

# United States Department of the Interior Bureau of Land Management

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**Environmental Assessment  
DOI-BLM-UT-Y010-2019-0021-EA**

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**September, 2019**

## **Supplementary Rules on Camping and Wood Gathering: Providing Sustainable Camping Opportunities in the Klondike Bluffs Mountain Bike Focus Area**

***Location:* Klondike Bluffs Mountain Bike Focus Area, Grand County, Utah**

***Applicant/Address:* BLM, 82 East Dogwood, Moab, UT 84532**

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## **1.0 PURPOSE & NEED**

### **1.1 Introduction**

The Moab Field Office (MFO) of the Bureau of Land Management (BLM) proposes to manage camping and enable future sustainable camping opportunities through designating campsites and/or providing a campground in the Klondike Bluffs Mountain Bike Focus Area (referred to as the Focus Area). In addition, proper disposal of human waste and a limitation on wood cutting and collection is proposed in this location. The Klondike Bluffs Mountain Bike Focus Area is depicted in Map 1 found in Appendix B. The proposal would add the Focus Area to the list of areas where the MFO provides sustainable campsites and/or campgrounds, and where dispersed camping is restricted. The BLM would seek establishment of supplementary rules regarding camping and wood gathering in the Focus Area, which would be undertaken through publication in the *Federal Register*, in accordance with 43 CFR 8365.1-6.

### **1.2 Background**

The almost constant use of public lands for dispersed camping in the Focus Area is damaging soils, woodland resources, vegetation, wildlife habitat, cultural resources, paleontological resources, recreation opportunities, scenic values and reduction of forage. The MFO hosts approximately 3 million visitors per year; a substantial, but unknown number of these visitors wish to camp. Visitation to the Moab BLM has increased over the last ten years, and dispersed camping pressures have increased commensurately.

The Focus Area was established in the 2008 Moab Resource Management Plan (RMP) and is contained within the Labyrinth Rims/Gemini Bridges Special Recreation Management Area (SRMA). It is located immediately west of, and adjacent to Arches National Park. The 14,600 acre Focus Area includes 53 miles of designated mountain bike trails, all established and constructed within the last 10 years. Trailhead facilities include kiosks, signs, toilets and graveled parking areas. The mountain bike trails have proven to be very popular, leading the public to “discover” this previously little utilized area. Since the great majority of the mountain bikers come from outside the area, many of them wish to camp as close as possible to the site of their chosen activity. There has been an explosion of campers in the Focus Area, especially on spring and fall weekends. Prior to 2008, there was little to no camping occurring within the Focus Area. In 2019, up to a thousand people camp in the Focus Area on any given spring and fall weekend. Those trees that grow within the Focus Area have been stripped in search of firewood. Additionally, there has been an increase in illegal off-road driving in search of campsites.

An additional isolated 160 acre parcel is located on the south side of the Focus Area, near the South Klondike Bluffs Trailhead, which is located on State of Utah School and Institutional Trust Lands Administration (SITLA) land. Currently, most dispersed camping in this location occurs on SITLA lands. SITLA is preparing a camping plan for this location, which would render the 160 acre isolated parcel without management for camping. This 160 acre parcel consists of low shale hills, which makes it unsuitable for sustainable camping opportunities.

In addition to mountain bikers who wish to camp near the bike trails, other visitors to the Moab area have also been attracted to the area for free dispersed camping. Some of these people wish to “live” on public land and work in town; Klondike Bluffs has excellent cell phone coverage and this fact is important to those wishing to “live” on public land. Other campers seek a camping locale that is near a paved highway for ease of access. As a result of this increased use, the BLM has monitored and observed unsanitary conditions and resource damage in the Focus Area. In addition, the State of Utah’s Southeast Utah County Health Department has requested that the BLM rectify the sanitation situation that has developed within the last ten years within the Focus Area.

The Focus Area includes a developed trailhead (North Klondike Bluffs) with a toilet, as well as several satellite trailheads that access the bike trails. In addition, the Copper Ridge Sauropod Trail, with its parking area and toilet, is available for visitors. This hiking trail is quite popular, especially with families. On some busy weekends, the parking area is so full of campers that the general public cannot park so that they may view the paleontological resources.

In addition, the grazing permittee has complained to the BLM that the level of dispersed camping is interfering with his grazing operations by reducing forage.

In summary, the past ten years have seen a dramatic increase in the volume of dispersed camping within the Focus Area, which has led to resource damage. This increase grows each year as visitation to Moab increases. The issue is documented in both law enforcement reports and recreation staff reports. Photos show “dispersed” campers as lined up, with very little dispersion between campsites. This unrestricted dispersed camping has led to a proliferation of motorized routes that are not designated in the Moab Field Office 2008 Travel Plan, as well as in damage to woodland resources, soils, wildlife habitat and vegetation. Campers choose spots without regard to any cultural or paleontological resources which may be present. Recreation users (particularly the mountain bikers who ride the trails) are concerned that the unrestricted camping is diminishing their experiences, as unrestricted camping tarnishes the views that they came to enjoy while riding their bikes. Grand County’s non-motorized Trail Committee has urged the BLM to take action on unrestricted camping activities in a world-class mountain biking Focus Area.

### **1.3 Need for the Proposed Action**

The BLM has observed an influx of recreational use, particularly dispersed camping, for which the Klondike Bluffs Mountain Bike Focus Area cannot sustainably support. There

have been reports of unsanitary condition (i.e. human waste) throughout the area. In addition, parking areas have been used for camping and this prohibits day users of the Focus Area from parking to access other resources in the area, including bike trails and popular fossil sites. Woodland resources are being denuded to fuel campfires. Illegal cross-country travel from users seeking areas to camp has led to degradation of natural resources such as soil and vegetation resulting in more bare soil areas that have previously been vegetated.

The need for BLM action is to address the decreasing quality of recreation opportunities in the area, the unsanitary conditions in the area, and resource degradation from dispersed camping and off-road travel in the Focus Area. The need is to designate camping opportunities and, when funding allows, to build a campground to accommodate overnight use in the Klondike Bluffs Mountain Bike Focus Area.

#### **1.4 Purpose(s) of the Proposed Action**

The purpose of the BLM Action is to promote sustainable and sanitary camping opportunities in the Klondike Bluffs Mountain Bike Focus Area, and to improve the quality of recreation opportunities, including day use activities, while minimizing resource damage from increased use in the area.

Decision to be made: The BLM will decide: 1) whether to restrict camping to developed recreation sites (including campgrounds) in the Focus Area and nearby 160 acre isolated parcel; 2) whether to designate up to 40 dispersed camping sites that meet established criteria and to reclaim former camping sites; 3) whether to require the use of portable toilets for dispersed campers until campgrounds with toilet facilities can be developed; 4) whether to prohibit wood cutting and gathering in the Focus Area and nearby 160 acre parcel; and 5) whether to establish other rules (such as disposition of human waste) that would apply to the Focus Area. Following a decision to restrict users, the BLM would pursue establishment of supplementary rules in accordance with 43 CFR 8365.1-6.

#### **1.5 Conformance with BLM Land Use Plan**

The Proposed Action (described below) is in conformance with the 2008 Moab Resource Management Plan (RMP). The following eight decisions from that RMP supporting the Proposed Action are:

REC-2: "Where unacceptable damage to natural or cultural resources by recreation use is anticipated or observed, BLM will seek to limit or control activities by managing the nature and extent of the activity or by providing site improvements that make the activity more sustainable or by a combination of management controls and facility development. Such management actions will seek to reduce or eliminate the adverse impact while maintaining the economic benefits associated with a wide range of recreation uses." (page 81)

REC-3: "BLM will consider and, where appropriate, implement management methods to protect riparian resources, special status species and wildlife habitat while enhancing recreation opportunities. Management methods may include limitation of visitor

numbers, camping and travel controls, implementation of fees, alteration of when use takes place, and other similar actions to be approved through normal BLM procedures.” (page 81)

REC-6: “Dispersed camping is allowed where not specifically restricted. Dispersed camping may be closed seasonally or as impacts or environmental conditions warrant. All vehicle use associated with dispersed camping activities is required to stay on designated roads.” (page 81)

REC-7: “Management actions limiting camping, wood gathering, firewood cutting, and requiring use of fire pans and portable toilets implemented through published closures limitations, restrictions or special rules applicable to specific land areas within the [planning area] are carried forward in all alternatives (see Moab Field Office recreation Rules in Appendix L).” (page 82)

REC-21: “Manage all Special Recreation Management Areas (SRMA) for sustainable camping opportunities. Camping may be restricted to designated sites if use and conditions warrant.” (page 83)

REC-22: “Manage all SRMAs according to the Visual Resource Management Class to protect scenic values and settings important to recreation.” (page 83)

REC-23: “Approved recreation facilities supporting recreation area management objectives will be planned and designed to reduce visual impacts where feasible.” (page 83)

## **1.6 Relationship to Statutes, Regulations, or Other Plans**

The Federal Land Policy and Management Act mandates multiple use of Public Lands, including recreation use. An objective of BLM’s recreation policy is to satisfy recreation demand within allowable use levels in an equitable, safe and enjoyable manner, minimizing adverse resource impacts and user conflicts.

The BLM’s 2018 *Moab Campground Business Plan* (approved by the Utah BLM Resource Advisory Council) authorizes the construction of a fee campground in the Focus Area in order to mitigate the ongoing resource damage caused by unlimited dispersed camping.

The Proposed Action is related to IM No. 2013-161 *Processing and Approving Supplementary Rules*: “The state director may establish supplementary rules to provide for the protection of persons, property, and public lands and resources. Supplementary rules are used to support objectives of 43 CFR Subpart 8365, “Rules of Conduct” for the protection of public lands and resources, and for the protection, comfort and well-being of the public in its use of recreation areas, sites and facilities on public lands. Supplementary rules should not duplicate or conflict with these or other Federal regulations.

Supplementary rules may be proposed in circumstances where existing regulations are not sufficient to manage resource use conflicts or to protect resources and may also be needed to implement decisions in resource management plans or other planning documents.”

The Proposed Action would complement the effort currently being undertaken by SITLA, State of Utah Sovereign Lands and Grand County on lands immediately west of Arches National Park. SITLA and Sovereign Lands manage approximately 15,000 acres just to the south of the North Klondike Mountain Bike Focus area. These two state agencies are working with Grand County to disallow dispersed camping and to provide campgrounds on State-managed land; these campgrounds would then be managed by Grand County.

The Proposed Action is also consistent with the Grand County General Plan (2012), which calls for promoting management of public lands for benefit and enjoyment of the people of Grand County and the nation. The Grand County General Plan recognizes that “the public lands of Grand County are the foundation of the county’s economic prosperity” because of the reliance of Grand County on tourist revenue (Section 3.2).

## **1.7 Identification of Issues**

### **1.7.1 Cultural Resources**

- How would cultural resources be protected by limiting dispersed camping to campgrounds and/or designated sites?

### **1.7.2 Livestock Grazing**

- How would livestock grazing be affected by limiting dispersed camping to campgrounds and/or designated sites?

### **1.7.3 Paleontology**

- How would limiting dispersed camping to campgrounds and/or designated sites benefit paleontological resources?

### **1.7.4 Recreation**

- How would camping opportunities be enhanced by providing designated campsites and/or campgrounds in the Klondike Bluffs Mountain Bike Focus Area?
- How would other recreation opportunities be enhanced by limiting dispersed camping to campgrounds and/or designated sites?

### **1.7.5 Soils and Vegetation (including Woodland Resources)**

- How would soils and vegetation (including woodland resources) be enhanced by limiting dispersed camping to campgrounds and/or designated sites and by prohibiting wood cutting?

### **1.7.6 Visual Resources**

- How would limiting camping to campgrounds and/or designated campsites benefit the visual resources of the affected areas? How would limiting wood cutting enhance visual resources?

### **1.7.7 Wildlife, including Migratory Birds and Utah Sensitive Species**

- How does limiting camping to designated sites benefit the habitat of wildlife, including migratory birds and Utah sensitive species?

## **2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION**

### **2.1 Alternative A – Proposed Action**

The BLM MFO proposes to manage camping and recreation/uses in the Klondike Bluffs Mountain Bike Focus Area by limiting camping to developed sites, including designated dispersed camping sites and developed campgrounds. This area is located east of U.S. Highway 191 and west of Arches National Park (see Appendix B). It was established as a Focus Area (or Recreation Management Zone) for mountain biking in the 2008 Moab RMP. The area totals approximately 14,600 acres. In addition, the BLM proposes the same restrictions on camping and other recreation uses on a nearby 160 acre parcel that is within the Labyrinth Rims/Gemini Bridges SRMA, but not within the Focus Area. The parcel is surrounded by SITLA lands located on the southern end of Klondike Bluffs, near the South Klondike Bluffs trailhead (which is located on SITLA land). The 160 acre parcel is described as the SE  $\frac{1}{4}$  of Section 33, Township 23 South, Range 20 East, Salt Lake Meridian.

In order to manage camping and recreation/uses, the BLM proposes the following rules that would apply year round:

1. Camping on BLM-administered public lands within the Klondike Bluffs Mountain Bike Focus Area would be limited to designated sites or developed campgrounds. These sites would be located out of sight of key observation points (such as bike trails and paleontological public sites).
2. Possession, set up and use of portable toilets for containment and disposal of solid human body waste would be required for overnight use at all designated campsites, except at campgrounds where constructed toilets are provided. A portable toilet is defined as 1) containerized and reusable; 2) a commercially available biodegradable system, such as a “wagbag” or 3) a toilet within a camper, trailer or motorhome. Disposal of portable toilet waste off public land would be required.
3. Wood cutting and gathering on BLM-administered public land within all of the Focus Area, as well as the isolated 160 acre parcel, would be prohibited at all times.

Signage would be installed to inform users of the locations of the campsites and/or campground, and of the rules governing their use. Campsites would be delineated on the ground to make their intended use clear and transparent, and camping opportunities would be made available through online maps to make finding their locations easy. Those areas not available for camping (usually due to a resource conflict) would be clearly marked as such.

Sustainable designated campsites would be marked in the short term, and a campground would be constructed as funding becomes available. Construction of a fee campground is already approved in the 2018 *Moab Campground Business Plan*.

Until a campground is developed, the BLM would designate and mark 40 dispersed sites in the Focus Area (see Map 2 in Appendix B). All of these sites would be designated in the northern block of the Focus Area (after publication in the *Federal Register*, in accordance with 43 CFR 8365.1-6. Until this notice is published, at-will dispersed camping would still be allowed. Each of the dispersed campsites would be located on previously disturbed sites away from day-use parking areas. They would be no larger than 40 feet square and subject to archaeological, paleontological, and wildlife clearances prior to implementation. They would not be located adjacent to bike trails and public paleontological sites. Campers would be required to provide their own portable toilet system in order to utilize these dispersed sites. Routes would be marked to access the sites. Former dispersed campsites that are not designated would be reseeded and restored to enhance recovery from the past impacts of dispersed camping.

There would be no sites designated on the BLM lands to the south that are between State of Utah land and Arches National Park (this area is commonly called “Klonso”). The Klonso area is made up primarily of rock ridges (known locally as “biscuit rocks”), and there is very little suitable terrain for camping. In addition, the road which accesses Klonso crosses Courthouse Wash and is subject to flooding, meaning that campers could be stranded should rain fall during the night. The road is not accessible by the BLM cleaning or pumping trucks, making major clean-up efforts very difficult. For these reasons, as well as its proximity to Arches National Park, no dispersed sites (or campgrounds) would be located within the Klonso area.

There would also be no sites designated on the 160 acre parcel completely surround by SITLA land. The parcel is primarily low shale hills, with very little suitable terrain for campsites. The isolated nature of the parcel also means that SITLA’s ability to manage camping on its large block of land (SITLA is currently working with Grand County on a campground management plan) could be impeded by the existence of dispersed BLM campsites. Access to this parcel is also problematic during inclement weather. For these reasons, no dispersed sites (or campgrounds) would be located on the 160 acre parcel.

In the reasonably foreseeable future, and as funding allows, the BLM will construct a 60-site campground to enhance camping opportunities and experiences. The campground would occupy up to 77 acres; the campground location is shown on Map 3. This area is outside high-yield paleontological resource zones. The campground design would include picnic tables, dumpsters, toilets and fire rings, and would accommodate both tents and RVs. On-the-ground archaeological and paleontological surveys would occur prior to construction. When the campground is constructed, some of the dispersed sites would be converted to reservable group sites, and would be subject to the same surveys. Those dispersed sites not utilized for this purpose would be undesignated and rehabilitated.

## **Conservation Measures**

1. Construction and surface disturbing activities would be avoided during the migratory bird nesting season (April 1 through July 31) if BLM determines that nesting structures exist and that activity would result in impacts to nesting birds.
2. Developed campgrounds and/or designated camping sites will not be located near rock formations, cliffs or outcrops that provide suitable nesting structure for cliff nesting raptors and golden eagles
3. If an active raptor or eagle nest is located within 0.5 mile of facilities the BLM will determine if the level of human activity at the facility warrants mitigation that may include temporary or seasonal closures.
4. Dogs will be required to be on a leash and under control in camping areas to protect kit fox and other local wildlife.
5. In the event that an active kit fox natal den is located in or near developed facilities the BLM will determine if the level of human activity at the facility warrants mitigation that may include temporary or seasonal closures to protect pup success.

## **2.2 Alternative B – No Action**

Neither the Klondike Bluffs Mountain Bike Focus Area, nor the 160 acre isolated parcel, would have restrictions on dispersed camping. Camping occurs wherever a user likes, regardless of its impact on resources or on other recreation users. Trees may be taken for firewood. While motorized vehicle use is restricted to designated roads, many users drive cross-country in pursuit of a campsite. Under the No Action alternative, no sustainable designated campsites would be provided to the public and no restrictions on their actions would be imposed.

# **3.0 AFFECTED ENVIRONMENT**

## **3.1 Introduction**

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

## **3.2 Resources/Issues Brought Forward for Analysis**

### **3.2.1 Cultural**

Cultural resources are typically defined as prehistoric and historic districts, sites, buildings, structures, and objects that represent past human activities. Human occupation of this region spans the last 10,000 to 12,000 years. The cultural sequence represented includes Paleo-Indian, Archaic, Formative (Anasazi & Fremont), Late Prehistoric (Paiute, Navajo, and Ute) and historic incoming cultures, primarily European in origin. The semi-arid climate contributes to a remarkable degree of preservation of cultural material. These often well preserved sites and artifacts are valued by Native American Tribes, the scientific community, the local community, and interested parties worldwide for their scientific, religious, cultural, and recreational values.

The BLM conducted a records review to identify known cultural resources within the Focus Area. The sites are primarily prehistoric, most of unknown age. The sites reflect prehistoric use of the area, including habitation locations and task specific activities related to hunting, gathering, tool making, and tool stone procurement.

Historically, the Focus Area was primarily used for mining, ranching, and recreation, as well as being adjacent to a primary travel corridor north from Moab to the railroad, then Highway 6 and 50, and eventually, I-70. Mining within and adjacent to the area has been particularly active in the last century and focused on copper early in the 20<sup>th</sup> century and later shifted to uranium. Ranching within, and adjacent to, the area initially focused on sheep in the early 20<sup>th</sup> century, and later shifted to cattle. Recreational use has shifted from limited local use to an increasingly continuous use by a national and international user base.

Natural processes, including erosion, fire, decay of organic material and destruction by animals native to the area can result in impacts to cultural resources. Over time, these natural processes have the potential to alter or completely destroy an archaeological site. Recreational activities, intentional or not, can alter sites in both positive and negative ways. Dispersed camping can negatively impact cultural the sites within or adjacent to the Focus Area through off-road driving, disturbance from camping activities and collection of artifacts by campers.

The BLM analyzed impacts from this action to cultural resources by way of a records review and Native American consultation. The BLM also considered effects to historic properties as required by Section 106 of the National Historic Preservation Act.

The record search determined that approximately 7% of the Area of Potential Effects (APE) is previously surveyed (1,060 acres), resulting from 33 previous projects spanning the last four decades. There are 69 previously recorded cultural resource sites within the APE, 28 of which have been determined to be eligible for the National Register of Historic Places. These sites are primarily prehistoric lithic scatters spanning the last several thousand years, as well as many of unknown age. There are also several toolstone sources and rockshelters with evidence of minimal to light prehistoric use. There is one instance of rock art, a panel composed of a single Fremont motif. There are historic period sites as well, including several artifact scatters, and three mine sites. These historic artifact scatters are from the early to mid-20<sup>th</sup> century. The scatters are generic enough in their assemblages to be of uncertain origin but are most likely related to mining, ranching, and/or recreation, given the history of the area.

### **3.2.2 Livestock Grazing**

The northern portion of the Klondike Bluffs area is within the Salt Valley Pasture of the Little Grand Allotment (4,181 AUMs). This allotment has one permittee. The entire Little Grand Allotment has an Allotment Management Plan (AMP) which has a grazing season of November 1 to May 30, with 713 cattle allowed. Within the Salt Valley Pasture, the AMP imposes a grazing rotation system. During the first year, cattle graze the pasture

from November 1 to December 15 and in the second year, cattle graze from April 1 to May 30.

The small southern portion of the Klondike Bluff area is within the Dalton Well Allotment (21 AUMs) with a season of use from October 20 to May 17, with 17 cattle allowed. This allotment has one permittee. The majority of the livestock grazing occurs on State land within this allotment.

Continued dispersed camping has resulted in the trampling of forage in the Focus Area. Formerly vegetated areas have been reduced to compacted soil, leading to a decrease of forage.

### **3.2.3 Paleontology**

The area is largely in Potential Fossil Yield Classification (PFYC) categories 4 and 5. This means that the potential for fossils to be found is high (the scale is from 1 – 5). The Focus Area includes many paleontological resources, including several open to the public. The Copper Ridge Sauropod Tracksite and the Dinosaur Stomping Grounds (a hike with approximately two thousand dinosaur prints) are found in the Focus Area. The Copper Ridge Tracksite is a stop on the Dinosaur Diamond National Prehistoric Byway.

Given the Focus Area's high potential for fossil resources, ongoing dispersed camping oftentimes occurs in paleontological sites, both developed and undeveloped.

### **3.2.4 Recreation**

Recreation use in the Focus Area has shifted and grown over the last several decades. Since the 1960's, the area has hosted a fairly easy Jeep Safari route (Copper Ridge), which travels from south to north through the Focus Area. In addition, a popular paleontological public site (the Copper Ridge Dinosaur Tracksite) has long existed within the Focus Area. This site is a stop on the Dinosaur Diamond National Prehistoric Byway. The BLM established a parking lot and toilet facility for this paleontological site in the late 1990s. The Klondike Bluffs Bike Trail was fairly popular with mountain bikers in the 1990s. While there was some scattered dispersed hiking and the occasional camper, recreation use of the area was light except for the jeep route, the short bike route and the paleontological site.

In 2008, a Recreation Focus Area was established as part of the Moab Resource RMP. The emphasis for the area was to be mountain bike opportunities. This Focus Area was established in consultation with Grand County and its Trail Mix committee, which had previously explored the area for mountain bike trail possibilities. Due to its varied terrain and hard surfaces, the area was deemed to be a prime site to develop approximately 50 miles of the 150 miles of mountain bike trail mandated by the Moab RMP. Between 2008 and the present, approximately 50 miles of single-track mountain bike only trail have been constructed within the Focus Area. The mountain bike trails were suited to many user abilities and soon proved very popular with private bike riders, commercial outfitters, and as a venue for bike races and events. In addition, the BLM added a hiking trail to the Dinosaur Stomping Ground, a collection of approximately 2,000 dinosaur tracks that

visitors can hike to. In 2016, the BLM added a large parking area and toilet on the north side of the Focus Area to accommodate the many cyclists who flocked to the area.

The popularity of the biking area, combined with the growing popularity of the Moab area, has resulted in an explosion of dispersed camping in the Focus Area. Prior to 2008, dispersed camping was an occasional occurrence in the project area. Since 2008, hundreds of groups utilize the area nightly for dispersed camping during the months of March, April, May, September and October. Even though the area is limited to designated routes, people travel cross country to camp at every available flat location. Dispersed camping occurs in the dinosaur track parking area, the mountain bike parking area, along the easier bike trails (which are in the flatter parts of the area) and wherever people can place RVs, camping trailers and/or tents. There is often very little separation between camping groups.

Undesignated dispersed camping has led to resource damage from illegal cross country driving, and to the proliferation of human waste and trash throughout the area. Recreationists utilizing the area for biking or dinosaur-site viewing have complained that the level of dispersed camping has damaged their recreation experience. Mountain bikers especially have complained that a “world-class resource” (biking trails) are being diminished by the presence of dispersed campers all along the trails.

### **3.2.5 Soils and Vegetation**

#### Soil

There are eight major soil types within the project area. The following table shows the types of soils, soil depth, percent slopes and what the soil is derived from:

<b>Soil Type</b>	<b>Soil Depth</b>	<b>Percent Slopes</b>	<b>Soil derived from</b>
Hanksville family-Badland complex	Moderately Deep	30 to 50%	Shale
Mesa fine sandy loam	Very Deep	2 to 6%	Sandstone
Moenkopie- Rock outcrop	Very Shallow	10 to 30%	Sandstone
Nakai fine sandy loam	Deep	3 to 10%	Sandstone
Nakai-Redlands complex	Deep	1 to 10%	Sandstone
Rock outcrop-Moenkopie association	Very Shallow	3 to 20%	Sandstone
Thedalund family-Rock outcrop	Moderately deep	30 to 50%	Sandstone and Shale
Toddler-Ravola-Glenton Families	Deep	0-3%	Sandstone and Shale

Shallow soils, especially are being eroded by the pressures of dispersed camping activities.

#### Vegetation

There are four general vegetation types within the project area. These are Salt Brush, Pinyon-juniper, Desert Shrub and Greasewood.

Salt Brush plant community includes shadscale, fourwing saltbush, Nuttall's saltbush, Indian ricegrass and galleta grass. Pinyon-juniper plant community includes Utah juniper,

pinyon pine, blackbrush, Mormon tea, Indian ricegrass, and galleta grass. Desert Shrub plant community includes blackbrush, Mormon tea, Utah juniper, galleta grass, Indian ricegrass, and sand dropseed grass. Greasewood plant community includes black greasewood, fourwing saltbush, galleta grass and saltgrass.

Unrestricted dispersed camping has impacted the area's vegetation as people drive off designated roads in pursuit of campsites. Vegetation is crushed by tires, tents, trailers and recreational vehicles. Due to the desert environment, this vegetation does not recover during the non-camping season. The pinyon-juniper in the Focus Area is being utilized for firewood, causing undue stress on this vegetation type.

### **3.2.6 Visual Resources**

The Focus Area is managed primarily as Visual Resource Management (VRM) Class II, with some VRM Class III along U.S. 191. Additionally, the Focus Area is immediately adjacent to Arches National Park, and portions of it are within the viewshed of that National Park. The isolated parcel is within one mile of Arches National Park. Lands within the viewshed of Arches National Park are managed as VRM Class II to help protect its visual integrity.

The Visual Resource Inventory (VRI) for the Moab Field Office describes the Klondike Bluffs area's landscape character as being devoid of structures and with no cultural modification. It is this "backcountry" sense that visitors, particularly mountain bikers, enjoy. By managing the area as VRM Class II, the BLM has tried to maintain its visual integrity by allowing only changes not obvious to the casual observer.

The area-wide dispersed camping, while temporary, has impacted the visual resources of the Focus Area and has diminished its visual integrity. Recreationists, especially mountain bikers, have complained vociferously to the BLM about the impact that dispersed camping has on the visual resources that they want to enjoy while biking. Visitors from Moab come from throughout the country and the world; they may be in Moab for only a short period, and if the area's visual resources are marred by dispersed camping during their visit, they have no opportunity to come at a more opportune time.

Wood cutting and gathering of the pinyon-juniper resource is affecting visual resources as the scenic backdrop of the scattered pinyon-juniper forest is being altered by the hacking off of limbs and branches.

### **3.2.7 Wildlife, including Migratory Birds and Utah Sensitive Species**

#### **General Wildlife**

The vegetative communities and geological formations found in the project area provide habitats for a variety of wildlife species, with the most abundant mammal species being desert cottontails, black-tailed jackrabbits, white-tailed ground squirrels, coyotes, badgers, bobcats, red fox and kit fox. A small peripheral area to the northeast is identified as year-long habitat for pronghorn antelope. The area does not support habitat for mule deer or bighorn sheep, but local resident animals may occasionally pass through.

Numerous reptile species such as fence lizards, side-blotch lizards, collared lizards and gopher snakes can be found in the area.

### **Migratory birds and raptors**

Migratory birds are protected under the Migratory Bird Treaty Act of 1918 (MBTA). A variety of migratory birds, including several raptor species and golden eagles, may use the area for nesting, foraging and winter stop-over habitats. The U.S. Fish and Wildlife Service (USFWS) issued guidelines for the protection of raptors that includes species-specific timing limitations and spatial offsets to active nests (Romin and Muck 2002). These guidelines have been incorporated into the Moab RMP.

### **Utah Sensitive Species**

Special Status Species Management Policy 6840 requires the BLM to manage State Sensitive Animal Species to prevent the need for future listing under the Endangered Species Act (ESA). A total of 40 Utah State Sensitive Animal Species animals potentially occur within the MFO, although only one species, the kit fox, has potential habitat and could be expected in the project area. Kit fox will be analyzed in this document.

### **Kit Fox**

The kit fox opportunistically eats small mammals (primarily rabbits and hares), small birds, invertebrates, and plant matter. The species is primarily nocturnal, but individuals may be found outside of their dens during the day. Kit foxes are adapted to desert and semiarid habitats, inhabiting mixed-grass shrublands, shrublands, and margins of pinyon-juniper woodlands over much of the Southwest. Kit fox are naturally curious and unsuspecting, making them more susceptible and habituated to humans.

Kit fox populations likely plummeted in the last half of the 19th century and early 20th century because of predator and rodent control campaigns. The extent to which they may have rebounded after the institution of regulatory control of poisons is unclear. Current kit fox abundance in Colorado is very low, with fewer than 100 animals in the state and little evidence of a self-sustaining population. Populations in the Great Basin, including Utah and Nevada, may now be in decline. The extirpation of the wolf facilitated greater coyote success and the range expansion of the red fox have both had negative consequences for kit foxes. Coyotes are likely a major cause of kit foxes mortality and red foxes may pose an even greater threat because of their greater ecological overlap and potential for competition. (Meaney et al 2006) Additionally, in the Moab area, human activity can attract all three species as they seek food sources from human trash in campgrounds and other recreational areas.

## **4.0 ENVIRONMENTAL IMPACTS**

### **Direct and Indirect Impacts from the Proposed Action (Alternative A)**

#### **4.1.1 Cultural**

The BLM consulted eight Native American tribes with ancestral and cultural ties to the Moab Field Office area. Because there is no ground disturbance associated with this action, BLM did not conduct any new cultural resources field survey.

The cultural resources in the area will not be negatively impacted by this undertaking, directly or indirectly because the BLM would choose designated campsites and campgrounds so as to avoid cultural resources. A cultural survey would be undertaken prior to marking or building campsites. Rather, the cultural resources will likely be positively impacted by well managed camping within the Focus Area. Judicious placement of designated campsites and/or a campground would allow the BLM to site camping locations in such a way as to protect non-renewable cultural resources. Per NEPA and Section 106 of the National Historic Preservation Act, the BLM will conduct appropriate identification efforts, analysis, and consultation for all campsites and/or campgrounds designated in the future.

Restricting camping to designated sites would reduce the amount of cross-country vehicle travel that is occurring with the Focus Area. Because cross country vehicle travel has the potential to harm cultural resources, any limitation or cessation of this type of travel has benefits to cultural resources.

#### **4.1.2 Livestock Grazing**

The Proposed Action would reduce the overall camping footprint within this project area, thus reducing the potential of campers negatively interacting with livestock grazing. Forage conditions would likely improve by having areas managed to preclude camping because vegetation could reestablish itself. Future impacts to vegetation from dispersed camping would be prevented by limiting camping to designated sites and campgrounds. There could be poor grazing condition near the designated sites due to the increase in camping. However, the overall impact to the area's forage would be positive.

#### **4.1.3 Paleontology**

Paleontological resources can be negatively impacted by natural processes over time. Unintentional, as well as intentional, human interaction with paleontological resources can accelerate the damage. The Proposed Action to manage camping in the Focus Area and the isolated parcel would have a positive impact on the resource by focusing camping in more a suitable area and one less likely for encounters with paleontological resources. In addition, the reduction of cross-country motorized travel in pursuit of dispersed campsites would reduce potential impacts to paleontological resources.

#### **4.1.4 Recreation**

Managing camping within designated campgrounds and/or campsites would improve the camping experience for those utilizing the Klondike Bluffs area for camping. Camping in designated sites, whether scattered throughout the Focus Area or in a campground, has the potential to provide more privacy for campers; campers would not have to put up with people camping right next to them, as is currently the case. A developed campground would additionally provide toilet facilities, garbage facilities, picnic tables and fire rings, thus reducing the amount of human waste and trash in the area, as well as reducing the possibility of a wildfire. Those using designated dispersed campsites would also be required to use a portable toilet system if a toilet were not available, leading to a lessening of sanitation issues in the Focus Area, as requested by the Southeastern Utah Health

Department. Camping would be responsibly accommodated in the Focus Area and the camping experience itself would be improved.

Additionally, those wishing to view the paleontological sites would have parking spaces restored to them. It would not be necessary to wend through the campers to access the Dinosaur Diamond paleontological site or the Dinosaur Stomping Ground. Visitors' experiences in viewing the tracks would not be marred by nearby dispersed campers.

Those wishing to bicycle the trails would not have to share the parking lot with campers (or be excluded from the parking lot by campers). The experience from the bike trails would not be marred by those who have driven cross country to camp immediately adjacent to the bike trails.

Adherence to the Travel Plan would be improved under Alternative A, as people would not drive all over the flat portion of the area in search of campsites. This adherence to the Travel Plan would benefit not only natural and cultural resources but also the experience of other recreationists in the area.

People who currently enjoy dispersed camping in the Focus Area would no longer be able to camp wherever they chose. The BLM's experience elsewhere in the Field Office indicates that many of these campers adapt to camping only in designated sites and/or in campgrounds. Those who wish to disperse camp would have opportunities available to them just to the west of U.S. 191, as well as other areas within the Field Office open to dispersed camping.

#### **4.1.5 Soils and Vegetation**

The Proposed Action would reduce the overall camping footprint within this area, and that would reduce the damage to both soils and vegetation. The Proposed Action would prevent people from having campsites across the whole area and from compacting the soils and crushing the vegetation. There would be less vehicle use as people seek campsites wherever they like, and there would be less impact to soils and vegetation from people due to dispersed and omnipresent camping activities. The designated campsites would be defined and damage from camping limited to this defined area. This would lead to less compaction of soils and crushing of vegetation as the area of disturbance from dispersed camping would be lessened and curtailed from growing.

Restricting wood cutting and gathering within the Focus Area would preserve the pinyon-juniper resources as people would be required to bring firewood with them to enhance their camping experiences. Pinyons and junipers would be allowed to reach their natural life without being consumed for firewood.

#### **4.1.6 Visual Resources**

Managing camping would meet VRM Class II objectives by retaining the landscape inventoried as devoid of cultural modification. Under Alternative A, designated campsites would be located away from the paleontological sites and from the bike trails. They would be located out of sight of key observation points utilized by visitors to the

area. Visitors could enjoy their experience in a visually pleasing fashion, without dispersed campers as a continuous backdrop. The visual effects of large numbers of campers (multi-colored vehicles and tents scattered across the landscape) would be mitigated by locating them areas that are not within sight of the major attractions of the Focus Area. This would enhance the visual resources of the area and maintain the scenic backdrop from the bike trails and the paleontological sites, thus meeting the goals of VRM Class II management.

By directing camping to designated developed areas, recreationists are more likely to adhere to the Travel Plan, which would greatly improve the visual resources of the area that are currently marred by a great deal of cross country tracking due to driving in search of dispersed campsites.

Disallowing the cutting of firewood would preserve the pinyon-juniper trees, which provide a scenic backdrop for the Focus Area.

#### **4.1.7 Wildlife, including Migratory Birds and Utah Sensitive Species**

##### **General Wildlife**

The Proposed Action to manage camping in the Focus Area would potentially have a positive effect on most wildlife habitats, including pronghorn antelope, as camping and travel to camping areas would be focused in specific areas that avoid high quality wildlife habitat. Cross county travel in pursuit of dispersed campsites would also be reduced or eliminated. Placement of designated campsites and/or a campground in areas of low habitat potential would allow the BLM to site camping locations in such a way as to protect local wildlife. By appropriately defining these campgrounds, campsites, and the roads to these facilities, cross-county travel and dispersed camping would be greatly reduced, resulting in a reduction to current and potential future damage to vegetation that supports wildlife habitats. Identifying and designating campgrounds and campsites is expected centralize visitor activities and reduce most negative human-wildlife interaction by allowing wildlife to expect human activities in predictable locations and patterns.

EA Conservation Measure Four (found on page 8) will reduce potential for dogs to harass local wildlife utilizing habitats in or near camping facilities by requiring them to be on a leash.

##### **Migratory Birds**

As discussed in the General wildlife section, migratory birds and raptors will also benefit from a reduction in damage to vegetation and spatial separation in bird habitats. Additionally, EA Conservation Measures One and Three will provide nesting birds and raptors seasonal and spatial protection for nests while raising their young, and EA Conservation Measure Two directs the BLM to install and designate facilitates in areas that minimize potential impacts to nesting raptors, including golden eagles.

### **Utah Sensitive Species – Kit Fox**

As discussed in the General Wildlife section, kit fox will also benefit from a reduction in damage to vegetation that supports prey habitats and centralizing visitor use. In the Moab area, there has been some evidence that kit fox individuals, including females with young, have been attracted to campgrounds, possibly due to a food source from campers' trash, and the reluctance of coyotes to interact with humans. Recently, negative interactions have occurred in campgrounds as red fox have expanded into these areas seeking food sources from campers' trash. Any future campgrounds would include trash receptacles as part of the proposal. Concentrating campers in designated sites would allow enforcement personnel to more easily enforce existing rules about keeping clean campsites.

EA Conservation Measure Five will reduce potential for camping activity to negatively impact an active natal den where pups may inappropriately interact with visitors resulting on habituation or abandonment.

## **4.2. Direct and Indirect Impacts from the No Action (Alternative B)**

### **4.2.1 Cultural Resources**

Under the No Action alternative, cultural resources will continue to be threatened by a less managed approach to camping. Direct and indirect impacts to cultural resources are probable as people continue to camp wherever they wish. This situation may worsen with time as visitation numbers increase. While much of the damage may be inadvertent, cultural resources are non-renewable and no amount of damage to them is acceptable.

Under the No Action alternative, visitors would continue to drive off the designated route system seeking dispersed campsites. This cross country travel has the potential to damage cultural resources as well (roads in the Focus Area have been surveyed for cultural resources, but the surrounding lands have not been). Again, any amount of damage to cultural resources is unacceptable.

The No Action alternative would lead to increased damage to cultural resources, which are irreplaceable and non-renewable.

### **4.2.2 Livestock Grazing**

Under the No Action alternative, livestock grazing will continue to be impacted by having a less managed approach to camping. Direct and indirect impacts are possible, and the situation may worsen with time as visitation numbers increase in the area. The interaction with livestock grazing and camping activities would increase in the absence of managed camping.

### **4.2.3 Paleontology**

Under the No Action alternative, paleontological resources would continue to be threatened by a less managed approach to camping. Direct and indirect impacts are probable as people continue to camp wherever they wish. This situation that may worsen with time as visitation numbers increase. While much of the damage to paleontological

resources may be inadvertent, paleontological resources are non-renewable and no amount of damage to them is acceptable.

Under the No Action alternative, visitors would continue to drive off the designated route system seeking dispersed campsites. This cross country travel has the potential to damage paleontological resources as people drive over fossil remains and/or tracks. Again, any amount of damage to paleontological resources is unacceptable.

The No Action alternative would lead to increased damage to paleontological resources in an area that is well-known for these resources, which are irreplaceable and non-renewable.

#### **4.2.4 Recreation**

Under the No Action alternative, recreation resources would continue to be diminished by a less managed approach to camping. Those visiting paleontological sites, as well as those utilizing the bike trails, would have their experiences marred by the presence of dispersed campers. Many day users would be unable to find parking spots, as these spots would continue to be used by campers. Cross country motorized travel would continue to worsen as people would seek dispersed campsites anywhere that was flat enough to accommodate tents or RVs.

Sanitation concerns in the Focus Area would not be improved, and would most probably worsen with an increase in visitation. There would be no rule requiring the use of a toilet or a portable toilet system by campers, leading to the continued disposal of solid human waste on public lands. The concerns of the Southeastern Utah Health Department regarding human waste in the Klondike Bluffs area would not be addressed.

#### **4.2.5 Soils and Vegetation**

Under the No Action alternative, soil and vegetation would continue to be impacted by having a less managed approach to camping. In addition, the cross country travel associated with dispersed camping would also continue to impact soils and vegetation. Direct and indirect impacts are possible, as the situation that may worsen with time as visitation numbers increase in the area. Soils would become increasingly impacted and hardened because of cross country driving and camping. Vegetation would continue to be crushed and, with the hardened soils, this vegetation would not be replaced. A large portion of the Focus Area would become bare of vegetation as a result.

Under the No Action alternative, pinyon and juniper trees would continue to be taken apart for firewood.

#### **4.2.6 Visual Resources**

Under the No Action alternative, the visual resources of the Focus Area would continue to degrade as more and more people seek campsites at locations within the viewshed of recreation users. Mountain bikers seeking views of an undeveloped landscape would have their experiences marred by views of multi-colored tents and vehicles scattered across the landscape. The scenic backdrop of both the paleontological sites and the bike trails would

be diminished by the presence of unmanaged campers. Cross country travel in pursuit of dispersed campsites would likely worsen, leading to further visual scars. The backdrop provided by the pinyon-juniper woodland would be diminished by the continued use of these trees for firewood. The continued provision of unmanaged camping would lead to a failure to manage the Focus Area as a VRM Class II area.

#### **4.2.7 Wildlife, including Migratory Birds and Utah Sensitive Species**

Under the No Action alternative, a positive effect would *not* occur to most wildlife and their habitats, including migratory birds, raptors, kit fox and pronghorn antelope, because camping and associated vehicle travel would not be managed within specific areas. Damage to vegetation that supports wildlife habitats would not be reduced. Visitor activities would not be centralized and negative human-wildlife interactions would increase. Habituation of red fox and kit fox would continue with potential negative impacts to a declining kit fox population as red fox, and potentially coyotes, habituate to camping areas, trails and parking lots.

### **4.3 Cumulative Impacts Analysis**

“Cumulative impacts” are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions.

#### **4.3.1 Cumulative Impact Area (CIA)**

The cumulative impact area is the Klondike Bluffs Mountain Bike Focus Area and the isolated 160 acre parcel. This is an area largely surrounded by lands managed either by the State of Utah or the National Park Service. The CIA is the same for all resources.

#### **4.3.2 Past, Present and Future Actions**

Past or ongoing actions that affect the same components of the environment as the proposed action are past mining operations (primarily for copper), ongoing livestock grazing, and recreation uses, which includes mountain biking and paleontological viewing. Approximately 15 mountain bike special recreation permit holders operate in the Focus Area.

Future actions include construction of a 60 site campground, which would be sited to avoid cultural and paleontological resources. It would be located outside the viewshed of most day users.

#### **4.3.3 Cumulative Impacts to Specific Resources**

##### **4.3.3.1 Cultural Resources**

The cumulative impact of the Proposed Action to cultural resources will be positive. The management of camping and the judicious placement of designated campsites and/or campgrounds to avoid cultural resources would contribute to the long term protection of these resources within the Focus Area. The cumulative impact of the No Action alternative would lead to possible degradation of archaeological sites.

#### **4.3.3.2 Livestock Grazing**

The cumulative impact of the Proposed Action to livestock grazing would be a positive. The management of camping and the placement of designated campsites and /or campground would reduce interaction between livestock grazing and camping activities with the area. The cumulative impact of the No Action alternative would lead to a further lessening of available grazing as people continue to degrade vegetation in search of dispersed campsites.

#### **4.3.3.3 Paleontology**

The cumulative impact of the Proposed Action to paleontological resources would be positive. The management of camping and the judicious placement of designated campsites and/or campgrounds would contribute to the long term protection of paleontological resources within the Focus Area. The cumulative impact of the No Action alternative would lead to possible degradation of paleontological sites as people continue to seek new dispersed sites, many of which have the potential to contain paleontological resources.

#### **4.3.3.4 Recreation**

The cumulative impact of the Proposed Action to recreation resources would be positive. The management of camping and the judicious placement of designated campsites and/or campgrounds would enhance the mountain bike trails and the paleontological sites that the majority of users come to see. The provision of sustainable camping opportunities would have the cumulative impact of adding positively to visitors' experiences (both campers and day users) while recreating in the Moab area.

The cumulative impact of the No Action alternative would lead to a further lessening of recreation opportunities for both bikers and viewers of paleontological sites. Dispersed campsites would continue to proliferate, as would use of non-designated routes to access these sites.

#### **4.3.3.5 Soils and Vegetation**

The cumulative impact of the Proposed Action to soils and vegetation would improve the area by reducing the uncontrolled and undesignated campsites within the area. Soils would be less likely to be compacted and vegetation less likely to be crushed. Pinyon and juniper trees would be less likely to be stripped for firewood.

The cumulative impact of the No Action alternative would lead to a further lessening of soils and vegetation as dispersed campers continued to create new campsites. Pinyon and juniper trees would continue to be stripped for firewood, and damage to this resource would increase.

#### **4.3.3.6 Visual Resources**

The cumulative impact of the Proposed Action to the visual resources of the Focus Area would be positive, especially in the long term. Cross country travel would be diminished and the visual resources of the area would be preserved by managing camping. Designated campsites would be chosen to meet VRM Class II objectives (not visible from key

observation points). Juniper and pinyon trees would be preserved and the scenic backdrop of the area maintained.

The No Action alternative would lead to increased visual scars throughout the area from cross country travel, as well as the temporary visual impact of “camper cities” spread throughout the Focus Area during spring and fall.

#### **4.3.3.7 Wildlife, including Migratory Birds Utah Sensitive Species**

The cumulative impact of the Proposed Action to wildlife and wildlife habitats would be positive. The Proposed Action would mean that additional recreational use would be focused in areas specifically identified as lower quality wildlife habitat. This is expected to contribute concentrated impacts including habitat degradation and wildlife displacement in a much smaller portion of the cumulative impact area. The No Action alternative would contribute anticipated additional recreational use dispersed throughout all wildlife habitats in the cumulative impact area, and is expected to contribute greater impacts including habitat degradation and wildlife displacement throughout the entire cumulative impact area.

## **5.0 CONSULTATION AND COORDINATION**

### **5.1 Introduction**

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

### **5.2 Persons, Groups, and Agencies Consulted**

**Table 5-1**

#### **List of all Persons, Agencies and Organizations Consulted for Purposes of this EA.**

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Grand County Trail Mix	County liaison for bicycle trail areas	In full support of Proposed Action
The Hopi Tribe	National Historic Preservation Act (54 U.S.C. 300101 et seq.)	Concurred with BLM that the Proposed Action would not deleteriously impact cultural resources.
The Navajo Nation	National Historic Preservation Act (54 U.S.C. 300101 et seq.)	No response.
The Paiute Indian Tribe of Utah	National Historic Preservation Act (54 U.S.C. 300101 et seq.)	No response.
The Pueblo of Jemez	National Historic Preservation Act (54 U.S.C. 300101 et seq.)	No response.
The Pueblo of Zuni	National Historic Preservation Act (54 U.S.C. 300101 et seq.)	No response.
The Southern Ute Tribe	National Historic Preservation Act (54 U.S.C. 300101 et seq.)	Concurred with BLM that the Proposed Action would not deleteriously impact cultural resources.

The Ute Indian Tribe of the Uintah and Ouray Reservation	National Historic Preservation Act (54 U.S.C. 300101 et seq.)	No response.
The Ute Mountain Ute Tribe	National Historic Preservation Act (54 U.S.C. 300101 et seq.)	No response.
Utah State Historic Preservation Office	National Historic Preservation Act (54 U.S.C. 300101 et seq.)	Comment received on March 27, 2019.

### 5.3 Summary of Public Participation

During preparation of this EA, the public was notified of the Proposed Action by posting on the BLM ePlanning website on November 7, 2018. The BLM received no public feedback as a result of this posting. The proposal was discussed at three meetings of the Grand County Trail Mix Committee, which are open meetings held by Grand County concerning non-motorized recreation. A 15 day public comment period (April 1 – 15, 2019) was offered on the EA. The availability of the EA was widely publicized. On April 4, the Moab *Times-Independent* ran a front page story on the proposal. On April 5, 2019, the Salt Lake *Tribune* ran a feature story on the proposal. The Southeast Utah Health Department contacted the Moab BLM about sanitation problems created by camping in the Focus Area.

The BLM received 14 responses during the public comment period. One comment (Ride with Respect) suggested a change to the EA. Table 5.3 summarizes the public input.

**Table 5.2 Summary of Public Comment**

Commentor	Summary of Comment Sent to BLM
Grand County Trail Mix (advisory committee to the Grand County Council)	Supports proposal. Comment details factors of overcrowding, cross country vehicle traffic to campsites, trash, resource damage and camping in designated parking lots. Trail Mix states that the proposed camping management plan would alleviate these issues and improve the situation in the Klondike Bluffs Mountain Bike Focus Area
Ride with Respect (motorcycle advocacy group)	Supports proposal and asks that a nearby isolated BLM quarter section be included in the camping management area. This quarter section is surrounded by SITLA property. SITLA is also considering the management of camping on its properties just north of Moab. Including this quarter section would provide more seamless management of camping in the Klondike Bluffs area. <b>BLM response:</b> the BLM has included this quarter section on the map of the camping management area.
Tara McKee, Utah Office of Outdoor Recreation, Governor's Office of Economic Development	Notes story in the Tribune and offers funding help for building a campground "when the BLM is ready for it". Suggests partnering with Grand County. (Note: the Grand County Office of Planning and Economic Development was contacted and has offered to partner with the BLM).
Sue deVall	Supports proposal and note the success of a similar management regime in the Onion Creek area of the Moab Field Office.
Emily D.	Supports the provision of toilets in the campgrounds. Asks that any ensuing campgrounds not include leash laws for dogs.

Ken Platt	Supports proposal to build campground and provide designated sites. Suggests that fires be limited to campgrounds only.
Steve Brock	Supports proposal, and “the sooner the better”.
Terry Sanslow	Supports proposal as a “benefit to everyone who goes there”.
Paul Roberson	Supports proposal as one who camps in the area 3 to 4 times per year. Asks that all new campgrounds have spacious sites and that they be directly connected to the bike trails so that people can ride from camp.
Parker Jones	Supports proposal. Enjoys dispersed camping, but realizes (as a Klondike user) that “this area requires increased organization . . . so that there is not poop everywhere”.
Steve Hales	Supports proposal and agrees with the environmental assessment.
Brian Peterson	<p>Wants to maintain the no fee area so that he may ride his off-road motorcycle in the area. Asks that that area be kept open to off-road motorcycles. States that developed campgrounds ban off-road motorcycles.</p> <p><b>BLM Response:</b> There is no truly “off-road” motorcycling in the Klondike Bluffs area. All travel is on designated routes only and no singletrack motorcycle trails are designated (both off-roading and many designated motorcycle trails are found in the White Wash area of the Moab Field Office). BLM campgrounds in the Moab Field Office do not ban dirt bikes.</p>
Lonnie Cook	Wants to maintain “primitive camping”. More effort should be put into Leave No Trace camping.
Bradley Greenwell	<p>Worried that the entire Moab area will be off limits to dispersed camping. Seeks “solitary dispersed camping opportunities.”</p> <p><b>BLM Response:</b> The Moab Field Office has many acres available for dispersed camping. There are 1,822,562 acres in the Moab Field Office. Of these, 41,967 acres are managed as camping only in campgrounds. On another 103,388 acres, camping is managed as limited to designated sites, but there are many sites available (they are limited to accommodate resources such as desert bighorn lambing). This means that camping is not restricted in any way on 1,677,207 acres.</p> <p>The proposed action would add 14,626 acres to the area where camping is managed. If the proposed action were implemented, 1,662,581 acres would remain available for dispersed camping. There is therefore no worry about the entire Moab area being off limits to dispersed camping. Solitary dispersed camping opportunities are available in many locations within the field office.</p>

## 5.4 List of Preparers

**Table 5.3 List of BLM Preparers**

Name	Title	Responsible for the Following Section(s) of this Document
Marie McGann	Resource Advisor	Air Quality
Jordan Davis	Assistant Field Manager	Invasive Species/Noxious Weeds, Woodland/Forestry
David Pals	Geologist	Geology, Water Resources, Wastes, Paleontology
Katie Stevens	Outdoor Recreation Planner	Team Lead, Recreation, Visual Resources, Wild and Scenic Rivers, Areas of Critical Environmental Concern
Pam Riddle	Biologist	Threatened and Endangered Animals, Wildlife, Migratory Birds, Utah Sensitive Species
Gabe Bissonette	Ecologist	Floodplains, Riparian Resources
Bill Stevens	Outdoor Recreation Planner	Wilderness/WSA, Environmental Justice, Natural Areas, Socioeconomics, Lands with Wilderness Characteristics
Dave Williams	Range Management Specialist	Soils, Vegetation, Livestock Grazing, Rangeland Health Standards, Threatened and Endangered Plants
Lisa Wilkolak	Realty Specialist	Lands/Access
Ashley Losey	Archaeologist	Cultural Resources, Native American Religious Concerns

## REFERENCES

BLM. (October 2008) *Approved Resource Management Plan*, Moab Field Office.

BLM (June 2018) *Approved Moab Campground Business Plan*, Moab Field Office.

Grand County, Utah (2012). *Grand County General Plan*.

Meaney, C.A., M. Reed-Eckert, and G.P. Beauvais. (2006, August 21). Kit Fox (*Vulpes macrotis*): a technical conservation assessment. [Online]. USDA Forest Service, Available: <http://www.fs.fed.us/r2/projects/scp/assessments/kitfox.pdf>.

Romin, Laura A. and James A. Muck. (2002). Utah field office guidelines for raptor protection from human and land use disturbances. U.S. Fish and Wildlife Service, Utah Field Office Salt Lake City.

## APPENDICES

**APPENDIX A** Interdisciplinary Team Checklist

**APPENDIX B** Maps

Map 1 Klondike Bluffs Mountain Bike Focus Area/160 Acre Parcel

Map 2: Sites to be Designated for Camping

Map 3: Campground Location

## Appendix A: INTERDISCIPLINARY TEAM CHECKLIST

**Project Title:** Supplementary Rules Regarding Camping and Wood Gathering: Providing Sustainable Camping Opportunities in the Klondike Mountain Bike Focus Area

**NEPA Log Number:** DOI-BLM-UT-Y010-2019 - 0021

**Project Leader:** Katie Stevens

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

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

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

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

The following elements are not present in the Moab Field Office and have been removed from the checklist:

Farmlands (Prime or Unique), Wild Horses and Burros.

Determination	Resource	Rationale for Determination*	Signature	Date
<b>RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)</b>				
NI	Air Quality Greenhouse Gas Emissions	The State of Utah National Ambient Air Quality Standards Areas of Non-attainment and Maintenance shows Grand County as an attainment or unclassifiable area. It is unlikely that any potential emissions associated with the proposed action would cause or contribute to an exceedance of the State of Utah National Ambient Air Quality Standards, or cause or contribute to any localized air quality issues. Therefore, Air Quality will not be discussed further in this EA.	Marie McGann	10/25/18
NI	Floodplains	Any future development would occur outside the 100' buffer for floodplains. Providing sustainable camping opportunities by creating specified campsites and toilet facilities would help to minimize impacts to ephemeral floodplains and aquatic systems by concentrating recreational use outside of these areas. This project will not affect the geomorphology, form, or function of floodplains within the project area.	Gabe Bissonette	12/11/18
PI	Soils	The action would reduce the overall camping footprint within this area and that would reduce the potential to damage soils. Potential to improve soil conditions where no camping is allowed. The designated campsites would remain the same or if increased in size, could add additional impacts.	David Williams	02/19/19
NI	Water Resources/Quality (drinking/surface/ground)	Potentially beneficial to any water resources	D. Pals	10/23/18
NI	Wetlands/Riparian Zones	Future camping development would occur outside of the 100 meter buffer for riparian areas. Providing sustainable camping opportunities by creating specified campsites and toilet facilities would mitigate some of the recreational pressure and human waste issues present at this location thus providing positive benefits to riparian areas within the watershed.	Gabe Bissonette	12/11/18
NP	Areas of Critical Environmental Concern	See 2008 RMP.	K. Stevens	8/21/18
PI	Recreation	Would enhance recreation experience for campers; see EA for explanation	K. Stevens	8/21/18
NP	Wild and Scenic Rivers	See 2008 RMP.	K. Stevens	8/21/18

Determination	Resource	Rationale for Determination*	Signature	Date
PI	Visual Resources	Action would improve visuals	K. Stevens	8/21/18
NP	BLM Natural Areas	See 2008 RMP.	W. Stevens	8/21/18
NI	Socio-Economics	The proposed action is not likely to cause an increase in overall visitor spending in the planning area. Any economic benefits from visitor spending would be small relative to the overall recreation and visitation sectors of the local economy.	W. Stevens	8/21/18
NP	Wilderness/WSA	See 2008 RMP.	W. Stevens	8/21/18
NI	Lands with Wilderness Characteristics	Would preserve naturalness within areas inventoried as having wilderness characteristics	W. Stevens	8/21/18
PI	Cultural Resources	The BLM identified cultural resources within the project area as part of its NHPA Section 106 process. This project will likely have a positive impact to cultural resources by reducing potential damage. Site specific cultural resources surveys and analysis will take place when camping locations are identified. There will be no adverse impacts to cultural resources as a result of this project	Ashley Losey	2/13/19
NI	Native American Religious Concerns	Tribal Consultation was conducted through BLM's National Historic Preservation Act section 106 process. Tribes raised no concerns.	Ashley Losey	3/25/19
NI	Environmental Justice	No EJ populations	W. Stevens	8/21/18
NP	Wastes (hazardous or solid)		D. Pals	10/23/18
NP	Threatened, Endangered or Candidate Animal Species	There is no suitable Mexican spotted owl habitats or other ESA listed habitats in the project area. Therefore no further discussion on Mexican spotted owl is needed within the Environmental Assessment.	Pamela J Riddle	10-19-18
PI	Migratory Birds	Action would facilitate the management of various migratory bird and raptor species and their habitats in the MFO and will be further discussed in the EA	Pamela J Riddle	10-19-18
PI	Utah BLM Sensitive Species	Action would facilitate the management of kit fox and their habitats in the MFO and will be further discussed in the EA	Pamela J Riddle	10-19-18
PI	Fish and Wildlife Excluding USFW Designated Species	Action would facilitate the management of general wildlife habitats in the MFO and will be further discussed in the EA	Pamela J Riddle	10-19-18
NI	Invasive Species/Noxious Weeds	Not expected to change the existing invasive and noxious weeds in the area to a degree that would be meaningful.	Jordan Davis	10/2/18
NP	Threatened, Endangered or Candidate Plant Species	<p>At the time of listing, Jones Cycladenia was found in Emery, Grand and Garfield Counties in Utah. The known populations of plants in the Moab Field Office are on the steep slopes in Professor Valley, steep slopes of Castle Valley, steep slopes above Onion Creek, steep slopes north of the Colorado River in Professor Valley and on the steep slopes below Dead Horse Point State Park. These populations are outside this project area. The plants occurs at an elevation between 4,390 to 6,000 feet. Jones Cycladenia flowers in mid-May through June.</p> <p>Although the Jones Cycladenia Model indicates potential habitat within this project area, all known populations of Jones Cycladenia found in the Moab Field Office are located on</p>	David Williams	02/19/19

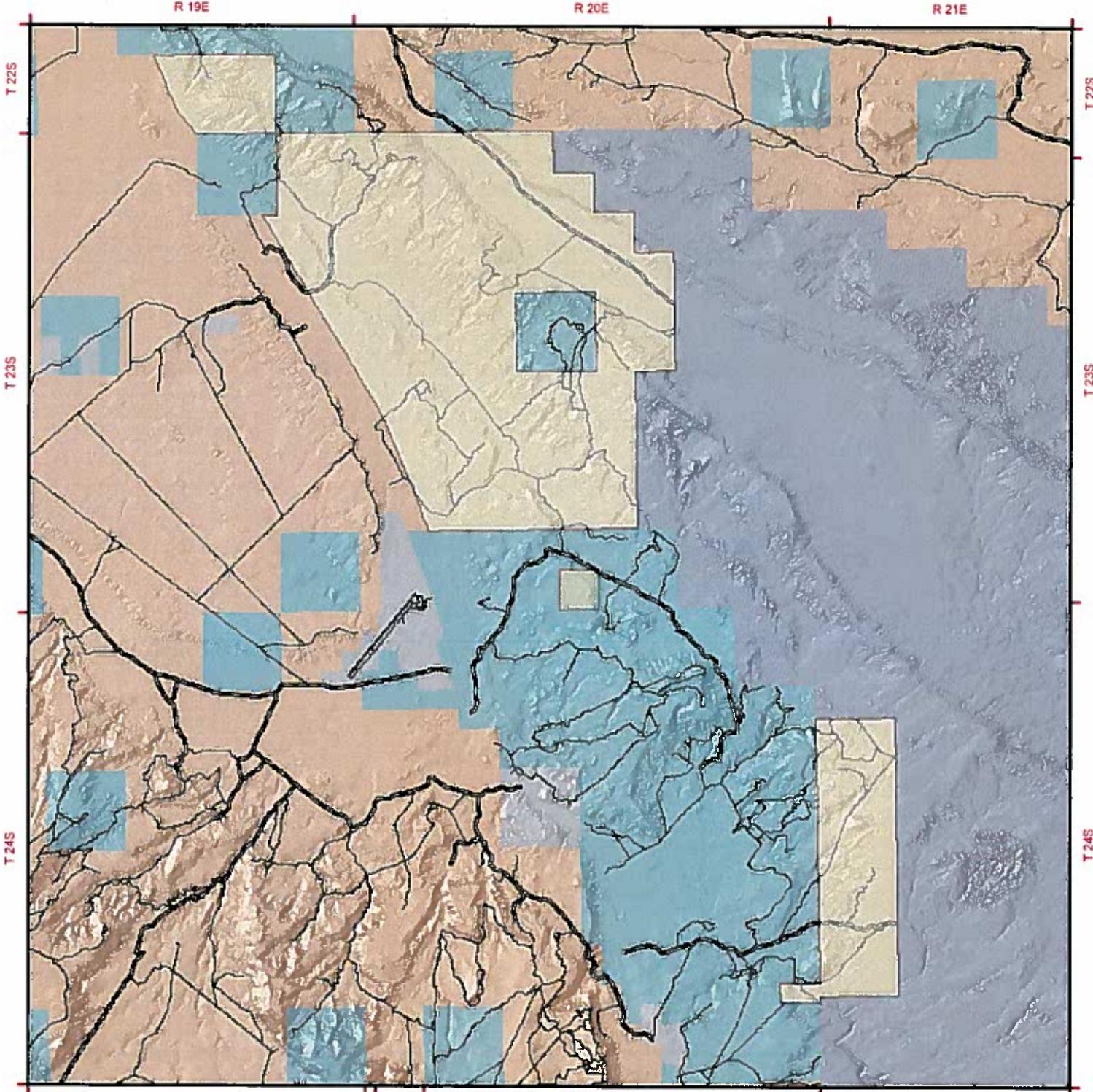
Determination	Resource	Rationale for Determination*	Signature	Date
		very shallow soils to shallow soils and on very steep slopes which are inaccessible to camping. Jones Cycladenia is restricted to soils with a narrow range of morphological and physical properties. Soils within Jones Cycladenia habitat are shallow (<50 cm), have high rock fragment content (increases to almost 100% with depth), and are formed in shale that fractures angularly in situ. Soils that support Jones Cycladenia often occurs on steep slopes (50%) with erosive surfaces. After reviewing the soils types within this project area majority of the soils are moderately deep to very deep and majority of the soils are derived from sandstone. There are a few soil types within the project area that are derived from shale, either on very steep slopes where no camping would occur, along with one soil type on flat terrain; however, this soil is deep not shallow. By having designated campsites on flat terrain, no potential impact to habitat that occurs on the steep slopes would occur. No surveys were determined necessary since the designated campsites would be on flat terrain and in deep soils which is not potential habitat.		
PI	Livestock Grazing	The action would reduce the overall camping footprint within this area and that would reduce the potential people to interact with livestock grazing. Forage conditions would likely improve in the areas designated for no camping, but could remain in poor condition near the designated sites.	David Williams	02/19/19
NI	Rangeland Health Standards	Not likely to change the health of the rangeland to a degree that would be meaningful.	David Williams	02/19/19
PI	Vegetation Excluding USFW Designated Species	The action would reduce the overall camping footprint within this area and that would reduce the potential to damage vegetation. This would likely to improve the vegetation condition in the areas that would not be designated for camping and likely impact the vegetation in areas that are designated for camping.	David Williams	02/19/19
NI	Woodland / Forestry		Jordan Davis	10/2/18
NI	Geology / Mineral Resources/Energy Production	Subject to valid existing rights	D. Pals	10/23/18
NI	Lands/Access	Subject to valid existing rights	Lisa Wilkolak	11/6/18
PI	Paleontology	In Klondike area restricted camping would protect resource	D. Pals	10/23/18

#### FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	Jennifer L. Jones	9/12/2019	
Authorized Officer	Nicole Gaddis/Night	9/13/19	

**Map 1: Proposed Camping Management Area  
Klondike Bluffs Mountain Bike Focus Area and 160 Acre Parcel**

BLM-DOI-Y010-2019-0021  
Bureau of Land Management  
Moab Field Office



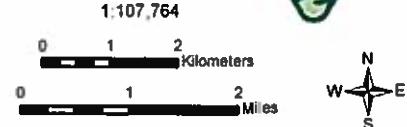
**Location Map**  
Utah BLM Field Office Boundaries



Legend	
	Proposed Camping Management Area
	B Roads (Maintained)
	D Roads (Unmaintained)
Land Status	
	Bureau of Land Management (BLM)
	National Park Service (NPS)
	Private
	State

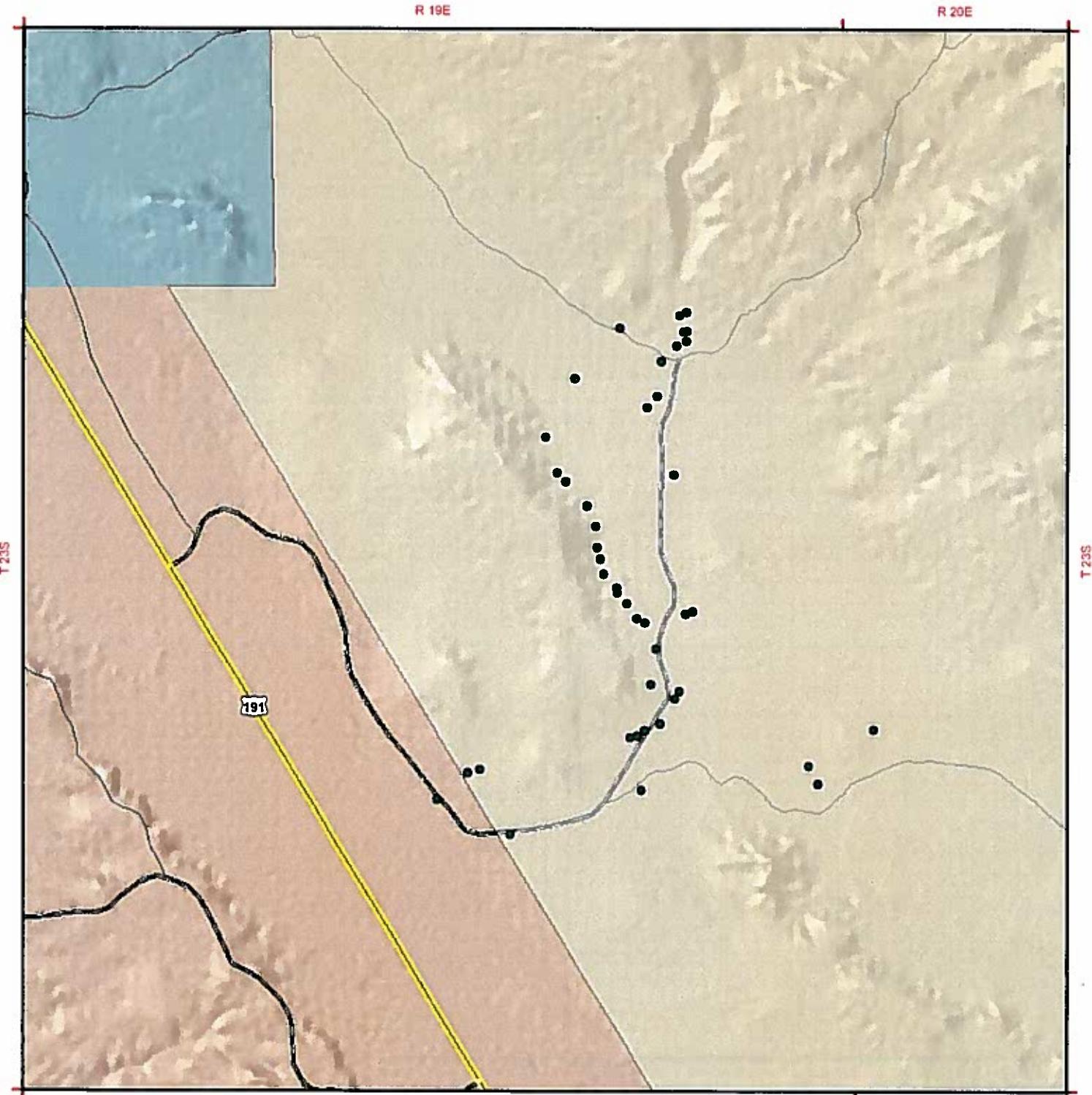
Date: 4/19/2019

No warranty is made by the Bureau of Land Management  
as to the accuracy, reliability, or completeness of these  
data for individual use or aggregate use with other data.





## Map 2: Proposed Sites to be Designated for Camping

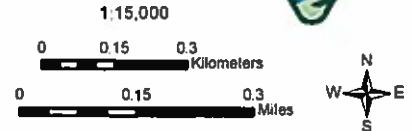


Location Map  
Utah BLM Field Office Boundaries



Legend	
●	Proposed sites
■	Proposed Camping Management Area
—	State and Federal Highways
—	B Roads (Maintained)
—	D Roads (Unmaintained)
Land Status	
■	Bureau of Land Management (BLM)
■	State

Date: 8/19/2019



No warranty is made by the Bureau of Land Management  
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data for individual use or aggregate use with other data.



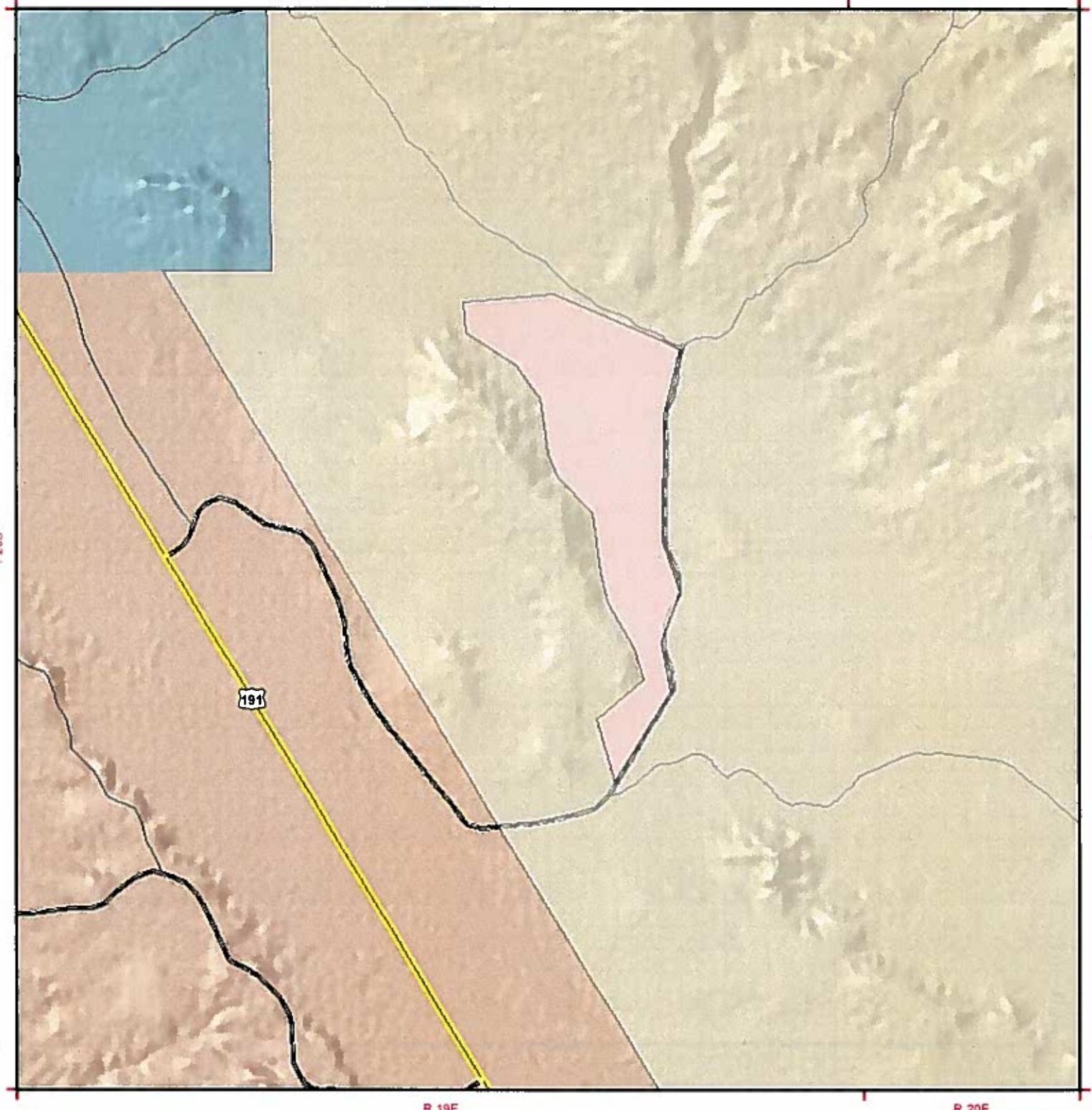


### **Map 3: Proposed Future Campground Location**

**BLM-DOI-Y010-2019-0021**  
**Bureau of Land Management**  
**Moab Field Office**

R 19E

R 20E



## Location Map

#### **Utah BLM Field Office Boundaries**



## **Legend**

- Future campground location (~ 77 acres)**

**Proposed Camping Management Area**

**State and Federal Highways**

**B Roads (Maintained)**

**D Roads (Unmaintained)**

**Land Status**

**Bureau of Land Management (BLM)**

**State**

The logo is a triangular emblem. The top half contains the text "NATIONAL SYSTEM OF PUBLIC LANDS" in a serif font, with "U.S. DEPARTMENT OF THE INTERIOR" and "BUREAU OF LAND MANAGEMENT" stacked below it. The bottom half features a stylized landscape illustration with mountains, a river, and a forest.

1:15,000

0 0.15 0.3 Kilometers  
0 0.15 0.3 Miles



Date 8/19/2019

*No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.*



# United States Department of the Interior Bureau of Land Management

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## Finding of No Significant Impact/Decision Record Environmental Assessment

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**DOI-BLM-UT-Y010-2019-0021 EA**

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**September 2019**

**Supplementary Rules on Camping and Wood Gathering: Providing  
Sustainable Camping Opportunities in the Klondike Bluffs  
Mountain Bike Focus Area**

**Location:** Klondike Bluffs Mountain Bike Focus Area and T. 23 S., R. 20 E.,  
Section 33, SESE, Grand County, Utah

**Proponent:** Moab Field Office, Bureau of Land Management

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Moab Field Office  
82 East Dogwood  
Moab, UT 84532  
435-259-2100  
435-259-2106



## **FINDING OF NO SIGNIFICANT IMPACT**

**DOI-BLM-UT-Y010-2019-0021**

### **INTRODUCTION:**

The Bureau of Land Management (BLM) has conducted an environmental analysis (EA), DOI-BLM-UT-Y010-2019-0021, for a Proposed Action to manage camping in the Klondike Bluffs Mountain Bike Focus area as well as on 160 acres located in the SE ¼ of Section 33, Township 25 South, Range 20 East, Salt Lake Meridian. These lands are located in the Labyrinth Rims/Gemini Bridges Special Recreation Management Area (SRMA). The project is described in the EA referenced above. The underlying need for the proposal would be met while providing recreation opportunities for the general public. The EA (DOI-BLM-UT-Y010-2019-0121) is attached, and is incorporated by reference for this Finding of No Significant Impact (FONSI). A No Action alternative and the Proposed Action alternative were analyzed in the EA.

### **FINDING OF NO SIGNIFICANT IMPACT**

Based upon a review of the EA and the supporting documents, I have determined that the project is not a major federal action and will not significantly affect the quality of the human environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity as defined in 40 CFR 1508.27 and do not exceed those effects described in the 2008 Moab RMP/FEIS. Therefore, an environmental impact statement is not needed.

This finding is based on the context and intensity of the project as described:

**Context:** The project is a site-specific action directly involving approximately 14,786 acres on BLM land that by itself does not have international, national, regional, or state-wide importance.

**Intensity:** The following discussion is organized around the Ten Significance Criteria described in 40 CFR 1508.27 and incorporated into resources and issues considered (includes supplemental authorities Appendix 1 H-1790-1) and supplemental Instruction Memorandum, Acts, regulations and Executive Orders.

The following have been considered in evaluating intensity for this proposal:

- 1. Impacts may be both beneficial and adverse.** The Proposed Action would impact natural and cultural resources beneficially as described in the EA. None of the environmental effects discussed in detail in the EA are considered significant, nor do the effects exceed those described in the 2008 Moab RMP/FEIS. Beneficial impacts to recreation users are also analyzed within the EA.
- 2. The degree to which the selected alternative will affect public health or safety.** The Proposed Action provides designated camping, including additional toilet facilities; this will add to public safety in this heavily visited area.
- 3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wilderness, wild and scenic rivers, or ecologically critical areas.** The historic and cultural resources of the area have been analyzed using a records review and Native American consultation. The cultural resources will be positively impacted by well managed camping within the Focus Area.

The following components of the Human Environment and Resource Issues are not affected because they are not present in the project area: Areas of Critical Environmental Concern, Wild and Scenic Rivers, BLM Natural Areas, Wilderness/Wilderness Study Area, Wastes, Threatened and Endangered Animal Species, and Threatened, Endangered or Candidate Plant Species.

In addition, the following components of the Human Environment and Resource Issues, although present, would not be affected by this Proposed Action for the reasons listed in Appendix A of the EA: Air Quality, Floodplains, Wetlands, Invasive Species, Lands with Wilderness Characteristics Water Resources, Native American Religious Concerns, Environmental Justice, Woodlands, Geology, Environmental Justice, Lands/Access, Rangeland Health Standards, and Socioeconomics.

Ten resources (Soils, Vegetation, Recreation, Livestock Grazing, Visual Resources, Migratory Birds, Utah BLM Sensitive Species, Fish and Wildlife, Cultural Resources and Paleontology) are analyzed in the EA. The Proposed Action would have beneficial impacts upon these resources.

4. **The degree to which the effects on the quality of the human environment are likely to be highly controversial.** There is no scientific controversy over the nature of the impacts.
5. **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.** The project is not unique or unusual. The BLM has experience implementing similar actions in similar areas. The environmental effects to the human environment are fully analyzed in the EA. There are no predicted effects on the human environment that are considered to be highly uncertain or involve unique or unknown risks.
6. **The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.** The actions considered in the selected alternative were considered by the interdisciplinary team within the context of past, present, and reasonably foreseeable future actions. Significant cumulative effects are not predicted. A complete analysis of the direct, indirect, and cumulative effects of the selected alternative and all other alternatives is described in Chapter 4 of the EA.
7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts – which include connected actions regardless of land ownership.** The interdisciplinary team evaluated the possible actions in context of past, present and reasonably foreseeable actions. Significant cumulative effects are not predicted. A complete disclosure of the effects of the project is contained in Chapter 4 of the EA.
8. **The degree to which the action may adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.** The project will not adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places, nor will it cause loss or destruction of significant scientific, cultural, or historical resources.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973, or the degree to which the action may adversely affect: 1) a proposed to be listed endangered or threatened species or its habitat, or 2) a species on BLM's sensitive species list. Habitats would incur no new impacts.
10. Whether the action threatens a violation of a federal, state, local, or tribal law, regulation or policy imposed for the protection of the environment, where non-federal requirements are consistent with federal requirements. The project does not violate any known federal, state, local or tribal law or requirement imposed for the protection of the environment.



Nicollee Gaddis-Wyatt, Moab Field Manager

9/13/19

Date

## **DECISION RECORD**

**DOI BLM UT Y010 2019-0021 EA**

The Bureau of Land Management (BLM) has conducted an environmental analysis (EA), DOI-BLM-UT-Y010-2019-0021, to manage camping in the Klondike Bluffs Mountain Bike Focus Area and on an isolated 160 acre parcel in that vicinity. Two alternatives were analyzed for their environmental impacts (Proposed Action and No Action).

It is my decision to approve the Proposed Action, which authorizes the BLM to manage camping on approximately 14,700 acres by limiting camping to designated campsites and/or to a campground. Camping rules will be applied year-round. Signing will be erected to inform users of the locations of the campsites and/or campground and of the rules governing their use. Campsites will be delineated on the ground to make their use transparent and easy. Those areas not available for camping (usually due to a resource conflict) will be clearly marked as not available for camping.

The following will be included to enhance the camping experience on BLM lands:

1. Camping on BLM administered public land in the Klondike Bluffs Mountain Bike Focus Area will be limited to developed campgrounds and/or designated camping sites. Initially, up to 40 designated campsites will be marked for public use. As funding allows, a 60 site campground will be constructed to accommodate camping needs in the area. The location of the dispersed sites and of the campground is shown in the attached EA.
2. Possession, set up and use of portable toilets for solid human body waste will be required for overnight use at all designated campsites, except at sites where constructed toilets are provided, such as at a constructed BLM campground. (A portable toilet is defined as a) containerized and reusable, b) a commercially available biodegradable system, such as a "wagbag" or c) a toilet within a camper, trailer or motorhome.) Disposal of portable toilet waste off public land is required.
3. Wood cutting and gathering on BLM administered public land within all of the Klondike Bluffs Mountain Bike Focus Area as well as the 160 acre parcel will be prohibited at all times.
4. Former campsites not repurposed to designated camping use will be reseeded and restored to enhance recovery from the past impacts of dispersed camping.

The EA is attached to this Decision Record.

**Authorities:** The authority for this decision is in CFR 43 8360 – Visitor Services.

**Compliance and Monitoring:** No monitoring is required. There are no special terms/conditions or stipulations.

**PLAN CONFORMANCE AND CONSISTENCY:**

The Proposed Action has been reviewed and found to be in conformance with the 2008 Moab Resource Management Plan (RMP). The following eight decisions from that RMP supporting the Proposed Action are:

REC-2: “Where unacceptable damage to natural or cultural resources by recreation use is anticipated or observed, BLM will seek to limit or control activities by managing the nature and extent of the activity or by providing site improvements that make the activity more sustainable or by a combination of management controls and facility development. Such management actions will seek to reduce or eliminate the adverse impact while maintaining the economic benefits associated with a wide range of recreation uses.” (page 81)

REC-3: “BLM will consider and, where appropriate, implement management methods to protect riparian resources, special status species and wildlife habitat while enhancing recreation opportunities. Management methods may include limitation of visitor numbers, camping and travel controls, implementation of fees, alteration of when use takes place, and other similar actions to be approved through normal BLM procedures.” (page 81)

REC-6: “Dispersed camping is allowed where not specifically restricted. Dispersed camping may be closed seasonally or as impacts or environmental conditions warrant. All vehicle use associated with dispersed camping activities is required to stay on designated roads.” (page 81)

REC-7: “Management actions limiting camping, wood gathering, firewood cutting, and requiring use of fire pans and portable toilets implemented through published closures limitations, restrictions or special rules applicable to specific land areas within the [planning area] are carried forward in all alternatives (see Moab Field Office recreation Rules in Appendix L).” (page 82)

REC-21: “Manage all Special Recreation Management Areas (SRMA) for sustainable camping opportunities. Camping may be restricted to designated sites if use and conditions warrant.” (page 83)

REC-22: “Manage all SRMAs according to the Visual Resource Management Class to protect scenic values and settings important to recreation.” (page 83)

REC-23: “Approved recreation facilities supporting recreation area management objectives will be planned and designed to reduce visual impacts where feasible.” (page 83)

The Proposed Action is also in conformance with the following additional plans:

The Federal Land Policy and Management Act mandates multiple use of Public Lands, including recreation use. An objective of BLM’s recreation policy is to satisfy recreation demand within allowable use levels in an equitable, safe and enjoyable manner, minimizing adverse resource impacts and user conflicts.

The BLM’s 2018 *Moab Campground Business Plan* (approved by the Utah BLM Resource Advisory Council) authorizes the construction of a fee campground in the Focus Area in order to mitigate the ongoing resource damage caused by unlimited dispersed camping.

The Proposed Action is related to IM No. 2013-161 *Processing and Approving Supplementary Rules*: “The state director may establish supplementary rules to provide for the protection of persons, property, and public lands and resources. Supplementary rules are used to support

objectives of 43 CFR Subpart 8365, "Rules of Conduct" for the protection of public lands and resources, and for the protection, comfort and well-being of the public in its use of recreation areas, sites and facilities on public lands.

The Proposed Action would complement the effort currently being undertaken by State of Utah School and Institutional Trust Lands (SITLA), State of Utah Sovereign Lands and Grand County on lands immediately west of Arches National Park concerning the management of camping.

The Proposed Action is also consistent with the Grand County General Plan (2012), which calls for promoting management of public lands for benefit and enjoyment of the people of Grand County and the nation. The Grand County General Plan recognizes that "the public lands of Grand County are the foundation of the county's economic prosperity" because of the reliance of Grand County on tourist revenue.

**Rationale for Decision:** The Proposed Action meets the purpose and need for the project by managing camping in an area popular with the public. There are no significant negative impacts to any resources located in the area of the Proposed Action. The Proposed Action beneficially impacts ten resources: Soils, Vegetation, Recreation, Livestock Grazing, Visual Resources, Migratory Birds, Utah BLM Sensitive Species, Fish and Wildlife, Cultural Resources and Paleontology. The public was notified of the Proposed Action by posting on the ePlanning website on November 7, 2018. A comment period was held on the EA in April of 2019. Fourteen responses were received, largely as a result of a feature story in the Salt Lake Tribune on April 5, 2019. Of these responses, eleven offered full support while three were in opposition. Grand County Trail Mix and Ride with Respect were in full support of the proposal, as was the Governor's Office of Economic Development. Ride with Respect suggested the addition of 160 acres to the Proposed Action. This parcel was added to the Proposed Action as a result of that input.

The decision would address concerns expressed by the Southeast Utah Health Department concerning the lack of sanitary facilities in the Focus Area.

**Protest/Appeal Language:**

The decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR Part 4. Public notification of this decision will be considered to have occurred on the date that it is posed on ePlanning. Within 30 days of this decision, a notice of appeal must be filed in the office of the Authorized Officer at Moab Field Office, Bureau of Land Management, 82 East Dogwood, Moab, Utah 84532. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals, Office of Hearings and Appeals, U.S. Department of the Interior, 801 North Quincy St., Suite 300, Arlington, VA 22203 within 30 days after the notice of appeal is filed with the Authorized Officer.

If you wish to file a petition for stay pursuant to 43 CFR Part 4.21(b)), the petition for stay should accompany your notice of appeal and shall show sufficient justification based on the following standards:

1. The relative harm to the parties if the stay is granted or denied,
2. The likelihood of the appellant's success on the merits,

3. The likelihood of irreparable harm to the appellant or resources if the stay is not granted, and
4. Whether the public interest favors granting the stay.

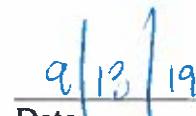
If a petition for stay is submitted with the notice of appeal, a copy of the notice of appeal and petition for stay must be served on each party named in the decision from which the appeal is taken, and with the IBLA at the same time it is filed with the Authorized Officer.

A copy of the notice of appeal, any statement of reasons and all pertinent documents must be served on each adverse party named in the decision from which the appeal is taken and on the Office of the Regional Solicitor, U.S. Department of the Interior, 6201 Federal Building, 125 South State Street, Salt Lake City, Utah 84138-1180, not later than 15 days after filing the document with the Authorized Officer and/or IBLA.



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Nicollee Gaddis-Wyatt, Moab Field Manager



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Date

**Attachments:** EA # DOI-BLM-UT-Y010-2019-0021