sensitive environment.	Comment noted. Refer to Alternatives A-E of the EA.	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
26	Group Size – Total Numbers	Wes Shook	I am concerned about the numbers the foundation is asking to be allowed to put on the trail, how does that compare to the visitor ship on the Cedar Mesa now what does that increase due to the WSA lands in the area. In addition, I feel that the foundation will come back to BLM asking for an ATV route from the Bluff Campground to the Foundation Fort, thru a residential area Copper Cliffs and South Cottonwood Subdivisions.	Comment noted. Refer to Alternatives A-E of the EA and Section 4.9 for cumulative effects.	None
27	Group Size – Total Numbers	Wes Shook	Can the Cedar Mesa ecosystem accommodate the increased numbers of visitors in this proposal?	See section 4.0 for analysis of potential impacts.	None
28	Group Size – Total Numbers	David L. Wegner	Will this permit have limits on the number of people who may participate on any given trip? Limits of Acceptable Change or some other appropriate metric should be used to assess impacts by the permitted trips on the landscape.	Refer to Alternatives A-E. Also addressed in Chapter 4 Monitoring.	None
29	Group Size/Cultural	Tamara Desrosiers	My main comment would be about numbers. Of special concern to me is the San Juan Hill area, which is already seeing a dramatic increase in visitation from people driving in via the Comb Wash road. I don't have to tell you how archaeologically rich this sensitive area is.	Addressed in Chapter 4. Specifically, impacts to cultural resources on the San Juan Hill route is analyzed in the context of large groups of 125, discrete groups of 12 within a larger party of 125, and a strict limit of 12 participants trekking at any given time within the Comb Ridge RMZ.	To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?
30	Group Size/Recreational Conflict	Tamara Desrosiers	I predict ever more conflict between user groups, especially private river runners who have come to expect some semblance of dispersed recreation in that area. Vehicle access should be managed very specifically to avoid inadvertent backing-up and turning-around impacts. If you allow one group a special permit, it follows that other large groups will demand equal access.	Addressed in Chapter 4, the Environmental Impacts analysis. Specifically, impacts to other recreational users on the San Juan Hill route is analyzed in the context of large groups of 125, discrete groups of 12 within a larger party of 125, and a strict limit of 12 participants trekking at any given time within the Comb Ridge RMZ.	To what extent could this proposal potentially impact other recreational users?
31	Health and Safety	Scott Laws	Will there be an EMT on the trip?	EMTs will not be specifically required, however permit stipulations will require that at least one guide per trip will have Basic First Aid and CPR training.	None
32	Health and Safety	Tamara Desrosiers	BLM should require leaders to have first aid and CPR training, with special emphasis on heat and the dangers of dehydration.	Refer to SRP Stipulations attached to EA as an Appendix. See response to comment 31.	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
33	Historical Accuracy	David L. Wegner	Permit should focus on the experience of the Hole in the Rock rather than adventure experiences that are more adrenalin focused.	The BLM analyzed the permit application as submitted. There were no requests for adrenalin-focused or adventure activities.	None
34	Human Waste	Wes Shook	Where will human waste for the number of participants be handled by the foundation.	Addressed in Alternative B. "Luggable loo" use will be required for on-trail use, while portable toilets will be placed at staging areas.	None
35	Human Waste	David L. Wegner	Will water and back country toilets be provided or will the impact be distributed on the landscape? The limited use of the area today likely has not been a hardship on the landscape and species. Increasing the user numbers will lead to increased impacts.	Addressed in Alternative B. "Luggable loo" use will be required for on-trail use, while portable toilets will be placed at staging areas.	None
36	Human Waste	Friends of Cedar Mesa	BLM should require that all human wastes be disposed of in portable waste containers. And, as also outlined in the design proposal, other waste should be carried out in "leave not trace" style.	Addressed in Alternative B. "Luggable loo" use will be required for on-trail use, while portable toilets will be placed at staging areas.	None
37	Human Waste	Mark Lugwig	We saw that the re-enactment group had portable toilets brought in for their trip. While these are unsightly from the river, I have to wonder whether two toilets are enough for two hundred people or if we find that there is waste behind every tree.	Addressed in Alternative B. "Luggable loo" use will be required for on-trail use, while portable toilets will be placed at staging areas.	None
SUWA 38	Indirect Effects	SUWA	BLM must analyze indirect effects such as the growth in visitation, vehicle use by both individual visitors and SRP holders, and future SRPs in the area. This includes the associated effects of this growth on other visitors, natural and cultural resources, and other foreseeable uses and impacts to lands surrounding the HITR SRP.	These effects are analyzed in Chapter 4 and Cumulative impacts of the Proposed Action in combination with other Heritage Tourism SRPs is specifically addressed in Section 4.4.1.	None
39	Indirect Effects - Other BLM lands	Wes Shook	The impact of additional visitors to the surrounding BLM lands around the Bluff Campground owned by the foundation.	The Proposed Action and analysis is limited to the routes and activity areas described in the EA. Cumulative impacts of the Proposed Action in combination with other Heritage Tourism SRPs is addressed in Section 4.4.1.	None
40	Indirect Effects - Costs - BLM	Wes Shook	What additional costs will be incurred by the BLM to manage this program and how will the costs be recovered?	BLM permit fees are set by the BLM Director under the Special Recreation Permit Authority. Fees are returned to the issuing permit office and can be used for permit administration and monitoring.	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
41	Indirect Effects - Costs - BLM - Monitoring	David L. Wegner	Will the user/permit fee be adequate to support BLM monitoring of the permitted trip impacts?	BLM permit fees are set by the BLM Director under the Special Recreation Permit Authority. The amount of monitoring is commensurate with the resource values at risk and past record of compliance.	None
42	Monitoring	Wes Shook	Who will monitor activities of these large groups to ensure compliance to rules placed on the foundation by the BLM? What is to stop them from taking handcarts up San Juan Hill if no monitors are available?	BLM conducts monitoring as a regular part of the Special Recreation Permit program.	None
43	Monitoring	David L. Wegner	Who is going to monitor the impacts of the permit activities on the landscape? Will it be self-monitored or will the BLM provide experts to evaluate impacts?	BLM conducts monitoring as a regular part of the Special Recreation Permit program. Additional monitoring may be provided by the Cultural Resource program at sensitive sites.	None
44	General	Bret Hosler	The proposal that has been presented by the Foundation represents a unique opportunity for the people interested in this type of cultural education of our community and others to learn about the history, struggle and sacrifice of those early pioneers and to help build the same qualities of hard work, positive character traits and respect in today's visitors.	Commenter does not raise issues that require analysis in the EA.	None
45	General	Ann Phillips	In regards to the Hole in the Rock Foundation proposed trekking, the impact on the land and the environment degradation due to camping at the site, the group size, the use of "luggable loos," the number of vehicles required for staging an event of this size, the fragile archaeological sites in the area, and the need for a probationary period have all been addressed in the thoughtful letter being sent to the BLM by Josh Ewing, Executive Director of Friends of Cedar Mesa. I concur with Josh's comments, and would like to add my voice to his letter which I understand he is sending to you.	See responses to comment number 34.	None
46	Parking	Mark Lugwig	Where does vehicle parking happen?	Vehicle parking is displayed on alternative maps and discussed for the alternatives.	None
47	Parking	David L. Wegner	How will traffic be handled into the staging area for the permit? Will it be distributed or will the permit concentrate the people in an independent separate spot and then transport the client to the	Refer to Section 2.0 for a detailed description of the proposal.	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
			point of departure? Minimize impacts to the back country.		
48	Parking	Friends of Cedar Mesa	We would urge the BLM to delay commencement of groups using the proposed routes until the staging areas are completed, with the boundaries of the areas well demarcated.	Parking areas will be delineated prior to use and to prevent parking area expansion.	None
49	Recreation - Use Conflicts	Friends of Cedar Mesa	We encourage the BLM to provide the public, as [a part] of the Environmental Assessment (EA), with the total number of special use days currently being used in the area.	Refer to Chapter 3.	None
50	Resource Impacts	Mark Lugwig	My other concerns are related to group size. In the past years as we see visitor numbers increase because of increases in access, we have seen the trading post going away. "Oh just one rock" adds up as people take souvenirs.	Refer to Chapter 4, Monitoring.	To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas?
SUWA 51	RMP Conformance	SUWA	The proposed HITR SRP must conform to the existing 2008 Monticello RMP. BLM must explain how the proposed HITR SRP conforms to the existing 2008 Monticello RMP, specifically with regard to the restrictions on day use group sizes.	A 12 person group size limit is set for the Comb Ridge RMZ, meaning that allowing a group size of larger than 12 for the proposed San Juan Hill Route would necessitate an RMP amendment. The 2008 Monticello BLM RMP does not specify group size limitations for the remainder of the Cedar Mesa SRMA, outside of limitations for in-canyon use.	None
SUWA 52	RMP Conformance	SUWA	BLM must prepare an EIS for the proposed HITR SRP because it has the potential to significantly impact the environment, and satisfies several of the intensity factors set out in NEPA.	The analysis in the EA does not show that the proposal would lead to significant impacts. The Finding of No Significant Impact (FONSI) will address the intensity factors listed in the CEQ regulations.	None
53	RMP Conformance - Precedence	Friends of Cedar Mesa	Our primary concern is with the precedent granting this permit would set for the greater Cedar Mesa area. We are concerned that allowing this permit will create a precedent where others will feel they should have the right to take large groups into even more sensitive areas.	Each SRP must be allowed or disallowed based on individual merits.	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
54	Safety and Health	John Kriesel, M.D.	Coccidioidomycosis (Cocci) is endemic to this region. We have seen cases as far north as Vernal. Persons who grow up in the region often have some immunity. Kids from Salt Lake or other cities probably won't be immune. Cocci is particularly virulent in Polynesian people. Participants who trek in this region should be informed about the risk of cocci before they go, and they should have some access to the organizers after the trip is over in case they get sick. Cocci is usually self-limited, but it can disseminate and become horrible or even fatal if it is not recognized.	The BLM contacted the local medical community and this cocci does not appear to be a problem in this area.	Add CSU to list of acronyms
55	Safety and Health	John Kriesel, M.D.	Hiking in this area in the summer is treacherous and extremely hot. I avoid it! Heavy pioneer clothing will cause some people to have heat exhaustion or sunstroke. The nearest medical care is in Blanding on the south side of the lake, and probably Panguitch or Richfield on the north. This is a long ways away and these little hospitals do not have helicopters — those would have to come from Salt Lake City or Las Vegas. The original Hole in the Rock Expedition started in the fall of 1879 and ended in April 1880. The pioneers were wise enough not to travel in extreme heat. Beware. No way would I let any of my children do this.	Stipulations require one guide per group have CPR and First Aid training and guides will have training on heat safety awareness.	None
56	Safety?	Mark Lugwig	That area is a river crossing and generally shallow but rivers change and river levels change. Sometime the changes are quick and without warning. A storm upstream can cause a surge in river levels than can add several feet of water to the river level without warning. (In reference to an earlier event: There were about one hundred children and teenagers swimming in the river in period clothing and without life jackets. They were spread out over about a one half mile area of the river.)	River use is not part of the Proposed Action and would not be authorized under the permit.	None
57	Soils	David L. Wegner	How will crypto biotic soils and soil crust be protected in the permit area?	Participants would be required to stay on trails during all permit activities. Portable toilets and "luggable loos" would be provided.	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
58	SRP - Timing	David L. Wegner	Historically the user of the Hole in the Rock by the early settlers were focused on specific times of the year. Will the permit be only for those historically significant times or will it be a year around permit?	The permit would be issued year-round, but approximately 75% of the proposed use would be concentrated in the months of June - August.	None
59	SRP duration	David L. Wegner	How is "multi-year" defined? Would it be better to state that this is two-year permit with opportunity to renew for an additional 2 year period? That would seem to be more effective in holding the permit tee's feet to the fire to abide by the conditions of the permit and to perform any recognized and approved mitigation.	If approved, the permit would likely be issued as a one-year probationary period, with a possibility for extension to five years based on compliance with permit stipulations.	None
60	SRP Timing and Duration	Friends of Cedar Mesa	We encourage the BLM to change its probationary period language. The permit should not be extended for a long term until after at least a few days with extensive use (e.g. multiple groups of 12 in the same area in the same day) have been monitored by the BLM.	The permit would be issued for a one-year probationary period, with a possibility for extension to five years based on compliance with permit stipulations.	None
61	Vehicle Support	David L. Wegner	Will the permit be restricted to hand carts and hiking or will ATV's be part of the program? They should not be.	ATVS are not part of the proposed action and will not be authorized in the permit.	None
62	Vehicle Support	Friends of Cedar Mesa	The number of vehicles needed to transport even the 125 people outlined for the San Juan Hill area would create a significant impact on other recreation users' experience.	Addressed in Chapter 4. Specifically, impacts to other recreational users at San Juan Hill is analyzed in the context of large groups of 125, discrete groups of 12 within a larger party of 125, and a strict limit of 12 participants trekking at any given time within the Comb Ridge RMZ.	
SUWA 63	Wilderness values; Cultural Resources; Recreation conflicts	SUWA	NEPA requires that BLM take a hard look at the impacts resulting from the HTR SRP, including impacts to wilderness-quality lands; impacts to lands proposed for wilderness in America's Red Rock Wilderness Act; impacts to natural and cultural resources; and impacts to other users within the vicinity of areas subject to use under the proposed HTR SRP.	The Proposed Action is for the use of designated routes within the existing Monticello BLM Travel Management Plan. The BLM is not required to make decisions based on pending legislation.	None
64	Wildlife	Wes Shook	What impact will these numbers have on the wildlife in the areas including the stress on water sources?	Wildlife has been included as a resource analyzed in the EA. Refer to Section 4.0 of the EA.	To what extent will the Proposed Action and Alternatives impact wildlife?

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
65	Wildlife	David L. Wegner	Will the permit be limited to those times of the year when minimal impact to the landscape and wildlife could occur or will the use be dictated by specific dates on the Mormon calendar?	Wildlife has been included as a resource analyzed in the EA. Refer to Section 4.0 of the EA. Use would occur throughout the year with approximately 75% of the use from June through September.	To what extent will the Proposed Action and Alternatives impact wildlife?
66	Wildlife	David L. Wegner	Will the permit be viable only during certain periods of the year – when the impact to species and habitats are minimal or will the permit focus on the time of year that is most conducive to public access?	See response to question number 65.	To what extent will the Proposed Action and Alternatives impact wildlife?
67	General	Pam and Quent Baker	The notion of 250 people at one time on a group trek across the landscape of SE Utah is outrageous. The impacts on the land would be enormous. Both natural and cultural resources in the area would be compromised and trampled. The impact on other visitors as well as local fauna would be traumatic. We urge you not to allow the issuance of a special permit for any one group this large. You need to follow the guidelines in the current management plan which clearly stipulate much more reasonable group size limits.	Alternatives to the EA have been added to address a wide range of group sizes. The EA analyzes impacts to several resources. Refer to Section 4.0 of the EA and to the Interdisciplinary Team Checklist. The Monticello RMP does not have specific limitations for group size limits for SRPs on the designated routes in question, with the exception of a 12 person group size limit within the Comb Ridge RMZ.	To what extent could this proposal potentially impact historic properties, specifically in the Cedar Mesa and San Juan Hill areas? To what extent could this proposal potentially impact other recreational users? To what extent will the Proposed Action and Alternatives impact wildlife?
68		Burton Black	Economic benefit to community	Socioeconomic impacts were addressed in the ID Team Checklist found as an Appendix of the EA.	To what extent will proposal foster heritage tourism throughout the Monticello PA?
69		Tamara Desrosiers	A “leave no trace” ethic should be required, and all leaders should attend some kind of training as per “visit with respect”.	Refer to SRP Stipulations attached to EA as an Appendix.	Stipulations
70		Bob McPherson	Economic benefit to community	See response to comment 68.	To what extent will proposal foster heritage tourism throughout the Monticello PA?
71		Jana Hassett	Economic benefit to community	See response to comment 68.	To what extent will proposal foster heritage tourism throughout the Monticello PA?

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
72		Brendan Herst	I am concerned about the large amount of visitation anticipated as a result of this plan. The proposed Long Flat route lies quite close to Owl Creek and Owl Creek Canyon, which are justly renowned for the quantity and quality of their archaeological resources. Implementation of the Hole In The Rock Foundation Trekking plan in this location would potentially compromise the solitude expected by visitors to this canyon complex, and possibly increase the damage to nearby Anasazi ruins. A similar scenario exists on San Juan Hill, as Comb Wash harbors a plethora of culturally important sites. Consequently, I believe the Long Flat and San Juan Hill route proposals should be eliminated.	Potential for conflicts with other recreational users is an issue analyzed in Chapter 4.3.1.3.	
73		Vaughn Hadenfelt	I also suggest that while the San Juan County/Bishop & Chafetz Land Use bill process is in progress, such special use permits should be put on hold. One possibility of this lands bill is the State Land exchange which needs to be considered before special use permits should be approved.	The BLM can only make decisions based on the laws, regulations and policies in place at the time a proposal is presented and a decision is made. The BLM cannot delay or make a decision based on possible legislation.	None
	Alternatives - Handcarts	Wes Shook	Should handcarts be used if this is to be a historical recreation, since handcarts were not part of the Hole in the Rock trek?	It is outside the scope of the analysis for BLM to enforce historical accuracy.	None
SUWA 74	Alternatives - Handcarts - Historical Accuracy	SUWA	Removes the use of handcarts from the proposed SRP. According to the Hole in the Rock Foundation, "handcarts were not part of the Hole-in-the-Rock journey . . ." Hole-in-the-Rock Foundation, http://www.hirf.org/hometrekking.asp (last visited November 4, 2014). Thus, the interpretive and educational purpose and need of the proposed HITR SRP can be met without the use of handcarts. This will also reduce the impacts to cultural and natural resources resulting from the use of handcarts.	It is outside the scope of the analysis for BLM to enforce historical accuracy.	None
75	Guides	David L. Wegner	Will there be natural and historical perspectives provided along the trails? Will there be a guide associated with each permitted trip?	In talking with the applicant they do plan to discuss these perspectives, and there will be one or more guides with each group.	None

Comment Number	Category	Commenter	Comment Text	BLM Response	Retained Issue
	Historical Accuracy	David L. Wegner	Guides should be trained to accurately portray the use of the Hole in the Rock.	In talking with the applicant, this is exactly their proposal.	None
76	T&E Plants	David L. Wegner	How will threatened and endangered plants and animals be protected in the permit area?	Threatened, endangered and candidate species have been analyzed in the Checklist.	To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate wildlife species? To what extent will the Proposed Action and Alternatives impact threatened, endangered and candidate species habitat?