

**DECISION MEMORANDUM**  
**Stateline Campground Extension**  
**DOI-BLM-AZ-A010-2009-0020-DNA**

U.S. Department of the Interior  
Bureau of Land Management  
Arizona Strip Field Office  
Grand Staircase-Escalante National Monument

**Approval and Decision**

Based on a review of the project described in the attached Determination of NEPA Adequacy documentation and Arizona Strip Field Office and Grand Staircase-Escalante National Monument staff recommendations, we have determined that the project is in conformance with the Arizona Strip Field Office Resource Management Plan (approved 2008), and the Grand Staircase-Escalante National Monument Management Plan (approved 2000). It is our decision to approve the action as proposed, and as described below.

The 3 additional campsites (1 equestrian/trailer site, and two walk-in sites) with the following stipulations:

- a. Immediately prior to the start of the project, BLM will contact personnel monitoring California condor locations and movement on the Arizona Strip to determine the locations and status of condors in or near the project area.
- b. If California Condors visit the worksite while activities are underway, the on-site supervisor will notify the BLM Arizona Strip wildlife team lead. Project workers and supervisors will be instructed to avoid interaction with condors.
- c. The project site will be inspected for micro-trash at the end of each day the work is being conducted (e.g., trash removed, scrap materials picked up) to minimize the likelihood of condors visiting the site. BLM staff may conduct site visits to the area to ensure adequate clean-up measures are taken.
- d. For projects where potential exists for leakage or spill of hazardous materials, a spill plan will be developed and implemented to prevent the potential poisoning of condors. The plan will include provisions for immediate clean up of any hazardous substance, and will define how each hazardous substance will be treated in case of leakage or spill. The plan will be reviewed by the BLM condor lead biologist to ensure condors are adequately addressed.
- e. The project site will be required to use wildlife proof receptacles for trash.
- f. Project workers and supervisors will also be required to attend an on-site briefing on condors presented by Peregrine Fund staff.

**Administrative Review or Appeal Opportunities**

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4 and the attached Form 1842-1. If an appeal is taken, your notice of appeal must be filed at the Arizona Strip Field Office 345 East Riverside Drive, St. George, Utah 84790, within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition (pursuant to regulation 43 CFR 4.21 (58 FR 4939, January 19, 1993) (request) for a stay (suspension) of the effectiveness of this decision during the time that your

appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the Office of the Solicitor (Department of the Interior, Office of the Field Solicitor, Sandra Day O'Connor U.S. Court House #404, 401 West Washington Street SPC44, Phoenix, AZ 85003-2151) (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

Standards for Obtaining a Stay

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 immediate and irreparable harm if the stay is not granted, and
4. Whether the public interest favors granting the stay.

\_\_\_\_\_  
Lorraine M. Christian, Arizona Strip Field Manager

\_\_\_\_\_  
Date

\_\_\_\_\_  
Rene Berkhout, Grand Staircase-Escalante National Monument  
Manager

\_\_\_\_\_  
Date

Attachment: Form 1842-1

## **Worksheet**

### **Determination of NEPA Adequacy (DNA)**

**U.S. Department of the Interior**

**Bureau of Land Management**

OFFICE: Arizona Strip Field Office

TRACKING NUMBER: DOI-BLM-AZ-A010-2009-0020-DNA

CASEFILE/PROJECT NUMBER: DOI-BLM-AZ-A010-2009-0020-DNA

PROPOSED ACTION TITLE/TITLE: Stateline Campground Extension

LOCATION/LEGAL DESCRIPTION: FAMS ID #1560 Stateline Campground, ST EQ #60160

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

The Stateline Campground is the northern terminus of the newly designated Arizona National Scenic Trail, which contains a signed trailhead complete with interpretive display, a vault toilet and 4 campsites; two equestrian/trailer sites and two walk-in campsites. The recently designated Arizona National Scenic Trail is a system of connected trails that stretches approximately 800 miles from the Mexican border to the Utah border. The non-motorized trail is primarily used by hikers, mountain bikers, and equestrians. The Buckskin Mountain portion is 12.3 miles long and is entirely on BLM administered land under the jurisdiction of the Arizona Strip Field Office. This northernmost section of the Arizona Trail connects the northern Kaibab National Forest section with the Utah border. The Stateline Campground is under the jurisdiction of the Arizona Strip Field Office on the Arizona portion of the campground and Grand Staircase-Escalante National Monument on the Utah portion of the campground. The Arizona Strip Field Office would take the lead for the expansion project with assistance from Grand Staircase-Escalante National Monument.

The entire Stateline Campground Expansion project would include 4 campsites (1 equestrian/trailer pull through site, and 3 walk-in sites), a vault toilet and a 4 stall corral. Development of one of the campsites (Arizona), the corral (Utah) and the vault toilet (Arizona) placement was addressed in the original EA-AZ-010-94-13.

This DNA addresses those portions of the Stateline Campground Expansion project that were not specifically addressed in the existing EA: installation of 3 additional campsites (1 equestrian/trailer site, and two walk-in sites). One of the walk-in sites would be on the Arizona portion of the campground, one would straddle the Arizona and Utah state line, and the pull through equestrian/trailer site would be entirely on the Utah portion of the campground. Each site would include a shade ramada with a concrete pad, picnic table and fire ring. The proposed project area would include site grading, compaction, minimum excavation and backfill for the shade shelter floors and individual campsite parking. The proposed project area is contained within the original potential development area.

The proposed project would include the following conservation measures for California condors, from the Arizona Strip Field Office RMP, as contract stipulations for ground disturbance activities related to the Stateline Campground expansion project.

CC-2.A. Immediately prior to the start of a permitted project, BLM will contact personnel monitoring California Condor locations and movement on the Arizona Strip to determine the locations and status of condors in or near the project area.

CC-2.B. Where California Condors visit a worksite while activities are underway, the on-site supervisor will notify the BLM wildlife team lead. Project workers and supervisors will be instructed to avoid interaction with condors.

CC-3.A The project site will be inspected for microtrash at the end of each day the work is being conducted (e.g., trash removed, scrap materials picked up) to minimize the likelihood of condors visiting the site. BLM staff may conduct site visits to the area to ensure adequate clean-up measures are taken.

CC-3.B For projects where potential exists for leakage or spill of hazardous materials, a spill plan will be developed and implemented to prevent the potential poisoning of condors. The plan will include provisions for immediate clean up of any hazardous substance, and will define how each hazardous substance will be treated in case of leakage or spill. The plan will be reviewed by the BLM condor lead biologist to ensure condors are adequately addressed.

In addition to these conservation measures, the project site would be required to use wildlife proof receptacles for trash.

Project workers and supervisors would also be required to attend an on-site briefing on condors presented by Peregrine Fund staff.

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

LUP Name/Date Approved Arizona Strip Field Office (FO) Resource Management Plan, February 2008

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

DFC-RR-03: Existing opportunities for visitors to enjoy sightseeing and viewing wildlife in the Backways TMAs will be maintained/enhanced.

DFC-RR-05: In Backways and Specialized TMAs, recreation opportunities associated with somewhat remote settings, such as exploring backcountry roads, vehicle camping, hunting, sightseeing, recreation aviation, and picnicking will be maintained/enhanced on existing roads, provided they will be compatible with the protection and enhancement of sensitive resource values, where appropriate.

DFC-VR-04: The existing “footprint” of cultural landscapes (facilities, projects, and improvements) will be maintained within the Arizona Strip FO.

DFC-VR-06: The objective of VRM Class 2 is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

DFC-TM-06: The Backways TMA will provide for a variety of motorized, non-motorized, and mechanical travel modes to serve existing and future recreational, traditional, casual, commercial, educational, and private needs.

MA-TE-77: Within the 10 (j) area, the BLM will not restrict authorized and/or permitted activities solely for the benefit of California condors. Persons engaged in authorized or permitted actions that encounter a condor will be requested not to haze the birds, but to notify the BLM or the Peregrine Fund. Administrative or other actions implemented may be subjected to additional stipulations and conservation measures as described in Appendix F.

LUP Name/Date Approved Grand Staircase-Escalante National Monument Management Plan, February 2000.

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

CAMP-1 Camping in developed campgrounds or in designated primitive camping areas will be allowed in the Frontcountry and Passage Zones. Dispersed primitive camping will not be allowed in these zones.

SRMA-4: Activities in this SRMA include canyoneering, equestrian use, backpacking, hiking, hunting, and scenic touring along the House Rock Valley Road. Management of this SRMA will be in coordination with the Kanab and the Arizona Strip Field Offices.

Other document Date Approved:  
Recreation Project Plan Arizona Trail-Buckskin Mountain Passage, February 1996.

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

List by name and date all applicable NEPA documents that cover the proposed action.

EA-AZ-010-94-13 Arizona Trail-Buckskin Mountain Passage-Recreation Project Plan;  
March 1, 1996.

Arizona Strip District Arizona Trail-Buckskin Mountain Passage-Recreation Project Plan  
Decision Record AZ-010-96-10 was signed on March 5, 1996.

## **D. NEPA Adequacy Criteria**

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

Documentation of answer and explanation:

The proposed project area is contained within the original potential development area that was reviewed in EA-AZ-010-94-13 and the Recreation Project Plan Arizona Trail-Buckskin Mountain Passage. The proposed Arizona walk-in campsite location is one of the campsite locations shown on map 3 for the original potential development area. The original site map identified that the equestrian campsites would include ramadas with pads, tables and fire rings. During the original construction phase of the Stateline Campground, ramadas with pads and tables were not added to the equestrian campsites.

The proposed location of the walk-in site that straddles the state line and the equestrian/trailer pull through campsite are not specifically described or drawn on versions of the site maps reviewed in EA-AZ-010-94-13. The original site plans and EA provided for the 1990s recreational needs of the area and the potential completion of the Arizona Trail. The proposed action provides for the recreational needs of current and future recreational users. The current proposed project area is well within the potential development area addressed and analyzed in the EA, and therefore will result in no difference to the project area footprint from the original footprint design.

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

Documentation of answer and explanation:

The proposed action, the Arizona Trail-Buckskin Mountain Passage and trailhead facility on the Utah-Arizona state line in EA-AZ-010-94-13, is appropriate to the new action in that it “intends to provide a higher quality, therefore more attractive, recreation trail experience than currently exists.” The new action would be constructed to meet the Americans with Disabilities Act/Architectural Barriers Act Accessibility Guidelines which now incorporates the Federal Accessibility Standards for Challenge Level II as described in the original EA.

The range of alternatives considered in the existing EA is appropriate with respect to the current proposed action. There were two additional alternatives presented in EA-AZ-010-94-13, the optional trail route through the Coyote Buttes portion of the Vermilion Cliffs including 2 miles of trail into Utah and the no action alternative. However, these two alternatives are not appropriate for consideration of this current proposed action because Stateline Campground is already in place and the current proposed action simply considers adding additional facilities

Grand Staircase-Escalante National Monument Management Plan provides for campground facilities within the Passage Zone management area. Current recreation use of the Stateline Campground by users of the Arizona National Scenic Trail, the Paria Canyon/Coyote Buttes Special Management Area and local and regional users has exceeded the current capacity of the four campsites at Stateline Campground. General use of the campground during weekends, holidays and peak visitor use in the spring and fall has resulted in wildcat expansion of campsites, unauthorized campsite creation, and parking issues related to equestrian trailers, ATV trailers and multiple vehicle groups that block through traffic into the campground and have begun to expand the road boundaries. This has created visual impacts and surface disturbance to areas outside of the current four campsite footprints.

The placement of one pull through equestrian/ trailer campsite, the delineation of the current campground roadway and the addition of the walk-in campsite that would straddle the Arizona and Utah state line, would help mitigate the potential for continued impacts of unauthorized campsite creation and roadway expansion by creating additional trailer parking off the existing vehicular loop and adding campsites within the original development area footprint reviewed within EA-AZ-010-94-13. Thus, adding campsites to a current campground would conform to the current resource values within the Passage Zone of the Grand Staircase-Escalante National Monument.

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

Documentation of answer and explanation:

Since the existing EA (EA-AZ-010-94-13) was issued, Grand Staircase-Escalante National Monument was designated in 1996 and Vermilion Cliffs National Monument was designated in 2000 through Presidential Proclamations. The Arizona Trail and Stateline campground complex is now solely within the Arizona Strip Field Office and Grand Staircase-Escalante National Monument. Vermilion Cliffs National Monument is located due east of the campground.

The Arizona National Scenic Trail formerly known as the potential Arizona Trail-Buckskin Mountain Passage was officially designated by Congress as a National Scenic Trail in March 2009.

The original EA stated “Approximately 9 miles to the south of the project area, the U.S. Fish and Wildlife Service plans to release a non-essential, experimental population of California Condors (*Gymnogyps californianus*) as a part of a species recovery effort.” The condor reintroduction project began, after the completion of the EA, in 1996. Impacts to condors were addressed in the EA. There would be no new impacts to the condor reintroduction project from the proposed action. Conservation measures as described in the description of the proposed action and below under “Wildlife” would be utilized to minimize any adverse impacts to the experimental population that could occur during the construction phase of the proposed action.

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

Documentation of answer and explanation:

The impacts of the proposed action are similar to those contained within EA-AZ-010-94-13 in that:

Visual Resources

The trailhead location would take full advantage of topographic and vegetation screening by preventing the removal of established piñon-juniper and minimizing the removal of other vegetative screening that would negatively impact the visibility of the 4 campsites from House Rock Valley Route, BLM route 1065. Thus, the current proposed action would create no direct impacts to visual resources in the area.

Recreation

As stated in the original EA, the proposed action, “would address an increasing recreation demand by directly and moderately improving non-motorized recreation opportunities on public lands in the region”. It would give users the opportunity to engage in various recreational activities to include hiking and biking, while providing a higher-quality experience to horsemen and other users than currently exists.

The original EA suggested a correlation between the creation of the trails and facilities and the potential for impacts related to increased visitor use in the area. The majority of the increased use in the valley has been created by external advertisement of recreation resources, not the development of these facilities. The proposed action is “designed to maximize a higher-quality experience than currently exists” by minimally increasing recreational facilities to help meet the demands in House Rock Valley that have been created by external advertisement. The steps necessary to minimize social impacts of recreation facilities as presented in the EA have been implemented to include visitor use limits in the Paria Canyon-Vermilion Cliffs Wilderness, and recreation monitoring protocols.

The proposed action would incorporate and be consistent with the new Americans with Disabilities Act/Architectural Barriers Act Accessibility Guidelines, July 2004 and amended in August 2005 in compliance with ADA standards by providing ADA accessibility for more than 40% of the Stateline campsites.

Thus, the current proposed action would create no direct or indirect impacts to recreation resources in the area that were not analyzed in the existing EA.

## Cultural

The proposed action footprint would be contained within Site Plan-Northern Terminus Trailhead-Potential development area as shown on Map 3 that was inventoried during the cultural survey. There were no significant cultural resources occurring within the area of the proposed action, thus, the current proposed action would create no direct impacts to cultural resources in the area.

## Rangeland

There would be no change in season of use or measurable loss of AUMs due to implementation of the proposed action. There should be a very slight reduction of grass and forb cover on about 4 acres of parking and trailhead facilities as stated and addressed in EA-AZ-010-94-13. Thus, the current proposed action would create no direct impacts to rangeland resources in the area that has not already been addressed in EA-AZ-010-94-13.

## Wilderness

EA-AZ-010-94-13 stated that “indirectly, increased visitor use in the project area over time could lead to a slight increase in the sights and sounds of human activity just outside the western Coyote Buttes portion of the wilderness.” The increased visitor use just outside the western Coyote Buttes portion of the wilderness is the result of outside publicity of Coyote Buttes not as a direct result of the original project. The proposed action should alleviate some of the pressure for overnight dispersed camping at the Paria Canyon/Coyote Buttes Special Management Area Wire Pass trailhead, which many visitors utilize when Stateline Campground has reached capacity. The increased campground capacity of the proposed action should decrease some of the sights and sounds of human activity currently being experienced at the Wire Pass trailhead excluding a few high use periods, potentially increasing the opportunity for experiencing solitude in this portion of the wilderness. Thus, the current proposed action would create no new direct impacts to the wilderness experience in Coyote Buttes that were not analyzed in the existing EA.

### Wildlife

EA-AZ-010-94-13 stated “The proposed action prescribes no trail construction between November 15 and March 1 to avoid any potential impacts of construction activities to wintering deer.” As there would be no trail construction completed as part of the proposed project that was assessed in the original EA, and any construction associated with the proposed project would be located within the boundaries of Stateline campground, which has received 10 years of concentrated human activity in the immediate area of the campground, there should be no impacts to the wintering deer population that were not analyzed in the existing EA. .

EA-AZ-010-94-13 stated “the anticipated direct and indirect impacts of the proposed action to the successful establishment of the experimental population of California Condors in the region would be slight to none.” The California condor has been successfully introduced into the region with no known impacts from the construction of or current placement of the Arizona Trail-Buckskin Mountain and Stateline Campground facilities. The current project would be contained within the existing Stateline Campground footprint and that of the original potential

development area as stated and addressed in EA-AZ-010-94-13. In addition to those issues addressed in the EA-AZ-010-94-13, the conservation measures listed in the proposed action would be required for any on-site work. There would be no new impacts to the condor reintroduction project from the proposed action.

#### Vegetation and Soils

The proposed project would be contained within the 4 acres that was analyzed during the EA-AZ-010-94-13 process and is currently being impacted by the presence of the existing campground. Thus, the analysis of impacts contained in the existing EA is valid in relation to the current proposed action.

#### Socio-Economic

EA-AZ-010-94-13 states: “the proposed action could indirectly contribute to a growing tourism industry in the region as trail users slightly increase. There would be no change in season of use or measurable loss of AUMs due to implementation of the proposed action.” External promotion of the local resources and the National Scenic Trail designation has contributed to a growing tourism industry in the area. The current proposed action would likely not contribute to the notoriety of the area and may result in decreased impacts to the local area from the increased visitor use.

Cumulative impacts as a result of the proposed action should be minimal. Local impacts and visitor trends are likely to see an increase of visitor use over time due to the new designation of the Arizona National Scenic Trail and increased destination orientated travelers to the House Rock Valley area. The current proposed action would create no new direct cumulative impacts to the local area and may result in decreased impacts from the development of new dispersed campsites within House Rock Valley.

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

Documentation of answer and explanation:

Consultation and coordination for EA-AZ-010-94-13 lasted for more than six years. During the public review process, 271 persons and/or organizations received information about EA-AZ-010-94-13. In addition to the review of the EA documents, the Arizona Trail-Buckskin Mountain Passage Recreation Project Plan was also reviewed by Arizona and Utah BLM personnel. Public involvement and interagency review associated with EA-AZ-010-94-13 and the corresponding Recreation Project Plan Arizona Trail-Buckskin Mountain Passage signed on February 1996 are adequate for the current proposed action as there is no deviation of the project area outside of the original potential development area as stated and addressed in EA-AZ-010-94-13.

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

Name Title Resource

Gloria Benson, Tribal Liaison  
Diana Hawks, Recreation/Wilderness/VRM  
Laurie Ford, Lands/Realty/Minerals  
Larry Denniston, Wildlife/T&E Wildlife  
John Herron, Cultural  
Jon Jasper, Outdoor Recreation Planner, Arizona Strip Field Office  
Lee Hughes, Special Status Plants  
Whit Bunting, Range/Vegetation  
Richard Spotts, Environmental Coordinator  
Ron Wadsworth, Supervisory Law Enforcement  
Linda Price, Monument Manager, Vermilion Cliffs National Monument, S&G  
John Sims, Vermilion Cliffs National Monument, Law Enforcement  
LD Walker, Weed Coordinator  
Lorraine Christian, Field Manager, Arizona Strip Field Office  
Rene Berkhout, Monument Manager, Grand Staircase-Escalante National Monument  
Clay Stewart, Outdoor Recreation Planner, Grand Staircase-Escalante National Monument  
Harry Barber, Kanab Field Office Manager  
Tom Christensen, Outdoor Recreation Planner, Kanab Field Office

Required Recipients of electronic distribution E-mails only (not reminders):

Andi Rogers, Habitat Specialist, Arizona Game and Fish Department  
Sarah Reif, Arizona Game and Fish Department  
LeAnn Skrzynski, Environmental Program Director, Kaibab Paiute Tribe

Note: Refer to the EA for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

**Conclusion**

Based on the review documented above, we conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM’s compliance with the requirements of the NEPA.

\_\_\_\_\_  
Lorraine M. Christian  
Arizona Strip Field Office Manager

\_\_\_\_\_  
Date

\_\_\_\_\_  
Rene Berkhout  
Grand Staircase-Escalante National Monument

\_\_\_\_\_  
Date

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