

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

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**FINDING OF NO SIGNIFICANT IMPACT**

**AND**

**DECISION RECORD**

**Determination of NEPA Adequacy**

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**DOI-BLM-UT-Y020-2016-013 DNA**

**March 2016**

**Cedar Mesa Hiking and Backpacking SRPs  
2<sup>nd</sup> Quarter 2016**

***Location:*** Cedar Mesa SRMA, San Juan County, Utah

***Applicant/Address:***

Western Washington University  
AS Outdoor Center  
Emily Muth  
516 High Street  
Bellingham, WA 98225

Alexander Dawson School  
Brian Hannen  
10455 Dawson Drive  
Lafayette, CO 80026

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Monticello Field Office  
365 North Main  
Monticello, Utah 84535  
435-587-1500  
Fax: 435-587-1518



**FINDING OF NO SIGNIFICANT IMPACT**  
**Determination of NEPA Adequacy**  
**DOI-BLM-UT-Y020-2016-013 DNA**

**Cedar Mesa Hiking and Backpacking Special Recreation Permits (SRPs)**

Based on the analysis of potential environmental impacts contained in the attached determination of NEPA adequacy and considering no environmental effects meet the definition of significance in context or intensity as defined in 40 CFR 1508.27 and do not exceed those effects disclosed and considered in the 2008 RMPs/RODs, I have determined that issuing these SRPs will not have a significant effect on the human environment. An environmental impact statement is therefore not required.

**DECISION RECORD**

It is my decision to issue Special Recreation Permits for day hiking and backpacking on Cedar Mesa SRMA for educational and commercial operations as described in DOI-BLM-UT-Y020-2016-006 DNA. A one-year probationary permit would be issued to Western Washington University AS Outdoor Center and the Alexander Dawson School, with potential for a five-year renewal after they have demonstrated one year of satisfactory performance including compliance with all terms and stipulations of the permit.

This decision is contingent upon the applicants providing all documents required for processing the respective SRPs and the permit holder's agreement to abide by all relevant terms, conditions, stipulations, and monitoring requirements described below.

**Authorities:** The authority for this decision is contained in the Federal Land Management and Policy Act of 1976 (FLPMA) and the Federal Lands Recreation and Enhancement act of 2004 (REA).

**Compliance and Monitoring:** SRPs are periodically monitored for compliance with terms, conditions, and stipulations in accordance with BLM Handbook H-2930-1 (2006). In addition, each permit holder is required to submit an annual post-use report documenting all trips on BLM.

**Terms / Conditions / Stipulations:** All hiking and backpacking Special Recreation Permits issued for the Cedar Mesa SRMZ are subject to the following terms, conditions, and stipulations:

- SRP General Terms and Conditions (Form 2930-2, page 2)
- BLM National Terms and Stipulations for Commercial Land-Based SRPs
- BLM Utah Terms and Stipulations for SRPs
- BLM Monticello Terms and Stipulations for Commercial SRPs
- Commercial Cedar Mesa Use Stipulations (Including Grand Gulch Primitive Area)

**PLAN CONFORMANCE AND CONSISTENCY:**

The proposed action and alternatives have been reviewed and found to be in conformance with one or more of the following BLM Land Use Plans and the associated decision(s):

**LUP Name: Monticello Field Office Resource Management Plan (RMP)**

Date Approved: November 17, 2008.

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

**RECREATION**

Management Actions - *Special Recreation Permits (SRPs)* (pg.91):

**REC-17:** “Special Recreations 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”.

**REC-18:** “Special Recreations 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”.

**REC-19:** “Special Recreations 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”.

Management Actions - *Cedar Mesa SRMA:*

Goals and Objectives, (pg. 98)

- “Cedar Mesa SRMA, Goals and Objectives (pg. 98): Provide outstanding recreational opportunities and visitor experiences while protecting, natural and cultural resource values with integrated management between the BLM and NPS.”
- “Provide a safe natural well-designed accessible recreation 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.”

**REC-105** (pg. 101-2): “Commercial use is limited to a group size of 12, one commercial group per day per trailhead and advanced permit required.”

**REC-109** (pg. 102): “Trailhead allocations, total overnight visitors per day:

- Kane – 20
- Bullet – 20
- Government – 20
- Collins – 20
- Fish/Owl – 20
- Road Canyon – 20
- Lime Canyon – 20
- Mule Canyon – 20
- Slickhorn – 20

**REC-108** (pg.102): “Commercial group size limited to 12 people per day per trailhead. One commercial group per trailhead per day. Commercial guides are required to meet all pertinent state guidelines.”

Management Actions - *Cedar Mesa SRMA Mcloyd Canyon*,  
**REC-117** (pg. 104): “One commercial group per day.”

TRAVEL MANAGEMENT

Management Actions -

**TM-22** (pg. 144): “Manage the following trails for non-mechanized use: Kane Gulch, Todie Canyon, Bullet Canyon, Shieks Canyon, Government Trail, Collins Canyon, Grand Gulch (from junction to San Juan River), Fish Canyon, Owl Canyon, Road Canyon, Mcloyd Canyon, Lime Canyon.”

**Rationale for Decision:** The decision to issue permits, renewals, and amendments for guided hiking and backpacking to educational and commercial organizations creates structured opportunities for students and clients to explore the outstanding scenic and archeological resources of Cedar Mesa SRMA. The presence of experienced guides maximizes protection of resources through consistent application of Leave No Trace principals and archeological site etiquette. SRPs result in socio-economic benefits to individual companies and guides, as well as to any surrounding communities where clients may acquire food and lodging immediately before or after a trip.

**Protest/Appeal Language:** This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4. If an appeal is taken, notice of appeal must be filed in the Monticello Field Office within 30 days from receipt of the decision. The appellant has the burden of showing that the decision appealed from is in error. Should they wish to file a petition for stay of the effectiveness of this decision during appeal review, instructions are outlined on Form 1842-1 which would be enclosed with the grant offer.

  
Authorized Officer

  
Date

**Attachment:** Determination of NEPA Adequacy DOI-BLM-UT-Y020-2016-013 DNA

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

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**Determination of NEPA Adequacy  
DOI-BLM-UT-Y020-2016-013 DNA  
March 2016**

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**Cedar Mesa Hiking and Backpacking SRPs  
2<sup>nd</sup> Quarter 2016**

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## Worksheet

### Determination of NEPA Adequacy

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

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The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

OFFICE: Monticello Field Office

PROJECT NUMBER: DOI-BLM-UT-Y020-2016-013 DNA

PROPOSED ACTION TITLE: Cedar Mesa Backpacking SRPs

LOCATION/LEGAL DESCRIPTION: Cedar Mesa SRMA, Utah

APPLICANT(S): Western Washington University AS Outdoor Center  
Alexander Dawson School

#### **A. Description of the Proposed Action and Any Applicable Mitigation Measures**

BLM is proposing to issue Special Recreation Permits (SRPs) for guided hiking and backpacking trips on Cedar Mesa Special Recreation Management Area (SRMA) for educational and commercial organizations. A one-year probationary permit would be issued to Western Washington University AS Outdoor Center and the Alexander Dawson School, with potential for a five-year renewal after they have demonstrated one year of satisfactory performance including compliance with all terms and stipulations of the permit.

The primary activity taking place on BLM would be guided day hiking and backpacking, with limited vehicle travel on designated routes to reach trailhead and staging destinations. All areas of Cedar Mesa SRMA may be accessed. The operating season would be from March – October each year, unless otherwise approved by the Monticello BLM Field Office. Maximum group size for any trip within the Cedar Mesa SRMA would be limited to 12 people per trip. Expected user days covered by this proposed action would be 24. Each group would be required to obtain an advanced reservation for overnight trailhead allocations and would agree to comply with the attached Commercial Cedar Mesa Use Stipulations. Each group would be issued a Monticello BLM Cultural Site Etiquette guide. Hiking and backpacking would be the only method of travel off designated routes. In-canyon and mesa-top backpacking camp sites would be in previously disturbed areas located away from archeological sites, ruins, rock art, and alcoves. Motorized travel to and from trailheads would be limited to routes designated in the Monticello BLM Travel Management Plan (2008). Dispersed vehicle camping on the mesa top would take place only in previously disturbed areas within 150 feet of designated routes.

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

**LUP Name:** Monticello Field Office Record of Decision and Approved Resource Management Plan (RMP)

**Date Approved:** November 17, 2008

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

### **RECREATION**

Management Actions - *Special Recreation Permits (SRPs)* (pg.91):

**REC-17:** “Special Recreations 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”.

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#### TRAVEL MANAGEMENT

Management Actions -

**TM-22** (pg. 144): “Manage the following trails for non-mechanized use: Kane Gulch, Todie Canyon, Bullet Canyon, Shieks Canyon, Government Trail, Collins Canyon, Grand Gulch (from junction to San Juan River), Fish Canyon, Owl Canyon, Road Canyon, Mcloyd Canyon, Lime Canyon.”

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

Monticello Field Office Proposed Resource Management Plan, and Final Environmental Impact Statement (EIS), August 2008

#### **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

No

Documentation of answer and explanation:

The Monticello RMP/EIS, Chapter 4.3.10, page 4-342-348 and Chapter 4.3.8, pages 4-234-235 analyzes the recreational opportunities on Cedar Mesa such as hiking and group size total for commercial use in Cedar Mesa/Grand Gulch Canyons. The Monticello RMP/EIS, Chapter 2, Table 2.1, page 2-44 gives the general policy for the issuance and management of Special Recreation Permits (SRPs), which is also analyzed in Chapter IV of the EIS. This proposed action is within the planning area of the EIS.

**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

No

Documentation of answer and explanation:

Five alternatives were analyzed in the EIS document. This range of alternatives is appropriate with respect to the current proposed action. Current environmental concerns, interest, resource values, and circumstances have not substantially changed and a new alternative is not needed. Non-Mechanized travel on Cedar Mesa and the issuance of SRPs is analyzed within the existing EIS.

**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  
 No

Documentation of answer and explanation:

The existing EIS is adequate as no new information is known.

**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  
 No

Documentation of answer and explanation:

The following chapters in the Monticello EIS analyzed the direct, indirect and cumulative effects to show the new proposed action is similar:

Chapter 4.3.10, page 4-321, 4-335  
Chapter 4.3.11, page 4-405  
Chapter 4.3.13, page 4-455, 4.468  
Chapter 4.3.19, page 4-727

Cumulative impacts that are reasonably foreseeable that would result from implementation of the proposed action are unchanged from those identified in the existing EIS document.

Environmental consequences of the proposed action were fully analyzed in Chapter 4 of the existing EIS.

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

Yes  
 No

The public involvement completed in the EIS is adequate for this proposed action.

Documentation and public involvement can be found in Chapter 5 of the EIS. There is no new information or issues that would necessitate a new public scoping period.

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

<b><u>Name</u></b>	<b><u>Title</u></b>	<b><u>Resource Represented</u></b>
Misti Haines	Recreation Permits Assistant	Areas of Critical Environmental Concern; Wild & Scenic Rivers, Environmental Justice
Jeff Brown	Natural Resource Specialist	Wastes (hazardous or solid)
Don Simonis	Archaeologist	Cultural Resources
Don Simonis	Archaeologist	Native American Religious Concerns
Jed Carling	Range Specialist	Invasive Species/Noxious Weeds; Wetlands/Riparian Zones; Floodplains
Mandy Scott	Wildlife Biologist	Threatened, Endangered, or Candidate Animal Species; Threatened, Endangered, or Candidate Plant Species; Migratory Birds; Fish and Wildlife
Misti Haines	Planning Specialist	Wilderness/WSA and Lands with Wilderness Characteristics
Cliff Giffen	Natural Resource Specialist	Air Quality Greenhouse gas emissions; Soils
Ted McDougall	Geologist	Mineral Resources/Energy Production
Paul Plemons	Fuels Technician	Fuels/ Fire Management
ReBecca Hunt-Foster	Paleontologist	Paleontological Resources

**CONCLUSION**

**Plan Conformance:**

- ✓ This proposal conforms to the applicable land use plan.
- NA This proposal does not conform to the applicable land use plan

**Determination of NEPA Adequacy**

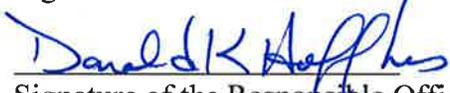
- ✓ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.
- NA The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.

/s/Misti Haines  
Signature of Project Lead

3/7/2016  
Date

/s/Brian Quigley  
Signature of NEPA Coordinator

3/8/2016  
Date

  
Signature of the Responsible Official

3/9/2016  
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**

**Wilderness Interim Management Impairment/Non-Impairment Evaluation Form**  
**Commercial Cedar Mesa Use Stipulations**

## INTERDISCIPLINARY TEAM CHECKLIST

**Project Title:** Cedar Mesa Backpacking SRPs

**NEPA Log Number:** DOI-BLM-UT-Y020-2016-013 DNA

**Project Leader:** Misti Haines

### **Description of the Proposed Action and Any Applicable Mitigation Measures:**

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

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

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

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

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

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

Determination	Resource	Rationale for Determination*	Signature	Date
<b>RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)</b>				
NC	Air Quality	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to air quality from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008 (PRMP/FEIS pg. 4-30).	CGiffen	02/22/16
NI	Floodplains	Floodplains are present along the proposed use canyons but were not specifically analyzed in the original document. There would be no impact to floodplains to a degree requiring analysis because the proposed activity (i.e. re-issuance / issuance of SRP permits) is a continuation of the current situation, no new surface-disturbing activities would occur, the proposal is a currently permitted and valid use of the canyons, current floodplain conditions would not be degraded by proposed use, and impacts of recreation decisions to floodplain vegetation (i.e. riparian resources) was previously analyzed in the Final EIS and associated ROD for the 2008 MFO RMP.	Jed Carling	2/22/16
NC	Soils	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to soils from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008 (PRMP/FEIS pg. 4-455).	CGiffen	2/22/16
NC	Water Resources/Quality (drinking/surface/ground)	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to water quality from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008.	MScott	3/2/16
NC	Wetlands/Riparian Zones	Impacts of recreation decisions on riparian resources were analyzed in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.11.2.4). This includes recreational use permits within the Cedar Mesa SRMA.  The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact riparian resources in a manner beyond what has been disclosed as recreation impacts on riparian resources in the final 2008 MFO ROD/RMP/EIS	Jed Carling	2/22/16
NC	Areas of Critical Environmental Concern	The proposed action is an area originally designated as an ACEC prior to the 1991 RMP-EIS. The area is currently managed as an SRMA and is managed for the same values as in the original ACEC. Areas of the SRMA that overlap the WSAs are managed under a WSA IMP. ACEC decisions in the MFO ROD/RMP,	Casey Worth	02/29/16

<b>Determination</b>	<b>Resource</b>	<b>Rationale for Determination*</b>	<b>Signature</b>	<b>Date</b>
		11/2008 allowed for the issuance of commercial SRPs in accordance with the recreation section of the RMP. Impacts to ACECs from recreation decisions were adequately analyzed in the MFO ROD/RMP, 11/2008.		
NC	Recreation	The proposed action is consistent with the 2008 MFO ROD/RMP recreation decisions for the issuance of Special Recreation Permits in the Cedar Mesa SRMA and will result in no change from the impacts analyzed in the 2008 Monticello ROD/RMP/ EIS.	Casey Worth	02/29/16
NC	Wild and Scenic Rivers	There are no eligible Wild and Scenic River segments located in the use areas identified in the SRP application.	Casey Worth	02/29/16
NC	Visual Resources	The proposed action would result in no change from the impacts to visual resources from recreation decisions analyzed in the MFO ROD/RMP and EIS 2008.	Misti Haines	02/29/16
NC	BLM Natural Areas	There are no BLM Natural Areas near or identified for use in the SRP application.	Casey Worth	02/29/16
NC	Socio-Economics	The proposed action will result in no change to the socio-economics analyzed in the 2008 Monticello RMP/ROD/ EIS.	Casey Worth	02/29/16
NC	Wilderness/WSA, Lands with Wilderness Characteristics	See attached Impairment/Non-Impairment evaluation form	Misti Haines	02/29/16
NC	Cultural Resources	The proposed action would result in no change from the impacts to Cultural Resources analyzed in the MFO ROD/RMP and EIS 2008.	Don Simonis	3/2/16
NC	Native American Religious Concerns	The proposed action would result in no change from the impacts to Cultural Resources analyzed in the MFO ROD/RMP and EIS 2008. The Tribes have not identified any new concerns for this area.	Don Simonis	3/2/16
NC	Environmental Justice	The proposed action would result in no change from the impacts to Environmental Justice analyzed in the 2008 MFO ROD/RMP/EIS.	Misti Haines	02/29/16
NC	Wastes (hazardous or solid)	The proposed action would result in no change from the impacts to waste management analyzed in the MFO ROD/RMP and EIS 2008.	J Brown	3/4/16
NC	Threatened, Endangered or Candidate Animal Species	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to threatened and endangered wildlife from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008. Stipulations to protect T&E species are attached to the SRP.	MScott	3/2/16
NC	Migratory Birds	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to migratory birds from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008.	MScott	3/2/16
NC	Fish and Wildlife Excluding USFW Designated Species	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to wildlife from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008.	MScott	3/2/16
NC	Invasive Species/Noxious Weeds	Impacts of recreation decisions on vegetation resources, including invasive species / noxious weeds, were analyzed in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.17.2.8).  The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision	Jed Carling	2/22/16

<b>Determination</b>	<b>Resource</b>	<b>Rationale for Determination*</b>	<b>Signature</b>	<b>Date</b>
		(ROD). The proposal would not impact invasive species / noxious weeds in a manner beyond what has been disclosed as recreation impacts on vegetation resources in the final 2008 MFO ROD/RMP/EIS.		
NC	Threatened, Endangered or Candidate Plant Species	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to threatened and endangered plant species from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008.	MScott	3/2/16
NC	Livestock Grazing	Impacts of recreation decisions on livestock grazing were analyzed in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.6). The proposed areas of use (e.g. Cedar Mesa canyons) are essentially unavailable for grazing in the RMP to protect cultural resources and maintain primitive recreational opportunities, such as proposed.  The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact livestock grazing in a manner beyond what has been disclosed as recreation impacts on livestock grazing in the final 2008 MFO ROD/RMP/EIS.	Jed Carling	2/22/16
NC	Rangeland Health Standards	Utah Standards for Rangeland Health (Soils, Riparian, Desired Species, and Water Quality) were individually analyzed for impacts from recreation decisions in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP). Primitive recreation in the proposal area is an on-going and continued use, and the proposed user days would be a minor component of the overall use. Thus the effects of the proposed action to rangeland health would negligible in respect to the total public use of the area.  The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact rangeland health in a manner beyond what has been disclosed in the final 2008 MFO ROD/RMP/EIS.	Jed Carling	2/22/16
NC	Vegetation Excluding USFW Designated Species	Impacts of recreation decisions on vegetation resources were analyzed in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.17.2.8).  The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact vegetation in a manner beyond what has been disclosed as recreation impacts on vegetation resources in the final 2008 MFO ROD/RMP/EIS.	Jed Carling	2/22/16
NC	Woodland / Forestry	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to forestry and woodland resources from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008.	MScott	3/2/16
NC	Fuels/Fire Management	The proposed action will not interfere with future fuels projects. Fire suppression efforts will not be hampered by the proposed renewal of an existing SRP on Cedar Mesa.	PPlemons	3/3/16
NC	Mineral Resources/Energy	Impacts of recreation decisions on mineral resource development were analyzed in the 2008 Final Environmental Impact Statement	T.McDougall	3/4/16

Determination	Resource	Rationale for Determination*	Signature	Date
	Production	(EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.7.4 and 4.3.7.4.3).  The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact mineral development in a manner beyond what has been disclosed in the final 2008 MFO ROD/RMP/EIS.		
NC	Lands/Access	The proposed action would result in no change from the impacts to the Lands and Realty program from recreation decisions analyzed in the MFO ROD/RMP and EIS 2008.	Brian Quigley	3/8/16
NC	Paleontology	The proposed action would result in no change from the impacts to Paleontological Resources analyzed in the MFO ROD/RMP and EIS 2008. Permit stipulations will be provided informing the proponent about the rules and laws surrounding paleontological resources, including the Paleontology Resource Preservation Act of 2009.	R. Hunt-Foster	2/22/16

**FINAL REVIEW:**

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	<i>/s/Brian T. Quigley</i>	3/8/16	
Responsible Official	<i>Donald K Hoffheins</i> <i>/s/Donald K Hoffheins</i>	3/9/16	

**WILDERNESS INTERIM MANAGEMENT  
IMPAIRMENT/NON-IMPAIRMENT EVALUATION FORM**

With the passing of the deadline for completion of reclamation activities in September of 1990, only temporary, non-surface-disturbing actions that require no reclamation; grandfathered uses, and actions involving the exercise of valid existing rights can be approved within WSA's. The reference document for evaluators and managers is Manual 6330, Management of Wilderness Sturdy Areas (July, 2012).

**DESCRIPTION OF ACTION**

**Name of action:** DOI-BLM-UT-Y020-2016-013 DNA

**Proposed Action:**  **Alternative Action:** \_\_\_\_\_ (check one)

**Proposed by:** Alexander Dawson School, Western Washington University AS Outdoor Center

**Description of action:** BLM is proposing to issue Special Recreation Permits (SRPs) for guided hiking and backpacking trips on Cedar Mesa Special Recreation Management Area (SRMA) for educational and commercial organizations. A one-year probationary permit would be issued to Western Washington University AS Outdoor Center and the Alexander Dawson School, with potential for a five-year renewal after they have demonstrated one year of satisfactory performance including compliance with all terms and stipulations of the permit.

The primary activity taking place on BLM would be guided day hiking and backpacking, with limited vehicle travel on designated routes to reach trailhead and staging destinations. All areas of Cedar Mesa SRMA may be accessed. The operating season would be from March – October each year, unless otherwise approved by the Monticello BLM Field Office. Maximum group size for any trip within the Cedar Mesa SRMA would be limited to 12 people per trip. Expected user days covered by this proposed action would be 24. Each group would be required to obtain an advanced reservation for overnight trailhead allocations and would agree to comply with the attached Commercial Cedar Mesa Use Stipulations. Hiking and backpacking would be the only method of travel off designated routes. In-canyon and mesa-top backpacking camp sites would be in previously disturbed areas located away from archeological sites, ruins, rock art, and alcoves. Motorized travel to and from trailheads would be limited to routes designated in the Monticello BLM Travel Management Plan (2008). Dispersed vehicle camping on the mesa top would take place only in previously disturbed areas within 150 feet of designated routes.

**Location:** Cedar Mesa SRMA

**What BLM WSAs are included in the area where the action is to take place?**

Grand Gulch ISA Complex, Mule Canyon WSA, Road Canyon WSA and Fish Canyon WSA

**VALID RIGHTS OR GRANDFATHERED USES (if any)**

**Is lease, mining claim, or grandfathered use pre-FLPMA?** \_\_\_ Yes  No

**If yes, give name or number of lease(s), mining claim(s) or grandfathered use and describe use or right asserted:**

**Has a valid existing right been established?** \_\_\_ Yes  No

**EVALUATION OF POTENTIAL FOR IMPAIRMENT OF WILDERNESS VALUES**

Is the action temporary and non-surface disturbing?  Yes  No

**If yes, describe why action would be temporary and non-surface disturbing and identify the planned period of use:** Activity would consist of commercial guided hikes and backpacking. Commercial activities and hiking and backpacking are permitted uses in wilderness, including WSAs. The Wilderness Act states: “*Commercial activities may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.*” The BLM’s Manual 6330, Management of Wilderness Study Areas (July, 2012), states that most recreational activities are allowed within WSAs. Failure to adhere to the permit’s stipulations could result in non-renewal by the BLM’s Administrative Officer.

**When the use, activity, or facility is terminated, would the area's wilderness values be degraded so far as to significantly constrain the Congress's prerogative regarding the area's suitability for preservation as wilderness?**

**Naturalness:** Effects to the natural environment would center on trails, natural travel routes, and dispersed camping within the Cedar Mesa Special Recreation Management Area. Temporary impacts could involve soil, vegetation, and water. Naturalness as an ingredient in wilderness is defined as lacking evidence of man’s impacts on a relatively permanent basis. None of the potential effects described above would affect significantly this aspect of naturalness essential to wilderness character.

**Outstanding Opportunities for Solitude:** This activity would not decrease significantly opportunities for solitude relative to their current status. This activity would take place in portions of the WSA identified in the original wilderness inventory as being in a natural condition and provide for opportunities for solitude.

**Outstanding Opportunities for Primitive and Unconfined Recreation:** There is no reason to believe that the proposed action will reduce these opportunities. There are no plans for trail construction or other modifications of the area. These trails have been popular since before establishment of the WSAs, and the original write-ups for the WSAs emphasized outstanding opportunities for solitude as being present in the backcountry of the units, but not necessarily in the more heavily used front country in which the proposed activities are located.

**Optional Supplemental Values:** No perceived negative impacts. The 1990 Final Environmental Impact Statement identified several threatened and endangered animal and plant species that *may* occur in the WSA. The current status is the presence of several plant species on the Utah state sensitive list. These species are all alcove plants, and do not occur along the two hiking trails, where the proposed action would occur.

**Considered cumulatively with past actions, would authorization of the action impair the area's wilderness values?**  Yes  No

**Rationale:** Hiking and commercial activities are permitted not only in WSAs, but in officially-designated wilderness.

## RESULTS OF EVALUATION

### Non-impairment Standard

The only actions permissible in study areas are temporary uses that do not create surface disturbance, require no reclamation, and do not involve permanent placement of structures. Such temporary or no-trace activities may continue until Congress acts, so long as they can be terminated easily and immediately.

The only exceptions to the non-impairment standard are:

- 1) Emergencies such as suppression activities associated with wildfire or search and rescue operations

- 2) Reclamation activities designed to minimize impacts to wilderness values created by IMP violations and emergencies
- 3) Uses and facilities which are considered grandfathered or valid existing rights as defined in H-8550-1
- 4) uses and facilities that clearly protect or enhance the land's wilderness values or that are the minimum necessary for public health and safety in the use and enjoyment of the wilderness values
- 5) Reclamation of pre-FLPMA impacts

**MAJOR CONCLUSION OF NON-IMPAIRMENT EVALUATION**

- Action clearly fails to meet the non-impairment standard or any exceptions, e.g. VER, and should not be allowed:**  Yes  No
- Action appears to meet the non-impairment standard:**  Yes  No
- Action may be allowable, pre-FLPMA grandfathered use:**  Yes  No  N/A
- Action may be allowable, pre-FLPMA VER:**  Yes  No  N/A

**OTHER CONCLUSIONS**

- Restrictions proposed may unreasonably interfere with pre-FLPMA rights or grandfathered uses:**  Yes  No  N/A
- Reasonable measures to protect wilderness values and to prevent unnecessary or undue degradation of the lands are incorporated:**  Yes  No  N/A
- Environmental Assessment required:**  Yes  No
- Plan of Operations Required:**  Yes  No
- Discovery verification procedures recommended:**  Yes  No  N/A
- Consider initiating reclamation through EA:**  Yes  No  N/A

**RELATED ACTIONS**

- Dated copy of Electronic Notification Board notice attached to case file:**  Yes  No
- Media notification appropriate: (optional)**  Yes  No
- Federal Register Notice appropriate: (optional)**  Yes  No
- Information copy of case file sent to USO-933:**  Yes  No

**Evaluation prepared by:** Name(s) Misti Haines Date 2/11/16

