



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

Red Rock-Sloan Field Office

Environmental Assessment

Environmental Assessment

DOI-BLM-NV-S020-2025-0004-EA

Programmatic Environmental Assessment for Special Recreation Permits Management in Red Rock Canyon National Conservation Area

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Table of Contents

Chapter 1 Introduction.....	3
Purpose and Need.....	3
Decision to be Made.....	3
Conformance Summary.....	4
Area Description	5
Chapter 2 Proposed Action and Alternatives.....	5
Common To All Alternatives.....	5
Alternative 1: No Action Alternative	8
Alternative 2: Proposed Action	8
Alternative 3: Minimum Use	15
Alternative 4: High Use.....	19
Alternatives Considered but Eliminated from Detailed Analysis	23
Chapter 3 Affected Environment and Environmental Effects	24
Resource Evaluation.....	24
National Conservation Lands	1
Fuels and Fire Management	4
Invasive Species/Noxious Weeds.....	13
Recreation.....	18
Threatened and Endangered Species.....	20
Wilderness	23
Chapter 4 Consultation and Coordination	27
Scoping and Public Participation	27
Summary of Consultation.....	27
Chapter 5 List of Preparers	28
Chapter 6 References.....	29
Appendix A	32
Stipulations and Mitigation Measures	32

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Chapter 1 Introduction

This Environmental Assessment (EA) has been prepared to disclose and analyze the environmental effects of the Proposed Action, which consists of determining the number of commercial, competitive, and organized group Special Recreation Permits (SRP) allowed to be issued throughout Red Rock Canyon National Conservation Area (RRCNCA). This EA also analyzes certain areas for certain uses, as well as the number of participants allowed per permit type. The EA will assist the Bureau of Land Management (BLM) Red Rock-Sloan Field Office in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in deciding as to whether any significant effects could result from the analyzed actions. Following the requirements of NEPA¹, this EA describes the potential impacts of a No Action Alternative and the Proposed Action, as well as two other action alternatives. If the BLM determines that the Proposed Action would not have potentially significant effects, a Finding of No Significant Impact (FONSI) will be issued and a Decision Record will be prepared. If significant effects are anticipated, the BLM will prepare an Environmental Impact Statement or select another alternative.

Purpose and Need

The BLM at RRCNCA issues SRPs for competitive, commercial, and organized group use per the guidance found in the BLM Recreation Permit and Fee Administration Handbook (H-2930-1). Historically high visitation from casual users increased interest in and demand for competitive and commercial permits, and changing resource conditions have resulted in the need to re-evaluate the types and amounts of SRPs available throughout the NCA, as well as the locations of and number of participants allowed for each type of use.

The BLM's authority to issue permits is described in the Federal Land Policy and Management Act of 1976 and 43 Code of Federal Regulations (CFR) 2930, however, the issuance of a SRP is a discretionary action (43 CFR § 2932.26). The authority to collect and retain recreation fees is specified in the Federal Lands Recreation Enhancement Act (FLREA) of 2004.

Decision to be Made

The BLM will decide whether to approve the proposed SRP types, amounts, locations, and participant limits as shown in the Proposed Action, deny the Proposed Action, or approve the Proposed Action with modifications. The BLM may include any terms, conditions, and stipulations for the protection of resources and to meet management objectives. In the decision process, the BLM must consider how the BLM's resource management goals, objectives, opportunities, and/or conflicts relate to this non-federal use of public lands.

¹ Executive Order 14154, *Unleashing American Energy* (Jan. 20, 2025), and a Presidential Memorandum, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity* (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 et seq. Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The [bureau] verifies that it has complied with the requirements of NEPA, including the Department's regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and Part 516 of the Departmental Manual, consistent with the President's January 2025 Order and Memorandum. The [bureau] has also voluntarily considered the Council on Environmental Quality's rescinded regulations implementing NEPA, previously found at 40 C.F.R. Parts 1500–1508, as guidance to the extent appropriate and consistent with the requirements of NEPA and Executive Order 14154.

Conformance Summary

Land Use Plan:	Red Rock Canyon National Conservation Area Resource Management Plan
Date Approved:	May 2005

The Proposed Action is in conformance with the Red Rock Canyon National Conservation Area Resource Management Plan (RMP), May 2005. The emphasis of the 2005 Red Rock Canyon National Conservation Area RMP is to protect unique habitats for threatened, endangered, and special status species while providing areas for community growth, recreation, mineral exploration and development, and other resource uses. The specific objectives and management directions that allow for the actions proposed can be found in the 2005 Red Rock Canyon National Conservation Area RMP Record of Decision and include:

(5A) Special Recreation Permits

5A.1 Commercial uses have grown steadily in the last five years. To avoid establishing use patterns that might be detrimental to RRCNCA, and to give a benchmark for analysis, initial allocations of commercial permits will be established as listed below. As monitoring results are evaluated, the number of permits could increase or decrease in the future. Initial permit allocations will be as follows:

(5A.1a) Rock Climbing Guides and Schools

- 5 year-round permits
- “guest” permits (number to be determined in climbing plan)

(5A.1b) Guided Horse Ride Operations

- 3 permits (no trail/use area overlap between permittees)

(5A.1c) Bus and Limo Tour Operations (on Scenic Drive, no interpretation or hiking)

No limits on number of tours

(5A.1d) 4X4 Vehicle Tour Operations (on designated roads)

- 4 permits

(5A.1e) Guided Bike Tours

- 4 permits (includes mountain bike and road bike tours)

(5A.1f) Guided Interpretive Hikes

- 5 permits

5A.2 New types of commercial uses proposed will be evaluated to determine if they are appropriate and consistent with RRCNCA management guidelines.

5A.3 The Bureau of Land Management will work in cooperation with local agencies and schools in the Clark County vicinity to further management directives. The administration of such agreements will be at the discretion of the RRCNCA Manager. Agreements determined to fall under this category will not be deducted from the limits set for the previously mentioned categories.

Area Description

Red Rock Canyon National Conservation Area encompasses roughly 200,000 acres on the west boundary of the Las Vegas valley. The terrain is a mix of lowland Mojave Desert, deep canyons, and prominent mountain ranges and sub-peaks. Elevations range from roughly 3,770 feet at the visitor center to more than 8,000 feet at the summit of La Madre Mountain.

The areas proposed for use in this EA include all designated roads, trails, and developed recreation sites. As the BLM continues site-specific recreation plans, new roads, trails, and developed sites may be made available for commercial use. A designated trail is any trail or trails identified on a map of designated trails and made available to the public, as well as any trail or route designated for a specific use by the posting of appropriate signs. Designated roads are any road identified on a map of designated roads made available for public use and which are also posted as designated through the posting of appropriate signs or markers. See the Final Supplementary Rules for Red Rock Canyon National Conservation Area, 58 Fed. Reg. 29627 (May 21, 1993) for further definitions.

Chapter 2 Proposed Action and Alternatives

Alternatives include the No Action Alternative (Alternative 1), the Proposed Action (Alternative 2), a minimum use alternative (Alternative 3), and a maximum use alternative (Alternative 4). Tables describing the Proposed Action, Alternative 3 and Alternative 4 are included in Attachment A. Alternative 2—No Action is included in Attachment B due to its length and level of detail. The minimum and maximum use alternatives analyze varying numbers of permits available per activity and permit type. The participation limits per permit described in Alternative 4 are the same as the proposed action. The descriptions of each type of permit or location are also the same between the proposed action and Alternative 4.

Common To All Alternatives

This EA will cover all designated roads and trails in RRCNCA. This includes the zone within Red Rock Canyon NCA generally referred to as the ‘Core Area’ and the Rainbow Mountain and La Madre Mountain Wilderness areas in their entirety. The Core Area is defined by the Calico Basin RAMP area at the north, the Scenic Drive and Rocky Gap Road, Middle Oak Creek, South Oak Creek, and First Creek trailheads in the middle, and south of SR160 to Bird Springs. This area is defined in the 2005 General Management Plan and Final Environmental Impact Statement for Red Rock Canyon National Conservation Area (see Figure 1). The Core Area could have more restrictive allowances for competitive, commercial, and group events on a seasonal basis subject to authorized officer discretion.

All SRPs proposed in this document would be restricted to designated roads, trails, and developed sites. Staff at RRCNCA are continually evaluating roads and trails for adoption into the BLM travel network. This means that any summary of the designated roads and trails in RRCNCA would only capture a snapshot in time and could unintentionally limit future SRP uses as new travel features are designated for public use. SRP applicants are encouraged to coordinate with recreation staff at the BLM regarding the use of roads and trails to ensure the feature is designated for public use.

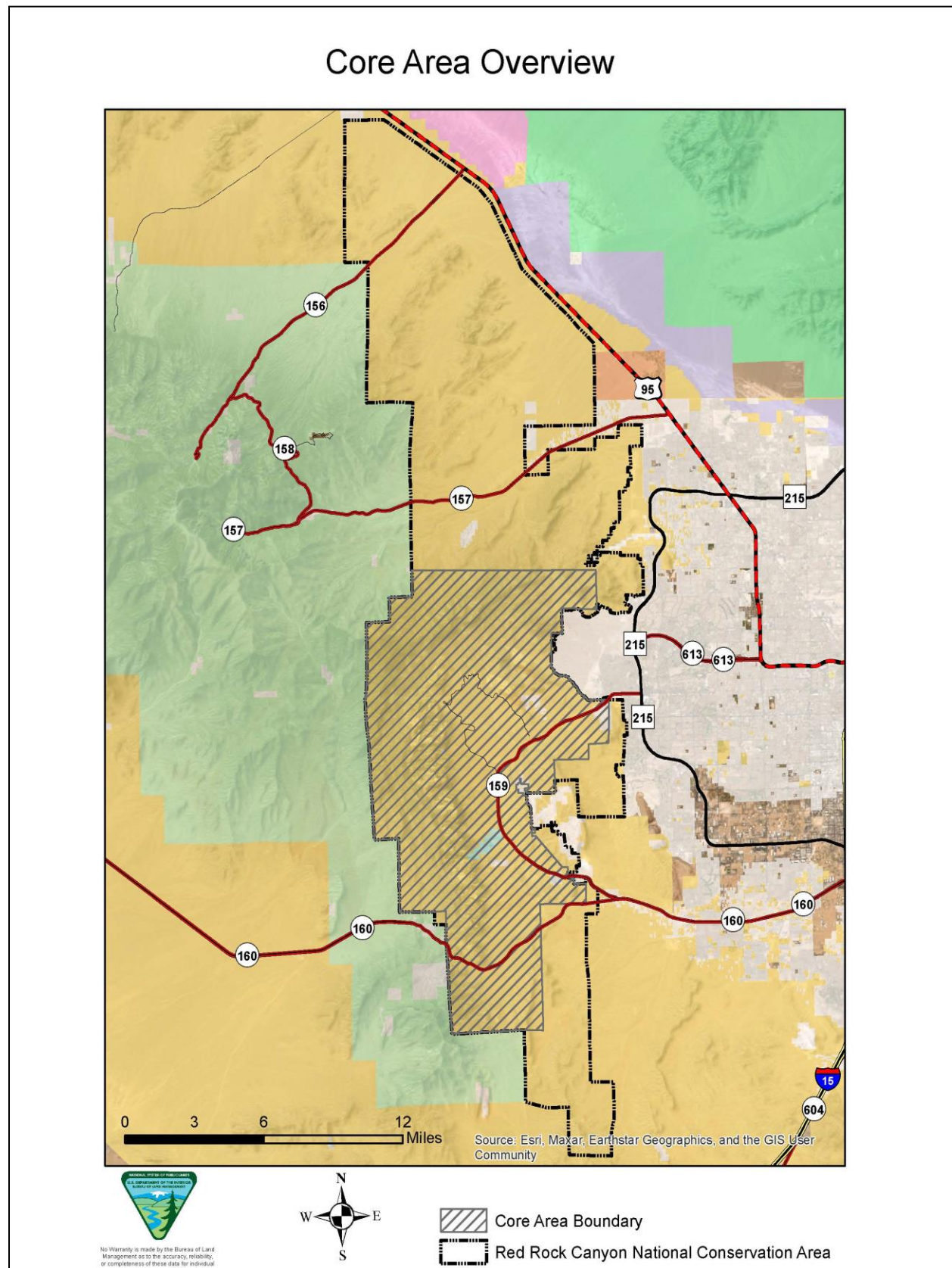
New roads and trails designated into the RRCNCA travel network after this document is written may be available to commercial, competitive, and organized group use at the authorized officer's discretion.

All SRPs proposing mechanized activities on trails (i.e. cycling events, tours, or group use) would be limited to trails designated for mechanized use. The use of electronic or pedal assisted mountain bikes (e-bikes) on designated trails would only be permitted on trails specifically allowing e-bike use. Any motorized use is limited to designated roads. This document is not proposing to change any of the designated uses currently established for roads and trails in RRCNCA, however, the designated uses on roads and trails could change over time in conjunction with other planning efforts.

All developed trailheads and facilities including the visitor center amphitheater and all designated parking areas would be available for various types and amounts of use as described in the following tables.

Commercial, guided rock climbing and commercial wedding operations are not analyzed in this document due to the complexity and breadth of analysis for those programs. Permit numbers, locations, and impact analysis for those activities will be covered in separate documents.

Figure 1 Map of Red Rock Canyon NCA and Core Area



Alternative 1: No Action Alternative

The No Action Alternative would result in the BLM continuing to rely on the 2010 Programmatic EAs for issuing SRPs in the Core Area (DOI-BLM-NV-S020-0014-EA) and Cottonwood Valley (DOI-BLM-NV-S020-2010-16-EA). See Appendix B for a complete breakdown of the current SRP types and associated limitations.

Alternative 2: Proposed Action

The Proposed Action is a programmatic evaluation of the types and numbers of special recreation permits for RRCNCA to include wilderness and non-wilderness areas, the “core area”, and all designated roads and trails. The evaluation will look at the Commercial, Competitive, and Organized Special Recreation Permits (SRPs) to determine:

1. Which types of SRPs are appropriate in RRCNCA
2. The appropriate number of each type of permit given changes in resource conditions and visitation
3. The appropriate number of participants for each type of permit
4. The appropriate type of permit for each administrative area
5. Mitigation measures needed for resource protection considerations

Table 1 Proposed Action: Organized Group* Use of Developed Facilities, Trails and Roads

Recreational Opportunities or Location	Number of Permits	Threshold Number of Participants Requiring Permit/Maximum Number of Participants Allowed per Event
Red Rock Dedication Overlook Picnic Areas	20 permits	7 or more vehicles or 25 people min/ 50% of parking or 50 people max
Willow Spring Picnic Area	20 permits	7 or more vehicles or 25 people min/ 50% of parking or 50 people max
Visitor Center Dedication Memorial Walkway—LOA ONLY	52 permits	4 tables or 25 people min/5 tables or 30 people max
Visitor Center Amphitheater	52 permits	25 people min/200 people max
Developed Parking Areas	52 permits	Dependent on available parking and disturbed area at each trailhead. 25% of parking or public space min/50% of parking or public space max
Scenic Drive (no congregating except for photographs)	52 permits	10 vehicles min/20 vehicles max
Designated Trails—Hiking and Equestrian	52 permits total	12 people min/24 people per day total, 12 per group per trail; 12 equestrian groups per year
Designated Trails—Cycling	5 permits	12 people min/500 people max
Pre-K to 12 Education Groups	175 days	12 people min/100 people max
Wilderness Education	5 permits	3 people min/12 people max

*An organized group is defined as more than one person participating in a non-competitive, non-commercial recreation activity or event (H2930, 1-4). The Authorized Officer determines when an organized group requires a permit. This table helps inform that decision by defining the minimum threshold number of participants that triggers organized group consideration.

Organized Group Use of Developed Facilities and Climbing Areas

The types of groups under this category include but are not limited to clubs, family reunions, scouting groups and community groups. The group permit would allow for use of developed facilities and climbing areas. Group use could also include one-time events with some commercial nature, such as a non-profit group who wishes to conduct a one-day event where fund raising occurs.

Willow Spring and 159 Overlook Picnic Areas: Group use permits would be limited to 20 per year at each location. Participation would be limited to 50% of vehicle spaces available at each location and 50 people maximum.

Visitor Center and Amphitheater: There would be 52 group use permits available per year for use of the amphitheater and 200 participants maximum for each event. Stipulations and mitigation measures would vary depending on the type of event proposed, but could include site, exclusive use, cost reimbursement, or bonding fees for the use of the amphitheater. Permittees would not use more than 50% of the parking available at the visitor center.

Developed Parking Areas: There would be a maximum of 52 permits per year for use of developed parking areas, including the Scenic Drive and Calico Basin. Permittee may be subject to site fee, exclusive use, or cost recovery dependent on the time and scope of activity. Bonding may be required by the permittee to insure the restoration or unusual maintenance costs as necessary. Use of developed parking areas is limited to 50% of available parking at each site. The minimum threshold for use of these sites that triggers consideration of an organized group SRP is 25% of available parking at each site.

Scenic Drive: 52 permits for organized group use of the Scenic Drive would be allowed annually. Any more than 10 vehicles in a group, such as a car or motorcycle club meeting for a drive, would trigger the limit for an organized group, and no more than 20 vehicles would be allowed per group. This type of permit would not allow hiking for long-term congregations at any stops along the scenic drive. Short stops for pictures would be allowed.

Designated Trails—Hiking and Equestrian: Permits would only be issued for use of designated trails. Equestrian use is allowed on many designated trails in the Core Area, Cottonwood Valley, Blue Diamond Hill, La Madre Foothills, and Twilight Zone trail networks. Hiking is allowed on all designated trails. A total of 52 permits would be available annually for organized group use of designated trails, however, no more than 12 permits would be allocated for equestrian use. Each permit would be limited to no more than 24 participants total, and group sizes must be kept at 12 or fewer participants per area.

Designated Trails—Mountain Biking: Permits would only be issued for use of designated mountain biking trails. Each permit would be limited to no more than 500 participants. These types of permits could include Class 1, 2 or 3 electric bicycles (e-bikes) pending subsequent land-use planning and/or implementation level decisions per the BLM Final Rule 4310-84-P (43 CFR Part 8340).

Pre-K to 12 Education Groups: There would be 175 days available for these groups. These permits would be intended for school field trips including ranger-led talks where a Red Rock Canyon NCA interpreter or ranger leads the group and teacher-led trips where the schoolteacher leads the group. Teachers would go through a teacher workshop before coming out with their students. One school bus per day per trail would be allowed, and no more than 100 participants total including teachers and chaperones. The participants would split into smaller groups with up to 10 minutes between each group, and no gathering of separate groups in one location.

Wilderness Education: Five permits would be available for organized group education trips to wilderness areas in Red Rock Canyon NCA. The permittees would be limited to no more than 12 participants per group and no more than 12 total participants per day.

Table 2 Proposed Action: Single Commercial (Fundraisers) and Competitive SRPs

Recreational Opportunities	Number of Permits Proposed Annually	Maximum Number of Participants Allowed per Event
Equestrian Race	1	50
Foot Race Utilizing the Scenic Drive	5	1000
Foot Race Utilizing Trails and Dirt Roads	5	500
Competitive Cycling Race Utilizing Trails and Dirt Roads	3	500
Competitive Cycling Race Utilizing the Scenic Drive*	2	1000
Non-competitive, Commercial Cycling Event Utilizing Trails and Dirt Roads	2	500
Non-competitive, Commercial Cycling Events Utilizing the Scenic Drive	3	200
Artistic/Holistic—Not limited to but including Yoga, Meditation, Painting, and Photography Class or Tutorials	5	50

*These events may require an exclusive use permit, subsequent analysis, and a Federal Register Notice.

Equestrian: Equestrian Competitive SRPs would be limited to one SRP per year with a maximum of 50 participants. All travel would be limited to designated roads and trails designated for equestrian use. Competitive events are not permitted in the La Madre and Rainbow Mountain Wilderness areas.

Foot Race Events Utilizing the Scenic Drive: Foot Race/Walk Events on the Scenic Drive would be limited to five SRPs per year with no more than 1,000 participants per race.

Foot Race Events Utilizing Trails and Dirt Roads: Foot Race Events on trails and dirt roads would be limited to five SRPs per year with no more than 500 participants per race. Races would be limited to designated trails and dirt roads.

Competitive Cycling Speed Events Utilizing Trails and Dirt Roads: Competitive cycling events, including mountain biking, may be considered speed events and may be subject to seasonal restrictions for wildlife protections. These events include but are not limited to races, time trials, and over-night endurance efforts. Three competitive event permits would be available annually with a limit of 500 participants per event. These types of permits could include Class 1, 2 or 3 electric bicycles (e-bikes) pending subsequent land-use planning and/or implementation level decisions per the BLM Final Rule 4310-84-P (43 CFR Part 8340).

Competitive Cycling Event Utilizing the Scenic Drive—Competitive cycling events would be limited to two per year with no more than 1000 participants allowed per event. A competitive

cycling event on the Scenic Drive would require an exclusive use permit, a Federal Register Notice, and could require additional analysis.

Non-competitive, Commercial Cycling Event Utilizing Trails and Dirt Roads: Non-competitive, commercial cycling events may be considered speed events per the 2023 Biological Assessment depending on the type and format of event, and may be subject to seasonal restrictions. Two event permits per year would be available with a maximum of 500 participants allowed per event. These types of permits could include Class 1, 2 or 3 electric bicycles (e-bikes) pending subsequent land-use planning and/or implementation level decisions per the BLM Final Rule 4310-84-P (43 CFR Part 8340).

Non-Competitive, Commercial Cycling Events Utilizing the Scenic Drive—These types of events would be limited to three per year and no more than 200 participants per event.

Single Artistic/Holistic Events—These events could include classes or tutorials for any artistic or holistic activity including but not limited to nature photography, yoga, meditation, or painting. There would be a total of five-single event permits available annually with a maximum participation limit of 50 including instructors. Groups with over 12 participants including instructors would not be allowed to utilize wilderness areas.

Table 3 Proposed Action: Full-Time Commercial SRPs

Recreational Opportunities	Number of Permits Proposed Annually	Maximum Number Per Group*	Maximum Number Per Permit Per Day*
Motorized Guided Tours On Unpaved Roads	3	5 vehicles	5 vehicles
Equestrian Tours	2	40 horses	320 horses
Hiking Guided Tours	5	12 participants	24 participants
Class 1** Vehicle Tours on Scenic Drive	5	12 vehicles	12 vehicles
Class 2*** Vehicle Tours on Scenic Drive	15	5 vehicles	10 vehicles
Guided Bike Tours on Natural Surface Trails, Dirt Roads, and Paved Roads	4	12 participants	24 participants
Artistic/Holistic—Not limited to but including Yoga, Meditation, Photography Classes or Tutorials, or Painting	5	12	12 participants

*Including guides or instructors.

**Class 1 Vehicle— All two or three-wheeled motorized vehicles. Typical vehicles in this category have saddle type seats and are steered by handlebars rather than steering wheels. This category includes motorcycles, motor scooters, mopeds, motor-powered bicycles, and three-wheel motorcycles.

(https://www.fhwa.dot.gov/policyinformation/tmguid/tmg_2013/vehicle-types.cfm)

Three-wheeled vehicles include tri-mobiles per **NRS 482.129** and other three-wheeled vehicles with enclosed cabs.

***Class 2 Vehicle—Two-Axle, Four-Tire Single Unit Vehicles other than passenger cars. Included in this classification are pickups, panels, vans, and other vehicles such as campers, motor homes, ambulances, hearses, carryalls, and minibuses.

(https://www.fhwa.dot.gov/policyinformation/tmguid/tmg_2013/vehicle-types.cfm)

Motorized Guided Tours on Unpaved Roads: Tours would be limited to three ongoing SRPs per year. Tours would be limited to not more than five vehicles per group and no more than five total vehicles in a single day. Vehicles would be limited to a speed limit of 15 miles per hour on the Rocky Gap Road and other unpaved roads.

Equestrian Tours: Tours would be limited to two SRPs for the core area. They would each have defined locations. There is currently one active equestrian tour permit held in Red Rock Canyon NCA. Tours would be limited to no more than 40 horses per group including guides, and no more than 320 horses per day.

Hiking: No more than five ongoing guided hiking permits would be issued per year. No more than 12 participants would be allowed per group, and no more than 24 participants total would be allowed per day. Only designated roads, trails, and interpretive areas would be authorized for use.

Class 1 Vehicle Tours: Class 1 vehicles are defined by the Federal Highway Administration and examples of these types of vehicles are found on the Federal Highway Administration website and the Nevada Revised Statutes. These types of permits would be limited to five total ongoing operations per year. Each operation would be limited to no more than 12 vehicles per group and no more than 12 vehicles per day.

Class 2 Vehicle Tours: Class 2 vehicles are defined by the Federal Highway Administration and examples of these types of vehicles are found on the Federal Highway Administration web page and the Nevada Revised Statutes. These types of permits would be limited to 15 total ongoing operations per year. Each operation would be limited to no more than five vehicles per group and no more than 10 vehicles per day.

Cycling Guided Tours on Natural Surface Trails and Dirt Roads: These tours would be on natural surface singletrack trails designated for mountain biking and dirt roads. Tours would be limited to no more than 12 bicycles per group, and no more than 24 bicycles per day. These types of permits could include Class 1, 2 or 3 electric bicycles (e-bikes) pending subsequent land-use planning and/or implementation level decisions per the BLM Final Rule 4310-84-P (43 CFR Part 8340).

Cycling Guided Tours on Paved Roads: These tours would use the paved roads within Red Rock Canyon NCA, including the Scenic Drive. Tours would be limited to no more than 12 bicycles per group, and no more than 24 bicycles per day. These types of permits would include Class 1, 2, and 3 electric bicycles (e-bikes) as defined by the BLM Final Rule 4310-84-P (43 CFR 8340).

Artistic/Holistic Events: Permits would be limited to five full-time ongoing SRPs per year. These would primarily be for class/workshop type of opportunities. It would not be for educational purposes by formal educational institutions. Painting, photography, yoga, and meditation could be included. Participants would utilize existing trails and facilities, and would not leave any material behind. No more than 12 participants, including instructors, would be allowed per group and no more than 12 total participants would be allowed per day. Groups would be limited to designated trails and parking areas, or other durable surfaces as deemed appropriate by the Authorized Officer.

Alternative 3: Minimum Use

Alternative 3 analyzes the potential impacts of not offering any SRPs other than an existing permit for equestrian tours. The equestrian tour permit was analyzed through a separate environmental analysis and is permitted under DOI-BLM-NV-S020-2022-0002-EA.

The issuance of a SRP is a discretionary action that is used by the BLM to authorize commercial, competitive, and group recreation events and activities on public lands and related waters (43 CFR § 2932.26). While Alternative 3 may not be popular among existing permittees, considering the social impacts and natural resource impacts that result from eliminating competitive and organized group events, and reducing the volume of commercial operations, provides the BLM with a valuable comparison to the No Action (baseline) Alternative.

Under Alternative 3, one equestrian tour permit would still be available. This is because a single equestrian tour permit was analyzed and approved through separate environmental analysis in DOI-BLM-NV-S020-2022-0002-EA, and the permittee has been issued a 10-year operating permit. This permit would be re-evaluated at the end of this 10-year period.

Table 4 Alternative 3: Organized Group* Use of Developed Facilities, Trails and Roads

Recreational Opportunities	Number of Permits Allowed Annually	Threshold Number of Participants Requiring Permit/Maximum Number of Participants Allowed per Event
Non-commercial Educational LOA climbing permit	0 days	0
Red Rock Dedication Overlook Picnic Areas	0	0
Willow Spring Picnic Area	0	0
Visitor Center Dedication Memorial Walkway—LOA ONLY	0	0
Visitor Center Amphitheater	0	0
Developed Parking Areas	0	0
Scenic Drive (no congregating except for photographs)	0	0
Designated Trails—Hiking and Equestrian	0	0
Designated Trails—Cycling	0	0
Pre-K to 12 Education Groups	0 days	0
Wilderness Education	0	0

*An organized group is defined as more than one person participating in a non-competitive, non-commercial recreation activity or event (H2930, 1-4). The Authorized Officer determines when an organized group requires a permit. This table helps inform that decision by defining the minimum threshold number of participants that triggers organized group consideration.

Table 5 Alternative 3: Single Commercial or Competitive SRPs

Recreational Opportunities	Number of Permits Proposed Annually	Maximum Number of Participants Allowed per Event
Equestrian	0	0
Foot Race Utilizing the Scenic Drive	0	0
Foot Race Utilizing Trails and Dirt Roads	0	0
Competitive Cycling Speed Event Utilizing Trails and Dirt Roads	0	0
Competitive Cycling Race Utilizing the Scenic Drive	0	0
Non-competitive, Commercial Cycling Event Utilizing Trails and Dirt Roads	0	0
Non-competitive, Commercial Cycling Events Utilizing the Scenic Drive	0	0
Artistic/Holistic—Not limited to but including Yoga, Meditation, Painting, and Photography Class or Tutorials	0	0

Table 6 Alternative 3: Ongoing Commercial SRPs

Recreational Opportunities	Number of Permits Proposed Annually	Maximum Number Per Group*	Maximum Number Per Permit Per Day*
Motorized Guided Tours On Unpaved Roads	0	0	0
Equestrian Tours	1	40	320 horses
Hiking Guided Tours	0	0	0
Class 1** Vehicle Tours on Scenic Drive	0	0	0
Class 2*** Vehicle Tours on Scenic Drive	0	0	0
Cycling Guided Tours on Natural Surface Trails and Dirt Roads	0	0	0
Cycling Guided Tours on Paved Roads			
Artistic/Holistic—Not Limited but including Yoga, Meditation, Photography Classes or Tutorials, or Painting	0	0	0

Alternative 4: High Use

Alternative 4 considers the impacts of offering a high number of competitive, full-time commercial, and single commercial permits. The permit numbers for organized groups would be the same as in the Proposed Action (Table 7); single commercial or competitive event permits offered would be double the amounts in the Proposed Action (Table 8); and full-time commercial permits offered would be double the number of permits per commercial use per year as analyzed in the Proposed Action (Table 9).

The number of competitive events (Table 8) and guided tours (Table 9) analyzed in this alternative is based on the number of requests for these permits received by the BLM.

This alternative does not propose any increased commercial use within either the Rainbow Mountain or La Madre Mountain Wilderness areas. The proposed commercial permits would only be allowed in the non-wilderness areas of RRCNCA. The number of commercial permits proposed inside of wilderness would remain the same as the Proposed Action and as identified in the Extent Needs Assessment for commercial services in wilderness.

Table 7 Alternative 4: Organized Group* Use of Developed Facilities, Trails and Roads

*An organized group is defined as more than one person participating in a non-competitive, non-commercial recreation activity or event (H2930, 1-4). The Authorized Officer determines when

Recreational Opportunities or Location	Number of Permits	Threshold Number of Participants Requiring Permit/Maximum Number of Participants Allowed per Event
Red Rock Dedication Overlook Picnic Areas	20 permits	7 or more vehicles or 25 people min/ 50% of parking or 50 people max
Willow Spring Picnic Area	20 permits	7 or more vehicles or 25 people min/ 50% of parking or 50 people max
Visitor Center Dedication Memorial Walkway—LOA ONLY	52 permits	4 tables or 25 people min/5 tables or 30 people max
Visitor Center Amphitheater	52 permits	25 people min/200 people max
Developed Parking Areas	52 permits	Dependent on available parking and disturbed area at each trailhead. 25% of parking or public space min/50% of parking or public space max
Scenic Drive (no congregating except for photographs)	52 permits	10 vehicles min/20 vehicles max
Designated Trails—Hiking and Equestrian	52 permits	12 people min/24 people per day total, 12 per group per trail
Designated Trails—Cycling	5 permits	12 people min/500 people max
Pre-K to 12 Education Groups	175 days	12 people min/100 people max
Wilderness Education	5 permits	3 people min/12 people max

an organized group requires a permit. This table helps inform that decision by defining the minimum threshold number of participants that triggers organized group consideration.

Table 8 Alternative 4: Single Commercial and Competitive SRPs

Recreational Opportunities	Number of Permits Proposed Annually	Maximum Number of Participants Allowed per Event
Equestrian Race	2	50
Foot Race Utilizing the Scenic Drive	10	1000
Foot Race Utilizing Trails and Dirt roads	10	500
Competitive Cycling Speed Event Utilizing Trails and Dirt Roads	6	500
Competitive Cycling Race Utilizing the Scenic Drive*	4	1000
Non-competitive, Commercial Cycling Event Utilizing Trails and Dirt Roads	4	500
Non-competitive, Commercial Cycling Events Utilizing the Scenic Drive	6	200
Artistic/Holistic—Not limited to but including Yoga, Meditation, Painting, and Photography Class or Tutorials	10	50

*These events may require an exclusive use permit, additional analysis, and a Federal Register Notice.

Table 9 Alternative 4: Ongoing Commercial SRPs

Recreational Opportunities	Number of Permits Proposed Annually	Maximum Number Per Group*	Maximum Number Per Permit Per Day*
Motorized Guided Tours On Unpaved Roads	6	5	5 vehicles
Equestrian Tours	4	40	320 horses
Hiking Guided Tours	10	12	24 participants
Class 1** Vehicle Tours on Scenic Drive	10	12	12 vehicles
Class 2*** Vehicle Tours on Scenic Drive	30	5	10 vehicles
Cycling Guided Tours on Natural Surface Trails and Dirt Roads	6	12	24 participants
Cycling Guided Tours on Paved Roads	10	12	24 participants
Artistic/Holistic—Not Limited but including Yoga, Meditation, Photography Classes or Tutorials, or Painting	10	12	12 participants

*Including guides or instructors.

Class 1 Vehicle— All two or three-wheeled motorized vehicles. Typical vehicles in this category have saddle type seats and are steered by handlebars rather than steering wheels. This category includes motorcycles, motor scooters, mopeds, motor-powered bicycles, and three-wheel motorcycles. (https://www.fhwa.dot.gov/policyinformation/tmguid/tmg_2013/vehicle-types.cfm) Three-wheeled vehicles include tri-mobles per **NRS 482.129 and other three-wheeled vehicles with enclosed cabs.

***Class 2 Vehicle—Two-Axle, Four-Tire Single Unit Vehicles other than passenger cars. Included in this classification are pickups, panels, vans, and other vehicles such as campers, motor homes, ambulances, hearses, carryalls, and minibuses. (https://www.fhwa.dot.gov/policyinformation/tmguid/tmg_2013/vehicle-types.cfm)

Alternatives Considered but Eliminated from Detailed Analysis

The BLM considered a very high use alternative. In this very high use alternative, the permit numbers for organized groups would be limited to one organized group per day per use area; single commercial or competitive events would be limited to one permit per type of event per month; and ongoing commercial permits would be limited to twice the number of permits per commercial use per year as analyzed in the Proposed Action.

This alternative was dismissed from further analysis because it would not have been compatible with the designating legislation which requires a balanced approach to conserving, protecting and enhancing the natural and recreation resources within RRCNCA. Further, this alternative would not be feasible to implement as staffing and other workload priorities would preclude the BLM from effectively administering the proposed number of permits.

Chapter 3 Affected Environment and Environmental Effects

Resource Evaluation

The BLM Southern Nevada District Office resource specialists reviewed the Proposed Action and found the resources to be present with potential for impact, present with no potential for impact, or not present.

The following table is a list of all resources considered in the evaluation of the Proposed Action and alternative(s). The resources found that may be affected by this proposal have been carried forward for analysis and are discussed further in this chapter. The resources that are not present or found to not be impacted by the Proposed Action because they would be completely mitigated with the implementation of standard stipulations will not be discussed further.

Table 1. Resources Considered in the Evaluation of the Proposed Action and Alternatives

Resource	May be Impacted (carry forward for analysis)	Present and Not Impacted or Not Present	Rationale for Not Impacted	Digital Signature & Date
Areas of Critical Environmental Concern (ACECs)		X	Not present	
Air Quality		X	Present, but not affected,	Lisa Christianson 03/20/2025
National Monument or Conservation Lands	X		See detailed analysis	Jon Prescott 11/26/2024
Cultural Resources		X	All Proposed Actions analyzed within this document will remain on designated trails, developed facilities and parking areas, and paved roads. The proposed actions are exempt from survey and SHPO consultation per Appendix A.16 of the State Protocol Agreement. Stipulations apply and suffice.	Annette Bennett 2/3/2025

Resource	May be Impacted (carry forward for analysis)	Present and Not Impacted or Not Present	Rationale for Not Impacted	Digital Signature & Date
Socioeconomics		X	The Proposed Action would not have a disproportionately high or adverse effect that would place socioeconomic burdens on the citizens of Clark County and nearby cities due to the limited context and intensity of the proposal.	Bridget Peregrino 6/2/2025
Fish and Wildlife Excluding Federally Listed Species		X	The Proposed Action involves none or minimal habitat disturbance. The primary direct impacts of the Proposed Action on wildlife would be killing or maiming of ground dwelling animals during touring activities; displacement of individuals; and increased potential for harassment of wildlife. Indirect impacts may include noise, increased erosion, and spread of weeds. Wildlife species in the general area are common and widely distributed throughout the area and the loss of a few individuals and/or habitat should have a negligible impact on populations of the species range wide. Mitigation measures included in this project will be sufficient to minimize impacts and a detailed analysis is not required. No impacts to BLM sensitive species are anticipated.	Marissa Dowalter-Miracle 5/12/2025
Floodplains		X	Not present	Boris Poff 4/11/2025

Resource	May be Impacted (carry forward for analysis)	Present and Not Impacted or Not Present	Rationale for Not Impacted	Digital Signature & Date
Forestry		X	The Proposed Action involves minimal future habitat disturbance. The long-lived nature of cacti and yucca preclude them from growing in areas of recent disturbance. Therefore, cacti and yucca should be minimally affected. Potential impacts may arise from visitor interactions, such as taking photographs while hanging off the plants or standing nearby, which can damage their root systems. Additionally, visitors sometimes mutilate these plants or cut off pieces as souvenirs. Given the abundance of cacti and yucca within the National Conservation Area and the mitigation measures in place, no further analysis for forestry-related impacts is deemed necessary at this time.	Mary Boyle 5/27/2025
Fuels and Fire Management	X		Carried forward for analysis	Tristan Jamieson 12/18/2024
Geology/Mineral Resources		X	Not present	
Green House Gas/Climate Impacts		X	Currently there are no emission limits for suspected Greenhouse Gas (GHG) emissions, and no technically defensible methodology for predicting potential climate changes from GHG emissions.	Lisa Christianson 03/20/2025

Resource	May be Impacted (carry forward for analysis)	Present and Not Impacted or Not Present	Rationale for Not Impacted	Digital Signature & Date
			However, there are, and will continue to be, several efforts to address GHG emissions from federal activities, including BLM authorized uses.	
Hydrologic Conditions		X	Not present	Boris Poff 4/11/2025
Invasive Species/Noxious Weeds	X		Carried forward for analysis	Mary Boyle 5/27/2025
Lands and Realty		X	Not present	
Livestock Grazing		X	Not present	
Migratory Birds		X	The Proposed Action involves none or minimal habitat disturbance nor poses any other direct threats to migratory birds. Migratory birds and their nests may be present around and adjacent to the project site resulting in potential displacement by noise disturbance from touring activities. Mitigation measures included in this project will be sufficient to minimize impacts and a detailed analysis is not required. No impacts to BLM sensitive species are anticipated.	Marissa Dowalter-Miracle 5/12/2025
Native American Concerns		X	Consultation letters were sent to 17 tribal partners on January 23, 2025 (see Table 4.1). To date, no responses have been	Dionysius-Caesar Nicolas

Resource	May be Impacted (carry forward for analysis)	Present and Not Impacted or Not Present	Rationale for Not Impacted	Digital Signature & Date
			received by any of the tribal partners.	6/3/2025
Paleontological Resources		X	All Proposed Actions analyzed within this document will remain on designated trails, developed facilities and parking areas, and paved roads. Attached stipulations suffice.	Annette Bennett 2/3/2025
Recreation/Travel/Wild and Scenic Rivers	X		See detailed analysis	Jon Prescott 11/26/2024
Soils		X	As there will be no new surface disturbance associated with the proposed action, there will be no impact to soils. Even with increased used of already established trails and previously disturbed areas, no new disturbance is expected.	Boris Poff 4/11/2025

Threatened Endangered or Candidate Animal Species	X			Marissa Dowalter- Miracle 5/12/2025
Threatened Endangered or Candidate Plant Species		X	Not Present	Mary Boyle 5/27/2025
Transmission Corridors		X	Commercial operations would not be permitted to use transmission corridors.	Jon Prescott 11/26/2024
Vegetation		X	Some BLM Sensitive Species that prefer growing in disturbed areas, like trailside, could be affected by recreation. However, following included stipulations should greatly minimize severe or long-term alterations to vegetation communities.	Mary Boyle 5/27/2025
Visual Resources		X	The activities proposed do not include anything that would impact the VRM landscape	Jon Prescott 11/26/2024
Wastes (hazardous or solid)		X	Not present, however, do include standard stipulations into the final grant document(s).	Lisa Christianson 03/20/2025
Water Resources		X	Not present	Boris Poff 4/11/2025
Wetlands and Riparian Areas		X	As there will be no permanent disturbance associated with the proposed action, there will be no impact to wetlands/riparian zones.	Boris Poff 4/11/2025
Wild Horse and Burros		X	Increased recreation use may increase conflict with wild burros; recreators should follow the law by not feeding, harassing, or interacting directly with the wild burros to reduce this risk. This is an existing issue	Allison Meaney 5/16/2025

			in the area that this project will not add to substantially.	
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Wilderness/Wilderness Study Areas/Lands with Wilderness Characteristics	X		Carried forward for analysis.	Aaron Hoppler 6/2/2025
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National Conservation Lands

Affected Environment

Red Rock Canyon National Conservation Area (RRCNCA) was established in 1990 “in order to conserve, protect, and enhance for the benefit and enjoyment of present and future generations...the unique and nationally important geologic, archeological, ecological, cultural, scenic, scientific, wildlife, riparian, wilderness, endangered species, and recreation resources of the public lands therein contained...” (PL 101-621)

RRCNCA consists of approximately 200,000 acres. It is located in Clark County, Nevada, approximately 15 miles west of the city of Las Vegas. It is bordered on the west by the Spring Mountain range, extends north to the mouths of Lee Canyon and Cold Creek and extends south to include the Bird Spring Range. A substantial portion of the eastern boundary is the western limit of the Summerlin Master Planned Community. Lands immediately adjacent to RRCNCA are now being developed north of Summerlin and off SR 157 are also now being developed.

It has long been a popular location for public recreation and leisure due to unique geological and ecological characteristics occurring in a natural setting so close in proximity to a major population center. The geologic features of the area include an abundance of limestone and sandstone formations, including unique features such as older limestone covering and protecting younger and less weather resistant sandstone. The result is a 3,000 foot escarpment running north-south along the west side of RRCNCA. Weathering has added form and texture, including potholes, domes, and arches to the sandstone escarpment.

Timed entry reservations are required to enter the 13-mile Scenic Drive from October 1—May 31, and visitors are required to present either an interagency parks pass, Red Rock Canyon pass, or pay \$20 at the entrance fee booth.

Environmental Effects of the No Action Alternative

The status of RRCNCA would not be impacted by this alternative and this alternative is consistent with the designating legislation (PL 101-621). The activities proposed in this alternative would be required to follow stipulations and mitigation measures that prevent the damage to or disruption of the other values for the which RRCNCA was designated.

The No Action Alternative would result in the BLM continuing to manage the special recreation permit program according to the 2010 Programmatic EAs for issuing SRPs in the Core Area (DOI-BLM-NV-S020-0014-EA) and Cottonwood Valley (DOI-BLM-NV-S020-2010-16-EA). Impacts to RRCNCA would continue to remain limited to existing, designated roads and trails in the Core Area and Cottonwood Valley. The types and numbers of permits issued for those areas would not change, neither would the participant limits.

The effects of continuing to issue SRPs under the current guidance would mean permitting recreation events and commercial services only in the Core Area and Cottonwood Valley. The current guidance allows for 54 full-time commercial permits across all categories. There are 12 vacant permits available that the BLM has not issued due to ongoing planning and analysis of the

recreation program. Permitting the additional 12 commercial operations would be compatible with the 2005 RMP, however, the addition of these operators within the Core Area and Cottonwood Valley may result in additional congestion and concentrated use in areas that are already heavily used.

Red Rock issued 13 competitive or organized group events under the current guidance in FY24. These events were largely restricted to use within the Core Area and Cottonwood Valley. It is reasonable to assume that many of these competitive events would continue to be requested and permitted into the future, creating competition for event times between permittees and between permittees and the public. Competitive events are further restricted from occurring in the Core Area from January to April to reduce crowding and conflicts with the public during the busy season.

Environmental Effects of the Proposed Action (Alternative 2)

The status of RRCNCA would not be impacted by this alternative and this alternative is consistent with the designating legislation (PL 101-621). The activities proposed in this alternative would be required to follow stipulations and mitigation measures that prevent the damage to or disruption of the other values for the which RRCNCA was designated. Expanding the opportunities for commercial, competitive, and group use to include all designated roads and trails in RRCNCA as described in the Proposed Action would likely disperse these types of uses to other areas of Red Rock that have not traditionally been used in this way. Recent planning efforts have formally designated many new roads and trails in parts of Red Rock north of the Core Area. While these areas have been heavily used by the general recreating public, commercial activities such as guided OHV tours and competitive foot and mountain bike races would be a new use.

The Proposed Action complies with the designating legislation of RRCNCA in that the BLM was charged with managing for recreation use of the conservation area lands. The Proposed Action also complies with the 2005 RMP, specifically section 5A.

Compared to the No Action Alternative, the Proposed Action would reduce the overall number of competitive events and full-time commercial permits on the Scenic Drive and on natural surface trails and dirt roads. The Proposed Action also categorizes motorized tours on the Scenic Drive based on vehicle class and has a higher allowable number of tour permits available than the No Action Alternative. Defining and regulating commercial bus and van tours on the Scenic Drive would allow the BLM to more closely monitor the number of these types of tours occurring in the Core Area while allowing more public exposure to the lands and resources in the NCA.

The Proposed Action would not allow any different uses for organized groups, however, it would permit more organized groups per category. The impacts of organized group use are difficult to anticipate because this category of permit is driven by public demand. However, Red Rock BLM has not hit the maximum allowable organized group permits under the current analysis.

Environmental Effects of Alternative 3

The status of RRCNCA would not be impacted by this alternative and this alternative is consistent with the designating legislation (PL 101-621).

Alternative 3 proposes to eliminate all special recreation permits except for one commercial equestrian tour operation, which would be required to follow stipulations and mitigation measures that prevent the damage to or disruption of the other values for the which RRCNCA was designated. No other types of SRPs or organized group use would be allowed.

Without commercial tours operating on the Scenic Drive, approximately 16,000 people would likely not have the opportunity to see RRCNCA, although it is impossible to tell how many of those visitors would choose not to visit on their own. The presence of these commercial operators on the Scenic Drive is well established and commonplace for local visitors, and eliminating this type of use would result in a slightly different, less commercial visitor experience for the general public.

The impact of eliminating competitive events and commercial tours on designated natural surface trails and dirt roads would only be noticeable to the general public on those weekends that the events would have otherwise occurred. Eliminating competitive events and commercial operations could result in a negative impact to many of the public who utilize the guide operations and to the public who enjoy hosting and participating in competitive events.

Overall, eliminating all SRP opportunities from RRCNCA would have a neutral effect to the status of Red Rock because the activities would only be allowed on designated roads, trails, and trailheads available for public use. However, damage to cultural, biological, geologic, or scientific resources could occur if large, organized groups continued to gather without the BLM's concurrence. Enforcing resource protection measures through issuance of Letters of Agreement or SRPs holds visitors and group organizers accountable for the impacts of their actions in RRCNCA.

Environmental Effects of Alternative 4

The status of RRCNCA would not be impacted by this alternative and this alternative is consistent with the designating legislation (PL 101-621).

The impacts of this alternative would be similar to the Proposed Action, however, the additional competitive events and guided tours could lead to other impacts to other natural, scenic, and recreational qualities managed within RRCNA. While the activities proposed in this alternative would be required to follow stipulations and mitigation measures intended to prevent damage to the other qualities managed within RRCNCA, the likelihood of resource damage or disruption to other visitor experiences occurring is higher in this alternative, especially on the Scenic Drive where traffic and visitor use is at an all-time high.

Mitigation Measures

Mitigation measures for any of the activities proposed in these alternatives would be included in the permit and would include stipulations unique to those events.

Fuels and Fire Management

Affected Environment

Wildfires can threaten human safety, degrade air quality, destroy structures and infrastructure, damage sensitive natural and cultural resources, and decrease land value. Wildfires in the planning area are caused by lightning and unauthorized and accidental human-caused fires. Human-caused fires account for over 50% of wildfires in the Southern Nevada District, historically only about 20% of the wildfires in the planning area over the past 20 years have been human-caused. The proposed actions are likely to impact Wildland Fire and Fuels Management by increasing the number of recreational users to the planning area of this proposed action increasing the number of human-caused wildfires and increasing the occurrence of invasive non-native species introduction and establishment which will contribute to an increase in the available fuel load and fuel continuity of the planning area.

The 2005 Red Rock Canyon National Conservation Area (RRCNCA) RMP/ROD requires: 1B.3 Implement prescribed natural fire program to restore fire ecology to montane chaparral communities in the escarpment canyons. 1B.4 Establish a minimum response fire suppression policy for pinyon-juniper uplands to promote mosaic habitats, in coordination with the U.S. Forest Service, Spring Mountain National Recreation Area. 1B.5 Implement strategies to minimize habitat type conversion fires stemming from invasive exotic annual grasses. 1B.6 Implement aggressive fire suppression policy for all fires in low elevation communities (Blackbrush).

The public lands managed by the Red Rock Canyon National Conservation Area (RRCNCA) contain several urban and wildland interface areas that can be characterized as lines, areas, or zones where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels. The majority of the RRSCNCA is wildland with a portion of wilderness and is the most visited national conservation area on the district with over 3 million visitors a year. The planning area is primarily wildland with developed and undeveloped recreational areas and the wildfire response is suppression. There is currently a NEPA proposal to allow natural start wildfires to fulfill their natural role with management and engagement dependent on fire severity, projected effects, and values at risk.

The operational role of the BLM Fuels and Fire Management in the planning area is wildland firefighting, hazardous fuels reduction, and cooperative prevention and education. Firefighter and public safety is the first priority in every fire management activity. Fire management plans and activities incorporate public health and environmental quality considerations. A fire management plan defines a program to manage wildland fires (wildfire and prescribed fire) and identifies and integrates all wildland fire management activities in accordance to approved resource management plan decisions. Wildfires frequently burn through jurisdictional

boundaries. Responses to wildland fire are coordinated across levels of government regardless of the jurisdiction at the ignition source. The planning area abuts numerous other jurisdictions including Clark County, the city of Las Vegas, commercial developers, and private property owners. The use of cooperative agreements promotes the common goals for the agency to manage incidents in a cost-effective manner for the protection of life, property, and natural resources. It is in the interests of city, county, state, tribal, and federal agencies to work toward a common goal concerning a wildfire incident.

The expansion of noxious and invasive plant species has altered the fire regime in the Mojave ecoregion from small, infrequent, and low severity wildfires to more frequent, large, and high severity wildfires. Plant communities and fire regimes have been altered where an invasive annual grass fire cycle has been established (Chambers, et al., 2013, p. 81). As a result, large, landscape-level fires have become possible when annual grass fuel loading is high and ignition sources are prevalent (Chambers, et al., 2013, p. 79). Common invasive annual grasses in the planning area are: Non-native Mediterranean grass (*Schismus spp*), cheatgreass (*Bromus tectorum*), and red brome (*Bromus rubens*). Winter precipitation can generate a sufficiently dense growth of grasses and other annual plants to potentially promote wildfire at the landscape level (Chambers, et al., 2013, p. 81). Tamarisk, or salt cedar (*Tamarix spp.*) is in the planning area and is a State listed noxious weed. Tamarisk fires are usually severe and are resistant to fire control efforts. BLM Fuels and RRSCNCA staff have worked on several projects to reduce hazardous fuels and invasive species presence in the planning area.

Smoke from wildfires can impact air quality in the planning area. Fire management activities work to minimize wildfire smoke impacts in coordination with local and state cooperators. Suppressing fires is a common minimization method. Reducing hazardous fuels before a wildfire event can reduce the amount of potential emissions by reducing the amount of available burnable fuel. Short-term impacts to air quality due to prescribed fire and hazardous fuel reduction activities are possible. Prescribed fire and hazardous fuel reduction projects are required to comply with federal, state, and local regulations and standards, including air quality and smoke management programs. Smoke management in Clark County is carried out in coordination with the Clark County Department of Air Quality (DAQ).

The fire management response following a wildfire can include emergency stabilization, rehabilitation, and restoration measures focused on preserving, protecting, and enhancing resource values where needed. Post-fire emergency stabilization and rehabilitation efforts are designed and implemented to achieve multiple objectives for vegetation, habitats, soil stability, and watersheds. For emergency stabilization, actions fall into several categories: human life and safety; soil/water stabilization; designated critical habitats for federal/state-listed, proposed, or candidate species; critical heritage resources; invasive plants; and monitoring. For burned area rehabilitation, some of the categories are: lands unlikely to recover naturally; weed/invasive species treatments; tree planting; repair/replace fire damage to minor facilities; and short-/long-term monitoring.

The BLM's fire prevention and education program is responsible for wildland fire prevention, prescribed fire education, fire trespass and investigations, and compiling fire statistics. Special emphasis is given to abandoned campfires, equipment caused fires, fireworks, children playing

with fire, railroad fires, and prescribed fire and natural fire occurrence data. Prevention planning is integrated with the fire and resource management planning process and needs are identified through a risk or hazard analysis that is approved as part of the fire management plan. Risk or hazard analysis can consider defensible space and landscaping. Buildings and landscaping within the planning area are generally comprised of non-combustible materials (i.e. adobe, tile roofs, xeriscaping, etc.).

Direct Impacts from the proposed action are human caused wildfires. Indirect Impacts from human caused fires may result in the loss of native vegetation and habitat. Depending on a fire's location and size, fire can damage or destroy property or infrastructure as well as threaten human safety and communities.

Fires are typically categorized on the basis of period of occurrence, size class, regime, and vegetation condition class. Wildfires can occur year-round in much of the Mojave region. For the planning area, the general fire season is usually April through October. The most critical fire conditions correspond with the hot summer period characterized by low moisture and midsummer thunderstorms.

Recent Fire History of Planning Area

- Diamond Fire 2005 120 Acres Natural
- Goodspring Fire 2005 33,581 Acres Natural
- Red Rock Fire 2005 42 Acres Natural
- Scenic Fire 2006 1,612 Acres Natural
- Bonnie Springs Fire 2007 390 acres Human
- La Madre Fire 2011 48 Acres Natural
- Harris Fire 2013 12 Acres Natural
- Pine Creek 2018 92 Acres Human

Fire Event	Year	Acreage	Cause
Loop Fire	2005	860	Natural
Overlook Fire	2005	62	Natural
Diamond Fire			

All fires of human or unknown origin that burn BLM land shall be investigated to determine origin, cause and, if possible, the responsible party(s) with the following exception. If a fire is not investigated due to safety, costs or other considerations, that decision must be recorded, signed by an Authorized Officer, and maintained at the local unit.

Environmental Effects of the No Action Alternative

Under the no-action alternative, wildland fire and fuels management would not be affected due to expected increases in human caused wildfires. Acres burned could remain the same or

decrease due to less transport and introduction of invasive annual grass species which contribute to the fuel loading and continuity of the planning area, resulting in decreased acres burned. However, increases in annual grass fuels could result regardless of increased or decreased human activity. Impacts to adjacent contiguous BLM acres would likely decrease under the no-action alternative. The No Action Alternative is similar in scope and effect to Alternative 3: Minimum Use.

Environmental Effects of the Proposed Action

This section analyzes the impacts of the Proposed Action on wildland fire and fuel management. Impacts would result from actions that would affect historic fire regimes, vegetation, ecological conditions, fuel loading, desired vegetation structural stages, resilience, hazard/risk, and invasive species. Alterations or changes in fire size, frequency, severity, wildland fuels, ignitions or ignition sources are likely to impact fire response, hazardous fuel management, mitigation/education, and emergency stabilization and rehabilitation (ESR) activities.

Wildland fuel conditions fluctuate within the planning area and are dependent on seasonal precipitation levels, ephemeral grasses, disturbance levels, vegetation conditions, and the presence of invasive or noxious plant species. As a result, fire hazards or fire risk can also fluctuate. The expansion of invasive plant species can greatly increase the amount of fuel, the intensity and size of fires, and can shorten fire-return intervals. A factor contributing to increased desert wildfires is the establishment of the fire regime altering invasive annual grass fire cycle.

Conditions favorable to the ignition and spread of wildfires can be present all year round in the planning area, peaking during the summer and the monsoon season when lightning is prevalent. Both human-caused and natural wildfire ignitions are exacerbated by invasive plant species which increase fuel continuity and provide a receptive fuel bed for wildfires. Wildfires under these conditions are intense, fast-moving, and resist control efforts.

Historically, large fires were uncommon in planning area, but this has changed over the past decade. Large fires generally remain infrequent in comparison to other areas in Nevada; however, wildfire impacts can be severe and long term, resulting in increased impacts and costs over time. Protecting priority wildlife habitats, watersheds, cultural resources, commercial and mineral developments, infrastructure, and WUI would affect fire suppression priorities by increasing demands on fire suppression resources, mitigation/education, emergency stabilization and rehabilitation (ESR), and hazardous fuel or vegetation treatment activities. Conflicts could result when available firefighting resources become overextended or overtaxed. Overextended firefighting resources could also affect availability of firefighting resources locally, regionally or nationally if they are diverted from other suppression efforts.

Fuel reduction and vegetation treatments could result in less fire suppression costs and decrease smoke impacts. Non-surface-disturbing vegetation treatments and/or effective suppression followed by effective rehabilitation/restoration could reduce impacts. Reactive fire management such as fire suppression and rehabilitation are usually more expensive and damaging than proactive fire, fuels, and vegetation management including prescribed fire, mechanical thinning, chemical treatment, and restoration. In general, fire suppression costs and risks to life and

property should be less when wildfires occur where hazardous fuels have been treated compared to areas where fuels have not been treated.

Increased demands and costs for fire suppression resources, mitigation/education or outreach needs, vegetation or fuel treatments, and emergency stabilization and rehabilitation activities are expected for all alternatives due to an increase in human activity. This can lead to an increase in human caused wildfires as well as increase the opportunity for invasive and non-native species to be introduced and become established. The natural fire regime would continue to be altered as fire frequency (including human caused fires), size, intensity or severity increase where land use patterns and related activities increase. Increased wildfire impacts would increase the risk of losing key ecosystem components. Other factors expected for all alternatives are increased operating costs (fuel, personnel, equipment, and supplies) and additional developments outside the control of BLM managers. Shrinking or declining budgets and changing priorities would further constrain fire management response and related activities.

In the short-term, under the proposed alternative, impacts to wildland fire and fuels management could increase due to increased human caused fires. Impacts to adjacent contiguous BLM lands are expected to remain the same or increase. However, through aggressive fire prevention, education, outreach, hazardous fuels treatment, and the implementation of best management practices, impacts could remain at current levels or decrease.

Over the long-term, under the proposed alternative where BLM hazardous fuels treatments are implemented and recreational area users are informed of the importance of preventing wildfires, wildfire frequency and size could decrease and could result in an overall decrease in impacts to wildland fire and fuels management in the planning area. In addition, impacts to adjacent contiguous BLM lands could decrease in the long-term where fire prevention measures, fuels and restoration activities are successful. However, increases in annual grass fuels could result in increased acres burned on adjacent BLM lands due to human caused fires and fire trespass.

Cumulative effects of the Proposed Action are loss of ecosystem function, native plant species, and habitat due to repeat natural and human caused wildland fires. Repeat fires are likely to perpetuate the annual grass fire cycle problem.

There would be cumulative effects on fire management from the increased need to protect RRCNCA infrastructure, WUI, and natural and cultural resources from human-caused and naturally occurring wildfires. Fire suppression priorities would be expected to increase and become more complex because WUI areas would expand on the perimeter of RRCNCA, including development occurring on BLM and on adjacent lands.

More commercial and recreational activities would occur within the planning area. Increasing population growth combined with the commensurate growth of recreation could increase the spread of invasive plant species and increase wildfire potential. Demand for fire suppression resources, fuel treatments, and ESR could increase.

Wildfires are grouped into nine cause classes for statistical purposes: Lighting, Equipment use, Smoking, Campfire, Fire use, Railroad, Incendiary arson, Children and lastly Miscellaneous.

Miscellaneous fires include: Power lines, Fireworks, Cutting/Welding/Grinding, Firearms Use, Blasting, Structures, Spontaneous Combustion, Flare Stack/Pit Fires, Aerial Luminaries and Glass Refraction/Magnification. Many of the human caused fires can be addressed through targeted education and outreach, management or enforcement.

Over the past decade, the Greater Metropolitan Las Vegas area has experienced an economic and housing boom as well as a severe economic downturn and housing crisis. The economic impacts affected people in different ways. While copper prices were very high, wire burning fires on BLM lands were frequent. When the housing bubble burst and people began losing their homes, foreclosures increased and trash dumping on BLM lands increased. Trash or debris fires also increased. As people were displaced or became homeless, the occurrence of escaped campfires increased. Similar direct and indirect impacts would be expected for the foreseeable future and cumulative impacts to fire management would scale in intensity according to the economic situation or conditions.

Historically, most human caused fires have been small because initial suppression actions were successful or because fuels were sparse. Lightning, or naturally caused fires accounted for most of the acres burned. Some areas burn repeatedly. Repeat fires would cumulatively change local vegetation and would scale by fire size and/or severity. Years where annual grass fuels are continuous or where fires occur in areas with sensitive resources would result in increased impacts to fire management. Fire costs can escalate quickly, and the cost of suppression and rehabilitation could be very high. As a result, due to the need to protect RRCNCA infrastructure, natural and cultural resources from wildfire, impacts to wildland fire management will vary according to management requirements or prescriptions, fuel loading, and wildfire risk.

Vegetation management (particularly fuel reduction) and ESR on public, privately owned, and other federal lands in and around the planning area would help to reduce wildfire risk and improve the vegetation conditions. Wildfires burning outside historic conditions could result in more severe post-fire effects. Wildfires burning in invasive annual grass could contribute to significant changes to the fire regime and vegetation in many areas.

Climate change results in variability in temperature and precipitation and is known to influence the composition and structure of native and invasive plant communities. Increased temperature could increase wildfires. The increased length of the frost-free season would increase the length of the normal fire season. There is a trend showing this region has seen a decrease in annual days at or below freezing temperature. The annual wildfire season is now occurring one to two months earlier than in previous decades. Wildfires are already possible year-round, but fire frequency and size would likely increase. Ephemeral grass fuel loading and the annual grass fire cycle are highly dependent on seasonal rainfall and other climatic conditions. The timing and seasonality of precipitation is correlated to wildfire risk where precipitation increases annual grass fuel loading and continuity. Upward trends in fall precipitation would likely increase annual grass fuels. Less fall/winter rainfall and more intense summer monsoon events could result in decreased cool season annual grass fuels.

Changes in climate could shift or change vegetation. Changes in climate would impact vegetation communities. Management direction or response to these changes would emphasize areas resistant to climate change. Specific moderate to major direct and indirect impacts to fire

management would be possible for managing fire in these areas. In general, moderate to major cumulative impacts would be expected due to climate change.

Vegetation communities have been changing over the last decade and have been altered by wildfire. Large or severe fires in areas where wildfires had been historically infrequent and small are becoming more frequent. Low to moderate severity fires are also becoming more frequent. Cumulative wildfire impacts would result in the loss of many native plant communities and decreases in plant diversity at the landscape level. However, changes in the vegetation conditions due to changes or varying climatic conditions would be exceeded or would be exacerbated by direct and indirect land use impacts, such as actions leading to the expansion of invasive plants (or effective treatments) and resultant wildfires including increases in human-caused fires.

Impacts could be minor to moderate, with specific major impacts possible where wildfire risk is increased due to invasive or noxious plant species. Rehabilitation of lands would increase as the frequency of large fires would increase. Potential for human-caused wildfire would increase because recreation special use and need would increase access and result in the expansion of invasive and noxious species. Increased population and development would increase the potential for human-caused fires over time. Shifts in plant communities due to disturbance and changing land-use patterns are likely to alter historic fire regimes at the landscape and watershed level.

Residual impacts would be similar to residual impacts to vegetation and weeds where wildfire impacts would contribute to the fragmentation of plant populations due to the increased incidence of combustible invasive and noxious plant species. Increases recreational activity within the planning area would likely lead to edge effects and disturbance outside of the planning area and potential increases in human caused fires.

Wildfires originating on adjacent lands from human or lightning caused fires could threaten values at risk including human safety, infrastructure or developments. Protecting priority wildlife habitats, watersheds, cultural resources, infrastructure, and WUI would affect fire suppression priorities by increasing demands on fire suppression resources, mitigation/education, emergency stabilization and rehabilitation (ESR), and hazardous fuel or vegetation treatment activities. Conflicts could result when available firefighting resources become overextended or overtaxed. Overextended firefighting resources could also affect availability of firefighting resources locally, regionally or nationally if they are diverted from other suppression efforts.

A lack of fuels reduction and vegetation treatments could result in increases in wildfire smoke impacts and fire suppression costs, as well as losses in habitat value as vegetation types shift from the desired future condition. In general, fire suppression costs and risks to life and property should be less when wildfires occur where hazardous fuels have been treated compared to areas where fuels have not been treated.

Increased demands and costs for fire suppression resources, mitigation/education or outreach needs, vegetation or fuel treatments, and emergency stabilization and rehabilitation activities are expected for both alternatives due to an increasing population, an expanding WUI footprint on both public and private lands, and the increased need for resource and watershed protection.

The natural fire regime would continue to be altered as fire frequency (including human caused fires), size, intensity or severity increase where land use patterns and related activities increase. Increased wildfire impacts would increase the risk of losing key ecosystem components. Other factors expected for all alternatives are increased operating costs (fuel, personnel, equipment, and supplies). Shrinking or declining budgets and changing priorities would further constrain fire management response and related activities.

Environmental Effects of Alternative 3

Under Alternative 3, wildland fire and fuels management would not be affected due to expected increases in human caused wildfires. Acres burned could remain the same or decrease due to less transport and introduction of invasive annual grass species which contribute to the fuel loading and continuity of the planning area, resulting in decreased acres burned. However, increases in annual grass fuels could result regardless of increased or decreased human activity. Impacts to adjacent contiguous BLM acres would likely decrease under the no-action alternative. The No Action Alternative is similar in scope and effect to the No Action Alternative.

Environmental Effects of Alternative 4

The Effects of Alternative 4 are similar in scope to that of the Proposed Action but with increased effect.

Mitigation Measures

The best wildfire mitigation strategy is fire prevention. An active hazardous fuels treatment and education program is needed to prevent catastrophic impacts to sensitive natural and cultural resources. Fire prevention strategies are employed to reduce human-caused fires with special emphasis in the WUI, campgrounds, and transportation corridors. One of the goals of this program is to enhance knowledge and understanding of wildland fire management policies and practices through internal and external communication and education. Key components are analysis of risks, hazards, and values, as well as the development of specific educational, mitigation, enforcement, and administrative actions.

Hazardous fuel projects and treatments can be used to reduce wildfire risk and potential smoke impacts by protecting and creating fire-adapted landscapes and to meet resource goals and objectives such as restoring and maintaining resilient landscapes. Fuel treatment projects require activity-level plans and environmental analysis. A common fuel project objective is to reduce wildfire risk to resources by reducing hazardous fuels.

Standard fire prevention measures and best management practices to prevent fires may be acceptable in many cases. Proposed best management practices, fire prevention measures, and/or other minimization measures should be considered and should be incorporated into a fire management plan, safety or hazard management plan as needed or when required by a BLM agency administrator for special recreation activities. Standard fire prevention best management practices developed by the BLM may be adopted, incorporated or updated at any time at the agency administrator's discretion. The required mitigation measures are:

- Fire restrictions are generally enacted May through October. Compliance with fire restrictions is mandatory while fire restrictions are in effect. Specific non-compliant activities may be permitted in writing on a case-by-case basis by a line officer after review and approval by the Fire Management Officer (43 CFR 9212).
- Conditions that support wildfires can occur any time of the year in Southern Nevada. In general, and when fire restrictions are not in effect, use standard fire prevention measures and best management practices to prevent fires (43 CFR 2805.12(d) or subsequent revisions).
- The proponent shall immediately report fires to the BLM, appropriate dispatch center or 911 and make all accommodations to allow immediate safe entry of firefighting apparatus and personnel.
- In the event of a human caused wildfire the proponent will be held responsible for all costs of suppression and damaged resources pending a wildfire Origin and Cause Investigation. An Origin and Cause Investigation will be carried out on any human caused fire by BLM Law Enforcement or their designated representative. To minimize disturbance of potential evidence located at the fire scene; the proponent shall properly handle and preserve evidence in coordination with the BLM. The proponent shall report to the Fire Investigator or BLM Incident Commander and enter into the fire origin area on BLM fires only when given permission to do so. The proponent will cooperate with the BLM in performance of fire investigation to determine wildfire cause.
- OHV: Ensure guides or responsible individuals carry fire extinguishers, buckets and shovels. Exhaust systems and other hotspots can heat up enough to ignite grass or other debris that has built up on the machine which can drop off and cause a wildfire. Remove build-up or clean debris from the machine's hotspots as needed and in compliance with weed stipulations to prevent fires. Do not idle engine or park over vegetation. Staying on designated routes will also help prevent fires because these areas are generally clear of vegetation. Other mitigation measures that prevent wildfires are possible and would be considered.
- OHV: Fire restrictions include prohibiting the operation of a motor vehicle or combustion engine equipment without a spark arrestor (43 CFR 8343.1 (c)). Year-round compliance with 43 CFR 8343.1 (c), 43 CFR 9268.3, and NRS 475.060 as applicable will further reduce risk of an ignition, simplify compliance, and increase enforceability with respect to the proposed activities. "Posting appropriate signs or by marking a map which shall be available for public inspection at local Bureau offices, the authorized officer may indicate those public lands upon which no off-road vehicle may be operated unless equipped with a properly installed spark arrestor."

Invasive Species/Noxious Weeds

The Proposed Project Area contains over 15 different vegetation classifications, primarily defined by water availability, shade, and elevation. All habitat types show evidence of human visitation, particularly due to the area's proximity to the Greater Las Vegas region. As a result, humans serve as the most significant vector for the introduction and spread of invasive plant species, exacerbated by historic grazing and fire. Consequently, both the richness and cover of invasive species are at unprecedented levels. Weeds are most often found along roadsides and trail peripheries, and do not necessarily implicate any humans in a knowing and willful breaking of provided rules. However, humans are curious creatures and much of the damage from invasive plants is highly exacerbated by those individuals who do choose to leave the designated rails.

Certain ecosystems are particularly vulnerable to disturbance due to their specialization and fragility. For instance, biological soil crusts, which are living layers on arid soils, provide essential functions related to hydrology and erosion control. These crusts can be destroyed by just a single pass from a vehicle or group of hikers, leaving bare ground more accessible for invasive species, which thrive under these conditions. Desert pavement, characterized by tight mosaics of rock clasts, functions similarly and can be easily disrupted, leading to increased competition from non-native species.

Riparian ecosystems are another critical area of concern. These habitats not only support a rich diversity of endemic plant and wildlife due to their alkaline nature, but also provide ecosystem services beneficial for healthy human habitation and recreation. They are often the focus of restoration efforts, agency priorities, and laws and statutes due to their importance. Considering their overwhelming positive influence, the Resource Management Plan stipulates we must utilize and consider multi-step processes "with adaptive management, [to] prioritize rapid solution to resource impacts from visitor use or other stressors." Additionally, watersheds are considered a priority area for protection per the Red Rock Canyon RMP Record of Decision. In such areas, preserving the native structure and constitution is imperative. Invasive species like tamarisk (*Tamarix* spp.) and Russian olive (*Elaeagnus angustifolia*) can impose a heavy water burden, degrading the ecosystem's health and functionality.

Consequences

High-use activities significantly increase the susceptibility of soil to erosion and compaction, thereby inhibiting its ability to support plant life. This change can lead to a shift towards a less desirable, riskier ecological state, beyond which the land may not recover. Areas characterized by desert pavement, riparian conditions, and high biological crust cover are particularly vulnerable.

Off-trail foot traffic in regions with sensitive biological crusts can disrupt fragile soils, especially during saturated conditions, although damage can occur regardless of moisture levels. Once exposed, bare ground resulting from disruption is quickly colonized by early-germinating invasive species. These plants often produce abundant seeds that can disperse over great distances, traits commonly seen in invasive species that transcend the various vegetation communities present in the area. Many of these species are annuals, and when they die back, they leave soil exposed, making it susceptible to aeolian erosion and further facilitating the spread of invasive seeds.

In areas with year-round or seasonal water sources, one can typically find the highest diversity of non-native plant species, from annual grasses to larger trees. The hydrological function in these regions is frequently disrupted, which negatively impacts native vegetation downstream. This disruption often leads to the decline of larger native plants, creating an environment that predominantly supports invasive annual grasses. Steep slopes become unstable and erode, resulting in the loss of rare vegetation. This loss subsequently reduces shade and increases water evaporation, which, if left unchecked, could push these ecosystems past an ecological threshold, causing perennial water systems to dry up more rapidly than they are replenished. Nonnative vegetation, tamarix spp. as the infamous southwestern example, can impose significant water burdens on riparian systems, leading to long-term degradation. Within the NCA, recent multi-agency efforts to manage tamarisk and Russian olive (*Elaeagnus angustifolia*) have reduced their populations to the lowest densities seen in decades, demonstrating the effectiveness of targeted removal strategies. A notable concern during this assessment period was the rapid and alarming spread of watercress (*Nasturtium officinale*) in several springs along the scenic Loop Drive. This invasive plant has outcompeted multiple native species and overtaken the vegetation that provides essential shade for alkaline springs. While some endemic springs have managed to shelter themselves with their root systems, the allelopathic properties of watercress pose threats to native aquatic life, necessitating further research to determine whether these springs are approaching ecological thresholds or if this proliferation represents a natural ebb and flow.

There are at least 60 recorded species of alien plants in Red Rock Canyon, ranging from apples and watermelon to invasive grasses and cacti. While not all alien species cause costly habitat loss, certain invasive weeds can dominate across various vegetation communities, undermining ecosystem health.

Noxious and non-native invasive species present significant challenges in managing the National Conservation Area (NCA) and the greater Mojave Desert ecoregion. According to Executive Order 13112, non-native invasive species are defined as "alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health." Noxious weeds are classified as any plants deemed injurious to public health, agriculture, recreation, wildlife, or property (Sheley, Petroff, and Borman 1999).

In Nevada, noxious weeds are categorized by the Nevada Department of Agriculture and the Plant Protection Act (2000), which is administered by USDA APHIS:

- **Category A:** Weeds that are not widely distributed in the state and are subject to active eradication efforts.
- **Category B:** Weeds established in some areas, with active eradication encouraged where possible.
- **Category C:** Weeds that are widespread; eradication is required from the premises of dealers.

Currently, 47 species are listed as noxious weeds in Nevada (NAC 555.010). Some of the most pervasive in the Proposed Project Area include Sahara mustard (*Brassica tournefortii*), Malta starthistle (*Centaurea melitensis*), tamarisk (*Tamarix* spp.), silverleaf nightshade (*Solanum elaeagnifolium*), giant reed (*Arundo donax*), Russian olive (*Elaeagnus angustifolia*), and

puncturevine (*Tribulus terrestris*). Invasive grasses seen in Red Rock Canyon include red brome (*Bromus rubens*), cheatgrass (*B. tectorum*), rip gut brome (*B. diandrus*), Bermuda grass (*Cynodon dactylon*), Mediterranean grass (*Schismus* spp.), and perennial crimson fountaingrass (*Cenchrus setaceum*). The presence of Sahara mustard is particularly concerning, as its high biomass correlates with reduced native forb biomass essential for wildlife and pollinators. Non-native annual grasses also compete with perennial grasses, which provide cover for desert tortoises (Abella 2023).

Fires can easily spread from large shrubs to neighboring plants because previously bare interspaces are now dominated by invasive grasses. The loss of these shrubs, which play critical roles in the ecosystem as cover for desert tortoises and nurse plants for Joshua trees, highlights the need for intensive management in areas that are becoming increasingly non-functional. In addition to the state-designated noxious weeds, nuisance weeds pose another concern. Given Red Rock Canyon's status as a tourist destination, it is important to monitor these weeds—many of which have not yet made the Nevada list but could become problematic. Although there may be no legal requirements for their removal at this stage, these species are often prime targets for eradication efforts, as they can still be managed effectively before establishing a foothold.

New invasive plants are introduced to Red Rock Canyon regularly, primarily due to human activities. Propagules in the form of seeds, vegetative tissue, rhizomes, or fruits often “hitchhike” on the clothing, gear, and pets of visitors and staff. This influx of invasive potential typically takes root in areas that are naturally or unnaturally devoid of native vegetation due to overuse, trampling, or environmental factors. These non-natives, particularly grasses, tend to be more resilient to trampling and can reproduce rapidly, further complicating management efforts.

Areas susceptible to invasion often go unmanaged, especially those that are not designated as trails and that experience continued foot traffic. This poses a significant challenge for the conservation of native plant communities and overall ecosystem health

Environmental Effects of the No Action Alternative

The no-action alternative would allow for the continued spread of noxious and nuisance weeds throughout the area, occurring at varying levels throughout the year, much like the current situation. This approach is less beneficial than the proposed action. Although the Proposed Action may attract more participants and groups, restructuring the Special Recreation Permit (SRP) holders and unifying various environmental assessments will facilitate the management of invasive plant issues and improve tracking. Swift tracking enables timely interventions, aligning with the strategy of Early Detection, Rapid Response (EDRR), which is the most cost-effective and resource-efficient method for maintaining the health of the Red Rock Canyon ecosystems.

Despite the presence of signage at major trailheads that highlights ecological, economic, and social risks associated with invasive species, including visitor-friendly best management practices like boot brush stations, there is a noticeable lack of these resources at the proposed locations, except for Red Spring. The effectiveness of such signage may be diminished by cultural factors, which can lead to a lack of compliance.

A pervasive issue within the NCA is the expansion of disturbed areas as visitors move from compacted pathways into the surrounding desert, driven by overcrowding, exploration, or the pursuit of aesthetic photography opportunities. Trampled vegetation can expose soil, facilitating erosion and creating favorable conditions for invasive plants. The repetition of this trampling leads to soil compaction, preventing natural recovery and altering local hydrology. This change can result in increased water pressure, which, in turn, channels flow and deepens swales and furrows.

Environmental Effects of the Proposed Action

The Proposed Action, especially its consolidation of various areas covered by different environmental assessments, is the best option for the National Conservation Area (NCA). This approach streamlines management, enhances labor and time efficiency, and facilitates quicker communication—critical components of the primary strategy for preventing weed germination and proliferation: Early Detection, Rapid Response (EDRR).

In the short term, noticeable changes may be minimal. In fact, as some events lead to an increase in permit numbers, overcrowding could create the illusion that the NCA is deteriorating rather than recovering. However, over time, as the benefits of EDRR become more evident—often taking several growing seasons—we can anticipate an overall reduction in both the number of invasive species and their coverage across the landscape.

There is, however, a possibility that consolidation could adversely affect our ability to enforce control and compliance measures. With the diverse land types, ecosystems, and recreational uses in the NCA, relying on a generalized model may result in one of two scenarios: either it may not be effective enough to address specific issues, or it could lead to inappropriate management of fragile ecosystems alongside more robust ones.

To mitigate these concerns, the time saved from not needing to conduct multiple assessments can be redirected toward developing a comprehensive compliance plan that actively involves resource specialists. This plan should ensure compliance checks are conducted by all staff, not just Outdoor Recreation Planners, thereby enhancing our capacity to manage invasive species effectively across the diverse ecosystems of the NCA.

In areas of high foot traffic, particularly where vegetation is already sparse, significant soil compaction occurs. This compaction reduces the soil's capacity to absorb water and nutrients—crucial factors for plant survival in arid environments. As a result, native plants, including cacti and yucca species, may struggle to establish and thrive. The suffocation of root systems further diminishes native vegetation, reducing overall plant diversity, which is critical for maintaining a balanced ecosystem.

Soil disturbance and the loss of native plants create a feedback loop that exacerbates the spread of noxious and invasive species. This spread leads to the further loss of native species, creating lasting impacts on natural plant communities with ecological, economic, and social

repercussions. Non-native invasive plants are particularly worrisome due to their potential to cause permanent damage, underscoring the need for effective management strategies.

Environmental Effects of Alternative 3

The minimal-impact alternative poses the least risk for spreading noxious weeds. However, it is important to recognize that even this alternative cannot completely prevent the spread of propagules, as many seeds are easily dispersed by wind, water, or adhering to animals. Implementing drastic measures under this alternative could restrict recreational opportunities, diminish the potential for stewardship among visitors, and conflict with the Bureau of Land Management's (BLM) Multiple Use-Sustained Yield mandate.

Environmental Effects of Alternative 4

The high-use alternative significantly increases the risk of invasive plant influx, leading to both a rise in non-native species richness and cover, alongside a decline in native species richness and cover. This shift could result in the loss of essential ecosystem heterogeneity, pushing ecosystems toward an ecological threshold from which recovery is unlikely. As a result, Red Rock Canyon would experience further desertification, negatively impacting not only its ecological health but also the visitor experience in the surrounding areas.

Mitigation Measures

- 1) Annual Weed Removal Activity
 - a) Activities coordinated with the BLM contact and a vegetation specialist.
 - b) Choose locations based on areas frequented during seasonally appropriate times.
 - c) Participation enhances knowledge about invasive plants and the importance of managing invasive plant management teams (IPMT).
- 2) Equestrian Permit Requirements
 - a) Equestrian permit holders must provide a recent copy of their certified weed-free hay and forage with their applications before bringing pack animals onto NCA land.
 - b) Certified weed-free feed is mandatory for all animals used in the NCA.
- 3) Material Importation Restrictions
 - a) Unloading, storing, or using non-certified weed-free straw, hay, grain, seed, or mulch within the NCA is prohibited.
 - b) All imported materials from contractor sources must be certified weed-free and devoid of noxious weeds or invasive plant materials before entering the project site.
- 4) Trail Use Restrictions
 - a) No shortcutting: Shortcutting trails or switchbacks is prohibited to prevent damage to trails, soil, and vegetation.
 - b) No new habitat disturbance: Participants must stay on designated trails and refrain from creating social trails, trampling vegetation, or damaging natural rock and soil structures. This includes avoiding activities like building rock cairns.
- 5) Landscape Restoration
 - a) Certain areas are closed to the public for natural recovery. Do not walk or camp in these areas.

- b) If a permittee is found to cause damage to closed trails, undesignated trails, or creating new trails, the permittee may be subject to probationary action.
- 6) Vegetation removal of any kind is prohibited in all parts of Red Rock Canyon NCA. This applies whether the plant or material is alive or dead or if the material is kept or discarded back onto the ground.
 - a) This includes but is not limited to: Picking flowers, breaking off branches, uprooting plants, trampling of trailside plants, taking cactus skeletons or pinecones, or slashing overgrown vegetation.
 - b) Taking away vegetation from the place it was found is considered as “removal,” no matter the intention.
- 7) Information about noxious weeds will be provided by the BLM in participant instruction and information packets. Permittees should instruct participants in cases needed to reduce spread of noxious plants.
- 8) All participants shall inspect, remove, and dispose of weed seed and plant parts found on their clothing and personal equipment, bag the product, and dispose of it as trash. At some major trailheads, boot brush stations are available for use.
 - a) Questions should be directed to the BLM SNDO noxious weed coordinator.
- 9) An equipment check should ensure that no equipment, clothing, shoes, carrying cases etc shall have any trace of mud and dirt, dried or fresh vegetation matter, or raw seed
- 10) To reduce the accidental spread of noxious weeds, avoid or minimize all types of travel through a state listed noxious weed-infested areas that can be carried to the project area. To minimize the threat of spreading noxious weeds project related equipment (i.e. undercarriages and wheel wells) should be cleaned of all mud, dirt, and plant parts before moving into relatively weed-free areas or out of relatively weed-infested areas.
- 11) During event activities:
 - a) Ensure that all equipment and personal gear is clean and free of soil and vegetation before arrival on site. This includes ensuring vehicles and equipment be washed/ cleaned before field use, and should be inspected before leaving the field for excess soil and vegetation.
 - b) Stay on existing trails and avoid creation of new trails. Limit the size of any vegetation and/or ground disturbance to the absolute minimum necessary to perform the activity safely and as designed.
 - c) Locate equipment storage, staging areas and vehicle parking or any other area needed for the temporary placement of people, machinery and supplies in areas that are relatively weed-free.
 - d) Avoid or minimize all types of travel through weed-infested areas or restrict major activities to periods of time when the spread of seed or plant parts are least likely.
 - e) Report weed populations they encounter at trail heads to help BLM monitor and protect the resources.
 - f) Education on weed identification can be gained from the Las Vegas office of the University of Nevada Cooperative Extension or the Red Rock / Sloan Field Office for BLM.

Recreation

Affected Environment

Parts of what is currently designated as RRCNCA have were managed as National Recreation Lands from 1967 to 1990, and the area has long been a popular location for public recreation and leisure due to unique geological and ecological characteristics occurring in a natural setting so close in proximity to a major population center. The landscape, roads, and trails provide opportunities for mountain biking, horseback riding, hiking, various styles of rock climbing, and 4x4 driving.

There are approximately 200 miles of designated non-motorized trails and 40 miles of designated dirt roads throughout RRCNCA. The trails are typically maintained by a volunteers while the roads are left as unmaintained, primitive driving experiences. Red Rock Canyon NCA offers developed recreation sites to the public including a 13-miles of paved Scenic Drive, a visitors center, campground, picnic area and boardwalk at Red Springs in Calico Basin, and 24 designated trailheads offering access to the various 200,000 acres. Timed entry reservations are required to enter the 13-mile Scenic Drive from October 1—May 31, and visitors are required to present either an interagency parks pass, Red Rock Canyon pass, or pay \$20 at the entrance fee booth.

Informal BLM observations suggest that approximately 60% of all visitors engage in either hiking or climbing activities; 30% come for mountain biking; and roughly 10% come for other activities like 4x4 driving, scenic viewing, or other events.

Visitation counts show that RRCNCA received 2.09 million visitors in FY24 and 2.4 million visitors in FY23. Of these visits, 44% and 36% of people entered the Scenic Drive, and the remainder of use was dispersed between Cottonwood Valley, Calico Basin, SR 159, La Madre Foothills, and Harris Springs.

Environmental Effects of the No Action Alternative

Recreation activities would continue to occur throughout RRCNCA with impacts to the public being limited to times when the scenic drive is closed for exclusive use events. Because exclusive use of the Scenic Drive is conditional and would only be allowed in special circumstances, these impacts to the public would be limited to a few hours each year as exclusive use under the No Action Alternative would only occur for a single, large cycling event.

Commercial operations and competitive events could lead to some visitors perceiving more crowds on the roads, trails, and developed recreation facilities, particularly at popular wedding locations like the Red Springs boardwalk where space is limited. However, competitive events and commercial operations, other than some rock guided rock climbing and hiking, occur in the front country areas of RRCNA in Non-Motorized and Roaded Developed Management Emphasis Areas (MEA) where interaction with other visitors is high and expected.

Environmental Effects of the Proposed Action

The effects of the proposed action on public access to recreation in RRCNCA would be similar to the impacts of the No Action Alternative in that the Scenic Drive could be closed to the public for two large cycling events each year. All other SRP uses, locations, and permit numbers would not impact the public use of recreation amenities.

Environmental Effects of Alternative 3

This alternative would have no impact to public recreation. No events or commercial services would be allowed in RRCNCA other than a single equestrian permit, and no exclusive use of the Scenic Drive would be permitted for competitive cycling.

The absence of all competitive events and commercial operations in the Non-Motorized and Roaded Natural MEAs could alleviate additional interactions between casual visitors, potentially improving their overall experience in developed recreation sites like Red Springs.

Environmental Effects of Alternative 4

The impacts to recreation under this high use alternative would be roughly four times as noticeable to the general public because this alternative allows four exclusive use competitive cycling events on the Scenic Drive as compared to the No Action Alternative.

Additionally, the higher numbers of commercial operations and competitive events could lead to some visitors perceiving more crowds on the roads, trails, and developed recreation facilities, particularly at popular wedding locations like the Red Springs boardwalk where space is limited. This alternative would have the greatest impact to the overall visitor experience and casual recreation user when compared to all other alternatives due to the high number of allowable permits. However, there is no guarantee that all available permit slots would be filled under this alternative.

Threatened and Endangered Species

Affected Environment

Threatened and endangered species are placed on a federal list by the U.S. Fish and Wildlife Service (USFWS) and receive protection under the Endangered Species Act (ESA) of 1973, as amended. The only federally protected species known to occur in the vicinity of the Proposed Action Area is the threatened Mojave Desert Tortoise (*Gopherus agassizii*). The Proposed Action Area is not within designated critical habitat for this species. The Southwestern Willow Flycatcher (*Empidonax traillii extimus*), Western Yellow-billed Cuckoo (*Coccyzus americanus occidentalis*), and Yuma Clapper Rail (*Rallus longirostris yumanensis*) are migratory bird species listed under the ESA that may use riparian habitats within RRCNCA (such as Red Spring or Ash Creek) as transients during migration on their way to breeding habitat. However, because riparian habitat is so limited within RRCNCA, the presence of these species within RRCNCA is expected to be very rare. For this reason, these species were not carried forward for analysis. One candidate species for listing under the ESA could occur within the Proposed Action Area, the Monarch Butterfly (*Danaus plexippus*); the USFWS recently proposed a new rule to list this species as threatened under the ESA (December 2024).

The Mojave Desert tortoise inhabits a variety of habitats, from flats and slopes dominated by Creosote Bush Scrub at lower elevations to rocky slopes in blackbrush (*Coleogyne ramosissima*) and juniper (*Juniperus* spp.) woodland transition zones at higher elevations (USFWS 2011).

Within Nevada, it is found at elevations between 650 to 4,770 feet. It spends the majority of its life in underground burrows to escape extreme hot and cold desert temperatures. The Mojave Desert Tortoise is most active during spring and early summer when daytime temperatures are more mild and annual plants are most abundant, with additional activity during the warmer fall months when breeding activity and male-male competition can be observed. It eats a wide variety of herbaceous vegetation, especially grasses and the flowers of annual plants. It also is known to eat woody perennials, cacti, and nonnative species, such as red brome (*Bromus rubens*) and red-stem filaree (*Erodium cicutarium*). The Mojave Desert Tortoise has a sizable and permanent population within RRCNCA. The majority of the sites composing the Proposed Action Area (with the exception of those in Harris Springs) fall within tortoise habitat, and visitors may encounter the species. In Nevada, the Mojave Desert Tortoise is considered active from approximately March 1 through October 31, though this window is flexible depending on environmental conditions.

The Monarch Butterfly, a species proposed for listing as “threatened” under the ESA, requires milkweed (*Asclepias* spp.) as a host plant for its eggs and caterpillars. In RRCNCA, there are three species of milkweed that may occur: *Asclepias asperula*, *Asclepias erosa*, and *Asclepias subulata*. *Asclepias subulata* occurs at lower elevation areas of the Mojave Desert, *Asclepias erosa* occurs in the lower-to mid-elevation areas, and *Asclepias asperula* occurs at higher elevations. Adult Monarch Butterflies will also use a variety of flowering plant species for nectar during migration and mating, especially thistles (*Cirsium* spp.). These plant species are very important as food sources for the Monarch. This species is potentially active in RRCNCA year-round; it has been seen in Clark County, Nevada, during every month of the year, but most observations occur during the fall. There are no known breeding records for the Monarch Butterfly within RRCNCA, though a few records exist for higher elevations in the Spring Mountains.

Environmental Effects of the No Action Alternative

Special Recreation Permits would continue to be issued in accordance with the 2010 Programmatic EAs for issuing SRPs in the Core Area (DOI-BLM-NV-S020-0014-EA) and Cottonwood Valley (DOI-BLM-NV-S020-2010-16-EA). The mitigation measures in these documents would continue to be followed to minimize adverse effects, as well as the terms and conditions of the RRCNCA Resource Management Plan’s Programmatic Biological Opinion (BLM File No. 1-5-04-F-526). The effects of the No Action Alternative are expected to be consistent with those of the Proposed Action and are discussed in more detail below.

Environmental Effects of the Proposed Action

The changes to the management of SRPs at RRCNCA as part of the Proposed Action are minor as they relate to the federally threatened Mojave Desert Tortoise and candidate Monarch Butterfly. The proposed number of annual permits and the maximum number of allowed participants in most categories either remains unchanged or decreases compared to those allowed under the combined totals for the 2010 Programmatic EAs for issuing SRPs in the Core Area (DOI-BLM-NV-S020-0014-EA) and Cottonwood Valley (DOI-BLM-NV-S020-2010-16-EA).

Because of this, the effects of the Proposed Action are likely to be similar to those anticipated under the No Action Alternative.

In addition to primary direct impacts such as the risk of death or injury to tortoises and monarchs via vehicle collision and increased potential for harassment of tortoises and monarchs, indirect impacts could include increased noise, introduction and/or spread of noxious weeds, and increased potential for soil erosion and compaction. These impacts could also lead to the displacement of individuals and declines in habitat quality in affected areas over time through the loss of forage, suitable nesting/burrowing sites, host plants, and shade.

Under the Proposed Action, visitors who explore RRCNCA via the services of SRP holders would receive information about desert tortoise conservation and Leave No Trace principles, informing them about protections for tortoises under the ESA and how to behave responsibly on public lands to ensure minimal impact to the flora, fauna, and landscape. This would be expected to have a positive effect for the desert tortoise and monarch butterfly by generating informed and responsible visitors that can share their knowledge and set an example for others while recreating in RRCNCA and beyond.

The proposed mitigation and minimization measures associated with this project are expected to reduce the number/severity of any adverse effects to the Mojave Desert Tortoise and Monarch Butterfly. Special Recreation Permit holders will also comply with the terms and conditions of the Red Rock Canyon NCA Resource Management Plan's Programmatic Biological Opinion (BLM File No. 1-5-04-F-526). A copy of the terms and conditions has been uploaded to ePlanning (Section 7 Log # NV-052-25-034) and in Appendix C.

Environmental Effects of Alternative 3 (Minimum Use)

Alternative 3 (Minimum Use) is likely to present the smallest risk of direct and indirect impacts to desert tortoises and monarch butterflies, such as injury or harassment of individuals or habitat degradation through the spread of noxious weeds or soil erosion. However, many visitors under this alternative would miss the opportunity to have a guided experience, which includes education about desert tortoise conservation and Leave No Trace principles. Though there are other opportunities for visitors to learn about these topics, such as through programs and guided hikes led by BLM park rangers, fewer visitors would receive this message than under the other alternatives. It is unknown how many visitors would still choose to visit RRCNCA on their own if there were no SRPs issued for commercial guide services, organized groups, and competitive events, but eliminating this avenue of outreach may indirectly lead to increased effects to desert tortoises, monarch butterflies, and their habitat by visitors who are unaware of the impacts of their behavior on public lands, especially as annual visitation continues to grow year over year.

Environmental Effects of Alternative 4 (High Use)

Alternative 4 (High Use) has the highest probability of negatively impacting desert tortoises and monarch butterflies. The high allowances for commercial guide services, organized groups, and competitive events would cause increased human presence in disturbed areas adjacent to tortoise and monarch butterfly habitat. This could lead to habitat degradation through increases in litter,

trampling of native vegetation, the spreading of invasive weeds, higher levels of soil erosion and compaction, and higher levels of human-generated noise. Increased human presence in and around tortoise and monarch butterfly habitat also presents more opportunities for vehicle collisions with animals and other instances of human-wildlife conflict, as well as higher potential for accidental wildfires.

This alternative has the highest possibility of direct adverse impacts, though it would generate the greatest number of outreach opportunities to the public through the permitting program to spread awareness about desert tortoise conservation and Leave No Trace principles. which would be beneficial for the conservation of desert tortoises and monarch butterflies.

Mitigation Measures

- 1.1. Compliance with the special stipulations below will help to ensure desert tortoises are not impacted:
 - 1.1.1. A speed limit of 25 miles per hour shall be required for all vehicles travelling on existing roads.
 - 1.1.2. Should a desert tortoise enter the area of activity, all activity shall cease until such time the animal leaves the area of its own accord.
 - 1.1.3. All drivers must check underneath vehicles and equipment before moving to ensure no tortoise has taken cover underneath parked vehicles.
- 1.2. The Holder will comply with the terms and conditions of the Biological Opinion File No. 1-5-04-F-526) for this project. The Biological Opinion is on file at the Bureau of Land Management, Southern Nevada District Office. The terms and conditions are attached.
- 1.3. The Holder, upon completion of the Proposed Action, must submit Appendix G. Please forward Appendix G to the BLM, Attn: Wildlife Biologist, 4701 N. Torrey Pines Drive, Las Vegas, Nevada 89130. Failure to abide by the terms and conditions of the grant and Biological Opinion, could result in temporary suspension of all activities within your ROW area per 43 CFR 2807.16 and 43 CFR 2807.17.
- 1.4. To prevent potential loss of host plants for monarch butterfly eggs, caterpillars, and chrysalises, milkweed plants (*Asclepias* spp.) should be avoided during project activities.

Wilderness

Affected Environment

While jointly managed between the BLM and the USFS, this impact analysis will only focus on the sections of wilderness managed by the BLM and located within the boundaries of the RRCNCA. Designated under the Clark County Conservation of Public Land and Natural Resources Act of 2002, La Madre Mountain Wilderness and Rainbow Mountain Wilderness are subject to the direction of the Wilderness Act of 1964 (Public Law 88-577) which states in Section 4(b). "Except as otherwise provided in this Act, each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer the area for such other purposes for which it may have been established

as also to preserve its wilderness character. Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.”

Wilderness character is a combination of biophysical, experiential, and symbolic qualities that distinguish wilderness from all other lands. Together these qualities represent the tangible aspects linking on-the-ground conditions in wilderness and the outcomes of wilderness stewardship to the statutory definition of wilderness. Wilderness character is evaluated collectively based on the following five qualities:

- Untrammeled, meaning the area is unhindered and free from modern human control or manipulation.
- Undeveloped, meaning the area is essentially without structures or installations, the use of motors or mechanical transport.
- Natural, meaning the area’s ecological systems are substantially free from the effects of modern civilization.
- Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation, meaning the area provides outstanding opportunities for visitors to experience solitude, and recreate in a primitive and unconfined manner.
- Other Features of Value, meaning the area may have unique ecological, geological, cultural, or other features of scientific, educational, scenic, or historical value.
-

As otherwise provided in the Wilderness Act, commercial services are allowed under the special provision stated in Section 4(d)(5), “Commercial services 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 area.” In accordance with the above-described special provision, the Commercial Services Needs Assessment for the La Madre Mountain Wilderness Area and Rainbow Mountain Wilderness Area within the Red Rock Canyon National Conservation Area was completed in August 2024 (See Appendix D). This assessment determined SRPs are proper and necessary, and identified to the appropriate extent consistent with management under the Wilderness Act.

The BLM-managed portions of La Madre Mountain Wilderness and Rainbow Mountain Wilderness encompass 28,114 acres and 20,225 acres respectively. Both wilderness areas are adjacent to one another and are within close proximity to the Las Vegas Valley, creating an urban interfacing boundary. Both wilderness areas provide outstanding recreational opportunities for hiking, rock climbing, scenic viewing, backpacking, wildlife viewing, photography, hunting, and exploration. Currently, the paved 13-mile Scenic Loop leads to multiple parking areas and designated trailheads providing access to the wilderness areas. Due to the ease of access and high use, visitors in the core area generally do not have the same opportunity for solitude as expected in more remote locations away from large population centers; however, the topographic variability and diversity of vegetation does provide enhanced visual screening preserving a sense of solitude. Wilderness recreation is generally confined to the RRNCA hours of operation and restrictions identified in the Red Rock Canyon NCA RMP, and the La Madre Mountain Wilderness and Rainbow Mountain Wilderness Management Plan.

La Madre Mountain Wilderness and Rainbow Mountain Wilderness are primarily untrammelled apart from concrete dams which were present prior to wilderness designation, and activities related to controlling wildfires. The wilderness resource appears to be substantially free from the effects of modern civilization and its primeval character is mostly preserved. The natural character of the wilderness is largely intact, though slight changes in vegetation have occurred including the introduction of non-native / invasive plants and alterations in the distribution of native vegetation species. Both wilderness areas are substantially undeveloped with little to no known structures outside of minimal signage installed to reduce incidents requiring search and rescue response, evidence of historic mining and remnants of the above-mentioned dams. While aircraft may be seen and heard from within the wilderness, the Federal Aviation Administration manages the airspace. Currently, the Las Vegas Metro Police Department (LVMPD) is authorized to conduct Search and Rescue training for its pilots and crew, utilizing a helicopter and subject to specific restrictions; additionally, actions involving motor vehicles, motorized equipment, and/or mechanized transport have been used in the wilderness in response to emergencies involving human health and safety. Extensive social trail braiding is present, and occasional cairns are observed leading to popular climbing routes. While mostly obscured in the rock face, both wilderness areas are known to contain numerous fixed anchors. Both wilderness areas contain unique other features of value including cultural significance and paleontological resources, geological features, and sensitive flora and fauna species.

The Environmental Effects of actions in La Madre Mountain Wilderness and Rainbow Mountain Wilderness are described in terms of wilderness character and the degradation or preservation of the wilderness qualities.

Environmental Effects of the No Action Alternative

Under the No Action Alternative, there would be no new impacts to the wilderness resource. SRPs would continue to follow the extent and direction provided by the analysis and mitigations determined in the 2010 Programmatic EAs for issuing SRPs in the Core Area (DOI-BLM-NV-S020-2010-0014-EA).

Environmental Effects of the Proposed Action

As determined in the Commercial Services Needs Assessment for the La Madre Mountain Wilderness Area and Rainbow Mountain Wilderness Area within the Red Rock Canyon National Conservation Area was completed in August 2024 (See Appendix D), commercial services are both proper and necessary in wilderness to the current extent for the preservation of wilderness character and realizing the recreational public purpose. The Proposed Action does not include increasing permitted operations and complies with the assessment's conclusion.

The Proposed Action does not include any trammeling activity or actions designed to manipulate or control ecological systems and, therefore, will not have any direct or indirect impacts to the untrammelled quality of wilderness character. While the natural quality may be indirectly impacted by unintentional introduction of nonnative or invasive species by permittees and their participants, the Proposed Action does not include any actions directly intended to impact the

natural environment and can be mitigated further through additional resource protection stipulations.

The Proposed Action does not include activities resulting in any additional structures, installations, and/or developments. Permittees and participants will continue to use designated trails and established social trails to access permitted areas, and guided rock-climbing tours will only utilize removeable protection and bolts already in place on agency-approved climbing routes; no new bolts or trail developments are proposed or authorized.

The Proposed Action would continue to impact opportunities for solitude or primitive recreation, including the potential to reduce the ability of casual users to avoid the sights and sounds of commercial participants or organized groups. However, group sizes will be capped at 12 people, including the guides, to help reduce impacts. Furthermore, opportunities for solitude or primitive recreation remain readily available in the more remote reaches of the wilderness areas. The Proposed Action does not include any new activities that would further impact the unconfined recreation aspect of wilderness character.

The Proposed Action does not include any activities that would result in new impacts to the other features of value quality of wilderness character. All permittees and participants would be required to comply with standard mitigations and additional stipulations determined by the appropriate resource specialist (cultural, botany, wildlife, etc.).

Environmental Effects of Alternative 3

The actions described under Alternative 3, defined by minimum use, could have both beneficial and adverse impacts to the wilderness resource. Under this alternative, only a single equestrian permit would be allowed in RRCNCA; no other commercial services or organized groups would be authorized.

Alternative 3 does not include any trammeling activity or actions designed to manipulate or control ecological systems and, therefore, will not have any direct or indirect impacts to the untrammled quality of wilderness character. While the natural quality may be indirectly impacted by unintentional introduction of nonnative or invasive species from permitted activities, Alternative 3 does not include any actions directly intended to impact the natural environment and can be mitigated further through additional resource protection stipulations.

The undeveloped quality of wilderness character would not be impacted by the actions described under Alternative 3. There are no proposed developments such as structures, installations or actions requesting motorized uses or mechanical transport. The sole equestrian permit would still be required to use designated trails and no new trail developments would be authorized.

The outstanding opportunities for solitude or primitive and unconfined recreation quality of wilderness character could be impacted by Alternative 3. Reducing the number of commercial permittees and participants would improve the potential for casual visitors to experience solitude and recreate in a primitive setting. Alternative 3 does not propose to reduce or increase the confinements currently in place in the RRNCA and would not have an effect on this aspect.

Actions described under Alternative 3 do not include any activities that would result in new impacts to the other features of value quality of wilderness character. All permittees and participants would be required to comply with standard mitigations and additional stipulations determined by the appropriate resource specialist (cultural, botany, wildlife, etc.).

Environmental Effects of Alternative 4

The actions proposed under Alternative 4, defined by high use, would have similar impacts as identified in the Proposed Action. The number of permits allowed to operate or conduct activities within wilderness remains the same as described in the Proposed Action and no additional impacts specific to actions described under Alternative 4 are anticipated.

Mitigation Measures

1. Group sizes are limited to a maximum of 12 people, including guides.
2. Permittees and participants will utilize Leave No Trace principles and practices when traveling and recreating in the wilderness. Leaving, storing or “caching” equipment or belongings is not authorized within designated wilderness.
3. Outfitters, guides, and organized group leaders will provide wilderness education and ethics information to participants.
4. No permanent fixed ropes or cables for climbing or belaying purposes are allowed. Additionally, the installation of new bolts without further BLM authorization is prohibited.
5. All activities must comply with federal legislation, such as the Wilderness Act of 1964, and agency policy.
6. All activities must comply with additional resource protection mitigations as determined by the appropriate resource specialist.

Chapter 4 Consultation and Coordination

Scoping and Public Participation

Initial planning efforts for this project began in 2022. The project went through internal scoping in winter 2024.

Summary of Consultation

Consultation was conducted with local Native American tribes to help assess impacts on Native American Traditional Cultural Properties. These interactions are detailed below in Table 4.1, List of Tribal Outreach, Contact and Consultation.

Table 4.1. List of Tribal Outreach, Contact, and Consultation

Date	Type	Parties
January 23, 2025	Consultation Letter	○ Big Pine Paiute Tribe of the Owens Valley ○ Bishop Paiute Tribe ○ Chemehuevi Indian Tribe ○ Colorado River Indian Tribes ○ Fort Independence Indian Reservation ○ Fort Mojave Indian Tribe ○ Hualapai Tribe ○ Kaibab Band of Piute Indians ○ Las Vegas Paiute Tribe ○ Lone Pine Paiute-Shoshone Tribe ○ Moapa Band of Paiutes ○ Paiute Indian Tribe of Utah ○ San Juan Southern Paiute Tribe ○ The Hopi Tribe ○ Timbisha Shoshone Tribe ○ Twenty-Nine Palms Band of Mission Indians ○ Utu Utu Gwaitu Paiute Tribe

Chapter 5 List of Preparers

Table 5.1 List of Preparers

Name	Title	Resource
Annette Bennett	Archaeologist	Reviewer, Cultural and Paleontology
Mary Boyle	Natural Resource Specialist	Invasive Species/Noxious Weeds
Marissa Dowalter-Miracle	Biologist	Threatened, Endangered, and Candidate Animal Species
Aaron Hoppler	Wilderness Specialist, Outdoor Recreation Planner	Wilderness
Tristan Jamieson	Fire Ecologist	Fire and Fuels Management
Boris Poff	RRCNCA Manager	Hydrology and Soils
Jon Prescott	Outdoor Recreation Planner	National Conservation Lands, Recreation, project lead
Alexandra Rothermel	Outdoor Recreation Planner	Chapter 1 and 2
Colleen Cepero Rios	Planning and Environmental Coordinator	Chapters 1,2 and 3
Lisa Christianson	Environmental Protection Specialist	Air Quality, Climate Impacts and Wastes (hazardous or solid)

Bridget Peregrino	Assistant Field Manager RRSFO	Socioeconomics
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Chapter 6 References

U.S. Fish and Wildlife Service. 2011. Revised recovery plan for the Mojave population of the desert tortoise (*Gopherus agassizii*). U.S. Fish and Wildlife Service, Pacific Southwest Region.

Appendix A

Stipulations and Mitigation Measures

For

**Programmatic Environmental Assessment for Special Recreation
Permits Management in Red Rock Canyon National Conservation
Area**

NEPA #: DOI-BLM-NV-S020-2025-0004-EA

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Appendix A

Stipulations and Mitigation Measures

The following stipulations and mitigation measures must be implemented unless they are not applicable to the Proposed Action. Those stipulations and mitigation measures that include “if applicable, if used, or if constructed” are to be implemented if the Proposed Action includes that activity or design.

2. General Resource Stipulations

- 2.1. The Holder shall comply with all applicable local, state, and federal laws and regulations for the protection of resources and the environment, to include but not limited to air, cultural, hazmat, soil, vegetation, water, wildlife.
- 2.2. As part of project reclamation, the Holder will be responsible for ensuring that any boreholes, wells, or other openings in the ground are backfilled and properly covered, according to the Nevada Regulatory Statutes.
- 2.3. The Holder shall remove from public land and properly dispose of any and all trash, litter, debris, waste, excess materials, including flagging and signs, or other substances and materials resulting from the use under this authorization. All trash and food items shall be promptly contained within closed, raven-proof containers.

3. Cultural and Paleontological Resources

- 3.1. Any cultural and/or paleontological resources (historic or prehistoric site or object) discovered by the Holder, or any person working on his behalf on public or federal lands shall be immediately reported to the Authorized Officer. Holder shall immediately suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the Authorized Officer. The Holder will make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. In some cases, this may delay activity at the site until the discovery may be recovered, or the project is modified to avoid impacting the find.
- 3.2. An evaluation of the discovery will be made by the Authorized Officer to determine appropriate actions to prevent the loss of significant cultural or paleontological values. Any decision regarding suitable mitigation measures will be made by the Authorized Officer after consulting with the Holder. The Holder will be responsible for the cost of evaluation. Holder shall be responsible for the resultant mitigation costs.
- 3.3. **Additional Cultural and Paleontological mitigation measures specific to the Special Recreation Permits in Red Rock At Red Rock Canyon National Conservation Area Project:**
 - 3.3.1. All permitted activities at the Red Spring Boardwalk and Picnic Area must remain on the Boardwalk or outside of the fenced area. No Climbing is permitted within 200 feet uphill from the base of the escarpment within the fenced areas. Access to climbing routes should avoid this area as well.

- 3.3.2. All activities permitted at Sandstone Quarry parking lot and trail must remain within existing areas of disturbance to include only paved areas and the trail. All events and Permit holders shall not climb, stand, move, or deface, aspects of the Historic Site, Sandstone Quarry. This includes, but not limited to, large, freestanding sandstone blocks and rebar in the hillside. No climbing is authorized along the trail from the parking lot north through the wash.

4. Fire and Fuels

- 4.1. Compliance with fire restrictions is mandatory while fire restrictions are in effect (43 CFR 9212). Fire restrictions are generally enacted May through October. Fire restriction orders are available for review at BLM district offices and on the BLM website.
- 4.2. The use of standard fire prevention measures should be practiced at all times (43 CFR 2805.12). Conditions that support wildfires can occur any time of the year in Southern Nevada.
- 4.3. The Holder shall immediately report fires to 911 or (702) 631-2350 and make all accommodations to allow immediate safe entry of firefighting apparatus and personnel.
- 4.4. An Origin and Cause Investigation will be carried out on any human caused fire by BLM law enforcement or their designated representative. To minimize disturbance of potential evidence located at the fire scene, the applicant/proponent shall properly handle and preserve evidence in coordination with the BLM. The BLM shall pursue cost recovery for all costs and damages incurred from human-caused fires on BLM lands when the responsible party(s) has been identified and evidence of legal liability or intent exists. Legal liability includes, but is not limited to, negligence and strict liability (including statutory and contractual liability), products liability, etc.

5. Fish and Wildlife, Excluding Federally Listed Species

- 5.1. If artificial water sources are used, wildlife escape ramps must be installed. Ensure escape ramps are properly designed and installed to allow wildlife to exit in the event an animal falls into the water source.
- 5.2. Project materials and equipment will be inspected for wildlife prior to moving said material/equipment to reduce potential injury to wildlife. Materials and equipment that cannot be inspected, or from which wildlife cannot escape, will be covered, or otherwise made secure from wildlife intrusion and entrapment at the end of each workday.
- 5.3. If any Gila monster are encountered during project construction, they must be reported immediately to the Nevada Division of Wildlife at (702) 486-5127.
- 5.4. Permittee shall not damage, collect, or introduce plants or animals at any location within RRCNCA without permission from the Authorizing officer.
- 5.5. The Permittee and participants will not harass, feed, or collect wildlife or plants while in RRCNCA.

- 5.6. Construction of any infrastructure would be designed to prevent wildlife from becoming trapped in open pipes or any other materials with open holes. All pipes would be capped to prevent access by wildlife.

6. Hazardous Materials

- 6.1. If hazardous materials/substances are used or present within the authorized area, the Holder shall immediately notify the Authorized Officer of any release (leaks, spills, etc.) of hazardous substances, toxic substances, or hazardous waste. As required by law, Holder shall have responsibility for and shall take all action(s) necessary to respond to and fully remediate releases (leaks, spills, etc.) within the authorized area. A copy of any report required or requested by any federal, state, or local government agency as a result of a reportable release or spill of any hazardous substances shall be furnished to the Authorized Officer concurrent with the filing of the reports to the involved federal, state, or local government agency.

7. Migratory Birds

- 7.1. Projects that require ground disturbance or actions that could affect nesting birds, should try to be scheduled outside of the bird breeding season. Breeding season in the SNDO generally occurs from February 15 to August 31. If a project cannot be schedule outside of those dates, a qualified biologist may be required to conduct a survey for nesting birds. If nesting birds are found, methods to reduce project impacts to nesting birds will be developed in coordination with the BLM.
- 7.2. Any infrastructure for projects will be designed and constructed in a manner that does not allow open pipes that birds or other wildlife could be trapped in. This includes fencing, gates, or other materials with open holes. All open pipes will be capped or secured so that wildlife cannot access.
- 7.3. If lighting is installed on buildings or required by the Federal Aviation Administration (FAA), lighting on buildings should be down-shielded and those structures/towers required by FAA to have lighting installed, should have flashing lights with the minimum intensity required by the FAA to prevent migratory bird collisions.
- 7.4. If project involves power lines and/or power line posts, the Holder shall follow Avian Power Line Interaction Committee (APLIC) guidelines (Suggested Practices for Avian Protection on Power Lines (2006) and Reducing Avian Collisions with Power Lines (2012)) to reduce this risk through facility design and comply with MBTA and other federal wildlife laws, due to potential for electrocution, collision, and nesting/perching by migratory birds on overhead power lines.
- 7.5. If guy wires are used on structures (including power line posts and communication towers) they must be marked with bird diverters so they are visible to prevent injury/mortality to birds through collision.
- 7.6. Any windows and large reflective surfaces temporarily or permanently installed other than solar panels should be designed to prevent bird strikes from occurring. This can be done via window treatments or by adjusting the angle of the windows and surfaces to a downward tilt to prevent reflection of the sky.

8. Mineral Resources

- 8.1. If construction activities produce excess mineral materials from within the boundaries of the project area, the excess mineral materials must be used within the boundaries of the project area or stockpiled within the boundaries of the project area for future disposal by the BLM.
- 8.2. If construction activities require that excess mineral materials be exported from the boundaries of the project area during or after construction activities take place, a written authorization, Contract for the Sale of Mineral Material (Contract), Free Use Permit (FUP), etc. must be obtained from the BLM by the Holder prior to exporting the excess mineral materials from the boundaries of the project area.
- 8.3. If excess mineral materials are to be stockpiled on site for a future disposal, specific BLM use authorization in the form of a written authorization, Contract, FUP, etc. must be obtained from the BLM prior to exporting the excess mineral materials from the boundaries of the project area.

9. Non-Native and Invasive Species and Noxious Weeds

- 9.1. Weed Management Plan - is required for any ground-disturbing activities greater than 1 acre:
 - 9.1.1. The holder/permittee/assignee/proponent is responsible for filling out BLM's Weed Management Plan Template, to be approved by BLM prior to issuance of authorization of initial habitat-disturbing activities, which describes how weed treatment will be conducted.
- 9.2. The holder/permittee/assignee/proponent is, for the lifetime of the responsibility for the disturbance or ROW, responsible for:
 - 9.2.1. Surveying for, and treating, all noxious weeds within the disturbed area during biologically appropriate times and before the noxious weeds have gone to seed.
 - 9.2.2. Surveying for, and treating, non-native weeds within the disturbed area during biologically appropriate times and before the non-native weeds have gone to seed. Non-native weeds that were common in the project area prior to disturbance must be kept at levels (cover and density) less than or equal to pre-disturbance. Non-native weeds that were not common or non-existent in the project area prior to disturbance must all be treated (this also applies to new introductions that spread off the disturbed area/ROW).
 - 9.2.3. Monitoring for, and reporting to BLM, non-native and noxious weeds occurrence, spread, and treatment (providing treatment data).
- 9.3. Any new detections of non-native or noxious weeds shall be reported to the SNDO Weed Management Specialist immediately (702-515-5000) to determine best course for treatment.
- 9.4. The use of pesticide treatment requires the holder/permittee/assignee/proponent to coordinate with the BLM SNDO weed management specialist (702-515-5000) and

prepare, submit, obtain, and maintain a pesticide use proposal (PUP) to utilize pesticides for project activities. The proponent shall submit a new PUP 6 months prior to their current PUP's expiration date.

- 9.5. In order to reduce the accidental spread of non-native and noxious weeds, the holder/permittee/assignee/proponent and any contractors shall avoid or minimize all types of travel through a state listed noxious weed-infested areas that can be carried to the project area. In order to minimize the threat of spreading noxious weeds project-related equipment (i.e. undercarriages and wheel wells) should be cleaned of all mud, dirt, and plant parts before moving into relatively weed-free areas or out of relatively weed-infested areas. Project workers shall inspect, remove, and dispose of weed seed and plant parts found on their clothing and personal equipment, bag the product, and dispose of it in a dumpster. If you have questions, consult with the BLM SNDO noxious weed coordinator.
- 9.6. During construction and maintenance activities the holder/permittee/assignee/proponent shall:
 - 9.6.1. Review the annual weed inventory prior to any ground disturbance.
 - 9.6.2. Limit the size of any vegetation and/or ground disturbance to the absolute minimum necessary to perform the activity safely and as designed.
 - 9.6.3. Begin activities in weed free areas whenever feasible before operating in weed-infested areas.
 - 9.6.4. Locate equipment storage, machine and vehicle parking or any other area needed for the temporary placement of people, machinery and supplies in areas that are relatively weed-free.
 - 9.6.5. Avoid or minimize all types of travel through weed-infested areas or restrict major activities to periods of time when the spread of seed or plant parts are least likely.
 - 9.6.6. If landscaping is part of the project design, the Holder/permittee/assignee/proponent will ensure that landscaping does not contain non-native species or state-listed noxious weeds, such as fountaingrass (*Pennisetum setaceum*).

10. Survey Monuments

- 10.1. Holder shall protect all survey monuments found within the authorization area. Survey monuments include, but are not limited to, General Land Office and Bureau of Land Management Cadastral Survey Corners, reference corners, witness points, U.S. Coast and Geodetic Survey benchmarks and triangulation stations, military control monuments, and recognizable civil (both public and private) survey monuments. If any of the above are to be disturbed during operations, the Holder shall secure the services of a Professional Land Surveyor or Bureau cadastral surveyor to perpetuate the disturbed monuments and references using surveying procedures found in the Manual of Instructions for the Survey of the Public Lands of the United States and Nevada Revised Statutes, Chapter 329, Perpetuation of Corners. The Holder shall record such

survey in the appropriate county and send a copy to the Authorized Officer. If the Bureau cadastral surveyors or other federal surveyors are used to restore the disturbed survey monuments, the Holder shall be responsible for the survey cost.

11. Threatened, Endangered or Candidate Animal Species

- 11.1. Compliance with the special stipulations below will help to ensure desert tortoises are not impacted:
 - 11.1.1. A speed limit of 25 miles per hour shall be required for all vehicles travelling on existing roads.
 - 11.1.2. Should a desert tortoise enter the area of activity, all activity shall cease until such time the animal leaves the area of its own accord.
 - 11.1.3. All drivers must check underneath vehicles and equipment before moving to ensure no tortoise has taken cover underneath parked vehicles.
- 11.2. The Holder will comply with the terms and conditions of the Biological Opinion File No. 1-5-04-F-526) for this project. The Biological Opinion is on file at the Bureau of Land Management, Southern Nevada District Office. The terms and conditions are attached.
- 11.3. The Holder, upon completion of the Proposed Action, must submit Appendix G. Please forward Appendix G to the BLM, Attn: Wildlife Biologist, 4701 N. Torrey Pines Drive, Las Vegas, Nevada 89130. Failure to abide by the terms and conditions of the grant and Biological Opinion, could result in temporary suspension of all activities within your ROW area per 43 CFR 2807.16 and 43 CFR 2807.17.
- 11.4. To prevent potential loss of host plants for monarch butterfly eggs, caterpillars, and chrysalises, milkweed plants (*Asclepias* spp.) should be avoided during project activities.

12. Vegetation

- 12.1. Restoration – for any habitat-disturbing activities (ground disturbance outside of maintenance in roads, permanently-disturbed areas, etc.):
 - 12.1.1. For temporary habitat disturbance, the holder/permittee/assignee/proponent is responsible for filling out BLM's Restoration Plan Template, which describes how temporary disturbance will be restored, to BLM for approval prior to issuance of authorization of habitat-disturbing activities.
 - 12.1.2. For permanent habitat disturbance, the holder/permittee/assignee/proponent is responsible for developing a decommissioning plan, following BLM's Restoration Plan Template, to be approved by BLM prior to issuance of authorization of habitat-disturbing activities, which describes how permanent disturbance will be restored.
 - 12.1.3. Disturbances will not be released from restoration requirements until the standards are met as described in BLM's Restoration Plan Template. Limit disturbance as much as possible to reduce restoration timelines. Weed Management stipulations must be followed.

- 12.1.4. Any use of seed or native plant materials will be approved by BLM in advance, and plant materials must originate from the appropriate Seed Transfer Zone and have appropriate seed tags, evidence of permits, and be weed free.

12.2. Cacti, Yucca, and Succulent Species:

- 12.2.1. For temporary habitat disturbance, cacti, yucca, or other succulent species that cannot be avoided must be salvaged by a BLM-approved contractor, stored appropriately during construction, and then planted back into the disturbed area in natural patterns and densities after construction. Survival standard is 80%. Coordinate with BLM.
- 12.2.2. For permanent habitat disturbance, cacti, yucca, or other succulent species in permanent disturbance areas must be salvaged by a BLM-approved contractor and moved to a BLM storage facility; in some circumstances when there are too many plants to be used, BLM may issue a forestry permit for destruction of these species. Coordinate with BLM.

13. Wild Horse and Burro

- 13.1. If wild horse and/or burro are encountered in or near the authorized area do not feed, harass, or otherwise interact with the animal. Report sick or injured animals, or violations to animals to the BLM immediately.

14. Recreation

- 14.1. Unless expressly stated, a land use authorization does not create an exclusive right of use of an area by the holder. The holder shall not interfere with other valid uses of the federal land by other users, such as casual recreationists.

15. Wilderness

- 15.1. Group sizes are limited to a maximum of 12 people, including guides.
- 15.2. Permittees and participants will utilize Leave No Trace principles and practices when traveling and recreating in the wilderness. Leaving, storing or “caching” equipment or belongings is not authorized within designated wilderness.
- 15.3. Outfitters, guides, and organized group leaders will provide wilderness education and ethics information to participants.
- 15.4. No permanent fixed ropes or cables for climbing or belaying purposes are allowed. Additionally, the installation of new bolts without further BLM authorization is prohibited.
- 15.5. All activities must comply with federal legislation, such as the Wilderness Act of 1964, and agency policy.
- 15.6. All activities must comply with additional resource protection mitigations as determined by the appropriate resource specialist.

Appendix B

No Action Alternative

For

**Programmatic Environmental Assessment for Special Recreation
Permits Management in Red Rock Canyon National Conservation
Area**

NEPA #: DOI-BLM-NV-S020-2025-0004-EA

Core Area SRP limits per DOI-BLM-NV-S020-0014-EA

Commercial Ongoing SRPs*

Recreational Opportunities	Number of Permits Proposed Annually	Number of Tours Allowed per Day	Maximum Number per Tour
4 X 4 (OHV) Guided Tours	4	2 per SRP	5 vehicles
Artistic	2	1	12 participants
Bus Tours (Commercial groups)	Not described	No limit	Undefined
Camping - Commercial use of group camp	2 per day	2 group sites; limit 14 days two times per year	Up to 50 participants, depending on site
Dual Sport (not speed events) - Rocky Gap	2	50	
Equestrian - Full-Time	3	8	40 participants
Hiking Guided Tours	5	2	12 participants
Hunting	Not defined (contingent upon NDOW and BLM allowances)	1	Only allowed in areas above 5,000 ft. with Las Vegas Field Office authorized permit.
Motorcycle/Scooter Tours	4	2	20 participants
Mountain Bike/Road Bike Guided Tours — Full-Time	4	2	12 participants
Mountain Bike/Road Bike Events	2	1	100 participants on scenic drive at one time
Rock Climbing— Full-Time	5	2 per area	12 participants
Rock Climbing— Guest Permits	8	2 per area	12 participants
Weddings	10 full-time	5	50 participants or less depending on location.
Yoga/Fitness	2	1	12

* **Note: Commercial Ongoing SRPs** are issued annually, with renewals granted up to five years pending the successful completion of annual compliance inspections.

Commercial Ongoing SRPs

4X4 (OHV) Guided Tours: Tours would be limited to four ongoing SRPs per year. Tours would be limited to two tours per day per SRP with not more than five vehicles per tour. Vehicles would be limited to a speed limit of 15 miles per hour on the Rocky Gap Road. One of these commercial SRPs may be utilized for the group use of developed facilities for special/one-day events not to exceed five events per year.

Artistic: Permits would be limited to two full-time ongoing SRPs per year. These would primarily be for class/workshop type of opportunities. It would not be for educational purposes by formal educational institutions. Paint, photography and sculpture could be included. Participants would utilize existing trails and facilities, and would not leave any material behind. No more than one tour per day with up to 12 participants each would be allowed.

The BLM would consider special event permits in lieu of unused full-time Artistic SRPs. There would be a maximum of 300 persons per event. Participants would be required to utilize developed facilities and previously disturbed locations as stipulated in their SRP.

Bus Tours (Commercial groups): The 2005 RRCNCA RMP does not set limits for the number and size of bus tours (commercial groups) that do not have participants hike, climb or bike. For bus tours that do not have participants hike, climb or bike at RRCNCA, no SRP is required, and therefore, it is not analyzed further in this PEA.

Bus tours that include hiking, climbing or biking activities at RRCNCA will require permitting. No interpretation is part of the permit. Additionally, all buses are limited to paved roads and may not take up over 50 percent of available parking. An EA will be needed before an SRP is issued. This PEA does not include analysis or approval of Bus Tour SRPs.

Camping — Commercial use of group camp: The commercial use of campgrounds was not considered in the RRCNCA RMP. The commercial use of the campground would be limited to off-peak periods. It would be limited to no more than two group sites with a maximum of 50 persons per site. There would be a two-week limit unless otherwise approved by a separate EA. In addition to group site fees, other fees may apply.

Dual Sport — Rocky Gap: Dual Sport Competitive SRPs in Rocky Gap would be limited to two SRPs per year with a maximum of 50 participants per permit. Only street-legal vehicles would be allowed and all travel would be limited to designated roads. These could not be speed events. In addition, events are prohibited in Wilderness Areas.

Equestrian — Full-Time: Tours are limited to three SRPs for the entire RRCNCA. They would each have defined locations. Currently, there are no existing SRPs in the RRCNCA Core Area considered under this PEA. (Note: Blue Diamond Mesa will be covered in a separate EA.)

Hiking Tours — Guided: Tours would be limited to five ongoing SRPs per year. Tours would be limited to two tours per day with no more than 12 participants per area, which includes guides.

Only designated trails and interpretive areas would be authorized for use.

Hunting: Commercial guides must have an existing Nevada Department of Wildlife (NDOW) and Las Vegas Field Office permit. Hunting is only permitted in areas above 5,000 feet in elevation. In addition, hunting permittees would follow all stipulations including seasonal restrictions.

Motorcycle/Scooter Tours: Tours would be limited to four permits per year. Each tour would be limited to two tours per day with a maximum of 20 participants per tour. Only street legal vehicles would be permitted. Tours would be limited to designated roads and the use of developed parking and interpretive areas.

Mountain Bike/Road Bike Guided Tours: Tours would be limited to four ongoing SRPs per year. Tours would be limited to two tours per day with no more than 12 mountain bike/road bikes per tour, including guides. Tours are limited to designated roads and mountain bike trails.

Mountain Bike/Road Bike Events: SRPs would be limited to two per year with a maximum of 100 participants on the scenic drive at one time. Only designated roads, mountain bike trails, the Scenic Drive and existing parking areas would be utilized.

Rock Climbing — Full-Time: Full-time permits would be limited to five ongoing SRPs per year with a limit of two tours per day per climbing area and 12 clients per climbing area per tour. A climbing area is defined as a crag or wall dependent on the number of routes and space at the base of climbs.

Permittees would utilize designated trails to access climbing areas.

Rock Climbing — Guest Permits: Guest permits would be limited to eight SRPs per year. Each permittee would be limited to two 5-day or one 10-day period per year for one year with a limit of two tours per day per climbing area and 12 client per climbing area per tour. As mentioned in the section above, a climbing area is defined as a crag or wall dependent on the number of routes and space at the base of climbs.

Guest permits would not have a guaranteed consecutive year renewal. Permittees would utilize designated trails to access climbing areas.

Weddings: Permits would be limited to ten full-time SRPs per year. Each permit would be limited to three locations in the Core Area of RRCNCA including Red Spring Boardwalk, 159 Overlook and Red Rock Wash Overlook. Red Spring and 159 Overlook would permit a maximum of two 2-hour periods per day with a maximum of 50 guests. Red Rock Wash Overlook would be limited to two 2-hour periods per day with a maximum of 15 guests and two vehicles. Permits would allow for still photography. Videography would require an additional permit from the Las Vegas Field Office.

Yoga/Fitness Tours: Permits would be limited to two ongoing permits per year. No more than one tour per day with no more than 12 total participants is allowed. Participants would be limited to the Calico Basin and Sandstone Quarry areas utilizing developed areas and designated trails.

Competitive SRPs

Recreational Opportunities	Number of Permits Proposed Annually	Maximum Number of Participants Allowed per Event
Competitive Rock Climbing	1	Limit of 1,000 participants/spectators per site/event
Equestrian - Rocky Gap	1	50
Foot Race/Walk Events - Utilizing the Scenic Drive	5	2000
Foot Race/Walk/Events - Utilizing trails and non-paved roads	2	300
Poker Run/Events - Utilizing the Scenic Drive	5	50

Competitive SRPs

Competitive Rock Climbing: While not addressed in the Record of Decision (ROD) for the RRCNCA RMP, competitive rock climbing could be a permitted event. Competitive rock climbing events would be limited to one event per year and only permitted during the months of November through February and May through August. The competitive rock climbing SRP would permit a maximum of 20 competitors per area per event and a maximum of 30 spectators per area per event. Events would not be able to take place in Wilderness Areas.

Maximum number of participants, vendors, event staff, and spectators are not to exceed 1,000 within the Core Area of RRCNCA. Maximum number of locations would be ten. Special stipulations will be developed as part of the Climbing Management Plan specific to competitive climbing. SRP applicants would be encouraged to utilize off-site facilities for vending, seminars, and other large group events related to this SRP.

Equestrian — Rocky Gap: Equestrian Competitive SRPs in Rocky Gap would be limited to one SRP per year with a maximum of 50 participants per permit. All travel would be limited to designated roads. SRPs are prohibited in Wilderness Areas.

Foot Race/Walk/Events — Utilizing the Scenic Drive : Foot Race/Walk Events on the Scenic Drive would be limited to five SRPs per year with no more than 2,000 participants per race.

Foot Race/Walk/Events — Utilizing Trails and Non-paved Roads: Foot Race/Walk Events on trails and non-paved roads would be limited to two SRPs per year with no more than 300 participants per race.

Poker Run/Events — Utilizing the Scenic Drive: Poker Run/Events would be limited to five SRPs per year with no more than 50 participants per event.

Staging and Facilities: All vehicle parking and event staging will be conducted at the Entrance Station area, Visitor Center parking lots, 159 Overlook parking, Red Spring parking, Scenic Drive Exit parking, or the Scenic Drive parking areas. No trails in Wilderness Areas will be authorized.

Organized Group Use of Developed Facilities and Climbing Areas

Recreational Opportunities	Number of Permits Proposed Annually	Maximum Number of Participants Allowed per Event
Group Camping and Off-Season Use of Campgrounds	20	20
Guest Climbing Permits — Education/Group	4	50 with only 12 per area per day
Non-commercial Wedding Permits	100	50 person and 10 vehicles
Red Spring Group Picnic Area	200	50
Willow Spring and 159 Overlook Picnic Areas	100	50
Visitor Center and Amphitheater - during normal operating hours	50	300 (subject to room/facility limits)
Visitor Center and Amphitheater - during non-operating hours	20	1000 (subject to site, exclusive use, and possible cost reimbursement fees)
Developed Parking Areas	50	Dependent on available parking and disturbed area at each trail head. No more than 50% of parking or public space would be impacted.

Organized Group Use of Developed Facilities and Climbing Areas

The types of groups under this SRP include but are not limited to clubs, family reunions, scouting groups and community groups. The group SRPs would allow for use of developed facilities and climbing areas. A group use SRP could also include one-time events with some commercial nature, such as a non-profit group who wishes to conduct a one-day event where

fund raising occurs. Although the SRP issued would be charged at the commercial rate, it would be a one-time use SRP.

Group Camping and Off-Season Use of Campgrounds: Group camp sites at Red Rock Canyon Campground are the only group camping areas covered by this PEA. If the campground is not open for general public use, the group sites may be available for group camping SRPs. Applicants would be responsible for cleaning, pumping toilets, trash removal and any extra security required for use of this site during the off-season.

Guest Climbing Permits — Education/Organized Group: SRPs would be limited to four per year. Each guest climbing permit would be limited to two 5-day visits or one 10-day visit. There would be a maximum of 50 participants per visit with 12 climbers per climbing area per visit.

The guest climbing SRP limit would be in addition to the commercial guest climbing permits. Because the RRCNCA RMP requires BLM to work cooperatively with local school programs, two of these guest climbing SRPs would be reserved for local school use.

Non-commercial Wedding permits: Non-commercial wedding permits would be limited to 100 SRPs. These SRPs would be limited to three areas in the Core Area of the RRCNCA: Red Spring Boardwalk, 159 Overlook and Red Rock Wash Overlook. Red Spring Boardwalk and the 159 Overlook would be limited to two 2-hour periods per day with a maximum of 50 participants and ten vehicles. Red Rock Wash Overlook would be limited to two 2-hour periods per day with a maximum of 15 guests and two vehicles. Permits would allow for still photography.

Videography would require an additional permit from the Las Vegas Field Office.

Red Spring Group Picnic Area : Only one SRP per day would be covered by this PEA for the Red Spring Group Picnic Area with a limit of 50 visitors per day and a maximum of four hours of use-time per day. Additional fees, such as reservation and assigned site fees may be required.

This PEA is for up to 200 SRPs per year.

Willow Spring and 159 Overlook Picnic Areas: There would be a maximum of one 4-hour period per day with a maximum of 50 visitors/period. Other assigned site fees and trash/cleaning fees may be required for requests beyond the four-hour period. This PEA would be for up to 100 SRPs per area per year.

Visitor Center and Amphitheater: There would be a maximum of one 5-hour period per day with a maximum of 300 visitors during regular operating hours and 1,000 visitors during non-operating hours. Permittee would be subject to site, exclusive use and/or cost reimbursement fees and/or bonding for the use of the Visitor Center and/or amphitheater. No alcohol would

be allowed during regular operating hours. Permittee will not have more than 200 persons in the amphitheater and not utilize more than 50 percent of the parking available at the Visitor Center. At private events where controlled consumption of alcoholic beverages has been properly permitted, the organizing group will be required to post a sign in the immediate vicinity of the event identifying it as a private event. This PEA would be for up to 50 SRPs per year.

At private events where controlled consumption of alcoholic beverages has been permitted, BLM employees and volunteers may not assist with handling, set-up or service of alcoholic beverages. BLM employees and volunteers may not consume alcohol on site, either on-duty or, if off-duty and participating in the event, as a guest. Event participants should not offer alcoholic beverages to BLM employees or volunteers staffing the Visitor Center. Any BLM employee or volunteer using alcoholic beverages while at the Visitor Center will be subject to disciplinary action. This PEA would be for up to 20 SRPs per year.

Developed Parking Areas in Core Area. There would be a maximum of one permit per day per developed parking area to be used as an aid station, parking, staging, or event space. Permittee may be subject to site fee, exclusive use, or cost recovery dependent on the time and scope of activity. Bonding may be required by the permittee to insure the restoration or unusual maintenance costs as necessary. See Appendix A for a list of available designated parking areas and current spaces for each site. These SRPs would be issued in addition to, but not in conflict with, other permitted activities.

Staging and Support:

- All SRPs would be limited to designated roads and trails in the Core Area of RRCNCA. If other trails are designated, SRP applicants may apply to amend their permit to include these areas. SRPs are prohibited from cross county travel.
- Permittees would be responsible for set up, staging, monitoring, damage control, tear down, and clean-up of any utilized resource in the Core Area of RRCNCA. They would be responsible for providing adequate facilities for their clients/spectators. If permittees use existing facilities, they would provide for the maintenance, cleaning, and supplies used for the duration of the permit, including pumping of pit toilets after an event using their own contractor. Permittees may not restrict the public from utilizing BLM provided facilities.
- All vehicle parking and event staging would be conducted at developed or designated parking areas. No parking would be allowed off-road. No commercial vehicles would be staged at areas not specified in the permittee's SRP. Staging may be permitted at the Red Rock Canyon Campground only as approved by the BLM when there are no other conflicts. Permittees shall ensure that the number of vehicles, unless authorized, may not fill more than 50 percent of the holding capacity of any parking area as determined by the BLM.

Cottonwood Valley SRP Limitations per DOI-BLM-NV-S020-2010-16-EA

Commercial Ongoing SRPs

Type of SRP	Number of Permits Proposed Annually	Number of Tours Allowed per Day	Maximum Number per Tour
4 X 4 (OHV) Guided Tours	2	2 per SRP	2 vehicles
Equestrian - Full-Time	1	2	12 horses
Hiking Guided Tours	3	2	12 hikers
Mountain Bike Guided Tours	3	2	12 bicycles
Rock Climbing— Full-Time	5	2 per area	12 participants
Rock Climbing— Guest Permits	8	2 per area	12 participants

* **Note: Commercial Ongoing SRPs** are issued annually, with renewals granted up to five years pending the successful completion of annual compliance inspections.

Commercial Ongoing SRPs

OHV guided tours: Would be limited to two ongoing SRPs per year. Tours would be limited to two tours per day with no more than two vehicles per tour. Tour vehicles would be limited to designated roads and would be limited to 25 miles per hour.

Mountain bike guided tours: Would be limited to three ongoing SRPs per year. Tours would be limited to two tours per day with no more than twelve mountain bikes per tour, which includes two guides.

Hiking guided tours: Would be limited to three ongoing SRPs per year. Tours would be limited to two tours per day with no more than twelve participants per tour, which includes two guides.

Horseback guided tours: Would be limited to one ongoing SRP per year. Tours would be limited to two tours per day with no more than twelve participants per tour, which includes two guides. No on-site storage facilities or corrals would be allowed. Hay or feed for the horses would be required to be weed free.

All tours would be limited to designated roads and trails in the Cottonwood Valley Trail System. No cross country travel would be permitted.

Guided Rock Climbing-Full Time: Full-time permits would be limited to five with a limit of two tours per day per area and twelve clients per tour per area.

Guided Rock Climbing- Guest Permits: Guest permits would be limited to eight per year. Each permittee would be limited to one 10-day or two 5-day periods per year. Permits would be limited to two tours per day with no more than 12 participants, which includes two guides. No more than two guest permits would be allowed in any given area per day.

An area is defined as a crag or wall dependent on the number of routes and space at the base of climbs.

Competitive SRPs

Type of SRP	Number of Permits Proposed Annually	Maximum Number of Participants Allowed per Event
Foot Race	6	500
Mountain Bike Races	6	500

Foot and mountain bike races: Would be limited to six foot race and six mountain bike event SRPs a year. The races would be limited to 500 participants with no more than 250 participants on the trail at one time.

All event activities will be limited to the designated roads, trails, and parking areas within the Cottonwood Valley Trail System.

Events would not be able to take place in wilderness areas.

Staging and Facilities: All vehicle parking and event staging will be conducted at the Late Night Trail Head, Cottonwood Valley Trail Head, and/or Red Valley parking area. No trails in wilderness areas will be authorized.

Organized Group/Event SRPs

Type of SRP	Number of Permits Proposed Annually	Maximum Number of Vehicles per Event or Number of Participants
OHV	3	200
Mountain Bike	5	500
Foot	5	500
Equestrian	3	200
Guest Climbing Permits — Education/Group	4	12

Organized Group/Event SRPs

Organized group or event permits are intended for group outdoor recreation activities or events which are not competitive. These are generally short-term events, which may include nonprofit groups doing fundraising or one-time commercial events. An example would be a business-sponsored mountain bike ride with funds going toward a charity. The authorized BLM officer determines when a permit is required based on planning decisions, resource concerns, potential user conflicts, or public health or safety issues. Permits will be considered on a case-by-case basis with the above considerations. Groups which wish to apply for numbers beyond the amount analyzed in this EA would require a separate EA and may incur cost reimbursement.

A permit may be issued for more than one event per permittee. For example: A mountain bike club may apply for five rides each year with no more than 200 participants per event. This would constitute one SRP with multiple events. Stipulations may dictate that this group have only 15

bikes in a group at a time with different groups utilizing different trails or riding at different times to minimize potential user conflicts and resource concerns.

Field managers may issue a Letter of Agreement (LOA) to document that the proposed activity has been determined to not require a permit. A LOA does not constitute an authorization.

OHV Organized Group events: Would be limited to three SRPs a year with no more than 200 participants per event. Vehicles would be limited to designated roads and would be limited to 25 miles per hour.

Mountain Bike or Foot Organized Group events: Would be limited to five mountain bike and five foot event SRPs a year with no more than 500 participants per event.

Equestrian Organized Group events: Would be limited to three SRPs a year with no more than 200 participants per event.

All event activities will be limited to the equestrian-designated roads, trails, and parking areas within the Cottonwood Valley Trail System.

Rock Climbing-Guest: Would be limited to four SRPs per year with each permit limited to ten days per year. This could be two 5-day visits or one 10-day visit. This limit would be in addition to the commercial Guest Climbing permits. The RMP requires us to work cooperatively with school programs for climbing.

Special Considerations for all permits

All SRPs would be limited to the north of State Route 160 during the first nine days of upland game bird season in October. This would apply to ongoing, competitive, and organized group SRPs. The permittee will coordinate with the U.S. Forest Service for SRP activities that cross into that agency's administered lands. Permittees would be required to obtain written permission to cross or stage on private land and provide it to the BLM.

SRPs will be subject to the fees established by the Director, updated every three years based on the Implicit Price Deflator Index, and published in the Federal Register. Fees can be charged for the reservation or assignment of sites when associated with recreational use. If more than 50 hours of staff time is required for processing a permit, cost recovery of direct expenses related to the permit will be charged. When cost recovery is necessary, the authorized officer shall notify the applicant of potential charges in writing within 30 days of receipt of the application.

The authorized officer may waive fees only for SRPs issued for research and/or scientific, therapeutic, or administrative use directly related to management of the permit area or if the event is co-sponsored by the BLM. Nonprofit, educational, or public agency status is not, on its own, a basis for waiving fees.

Staging and Support for Commercial, Competitive, and Organized Group Event SRPs

Staging areas for commercial, competitive, and organized group events would be located at the Cottonwood Valley parking lot, the Red Valley parking area and the Late Night parking lot. If there is a need for overflow parking, participants will be allowed to park along one side of designated roads as long as emergency vehicles can pass. No parking will be allowed off road or in vegetated areas. Events will have aid stations consisting of tables and chairs, which would be limited to disturbed areas along the trail.

Permittees would provide their own staffing, medical support, parking support, trail markings, portable structures and advertisements. All event-related material would be removed within 48 hours after the event.

The painting of rocks or the establishment of permanent markers or improvements would be prohibited.

Permittees would be responsible for providing adequate rest room facilities for all participants/spectators. A minimum of two rest rooms at the main staging areas would be required. If the Permittees use existing facilities, they may provide for the maintenance, cleaning and supplies used during the duration of the event, including pumping out of pit toilets after the event. The general public must also have access to the rest room facilities at all times.

Appendix C

Biological Opinion Terms and Conditions

For

**Programmatic Environmental Assessment for Special Recreation
Permits Management in Red Rock Canyon National Conservation
Area**

NEPA #: DOI-BLM-NV-S020-2025-0004-EA

Biological Opinion for Red Rock National Conservation Area File No. 1-5-04-F-526

**Terms and Conditions for Programmatic Environmental Assessment for Special Recreation
Permits Management in the Core Area of Red Rock Canyon National Conservation Area**

DOI-BLM-NV-S020-2025-0004-EA

Section 7 Log #: NV-052-25-034

Measures Proposed to Minimize the Effects of the Proposed Action:

1. Speed limit: Within Clark County, the speed limit is 25 miles-per-hour on unposted County roads; this speed will be established for all activities at all times unless otherwise designated.
2. Vehicles: All project/event-related individuals shall check underneath stationary vehicles before moving them.
3. Vehicle traffic: Shall be restricted to existing access roads, unless otherwise authorized by BLM and the Service.
4. Litter-control: Will be implemented and enforced by the project proponent or BLM. Trash containers shall remain covered, must be raven-proof, and emptied frequently enough to prevent overflow of materials. Trash, litter, project debris, etc. shall be transferred to a designated solid waste disposal facility. Vehicles hauling trash must be secured to prevent litter from blowing out along the road.
5. Tortoise mortality/injury: BLM wildlife staff (702/515-5000) and the Service (702/515-5230) must be notified of any desert tortoise death or injury due to the project implementation by close of business on the following workday. In addition, the Service's Division of Law Enforcement shall be notified in accordance with the reporting requirements of this biological opinion.
6. Tortoise activity: The period of greatest tortoise activity is generally defined as March 1 – Oct 31. However, unseasonably warm weather and/or precipitation outside this period may result in tortoise activity, particularly by hatchling and juvenile tortoise, and thus warrant adherence to requirements established for periods of greater activity. Similarly, BLM may determine that additional measures are appropriate for projects planned for the end or beginning of either period if conditions are suitable for desert tortoises to be active.
7. Education Program: A BLM/Service-approved biologist (as defined below) shall present a tortoise education program to all foremen, workers, permittees and other employees or participants involved on projects covered under this opinion. The program will consist of either a presentation or fact sheet as determined by project level consultation between BLM and the Service. The program or fact sheet will include information on the life history of the desert tortoise, legal protection for desert tortoises, penalties for violations of Federal and State laws, general tortoise activity patterns, reporting requirements, measures to protect tortoises, terms and conditions of the biological opinion, and personal measures employees can take to promote the

conservation of desert tortoises. The definition of "take" will also be explained. Workers and project associates will be encouraged to carpool to and from the project sites. Specific and detailed instructions will be provided on the proper techniques to capture and move tortoises which appear onsite if appropriate, in accordance with Service-approved protocol. Currently, the Service-approved protocol is Desert Tortoise Council 1994, revised 1999.

8. Biologist approval: BLM and Service wildlife staff must approve the biologists to be used to implement the terms and conditions of the biological opinion, or permit issued by BLM. Any biologist and/or firm not previously approved must submit a statement of qualifications in the Service-developed format and be approved by the wildlife staff before authorized to represent BLM in meeting compliance with the terms and conditions of the biological opinion. Other personnel may assist with implementing conservation measures, but must be under direct field supervision by the authorized biologist.
9. Biologist qualifications: In accordance with Procedures for Endangered Species Act Compliance for the Mojave Desert Tortoise (Service 1992), an authorized desert tortoise biologist should possess a bachelor's degree in biology, ecology, wildlife biology, herpetology, or closely related fields as determined by BLM and the Service. The biologist must have demonstrated prior field experience using accepted resource agency techniques to survey for desert tortoises and tortoise sign, which should include a minimum of 60 days field experience. All tortoise biologists shall comply with the Service-approved handling protocol (Desert Tortoise Council 1994, revised 1999). In addition, the biologist shall have the ability to recognize and accurately record survey results and must be familiar with the terms and conditions of the biological opinion that resulted from project level consultation between BLM and the Service.
10. Tortoise in harm's way: If a tortoise is found within the project/activity site in harm's way, all potentially harmful activity shall cease until the tortoise moves or is moved out of harm's way by an authorized biologist. If a desert tortoise is in imminent danger, the tortoise shall be moved out of harm's way and on to adjacent BLM land, using techniques described in the tortoise education program.
11. Moving tortoises: Tortoises that are moved offsite and released into undisturbed habitat on public land, must be placed in the shade of a shrub, in a natural unoccupied burrow similar to the hibernaculum in which it was found, or in an artificially constructed burrow in accordance with the tortoise handling protocol. Tortoises encountered shall be treated in a manner consistent with the appropriate measures in this biological opinion.
12. Permits: All appropriate State and Federal permits, including NDOW and Service permits for handling desert tortoises or their parts, must be acquired by the tortoise biologists or other personnel before project initiation and prior to handling any desert tortoise or their parts, or conducting any activity requiring a permit.
13. Project oversight: A BLM representative(s) shall be designated who will be responsible for overseeing compliance with the reasonable and prudent measures, terms and conditions, reporting requirements, and reinitiation requirements contained in this biological opinion. The designated

representative shall provide coordination among the permittee, project proponent, BLM, and the Service.

14. Desert tortoise burrows: Will be avoided whenever possible; if not, the burrow will be cleared in accordance with the measures set forth in this biological opinion.
15. Heat stress: Desert tortoises encountered experiencing heat stress will be placed in a tub, by an authorized tortoise biologist, with one inch of 76-90°F water for at least 20 minutes or until heat stress symptoms are no longer evident.
16. Temperature restrictions: Desert tortoises shall be treated in a manner to ensure that they do not overheat, exhibit signs of overheating (e.g., gaping, foaming at the mouth, etc.), or are placed in a situation where they cannot maintain surface and core temperatures necessary to their well-being. Desert tortoises shall be kept shaded at all times until it is safe to release them. No desert tortoise shall be captured, moved, transported, released, or purposefully caused to leave its burrow for whatever reason when the ambient air temperature is above 95°F (35°C). Ambient air temperature shall be measured in the shade, protected from wind, at a height of 2 inches (5 centimeters) above the ground surface. No desert tortoise shall be captured if the ambient air temperature is anticipated to exceed 95°F (35°C) before handling and relocation can be completed. If the ambient air temperature exceeds 95°F (35°C) during handling or processing, desert tortoises shall be kept shaded in an environment that does not exceed 95°F (35°C), and the animals shall not be released until ambient air temperature declines to below 95°F (35°C).
17. Reporting: The project proponent, permittee, or project lead if an internal action, must submit a document to BLM wildlife biologist within 30 days of completion of the project showing the number of acres disturbed, remuneration fees paid, and number of tortoises observed or taken, which includes capture and displacement, killed, injured, or harassed by other means, during implementation of programmatic actions.
18. Previous disturbance: Overnight parking and storage of equipment and materials, including stockpiling, shall be within previously disturbed areas or within areas cleared by a tortoise biologist to minimize habitat destruction.
19. Project boundaries: Project activity areas will be clearly marked or flagged at the outer boundaries before the onset of construction. All activities shall be confined to designated areas. When new access routes have been identified for development, routes will be flagged by the tortoise biologist prior to surface disturbance.

Proposed Measures for Actions Involving Ground Disturbance:

20. Blading of vegetation: *Not applicable.*
21. Fees: Prior to issuance of authorization, and prior to any surface-disturbing activity associated with the proposed project, the project proponent shall pay a remuneration fee of \$1,135 for each acre of surface disturbance, if paid prior to March 1, 2026. This rate will be indexed annually for

inflation based on the Bureau of Labor Statistics Consumer Price index for All Urban Consumers (CPI-U). Information on the CPI-U can be found on the internet at <http://stats.bls.gov/news.release/cpi.nws.htm>. An exception is made if the disturbance for the project is less than 0.25 acre of disturbance or for activities that result in a long term benefit for the species (e.g., trail realignment to minimize habitat impacts). Fees shall be submitted as directed in the attached form (Attachment C).

- 22. Notification: *Not applicable.*
- 23. Clearance: *Not applicable.*
- 24. Fencing: *Not applicable.*
- 25. Clearance following fence construction: *Not applicable.*

During Ground Disturbing Activities:

- 26. Fence inspection/maintenance: *Not applicable.*
- 27. On-site biologist: *Not applicable.*

Following Termination of Ground Disturbing Activities:

- 28. Fence removal: *Not applicable.*
- 29. Restoration: *Not applicable.*

Proposed Measures for Activities that Involve Maintenance or Modification of Existing Sites and Limited to Existing Disturbed Areas Adjacent to Tortoise Habitat:

- 30. Clearance- barren/unsuitable areas: *Not applicable.*
- 31. Fence high-risk areas: *Not applicable.*
- 32. On-site biologist: *Not applicable.*

Proposed Measures for Commercial or Competitive Events, Film, Research/Monitoring Permits:

- 33. Unauthorized introductions: The permittee shall not damage, collect, or introduce plants or animals to any location, unless specifically permitted by BLM.
- 34. Existing disturbance: All motorized vehicles, parking and activities are restricted to existing roads and existing disturbed areas; no additional ground disturbance will be allowed.
- 35. Marking/infrastructure: Painting of rocks or establishment of permanent markers or installation of permanent infrastructure is not allowed with these activities.

36. Removal of materials: The applicant is responsible for removal of any project-related materials such as flagging, markers, etc. within one week of the activity, project, or study conclusion except horse trail and endurance rides where all materials shall be removed immediately following the event. With the exception of horse endurance rides, any flagging used will be discretely placed so as not to attract the attention of the casual user.
37. Compliance: If this project involves studies affecting species protected by the Migratory Bird Treaty Act or Endangered Species Act, prior to implementation of research, inventory or monitoring, proof of the Service permit authorizing this activity must be provided to BLM at:
- Bureau of Land Management
Renewable Resources, Attn: Wildlife Staff
4701 N. Torrey Pines Dr
Las Vegas, Nevada 89130
38. Reports: Will be submitted to BLM wildlife staff representative following the end of the permit period (or yearly if a multiple year permit is issued) showing the number of desert tortoises injured, killed, collected, encountered or moved as a result of the permitted activity. Additional information for collections and research permits would include the UTM coordinates or GIS coverage of the collection sites, the number and location species of collected associated with permitted activities.
39. Provide data: For research, inventory, or monitoring activities collecting data on desert tortoise, a copy of the study results including any management recommendations will be submitted to the Service and BLM wildlife staff representative upon completion of the project to aid in recovery and future management of the tortoise and its habitat.
40. Weed-free hay: Only certified weed-free hay may be used by permittees and participants associated with horse trail and endurance rides, if available.
41. Temporary water troughs: Any temporary water troughs will be removed upon conclusion of the event. If drained onsite, they will be drained in such a way as to minimize disturbance to natural wash systems.
42. Staging/veterinarian checks, etc.: Will be returned to pre-event conditions within one week of the event. Should pre-event conditions not be restored, the applicant will be responsible for reimbursement of costs accrued during clean-up or restoration.

Proposed Measures for Restoration Activities and Mechanical Weed Treatments:

43. Clearance: *Not applicable.*
44. On-site biologist or fence/clearance: *Not applicable.*
45. Project access, vehicles: *Not applicable.*

Proposed Measures for Wild Horse and Burro Management Activities:

- 46. Vehicles, access roads: *Not applicable.*
- 47. Habitat: *Not applicable.*
- 48. Habitat: *Not applicable.*
- 49. Utilization: *Not applicable.*
- 50. Trap sites: *Not applicable.*
- 51. Management objectives: *Not applicable.*
- 52. Disturbances: *Not applicable.*

Proposed Measures for Wildlife Management Activities:

- 53. Vehicles, access: *Not applicable.*
- 54. Disturbance: *Not applicable.*

Limitations and Standard Operating Procedures for Casual/Dispersed Recreation:

- 55. SRPs: Will be issued for all commercial trail guiding operations.
- 56. Mountain bikes: Are restricted to paved or dirt roads in the NCA or any trail designated for their use. Mountain bikes are prohibited on trails between Spring Mountain Ranch State Park and La Madre Mountain, including all trails around the Scenic Drive.
- 57. Equestrian use: Is limited to designated trails in the area from La Madre Mountain south to Cottonwood Pass, 3 miles south of SR 160, and from the Spring Mountains Escarpment to the eastern boundary of the NCA (the area contained in the original NCA designation); no cross-country riding is allowed.
- 58. New trails: No new trail development is permitted without BLM authorization. Any trails established without prior concurrence will be restored to nature upon discovery. An interdisciplinary BLM team will review all new construction.
- 59. Trail monitoring: All trails would be monitored and additional protective measures implemented as needed.
- 60. Cross-country travel: Occasionally, cross-country driving or ditching of vehicles occurs within the NCA which are typically handled as a law enforcement action that includes vehicle recovery and photography. In some cases, the recovery actions can create a greater degree of habitat disturbance than the initial trespass action. These actions are, however, followed up with

restoration at the cost of the trespasser. Restoration efforts may be delayed by legal disputes but blocking access to the site is typically conducted following the vehicle recovery action.

Attachment 1
SECTION 7 LAND DISTURBANCE FEE PAYMENT FORM

Biological Opinion File Number: 1-5-04-F-526
Biological Opinion Issued By: Nevada Fish and Wildlife Office, Reno, Nevada
Species: Desert Tortoise (*Gopherus agassizii*) (Mojave population)
Programmatic Environmental Assessment for Special Recreation Permits
Project Name: Management in the Core Area of Red Rock Canyon National Conservation Area
NEPA #: DOI-BLM-NV-S020-2025-0004-EA
Case File/Serial #: _____
BLM Sec 7 log: NV-052-25-034
Project Proponent: BLM
Phone Number: _____

Payment Calculations:	Clark County		County		County	
	Critical habitat	Non-critical habitat	Critical habitat	Non-critical habitat	Critical habitat	Non-critical habitat
# acres anticipated to be disturbed on federal land	0	0				
Fee rate (per acre)	1135	1135				
Total cost/habitat type (per county)	\$ 0	\$ 0	\$ -	\$ -	\$ -	\$ -
Total cost per county	\$ 0		\$ -		\$ -	

Total payment required (all counties): **\$ 0**

Amount paid: _____ **Date:** _____ **Check/Money Order #:** _____

Authorizing agencies: Bureau of Land Management, Las Vegas, Nevada

Make check payable to: Bureau of Land Management

Deliver check to: **Physical Address**
 Bureau of Land Management
 4701 N Torrey Pines Drive
 Las Vegas, NV 89130

Credit Card Payments: Contact BLM Southern Nevada District Office at 702-515-5000

Process check to:
 Contributed Funds-All Other
 WBS: LVTFFX000800

Appendix D

Commercial Services Needs Assessment for the La Madre Mountain Wilderness Area and Rainbow Mountain Wilderness Area

For

**Programmatic Environmental Assessment for Special Recreation
Permits Management in Red Rock Canyon National Conservation
Area**

NEPA #: DOI-BLM-NV-S020-2025-0004-EA

Commercial Services Needs Assessment for the La Madre Mountain Wilderness Area and Rainbow Mountain Wilderness Area within the Red Rock Canyon National Conservation Area

Introduction

In 1990, Red Rock Canyon, located approximately 17 miles west of the Las Vegas Strip, was designated as Nevada's first National Conservation Area (NCA) under the Red Rock Canyon National Conservation Establishment Act. Accounting for adjustments made in 1994 and 1998, the current boundary encompasses approximately 198,000 acres. Red Rock Canyon NCA is known for its exceptionally scenic views, wildlife, cultural, paleontological, and natural resources, and world-class climbing, attracting nearly four million local and international visitors per year. In November 2002, the La Madre Mountain Wilderness Area and Rainbow Mountain Wilderness Area were congressionally designated under Public Law 107-282, known as the Clark County Conservation of Public Land and Natural Resources Act of 2002 (Clark County Act). The La Madre Mountain Wilderness Area and Rainbow Mountain Wilderness Area encompass 47,180 acres and 24,997 acres respectively. These areas were established to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the unique and important geologic, archeological, ecological, cultural, scenic, scientific, wildlife, riparian, wilderness, endangered species, and recreation resources of the public lands. Portions of the identified wilderness areas are within Red Rock Canyon NCA and the Spring Mountains National Recreation Area (NRA), and are jointly managed by the Bureau of Land Management (BLM) and the United States Forest Service (USFS). The 28,114-acre section of La Madre Mountain Wilderness and 20,225-acre section of Rainbow Mountain Wilderness within the Red Rock Canyon NCA, wholly managed by the BLM, will be the entire focus of this Needs Assessment.

With further development, accessing wilderness has become increasingly more urbanized. Since designation in 2002, the Las Vegas metro valley has experienced increasingly rapid growth in population and urban development. In the last 22 years, the city's development proximal to the NCA has significantly amplified, now consuming the land up to the eastern NCA boundary, providing very little buffer between the urban landscape and designated wilderness. In the La Madre Mountain Wilderness, most visitation occurs on designated trails leading up to Turtlehead Mountain, La Madre Spring, the White Rock Hills vicinity, Kraft Mountain, and Brownstone Basin. In the Rainbow Mountain Wilderness, most visitation occurs along eastern access points such as Lost Creek, Pine Creek, and Icebox Canyon. All identified high visitation points are predominantly accessible from trailheads located near the paved Scenic Loop Drive, while access points requiring more rugged travel to reach experience much less visitation.

The La Madre Mountain Wilderness and Rainbow Mountain Wilderness are known to contain numerous prehistoric cultural resource sites of high significance to the tribal communities, including rock shelters, roasting pits, petroglyphs, pictographs, campsites, and lithic materials. Additionally, historic sites including dams and spring developments built by the Civilian Conservation Corps, homestead sites, mining cabins and sites, fences, bottles, and cans are all present within these wilderness areas. As such, visitor use management remains a critical

component of preserving the integrity of these irreplaceable resources for their own intrinsic value and for the purpose of preserving wilderness character.

Commercial services have operated in the NCA prior to the wilderness designation. The NCA Resource Management Plan (RMP) and the Wilderness Management Plan (WMP) established management direction for the La Madre Mountain Wilderness and Rainbow Mountain Wilderness. The established management direction in wilderness allows for commercial guides and outfitters with accompanying limitations and specific activity restrictions. The RMP addresses recreational activities and commercial use in Sections 4 and 5, while the WMP provides direction under the Management of Group and Commercial Services section consistent with RMP decisions. Under the respective management direction, commercially guided climbing is limited to 5 permits operating year-round and 12 temporary (guest) permits; all are restricted to one per area/crag. Additionally, the BLM can issue up to 4 non-commercial rock-climbing group permits for up to 12 people per group per year. Commercially guided hiking is limited to 5 permits operating year-round and are restricted to two guided tours per day utilizing designated trails, visitor-worn hiking paths per agency approval, washes, and bedrock/slickrock. Commercially guided equestrian tours are limited to 3 permits operating year-round within the entire NCA in non-overlapping areas utilizing designated trails and are further restricted to two tours per day. All commercial group sizes are limited to 12 people / horses, including the guide.

Currently, the paved 13-mile Scenic Loop starting at the visitor center leads to multiple parking areas and designated trailheads providing access to La Madre Mountain Wilderness and Rainbow Mountain Wilderness. These parking areas are located outside of the wilderness boundary; some provide toilet facilities, and interpretive information from BLM Park Rangers or partnership staff. Access points near the Scenic Loop are in the core area (map Zone 1) of the NCA and defined as areas that are easily accessible, contain the designated trails within each wilderness area, where the expected visitor would not have the same opportunity for solitude as expected in a more remote location, and are close to population centers. The core area also includes popular hiking and climbing destinations that tend to attract a higher number of visitors due to their accessibility from the nearest trailhead, visibility from paved roads, and well-known recreation opportunities. Visitors can also access wilderness areas on the far northern, southern, eastern and western sides of the NCA via Harris Springs, Cliff Shadows, Lovell Canyon Road, and Rocky Gap Road. Access points with no close proximity to the Scenic Loop are outside of the core area (map Zone 2), defined as areas that typically do not have designated trails, where accessibility is more difficult to reach and away from population centers. This area may contain high quality recreation destinations but the experience itself may be more technically difficult, and require a higher level of skill, fitness, and self-sufficiency.

Needs Assessment

This needs assessment has two primary goals; to determine if commercial services remain proper and necessary within the La Madre Mountain Wilderness and Rainbow Mountain Wilderness, and if they are, to determine the extent necessary.

The Wilderness Act of 1964 established a “National Wilderness Preservation System to be composed of federally owned areas designated by Congress as ‘wilderness areas,’ and these shall

be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness.” In 1976, with the passage of the Federal Land Policy and Management Act (FLPMA), Congress made the BLM the fourth land management agency with wilderness management authority under the Wilderness Act. Section 4(c) of the Wilderness Act specifically prohibits commercial enterprises but provides a special provision in Section 4(d)(5), which states, “Commercial services 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” (emphasis added). The Act, in Section 4(b), defines public purposes as, “Except as otherwise provided...recreational, scenic, scientific, educational, conservation, and historical use.” Furthermore, page 1-20 of BLM Manual Section 6340 (MS-6340) provides guidance in determining the “extent necessary” for commercial services (Appendix C).

The provision authorizing commercial services sets three main benchmarks for analyzing the appropriateness of services; these are: 1) proper, 2) necessary, and 3) extent. The three benchmarks, along with the guidance provided in MS-6340, will guide the determination of what, if any, commercial services may be performed with the La Madre Mountain Wilderness Area and the Rainbow Mountain Wilderness Area. These benchmarks will serve as a filter of analysis beginning with proper and concluding with extent.

Part 1: Proper

Proper, by definition, means adapted or appropriate to purpose or circumstance in conformance with established standards. In consideration of this definition, the question arises: are commercial services proper in the wilderness? In wilderness, a proper service is one that is compatible and appropriate for the site. Under this analysis, to be proper, all activities considered must be consistent with the RMP and the WMP. Furthermore, to be proper, other prohibited wilderness uses, as identified in Section 4(c) of the Wilderness Act, must not be included.

The BLM first considers which commercial services are not proper within the wilderness prior to considering which may be appropriate. Commercial services proposing single-day activity exceeding the NCA hours of operation would not be proper as these would conflict with the current RMP decision. Any commercial service proposing a group size of more than 12 or including overnight activities would not be proper as these activity components conflict with the current WMP decision. Competitive commercial events would not be proper in the wilderness area as they are prohibited by regulation.

Commercial services would not be allowed to store or cache any equipment or gear in the wilderness to preserve the undeveloped quality of wilderness character. Climbing guides would not be permitted to install new permanent equipment or create new routes. Except for photos or memories, commercial services would not be permitted to take anything from the wilderness area. Commercial services would not be allowed to alter any of the landscape features within the wilderness area for visitor convenience or entertainment, as this would impact the primitive

aspect of the outstanding opportunities for recreation or primitive and unconfined recreation quality of wilderness character. Commercial services would not be allowed to travel cross country in the core area, which is limited to designated trail use.

Finally, commercial services proposing activities that involve the use of motorized or mechanized transportation or equipment would not be proper in the wilderness area, excluding the Americans with Disabilities Act (ADA) compliancy discussed in further depth later.

As identified, for a commercial service to be proper it must be wilderness compatible and site appropriate. The RMP and WMP management decisions for the La Madre Mountain Wilderness and Rainbow Mountain Wilderness were established to protect resources while providing direction for commercial services and visitor use management. The management decisions cap the number of commercial enterprise permits available categorically by activity, limit group sizes, designated trail and area use. Therefore, any commercial service would need to comply with the limitations set forth under the RMP and WMP. Any commercial services would need to remain within the operating hours of the NCA, meaning only day trips are proper. There will be no Wilderness Act Section 4(c) prohibited means of transportation or equipment, except for persons whose disability requires the use of a wheelchair. The wheelchair must be designed solely for use by a mobility-impaired person and suitable for use in an indoor pedestrian area to be appropriate for access into the wilderness (refer to the ADA, as amended, Section 12207). Commercial services focused on providing opportunities for underserved communities may be proper if they are able to serve of the public purposes of wilderness.

The Wilderness Act identifies preservation of wilderness character as the primary purpose of wilderness. Congress further identified six subordinate public purposes that must be administered so as to preserve the wilderness character of the area. These are recreation, scenic, scientific, educational, conservation, and historical use. Commercial services devoted to facilitating recreation, scenic, and education may be proper within the La Madre Mountain Wilderness and Rainbow Mountain Wilderness.

Although wilderness is committed to scientific public purposes, this needs assessment will not analyze services scientific in nature; a separate individual analysis would be conducted upon receipt of a scientific project proposal. Likewise, while commercial filming objectives may be appropriate in wilderness, a separate individual analysis will be conducted should a proposal be received. Scientific proposals and commercial filming are outside of the scope of this analysis and are more appropriately analyzed on an individual basis. The content of this analysis will specifically focus on outfitter and guide commercial services geared towards supporting the public purposes of recreation, scenic, educational, conservation, and historical uses.

In summary, for commercial services to be proper within wilderness, they must not utilize any prohibited wilderness uses (Wilderness Act Section 4(c)) and must adhere to management decisions defined in the RMP and WMP. Secondly, services focused primarily on administering access to participants with disabilities or underserved communities are proper. Lastly, services focused on the educational, scenic, and recreational public purpose of wilderness are proper.

Proper commercial services within the La Madre Mountain Wilderness and Rainbow Mountain

Wilderness:

- Must not utilize any prohibited wilderness uses, with the exception of already established trails and installed permanent fixed anchors on existing climbing routes.
- Must adhere to the NCA RMP and WMP management decisions including hours of operation, designated trail or area use, and limit group sizes to no more than 12 people including the guides.
- Services may focus on administering access to participants with disabilities or underserved communities.
- Services may focus on the educational, scenic, or recreational public purposes of wilderness.

Part 2: Necessary

Necessary, by definition, means essential, indispensable, or required for a particular purpose. In consideration of this definition, the second question arises: are commercial services necessary in the wilderness? In wilderness, necessity dictates the service must not be readily available outside of wilderness, visitors cannot access without the service, and they must serve a public purpose identified in the Wilderness Act. Sole desire by commercial operators or the public does not equate to necessity on its own merit. Since the BLM has established the first benchmark, proper, the next filter of analysis will determine what is necessary in wilderness.

Both the La Madre Mountain and Rainbow Mountain Wilderness areas boast supreme scenic views, are home to numerous flora and fauna, and contain irreplaceable archaeological sites of cultural significance. All aspects important to wilderness character. As the urban interface development and visitor interest increases, the NCA cannot solely manage all educational, recreational, and resource protection needs without the support of partnership. Commercial services capable of assisting the BLM with preserving the wilderness character, providing education on the cultural resources, and facilitating the protection of the wilderness are necessary to support the NCA in fulfilling the Congressional mandate of the Wilderness Act. Considering this determination, for any commercial service to be necessary, they must meet an identified public need, meet agency objectives, and have a proven ability to provide a high standard of cultural resource education and wilderness character preservation; if not, they would not be considered necessary.

The NCA will encourage commercial services focused on administering access to participants with disabilities or underserved communities, without whom would otherwise go unserved. However, even services focused on participants with disabilities or underserved communities must be able to administer a BLM approved curriculum furthering the preservation of wilderness character. Services limited to only scenic and recreation focused activities would not be necessary. Excluding wilderness, the NCA and overall Southern Nevada District Office (SNDO) provide ample opportunities for scenic and recreational activities without an educational component. The NCA does, and will continue to, consider sites outside of wilderness suited to provide solely scenic and recreational commercial services.

In summary, for any commercial service to be necessary in the La Madre Mountain Wilderness and Rainbow Mountain Wilderness, they must assist the NCA in preserving wilderness character and provide an approved resource education component. The NCA encourages commercial

services focused on administering access to participants with disabilities or underserved communities, but these services are still required to provide an educational component. Strictly, only commercial services capable of complying with this requirement are determined to be necessary in wilderness and consistent with the direction provided in the Wilderness Act, NCA RMP and WMP.

Necessary commercial services in the La Madre Mountain Wilderness and Rainbow Mountain Wilderness:

- Must be proper.
- Must administer a BLM approved curriculum to further the preservation of wilderness character. This is a requirement for any commercial service.

Part 3: Extent

Extent, by definition, means scope, space, volume, or to which degree. In consideration of this definition, the third question arises: to what extent are commercial services necessary in the wilderness? In wilderness, extent determines the capacity to which the services will be offered, in assurance that no more commercial services are offered than are necessary to achieve the Congressional mandate of preserving wilderness character.

As identified in the Introduction, during the development of the RMP and WMP, it was determined that the maximum capacity of commercial permits possible, while maintaining wilderness character, would be as follows: 5 renewable hiking guides, 3 renewable equestrian guides, 5 renewable climbing guides, and 12 temporary (guest) climbing permits. Under the same direction, guided hikes are limited to 2 tours per day with a group size limit of 12 including the guide; guest climbing permits are limited to 1 trip of up to 10 consecutive days or 2 trips up to 5 consecutive days, with all guided climbs limited to one per area/crag and no more than 12 people per group including the guide; equestrian guide permits must have a defined non-overlapping area of operation and are limited to 2 tours per day with a maximum of 12 horses per tour including the guide.

Currently, commercial services are operating in the La Madre Mountain Wilderness and Rainbow Mountain Wilderness. As of this analysis, the maximum guided hiking and guided rock-climbing permits have been assigned, while equestrian guide permits are still available and temporary (guest) rock climbing permits operate on an annual lottery basis. Considering the assigned and vacant permits, the management decisions defined under the RMP and WMP are valid thresholds for determining the extent of commercial services. It is reasonable to assert, if more guided hiking and rock-climbing permits were allowed, opportunities for solitude or primitive and unconfined recreation would be negatively impacted by the sight and saturation of guided groups and crowds, limiting the opportunities for casual-use individuals.

By remaining consistent with the capacity management decisions defined in the RMP and WMP, preservation of wilderness character is prioritized. The limitation on the number of commercial services, group size and area restrictions are essential to better assure that wilderness character is preserved to the maximum extent possible, while still allowing for the educational value of wilderness to be realized.

Extent of commercial services with the La Madre Mountain Wilderness and Rainbow Mountain Wilderness:

- Commercial services permits are capped as follows:
 - o 5 renewable guided hiking permits, 2 tours per day with a maximum of 12 people including the guide occurring on designated or BLM approved visitor-worn trails.
 - o 3 renewable guided equestrian permits, 2 tours per day with a maximum 12 horses per tour including the guide occurring on non-overlapping areas of operation.
 - o 5 renewable guided rock-climbing limited to one per area/crag with a maximum of 12 people per group including the guide.
 - o 12 temporary guest permits limited to 1 trip of up to 10 consecutive days or 2 trips up to 5 consecutive days with a maximum of 12 people per group including the guide and no more than one group per area/crag.

Findings and Conclusion:

Upon completion of the three-part analysis of the Needs Assessment, the appropriate number of commercial services was identified consistent with management under the Wilderness Act. The analysis determined that commercial services providing guided hiking trips on designated trails, guided rock-climbing groups in approved areas/crags, and guided equestrian tours on designated trails in non-overlapping areas, all with groups no more than 12 people each, are the only type of services that are proper in the wilderness. It was determined that, for any commercial service to be necessary, they must be able to administer a BLM approved educational component furthering the preservation of wilderness character. Services that administer access to participants with disabilities and underserved communities are both proper and necessary in wilderness when they meet the relevant educational requirements, and such services would be encouraged by the NCA. Lastly, the analysis determined the extent of commercial services would be limited to no more than 5 commercially guided hiking permits operating two guided hikes per day, no more than 5 commercially guided rock-climbing permits and 12 temporary (guest) permits with only one guided rock-climbing group per approved area/crag, and no more than 3 commercially guided equestrian permits operating two tours per day in non-overlapping areas. As overall visitor use increases, a recommended capacity study should be initiated to assess for the continued necessity and extent of commercial services in the La Madre Mountain Wilderness and Rainbow Mountain Wilderness.

Having commercial services, as identified in this needs assessment, would assist the BLM in facilitating the recreational and educational public purposes of wilderness and in fulfilling BLM's legislative mandate of preserving wilderness character. Commercial services are necessary to better assure that wilderness character is protected for "future use and enjoyment as wilderness."

Prepared:

Name **Aaron Hoppler**

Position **Outdoor Recreation Planner-
Wilderness Specialist**

AARON HOPPLER

Digitally signed by AARON
HOPPLER

Date: 2024.08.19 09:42:57 -0700'

Signature _____

Date _____

Recommended:

Name **Miles Gurtler**

Position **Nevada Recreation & NCLS
Program Lead**

MILES GURTLE

Digitally signed by MILES
GURTLE

Date: 2024.08.19 12:18:17 -0700'

Signature _____

Date _____

Recommended:

Name **Boris Poff**

Position **Red Rock Canyon NCA
Manager**



Digitally signed by BORIS POFF
Date: 2024.08.19 21:30:11 -06'00'

Signature _____

Date _____

Approved:

Name **Catrina Williams**

Position **Field Manager Red Rock/Sloan
Field Office**



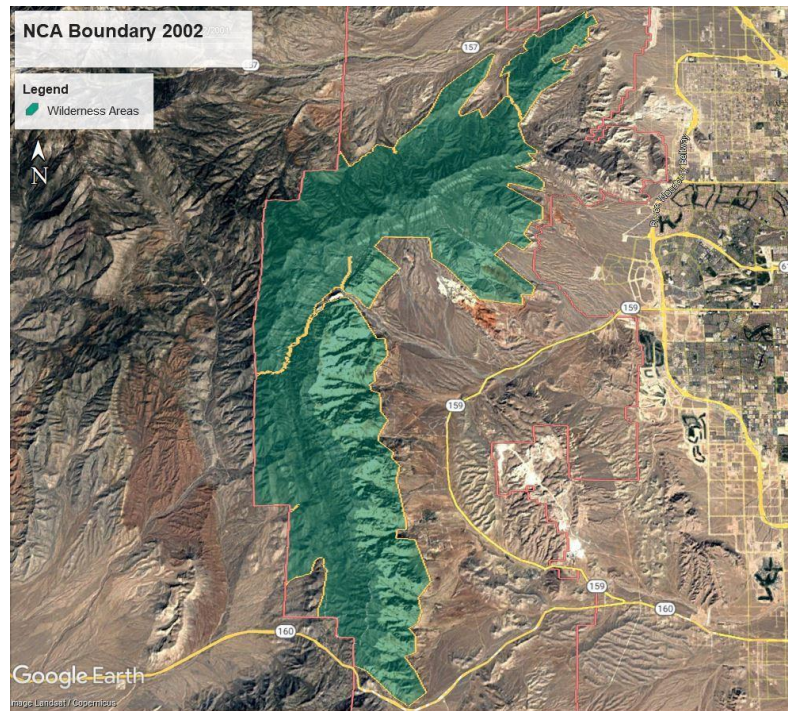
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WILLIAMS

Date: 2024.08.20 09:08:07 -0700'

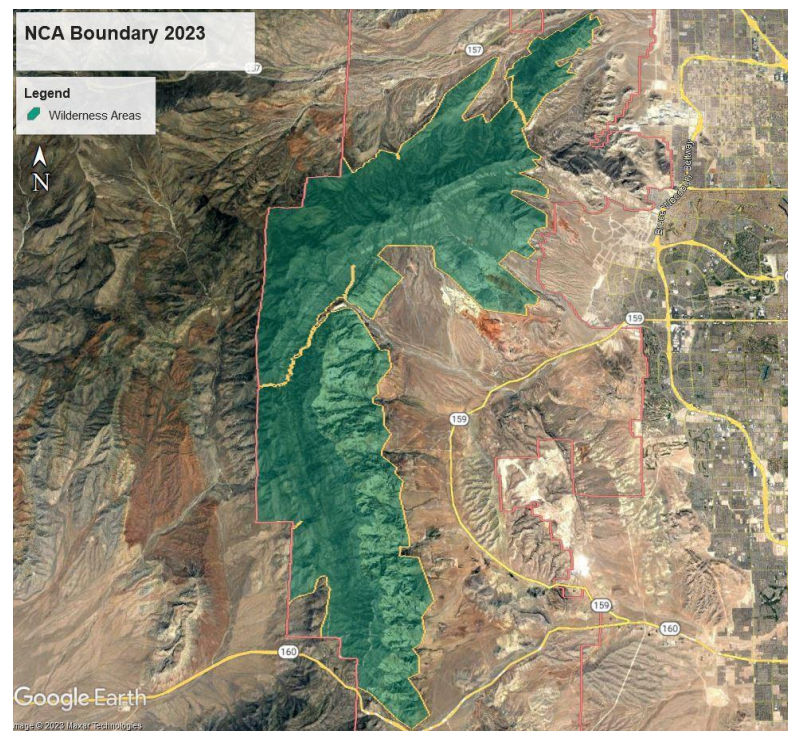
Signature _____

Date _____

Appendix A

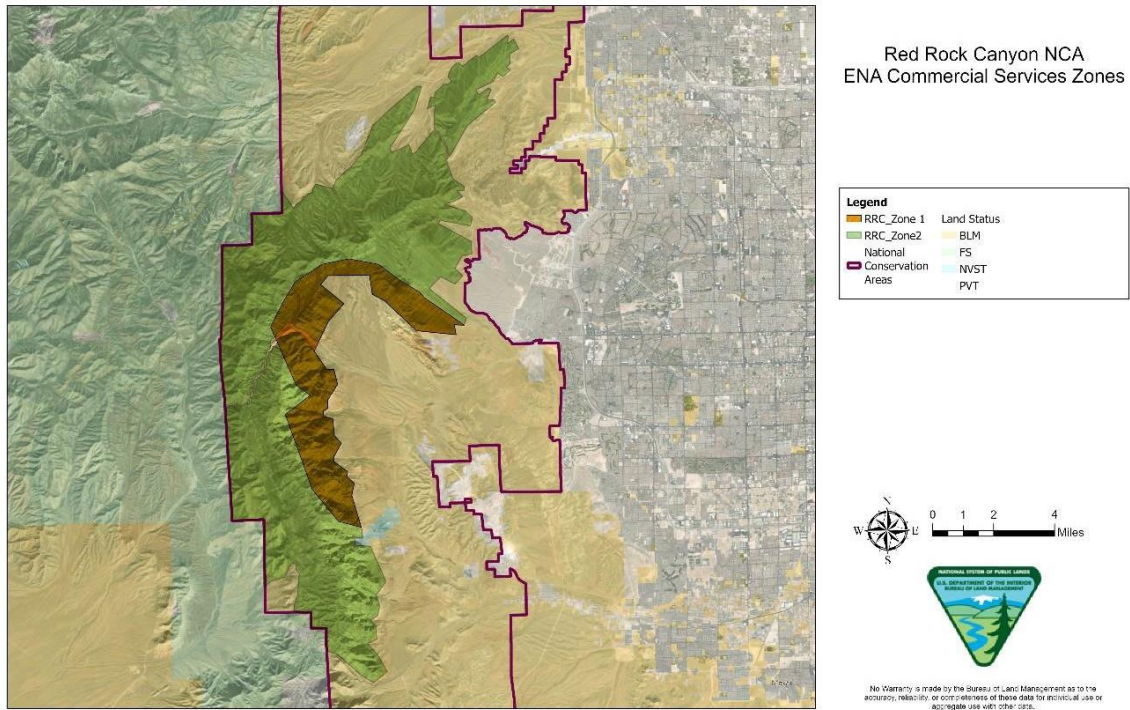


NCA Boundary and development in 2002



NCA Boundary and development in 2023

Appendix B



Defined areas for commercial services; Zone 1 (Orange) and Zone 2 (green).

Appendix C

Bureau of Land Management Manual Section 6340

4. Commercial Enterprises and Services (pg. 1-20)

a. General principles. Commercial enterprises are prohibited in wilderness areas, except for valid existing rights and as otherwise provided for in Section 4(d) of the Wilderness Act. Section 4(d)(6) allows those commercial services necessary for activities that are proper for realizing the recreational or other wilderness purposes of the areas. Commercial services are allowed to the extent necessary for realizing these wilderness purposes. Allowable commercial services may include those provided by packers, outfitters, and guides, and may also include commercial filming (see sub-section b, below) or restoration stewardship contracts (see 1.6.C.15.f.vi of this manual). Determining the “extent necessary” is based on the following guidance:

i. The BLM should determine through analysis if one or more of the public purposes of wilderness would go unrealized if there was no commercial use. If a given purpose can be adequately realized in a given place and time without commercial services then the commercial service is not necessary.

ii. Commercial services may serve visitors who lack the necessary physical or cognitive ability or specialized knowledge, skills, or equipment to engage in wilderness recreation. To be allowable a commercial service must be necessary to realize wilderness purposes rather than only to provide a desired activity in a wilderness setting.

iii. Commercial services may be necessary to address specific resource concerns, provide support for research or other projects, or provide wilderness education or interpretation.

iv. In all instances, commercial services may be performed within the wilderness to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the area. For example, an overnight pack trip to a distant valley to experience wilderness solitude may be dependent on a wilderness setting and therefore would likely satisfy the statutory requirement that the service is proper for realizing the wilderness purposes of the area.

v. Commercial services can be allowed only where their authorization will not impair wilderness character as a whole. Where commercial services are likely to impair wilderness character as a whole, reduction in commercial service use or non-commercial use (or both) may be necessary. Reductions will be based on levels of demand, need, equity, and availability of similar experiences in the vicinity of the wilderness.

Acknowledgements

With special recognition and gratitude for their involvement in the development, review, and completion of this Commercial Services Needs Assessment for the La Madre Mountain Wilderness Area and Rainbow Mountain Wilderness Area within the Red Rock Canyon National Conservation Area. Their dedication and contributions to the success of this document are greatly appreciated.

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