United States Department of the Interior
Bureau of Land Management

Determination of NEPA Adequacy

DOI-BLM-UT-0300-2016-0020-DNA

Needle Rock Outfitters
Special Recreation Permit

Location: Grand Staircase-Escalante National Monument

Applicant/Address: Needle Rock Outfitters
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Crawford, CO 81415

Grand Staircase-Escalante National Monument
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Worksheet

Determination of NEPA Adequacy

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

OFFICE: Grand-Staircase-Escalante National Monument (GSENM)

TRACKING NUMBER: DOI-BLM-UT-0300-2016-0020-DNA

PROPOSED ACTION TITLE/TYPE: Needle Rock Outfitters Special Recreation Permit (SRP)

LOCATION/LEGAL DESCRIPTION: Grand Staircase-Escalante National Monument located in Kane and Garfield Counties, Utah

APPLICANT (if any): Needle Rock Outfitters

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

The BLM is proposing to issue a one-time SRP to Needle Rock Outfitters, a new SRP applicant, to conduct guided hunting services and dispersed camping. Authorization for Needle Rock Outfitters would begin on September 15, 2016 and extend through December 31, 2016.

Needle Rock Outfitters plans to operate in the 2016 season from September 29 through October 10, and estimates they will serve 4 participants over a 10 day season. Based on projected use, the BLM estimates that Needle Rock Outfitters will create a total of 80 user days in 2016.

Authorized areas for guided hunting services within GSENM include the Kaiparowits East and Kaiparowits West hunting units, as defined by the Utah Division of Wildlife Resources. Authorized areas for dispersed camping include previously disturbed and durable locations along open roads identified on the Monument's Transportation Plan.

Needle Rock Outfitters will operate in accordance with established GSENM and BLM statewide stipulations. A copy of the standard SRP stipulations is attached to this document. Due to size, maps are not attached but can be provided upon request.

B. Land Use Plan (LUP) Conformance

LUP Name: GSENM Monument Management Plan (MMP) Date Approved: February 2000

The proposed action is in conformance with the applicable MMP because it is specifically provided for in the following LUP decisions:

- OG-1: Outfitter and guide operations will be allowed throughout the Monument in compliance with the constraints of the zones and other Plan provisions.
- GROUP-3: Appropriate NEPA analysis will be prepared on areas where permits could be

authorized.

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

DOI-BLM-UT-0030-2011-0002-EA	Programmatic Environmental Assessment for Issuing Special Recreation Permits within Grand Staircase – Escalante National Monument, completed on October 11, 2012.
DOI-BLM-UT-0030-2011-0002-EA	Decision Record for Programmatic Environmental Assessment for Issuing Special Recreation Permits within Grand Staircase – Escalante National Monument, signed October 15, 2012.

D. NEPA Adequacy Criteria

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

Yes, this new proposed action is a feature of the proposed action analyzed in the Programmatic Environmental Assessment (EA) for Issuing SRPs within GSENM. The proposed action is to issue SRPs that authorize services for guided hunting and dispersed camping. DOI-BLM-UT-0030-2011-0002-EA specifically addresses commercial and organized groups providing services for day hikes, backpacking, mountain biking, hunting, bus and auto tours, ATV tours, outdoor educational courses, equestrian uses, photography, vending, fishing, weddings and other permitted uses under the BLM SRP regulations, 43 CFR 2930.

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

Yes, the range of alternatives considered in the Programmatic EA is still appropriate. Two alternatives were analyzed – No Action and the Proposed Action. The BLM analyzed the impacts of issuing SRPs based on applicants complying with identified stipulations to protect the environment. Four issues were identified during internal and external scoping: Cultural, Wildlife, Recreation, and Wilderness Study Areas (WSA) (Section 1.7 of the referenced EA). Given current environmental concerns, interests, and resource values, the range of alternatives and identified issues are still appropriate. No new issues have been identified.

3. **Is existing analysis adequate in light of any new information or circumstances (such as, rangeland health standards assessment; recent endangered species listings, updated list of BLM sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

Yes, the existing analysis is still valid. The proposed action is an activity that has been directly addressed in the Programmatic EA. No new information or circumstances have been identified and existing analysis

is adequate.

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

Yes, the impacts of issuing this SRP (services for guided hunting and dispersed camping) were directly addressed in the Programmatic EA. Soil disturbance would involve foot traffic along hiking routes and vehicle traffic along open roads identified on the Monument's Transportation Plan. Direct, indirect, and cumulative effects are addressed in Chapter 4 of the Programmatic EA.

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

Yes, the public involvement and interagency review conducted as part of the existing Programmatic EA remains adequate. The proposed action is for activities (services for guided hunting and dispersed camping) that have been directly addressed in the Programmatic EA. The EA provided a 30- day public review period and covered this type of activity in its analysis.

E. Persons/Agencies/BLM Staff Consulted

See attached Interdisciplinary Team Checklist

CONCLUSION *(If you found that one or more of these criteria is not met, then you cannot conclude that the NEPA documentation fully covers the proposed action).*

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation adequately considers the impacts of the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

/s/ Brian Amstutz	*5/4/16*
Signature of Project Lead	Date
/s/ Amber Hughes	*5/4/16*
Signature of NEPA Coordinator	Date
/s/ Matt Betenson, For Monument Manager	*5/11/16*
Signature of the Responsible Official	Date

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

regulations.

ATTACHMENTS:
ID Team Checklist
Stipulations

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

COMMERCIAL
STATE WIDE SPECIAL RECREATION PERMIT STIPULATIONS

Special Recreation Permit Details

Name of Company:	All GSENM Special Recreation Permit Holders
Special Recreation Permit Number:	
Pre-trip Itineraries Required?	
Deductions or Discounts Applicable:	

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

BLM Utah Terms and Stipulations

A. General

1) Permits issued for more than one year are subject to annual validation. To secure validation the permit holder must:
    a. have performed satisfactorily under the terms and conditions of this permit and be in conformance with applicable Federal, State, and local laws, ordinances, regulations, orders, postings, and written requirements applicable to the area and operation covered by the permit,
    b. ensure that all persons operating under the permit have obtained all required Federal, State, and local licenses or registrations,
    c. have on file, with the office issuing the permit, current insurance that meets or exceeds the BLM's minimum insurance requirements for the event or activity and identifies the United States Department of the Interior – Bureau of Land Management as additional insured, and
    d. have no outstanding, past due, or unpaid billing notices.

2) Permittees may not leave unattended personal property on public lands administered by the Bureau of Land Management for a period of more than 48 hours without written permission of the authorized officer, with the exception that vehicles may be parked in designated parking areas for up to 14 consecutive days. Unattended personal property is subject to disposition under the Federal Property and Administrative Services Act of 1949 as amended.

3) The permit only authorizes the use for the activity, the time(s) and in the area(s) specifically described in the approved area(s) of operation section of this permit (page one of Form 2930-2) or on the list of authorized routes or maps attached to the SRP.

4) The permittee must maintain on file with the BLM a current and correct list of employees who will be conducting services for the company on public land. Persons providing services under this permit must be an employee of the permittee.

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

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

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

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

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

B. Financial

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

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

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

4) The permittee must submit a post use report (see Appendix A) thirty days after the last use of the permit in a calendar year, or as agreed upon with the field office administering the permit. Alternative reporting arrangements may be established by written agreement with the authorized officer. An extension of this due date may be approved by the issuing office on a case-by-case basis. All post use reports are due by January 31 of each calendar year unless specified in the permit. The report must contain a trip-by-trip log of: trip location, beginning and ending dates of each trip, number of clients, number of guides, and gross receipts for the trip. In reporting gross

receipts, the outfitter will report all payments made by the customer including, but not limited to, activity-related equipment rental, gratuities, donations, and gifts, with the only exceptions being state and local sales tax and retail sales of durable goods that remain the property of the customer and have utility after the activity. The request for deductions based on pre- and post-trip transportation and lodging expenses and percentage of time on public land, if being claimed, must also be submitted at this time. Requests for transportation and lodging deductions must be accompanied by copies of supporting receipts documenting proof of payment.

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

   a. More than 15 calendar days but less than 30 calendar days after the due date: $125
   b. More than 30 calendar days after the due date, but less than 45 calendar days: $250

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

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

   a. W-2 records or a similar record of employment for all employees conducting activities under the permit,

   b. a record of all financial relationships with booking agents or advertisers,

   c. a record of all receipts or compensation including payments, gratuities, donations, gifts, bartering, etc., received from any source during activites conducted under the permit, and

   d. a record of all payments made by the permittee and claimed as a deduction in the permittee's fee submission.

   e. a complete and reconcilable accounting system that includes the following items:

   i. customer cash receipt deposit ledger or statements. These include the deposit transactions with continuous sum totals.
   ii. bank statements/ledgers, or the deposit slip ledger receipts

C. Insurance

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

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

General Guidelines for Minimum Insurance Requirements

SRP Event or Activity	Per Occurrence	Per Annual Aggregate

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

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

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

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

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

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

D. Marking of Outfitter Vehicles

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

E. Pre-Trip Itinerary

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

F. Environmental and Resource Protection

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

1) For all activities and at all base camps with locations served/supported by a motorized vehicle, the permittee must have a toilet system that allows for the proper carry-out and disposal of solid

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

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

3) Washing or bathing with soap is not permitted in tributary streams, springs or other natural water sources. Dishwater must be strained prior to dispersal (scattering). Dishwater and bathwater may not be dispersed within 200 feet of streams, springs, or other natural water sources.

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

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

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

7) No camping is permitted within 300 feet of a known prehistoric or historic site. These resources include, but are not limited to, archaeological sites such as prehistoric camps, quarries, structures, middens, and rock art, and historic sites such as corrals, line cabins, dumps, historic signatures and signature panels, trails, mines and related structures, and historic roads.

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

G. Fires

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

2) At sites accessed by the permittee's motor vehicle(s), the permittee must provide its own fuel wood.

3) At sites accessed by the permittee's motor vehicle(s), the permittee must use a fire pan to contain the fires, ash, and charcoal. Charcoal and ash from the fire pan must be hauled out.

4) Gathering wood from standing trees, live or dead, is prohibited.

5) 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.

6) Scatter fuel wood piles and rock lined fire rings before leaving the site.

H. Informed Risk

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

2) The permittee shall review potential safety concerns, contingency plans and potential consequences with its clients prior to operations.

3) The permittee shall utilize the appropriate and proper equipment and gear for the activity.

4) The permittee shall ensure that all persons operating under the authorization are made aware of the physical safety hazards associated with abandoned mine openings and the potential for encountering abandoned mines within the permitted area. The permittee must present or display a copy of the attached *Utah Abandoned Mine Safety: Stay Out and Stay Alive!* brochure in prominent view where all participants and public may view it. To obtain additional copies of the brochure, contact your local BLM office.

I. Safety and Equipment

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

2) Every person serving as a guide on public land must at a minimum be trained and currently certified in Basic First Aid and Cardio-pulmonary Resuscitation (CPR). Each guide must have legible copies of certification cards in his/her possession while operating under a BLM Special Recreation Permit in Utah. In addition, certification cards must be filed at the permittee's headquarters and available for BLM review if requested.

3) The following equipment must be carried on all commercial trips:
   (a) A first aid kit adequate to accommodate each activity, group, or subgroup will be carried on all trips.
   (b) Adequate repair kits and spare supplies appropriate for the trip and activity.

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

SUPPLEMENTAL STIPULATIONS FOR GUIDING HUNTERS

1) The permittee must ensure the hunt is conducted in full compliance with State of Utah and Federal wildlife laws and regulations and the rules of fair chase.

SUPPLEMENTAL STIPULATIONS FOR OUTFITTERS 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. Prior written permission from 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 PERMITTEES USING OFF HIGHWAY VEHICLES AND MOUNTAIN BIKES

1) OHV and mountain bike use must be specifically provided for in the permit and operating plan.

2) Only routes specifically approved in the permittee's operating plan may be utilized.

3) Permittees must be familiar with and comply with State of Utah OHV laws. All activities and activity participants must follow state regulations and manufacturer's recommendations regarding operations.

4) OHV operators must be familiar with and comply with BLM's OHV designations whether posted on the ground or not.

5) Permittees must operate in accordance with 43 CFR 8341 concerning OHV use on public lands. To obtain a printed copy of these regulations, contact your local BLM office or visit BLM-Utah's Recreation Permits website at: http://www.blm.gov/ut/st/en/prog/recreation_home/permits.html

6) OHV operators must yield to non-motorized users. Mountain bikers must yield to pedestrians and riding or pack animals.

7) Operators shall not intentionally chase or harass wildlife.

8) The permittee shall be responsible for clean-up and remediation in event of accident or mechanical failure resulting in the spillage of fuels, lubricants, coolants, hydraulic fluids, or other petroleum-based or synthetic organic compounds.

GRAND STAIRCASE – ESCALANTE NATIONAL MONUMENT RESOURCE STIPULATIONS

GENERAL

1) For “multi-year” SRPs, two consecutive seasons of nonuse may result in cancellation of the SRP. If a permit is cancelled, the permittee would be required to apply for a new SRP.

RESOURCE PROTECTION

1) All SRP operators will use Leave No Trace and TREAD Lightly stewardship practices.

Camping

1. Dispersed primitive camping is not allowed in the Frontcountry and Passage Zones. Camping in the Frontcountry and Passage Zones must be in developed campgrounds or in designated primitive camping areas. Designated primitive camping areas have not been identified in the Monument to date. Therefore, if a permittee intends to camp in areas not designated as primitive camping areas in the Frontcountry and Passage Zones, they must identify these areas in their operating plans.

2) Motorized or mechanized vehicles may pull off designated routes no more than 50 feet for direct access to dispersed camping areas in the Outback Zone. All operators are required to use previously disturbed areas. No roadside disturbance is allowed where signed and adjacent to Wilderness Study Areas, endangered plant areas, relict plant areas and riparian areas.

3) Camping within 300 feet of an isolated water source, i.e., spring, pond, rock pool, water pocket, is prohibited.

4) There is no camping allowed in the Kodachrome Bladder pod restoration area along Rock Spring Bench Road and Paria River. Camping in existing disturbed areas is allowed.

Fire

1) Campfires are not allowed in the Escalante and Paria/Hackberry Canyons, No Mans Mesa or other identified relict plant areas, and in archaeological sites, rock shelters and alcoves throughout the Monument.

2) Campfires are allowed only where designated fire grates, exist, or by using mandatory fire pans in Frontcountry and Passage Zones. Wood collection for campfires is not allowed in Frontcountry and Passage Zones. Permittee must bring firewood from the immediate area and remove all unused wood from the campsite upon departure.

3) Campfires are allowed in Outback and Primitive Zones. Use of fire pans or fire blankets are encouraged and only dead and down wood can be collected or bring your own. Burn wood to ashes and douse with water, making sure that your fire is DEAD OUT and that the area is restored to a natural condition before leaving.

4) When using designated fire grates in the Frontcountry and Passage Zones, burn all wood and coals to ash, put out campfires completely, then leave cool ashes.

5) Permittee may be held responsible for fire suppression costs resulting from wildfire caused by the permittee, employees, agents, and/or representatives and by all clients, customers and participants under the permittee’s supervision.

6) Wildfires should be reported immediately to the nearest BLM office. Permittee is responsible for informing employees, clients, and participants of the current fire danger and required precautions that may be placed in effect by BLM or the State of Utah.

Group Size Limits

1) Group size is limited to 25 people in the Passage and Outback Zones including guides. Groups sizes over 12 people must be disclosed in the Letter of Authorization.

2) Group size within the Primitive Zone is limited to 12 people and 12 pack animals including guides, however within the Paria River corridor in the Primitive Zone, permits could be approved for groups over 12 people up to a maximum of 25 people. Group sizes over 12 people must be provided in writing in the permit.

3) Group size limits cannot be achieved by staggering individual groups along a single route by time or distance. Instead, individual groups must comply with group size limits by utilizing separate and unique routes, or by traveling from opposite ends of a single route. If traveling from opposite ends of a single route, groups may pass each other, however they cannot gather at a single location.

Transportation and Access

1) All machinery (street legal motorized vehicles, non-street legal all-terrain vehicles, dirt bikes, mountain bikes, etc.) that has been used outside the Monument must be cleaned prior to use in the Monument to prevent the possible introduction and spread of noxious weeds.

2) Motorized and mechanized travel within the Monument must be along open roads listed on the transportation map in the Grand Staircase-Escalante National Monument Management Plan.

3) Cross-country motorized or mechanized travel on the Monument is prohibited. All motorized and mechanized (bicycles, skateboards, deer carts, etc.) vehicles must stay on designated open roads while traveling in the Monument.

4) Permittee shall not construct new trails or maintain existing trails without written authorization from the Authorized Officer.

5) Permittee shall not use paint or flagging or construct cairns to mark trails, unless specifically allowed for in its Annual SRP Authorization.

Sanitation

1) Permittee must use a portable self-contained toilet system when camping in an area less than a 300-foot distance from water sources. All human waste must be packed out and disposed of at a certified disposal site.

2) If a small portable toilet cannot be used, deposit solid human waste in catholes dug 4 to 6 inches deep at least 300 feet) from water sources, camp, and trails. Cover and disguise the cathole when finished. Never dig a cathole under an overhang or shelter.

3) If necessary, i.e., camping in one location for multiple days, a trench may be dug to dispose of human waste. To dig a trench, start with a cathole dug 4 to 6 inches deep and expand it in one direction as additional people use it; soil dug from the trench should be used to cover the feces.

Supplemental Stipulations for Permittees Guiding Hunters

1) Hunters are prohibited from field dressing game animals within 300 feet of trails and water sources.

Supplemental Stipulations for Permittees Guiding Climbers

1) Climbing, bouldering, or any form of canyoneering is not allowed unless specified in the permit. Climbing is not allowed in archaeological sites, on natural bridges or arches, or within identified threatened and endangered species nesting areas.

Supplemental Stipulations for Permittees Using Riding or Packing Animals

1) Horses or other pack animals are not allowed in relict plant communities, archaeological sites, rock shelters, or alcoves. Guides and their guests must enter these sites on foot to reduce resource impacts.

2) Sheep species are not allowed as pack or companion animals.

3) Riding and pack stock are limited to 12 animals in the Primitive Zone.

4) Riding and pack stock may not be confined within 200 feet of water sources, camp and trails, or 100 feet of an archaeological site. If it is necessary to keep riding and pack stock confined for an extended period of time, select a site where damage to vegetation is minimized.

5) Stock may not travel in streams except when crossing.

6) Stock may not travel in the riparian zone of Deer Creek to avoid habitat for the endangered species Ute Ladies Tresses *(Spiranthes diluvialis)*. Stock needs to remain on the high trail through Deer Creek canyon.

Archaeological and Historical Site Etiquette

Archaeological and Historical sites are fragile and irreplaceable resources. These resources include, but are not limited to, archaeological sites such as prehistoric camps, quarries, structures, middens, rock art, and historic sites such as corrals, line cabins, dumps, historic signatures and signature panels, trails, mines and related structures, and historic roads. No collection of archaeological or historical materials is allowed except by permit, which are issued only to qualified research institutions. When artifacts are encountered on the surface, they can be examined and gently handled, but must be returned to their exact location. Removal of artifacts from a subsurface context is not allowed as such removal will damage the archaeological or historical site. Do not drive on, or ride livestock across, such sites unless on an existing, Monument-approved road or trail. Do not touch or use tracing techniques at rock sites, as rubbing, pressure, and hand oils permanently damage rock art sites. Enjoy the archaeological or historical site, but assure that the site remains undamaged for future permitees, the general public, and for future research.

Paleontological Resource Etiquette

Paleontological resources are fragile, non-renewable resources. In GSENM they come in five different categories, bone sites, track and trace sites, wood sites, paleo-botanical sites, and invertebrate sites. No collecting of any materials is allowed except by permit, which are only issued to qualified research institutions. The handling of botanical and invertebrate fossils is ok, but these resources should be returned to their original location. The removal of vertebrate fossils from the ground is not allowed as it

destroys the context of rare resources. When vertebrate fossils (bones, scales, and teeth) are encountered, enjoy them in place and report their location to Monument staff. Tracks and trace fossil localities such as dinosaur footprint sites can be very fragile and experience high visitation. Avoid standing on or trampling them which can accelerate their erosion. No molding or casting of any sort is allowed on fossil footprints without a permit, issued by the BLM's Utah State Office.

Biological Soil Crust Etiquette

Concentration of recreational use is generally desirable. Use designated or existing campsites to reduce impacts of haphazard placement of rest sites or campsites by individuals. Use existing trails to minimize the amount of biological soil crust that is disrupted by trampling. When possible, use hardened surfaces, such as rocks, or areas with minimal crust potential. When hiking in areas that lack trails, please use washes, walk on rock or in erosional channels to minimize impacts to soil crust.

Wilderness Study Areas Etiquette

GSENM has 16 Wilderness Study Areas (WSA) located in the primitive zone that are managed and monitored to protect their suitability for designation by Congress as wilderness. The Monument's approximately 881,997 acres of lands identified as WSA's are protected for their qualities of naturalness and remain predominantly untouched by human activity. They offer outstanding opportunities for solitude and primitive and unconfined recreation. In addition, nearly all possess at least one or more ecological, geological, scientific or scenic value. BLM is required to provide stewardship of these lands so as not to impair suitability of WSA's until Congress makes a final determination on designation.

Permittee's are responsible for knowing boundaries of primitive zones that include wilderness study areas (WSA) or other special management areas and for complying with legislative and permit conditions that may exist in such areas. Maps and information concerning WSA's are available on the GSENM website and at Monument Visitor Centers.