

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

---

**Decision Record**

**Proposed Change in Management of  
Paria Canyon-Vermilion Cliffs Wilderness**

**Environmental Assessment (EA)  
DOI-BLM-AZ-A020-2019-0003-EA**

---

*Location:*

Paria Canyon – Vermilion Cliffs Wilderness, Vermilion Cliffs National Monument and Kanab Field Office, Coconino County, Arizona and Kane County, Utah

**January 2021**

---

Vermilion Cliffs National Monument  
345 East Riverside Drive  
St. George, Utah 84790  
435-688-3200  
435-688-3258

Kanab Field Office  
669 South Highway 89A  
Kanab, UT 84741  
435-644-1200  
435-644-1299



**Decision Record**  
**Proposed Change in Management of**  
**Paria Canyon-Vermilion Cliffs Wilderness**  
**Environmental Assessment (EA)**  
**NEPA No. DOI-BLM-AZ-A020-2019-0003-EA**

**DECISION**

After having considered the analysis contained within EA No. DOI-BLM-AZ-A020-2019-0003-EA, and other information in the project record, my decision is to amend the Paria Canyon Vermilion Cliffs Wilderness Management Plan (WMP) to authorize an increase in visitor use numbers up to a maximum of 96 people and up to 16 groups per day, whichever comes first, at Coyote Buttes North (CBN), subject to the management practices and adaptive management described in the EA. Under this decision, daily permit numbers would initially be set at 64 people and/or 16 groups per day, whichever comes first. The BLM would continue to monitor and evaluate resource and social conditions, user conflicts, and user safety to determine whether to adjust daily permit numbers up or down. As part of this decision, the BLM will implement the best management practices listed in this Decision Record, which were evaluated in the BLM's EA.

The BLM, utilizing adaptive management principles, will periodically monitor the project area to ensure that the management objectives and desired future conditions for the area set forth in the applicable land use plans described in Section 2.3 of the EA are being met in accordance with the Wilderness Act. This monitoring will focus on user demand, visitor satisfaction, amount and severity of trash, human waste, and social trailing, and damage to geologic and cultural features. If monitoring indicates changes are needed, visitor use numbers may be increased or decreased depending upon the type, trend, and severity of the impacts.

Based on my review of the EA, I have concluded that the action was analyzed in sufficient detail to allow me to make an informed decision. I have selected Alternative A: to amend the WMP to authorize an increase in visitor use up to 96 people per day and up to 16 groups per day, whichever comes first. Implementation will begin at no more than 64 people per day and up to 16 groups per day and may be adjusted up or down based on the results of monitoring for changes in resource and social conditions. This decision will allow the BLM to better meet visitor demand for access to CBN and the Wave, without impairing opportunities for solitude, remoteness, and other wilderness characteristics.

**AUTHORITY**

This decision is authorized by the Federal Land Policy and Management Act of 1976 (FLPMA), as amended (43 United States Code [U.S.C.] 1701).

**PLAN CONFORMANCE**

This decision has been reviewed and found to be in conformance with the Vermilion Cliffs National Monument (VCNM) Resource Management Plan (RMP) (approved on January 29, 2008), the Kanab Field Office RMP (approved on October 31, 2008), and the Kanab-Escalante



Planning Area RMP (approved on February 6, 2020). The action is consistent with the decisions contained within these plans (as listed in Appendix B of the EA); it has also been determined that the project will not conflict with other decisions in these plans.

## **CONSISTENCY WITH FEDERAL LAWS, STATE LAWS, OTHER PLANS**

Numerous federal laws, regulations, and policies guide BLM management activities on public lands. FLPMA directs the BLM to manage public lands “in a manner that will protect the quality of scientific, scenic, historic, ecological, environmental, air and atmospheric, water resources, and archeological values.” EA No. DOI-BLM-AZ-A020-2019-0003-EA was prepared in compliance with the National Environmental Policy Act (NEPA), FLPMA, the National Historic Preservation Act (NHPA), the Endangered Species Act (ESA), and the Wilderness Act. See Section 1.6 of the EA for a discussion on the federal laws, state laws, executive orders, regulations, and other plans that the action is consistent with.

The project is located within Coconino County, Arizona and Kane County, Utah, and is consistent with the Coconino County Comprehensive Plan (adopted September 23, 2003) and the Kane County RMP (revised July 2017). The action does not conflict with decisions contained within these plans.

## **COMPLIANCE AND MONITORING**

The EA analyzes an adaptive management strategy for responding to unacceptable changes to sensitive resources. The adaptive management strategy includes potentially adjusting numbers up or down, installing the minimum of route delineation signs/markers, increasing education efforts for protection of geologic and cultural resources, enhancing communication options for safety, and increasing safety patrols.

Additionally, the following management practices listed below will be implemented.

### Soils

- A public education program on biological soil crusts will be initiated. This will include, but not be limited to, posting information on soil crusts at trailhead kiosks and including a brochure on biological soil crusts with all visitor use permits.

### Vegetation

- A public education program on vegetation will be initiated. This will include, but not be limited to, posting information on impacts to vegetation from social trailing at trailhead kiosks and including a brochure on this subject with all visitor use permits.

### Cultural Resources

- A public education program on cultural resources will be initiated. This will include, but not be limited to, posting information on cultural resources at trailhead kiosks and including information with all visitor use permits.

### Recreation

- A public education program on the use of rubber capped hiking poles will be initiated to reduce damage to sandstone from sharp hiking poles. This will include, but not be limited to, posting information on damage done by sharp hiking poles at trailhead kiosks and including information with all visitor use permits.

### Waste Management

- A public education program on proper disposal of human and animal waste will be initiated. This will include, but not be limited to, posting interpretive signage at the trailhead kiosks and including information with all visitor use permits.
- The use of a human waste disposal bag will be encouraged throughout Paria Canyon Vermilion Cliffs Wilderness (PCVCW).
- Dogs will be discouraged in Paria Canyon, Buckskin Gulch, Wire Pass, CBN, and Coyote Buttes South. If dogs are taken into these areas, visitors will be encouraged to use a leash and remove fecal waste.

## **ALTERNATIVES CONSIDERED**

Two action alternatives and the no action alternative were considered during the EA process and are briefly described below (see Chapter 2 of the EA for a detailed description of each alternative).

Alternative A would amend the WMP to authorize an increase in CBN's visitor use limit up to 96 people per day and/or 16 groups per day, whichever comes first.

Alternative B would amend the WMP to authorize an increase in CBN's visitor use limit up to 48 people per day and/or up to 16 groups per day, whichever comes first.

Alternative C – No Action Alternative represents current management. This alternative maintains CBN's visitor use limit at 20 people per day. The WMP would not be amended.

No other alternatives were considered.

## **RATIONALE FOR DECISION**

The BLM has complied with NEPA and its implementing regulations by preparing an EA (DOI-BLM-AZ-A020-2019-0003-EA). The BLM's purpose and need was to evaluate opportunities to allow for more visitors in CBN and to improve visitor amenities in VCNM (see Section 1.3 of the EA), consistent with the BLM's responsibility to appropriately manage wilderness and other resource values in the area. I have determined, on the basis of the analysis in the EA, that authorizing an increase in visitor use limits of up to a maximum of 96 people and/or up to 16 groups per day, whichever comes first, and the other actions evaluated in the EA, would result in only minimal impacts to resources, including wilderness, while accomplishing the agency's other goals. Authorizing this action would promote greater recreational opportunities on the public



lands. As described in the EA, this action also responds to Secretary's Orders 3347, 3356, and 3366, which direct the BLM and other bureaus in the Department of the Interior to identify additional appropriate recreation and conservation opportunities on the lands they administer.

The selected alternative could impact the wilderness quality of solitude for those seeking solitude as part of the experience. For visitors who simply want to see the Wave, and are unaccustomed to primitive settings, their experience may not be adversely affected. Impacts to solitude away from the route and the Wave are less likely to occur because most of these visitors are there to visit the Wave and will likely remain in the same general area of the wilderness where they have already encountered other people. In other words, the additional people will not be spread out over the entirety of the wilderness area. Thus, the increased use will not affect new areas of the wilderness, and opportunities for solitude will not be substantially impacted for the PCVCW as a whole.

As stated in Section 3.4.4 of the EA, while wilderness does provide opportunities for people to experience natural sights and sounds; remote, isolated, unfrequented, or secluded places; and freedom, risk, and the physical and emotional challenges of self-discovery and self-reliance, "any one wilderness does not have to provide for all these opportunities, nor is it necessary that they be present on every acre of a given wilderness". This would be most apparent at the Wave and along the trail, a total area of less than 50 acres. Visitors currently expect to encounter other people along the route to the Wave and at the feature itself; this alternative would not change that. While the number of people encountered would increase, the number of group encounters would remain the same. Opportunities for solitude would be preserved on the remaining 112,500 acres within the wilderness, including unparalleled opportunities to be alone and remote from others. While the BLM must ensure that opportunities for solitude are provided in the wilderness, that does not mean that absolutely no changes in visitation can occur. Increased visitor use levels still provide opportunities for solitude, particularly in areas away from the trail. As such, this decision is consistent with the requirements of the Wilderness Act and will leave CBN unimpaired for future use and enjoyment as part of the PCVCW.

The EA considered and analyzed the proposed action as well as alternatives to the proposed action, and went through an interdisciplinary review process. The EA is a public document, and is available at <https://go.usa.gov/xyxtK>, or upon request.

The BLM also considered the information set forth below:

- The action is in conformance with the VCNM RMP, the KFO RMP, and the Kanab-Escalante Planning Area RMP (see Section 1.5 and Appendix B of the EA).
- The EA analysis determined that implementing the action will meet the BLM's purpose and need to increase visitor access to CBN (see Section 1.3 of the EA), without resulting in significant impacts to resources.
- Cultural sites are likely present in the vicinity of the route to the Wave. Human impact monitoring studies have shown that these sites receive little to no visitation. Most recreationists are focused on getting to the Wave and do not seek out such sites or stop to admire them.
- Public scoping began on May 8, 2019 and ended on June 21, 2019. More than 500 letters and/or emails were sent to individuals and groups including Federal, State, County, and Tribal



organizations. Three public meetings were held: June 4 in Kanab, Utah; June 5 in Page, Arizona; and June 6 in St. George, Utah. A total of 1,570 comment documents were received during the scoping period. A copy of the Scoping Report can be found at the BLM's ePlanning NEPA registry: <https://go.usa.gov/xyxtK>. A 30-day public comment period on the preliminary EA occurred from September 13, 2019 to October 12, 2019. During the public comment period, three public meetings were held: September 24, in St. George, Utah; September 25, in Page, Arizona; and September 26, in Kanab, Utah. A total of 217 comment letters (to include emails) were received.

The decision to amend the WMP to increase CBN's visitor use limit to a maximum of 96 people and/or up to 16 groups per day, whichever comes first, is hereby selected. Upon implementation of this decision, permit numbers will initially be set at 64 people and/or 16 groups per day, whichever comes first. Monitoring will continue to assess impacts from increased visitor use. BLM resource specialists will continue to periodically monitor the project area (PCVCW and VCNM) to ensure that the management objectives/desired future conditions of these two areas set forth in the applicable WMP and RMPs are being met in accordance with the Wilderness Act. This monitoring will include quantifying amount and severity of trash, human waste, social trailing, and damage to geologic and cultural features. Adaptive management will be based upon monitoring results and implemented to address changes to sensitive resources such as geologic features, soil crusts and wilderness character. If monitoring indicates changes are needed, visitor use numbers may be increased or decreased depending upon the type, trend, and severity of the impacts. Visitor numbers would not be allowed to exceed 96 visitors per day. This limit is established in the VCNM RMP (16 groups of up to 6 hikers each). Findings and decisions on actions related to infrastructure were analyzed in the EA and will be addressed under separate decision records.

Alternative A, which would permit up to 96 people per day and/or 16 groups per day, whichever comes first, was chosen because it meets the purpose and need of increasing recreation and conservation opportunities while also adequately limiting the potential environmental impacts of this action. Impacts to geologic features would be minor, appearing as small areas of sandstone that have been broken and rounded over, leaving a slick and shiny appearance on the trail. Such impacts would be unnoticed by most visitors. Other evidence of man's presence could include trash and other debris.

As stated in Section 4.2.3.1 of the EA, researchers have established that perceptions of crowding depend on characteristics of visitors. "For example, people seeking solitude as part of the experience [(such as visitors to wilderness areas)] are more likely to be negatively affected if they encounter other people." Low levels of interaction are considered appropriate and expected in primitive settings, such as wilderness, while high levels of interaction may be acceptable in more developed settings. In permitted areas, such as CBN, there is a pre-existing expectation among visitors that they will be sharing the wilderness with a number of other people. As a result, their sense of solitude will be affected. But they also have the opportunity to experience greater solitude by exploring areas away from the primary destination (the Wave) and the trails leading to it. These areas of greater solitude constitute more than 99.95 percent of the PCVCW.



Daily visitors numbers could be less than 64 due to smaller group sizes “using up” the number of groups allowed each day. BLM records indicate the actual average group size for CBN permits is 3.2. Some visitors hike alone. Therefore, the actual number of visitors on any given day could be less than the maximum number allowed, which could further reduce the potential impacts on opportunities for solitude and various resources.

I have selected Alternative A – to amend the WMP to allow up to a maximum number of 96 people and/or 16 groups per day, but have chosen to implement the action by initially authorizing no more than 64 people and/or 16 groups per day (whichever comes first). This will be followed by monitoring and an adaptive management strategy which is anticipated to provide the necessary information to help refine numbers to achieve an appropriate balance between visitor access and conservation of resources. If monitoring data and adaptive management strategies indicate changes in visitor numbers are needed, permit numbers may be increased or decreased as appropriate, up to a maximum of 96 people and/or 16 groups per day.

Alternative B, which would permit up to 48 people per day and/or 16 groups per day, whichever comes first, was also not chosen in its entirety because while it would meet the purpose and need, the EA analysis indicated that additional visitors could be authorized in CBN while still protecting sensitive resources.

Alternative C – No Action was not selected because it would not meet the BLM’s purpose and need to increase recreation opportunities to CBN.

## **ADMINISTRATIVE ACTIONS**

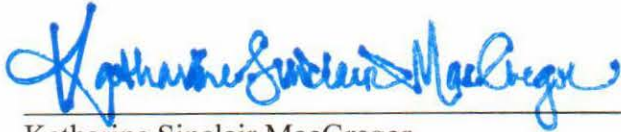
In support of the selected action, the BLM will continue Human Impact Monitoring at CBN. Additional monitoring to better inform adaptive management decisions is planned. The existing Limits of Acceptable Change (LAC) framework will continue to guide acceptable resource, social and managerial settings.

The BLM anticipates a number of administrative actions in the future that will improve opportunities for access to the Wave (but still within the visitor use limits established by this decision). One example is to reduce the potential for visitors to submit more than one application for a permit per day. Addressing this issue would increase opportunities for a hiker to succeed in drawing a permit. Similarly, a weighted lottery, such as those used by many state wildlife agencies for hunting permits, would award “points” to an applicant for each unsuccessful application. Each successive application would then be more likely to draw a permit. These and other similar actions will be evaluated in order to improve the permit system and increase opportunities for access to the Wave.

## **SECRETARIAL APPROVAL**

I hereby approve the decision described herein. My approval of this Decision Record constitutes the final decision of the Department of the Interior and, in accordance with the regulations at 43 CFR 4.410(a)(3), is not subject to appeal under departmental regulations at 43 CFR 4. Any

challenge to this decision as approved by this Decision Record must be brought in the Federal District Court.



Katharine Sinclair MacGregor  
Deputy Secretary of the Interior

JAN 08 2021

Date