FINDING OF NO SIGNIFICANT IMPACT (FONSI)

ENVIRONMENTAL ASSESSMENT (EA) # UT -062-02-124
Cameo Cliffs Recreation Area Management Plan

The Bureau of Land Management, Moab Field Office, is preparing a Recreation Area Management Plan to consider providing for vehicle use in the Cameo Cliffs (Hook and Ladder Gulch) Area. San Juan County has proposed that portions of the 180 miles of existing road within the Planning Area be utilized to create opportunities for motorized recreation. The proposal includes creating a Special Recreation Management Are, with special rules, and marking 50 miles of main routes to help visitors find their way. To facilitate this public use, a staging area would be developed on County Road 114. The Recreation Plan for the area also considers constructing a motorized route along the southern side of Cameo Butte, and a camping area on the west side of Casa Colorado Rock. The Recreation Area Management Plan and its accompanying Environmental Assessment also include consideration of off-road vehicle designations within the area. The area is currently in the "open" category; consideration will be given to changing this to "designated" or "existing" via a possible Plan Amendment.

This unsigned FONSI and the attached EA #UT– 062-02-124 for the Cameo Cliffs Recreation Area Management Plan are available for public review and comment for 30 days beginning on July 19, 2004.

Based on the analysis of potential environmental impacts in the attached EA and consideration of the significance criteria in 40 CFR 1508.27, I have determined that with required and proposed mitigating measures the Cameo Cliffs Recreation Area Management Plan would not result in significant impacts on the human environment. An environmental impact statement (EIS) is not required.

The decision to approve or deny the Cameo Cliffs Recreation Area Management Plan, and if appropriate a signed FONSI with rationale, will be released after consideration of public comments and completion of the EA.

_____ _____

Authorized Officer Date

Environmental Assessment #UT-062-02-124

Cameo Cliffs
Recreation Area Management Plan

Department of the Interior

Bureau of Land Management

Moab Field Office

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INTRODUCTION

Location and Setting

Cameo Cliffs is located in San Juan County in southeastern Utah, approximately 18 miles northwest of Monticello, Utah and 30 miles south of Moab, Utah (Map 1). Within the boundary of the planning area there are approximately 20,050 acres of public land. BLM and San Juan County jointly propose establishment of a Special Recreation Management Area (SRMA) and designation and marking of certain roads and trails for use by vehicles and other management actions within the SRMA. All actions proposed apply only to public land. Recommendations have been made to San Juan County to acquire public route access on School and Institutional Trust Lands Administration (SITLA) lands.

The SRMA proposed by San Juan County, hereafter referred to as "the planning area" is bounded by Utah Highway 46 and a series of county roads on the north, county roads on the east and south, and U.S. Highway 191 on the west (Map 1). Public lands within the planning area include all or portions of: T. 29S., R. 23 E., Sections 3,4,10-15, 22-27, 34 and 35; T. 29 S., R. 24 E., Sections 17-21, 28-31, 33 and 34; T. 29 1/2 S., R. 23 E., Sections 31, 33 and 34; T. 29 ½ S., R 24 E., Sections 34 and 35; T. 30 S., R. 23 E., Sections 1, 11, 12 and 13; and T. 30 S., R. 24 E., Sections 3 –11, 17 and 18.

Over the past several decades, the public has increasingly relied on federal lands to provide motorized recreational opportunities. While providing for this use of BLM-administered lands, it is also the responsibility of the BLM to ensure that the land and water resources of the public lands are preserved and conserved for future generations. Balancing public use and enjoyment of the public lands and the protection of resources requires BLM to manage the various activities, including recreation, that occur on them. This proposal would provide a focal point for responsible motorized, mechanized and non-motorized recreation use.

No specific recreation directives were made regarding the Cameo Cliffs planning area within the Grand RMP and the proposed action will rectify that lack of management direction.

The proposed Cameo Cliffs Special Recreation Management Area is within San Juan County. In 2002, the San Juan County All-terrain Vehicle (ATV) Plan was amended to the San Juan County General Plan (San Juan County, 2002). Cameo Cliffs was identified in the San Juan County All-terrain Vehicle (ATV) Plan as an area of focus. The purpose of San Juan County's ATV plan is to provide "long range and orderly" direction for All-terrain Vehicle use in San Juan County. BLM also has direction to consider accommodating ATV use. FLPMA Section 103(1) recognizes outdoor reaction as one of the uses of the public lands. Such use is in conformance with the Grand RMP. BLM's purpose for considering the County proposal is to provide for ATV use while protecting other resource values.

To protect the resources in the Cameo Cliffs area from increased vehicular use, BLM needs to prepare a management plan. Planning is needed for immediate increases in ATV use (staging areas, signed routes, information kiosks) and for continued recreation use over the next five to ten years (camping areas, toilets, and publication of brochures on the route system). San Juan

County's plan to promote the area for ATV use may lead to increased visitation; BLM needs to undertake planning in order to accommodate this increased use.

NEED FOR THE PROPOSED ACTION

Cameo Cliffs has been proposed by San Juan County as a Special Recreation Management Area with a focus on ATV riding. In order to address the inherent conflicts that this heightened activity may have on the area, planning is required to address the issues. The underlying need for the proposed action is to provide for ATV activity while protecting other uses and values.

CONFORMANCE WITH LAND USE PLAN

Designating Cameo Cliffs as an SRMA and changing the OHV designation in the planning area are not in conformance with the Grand RMP; these actions would require Plan Amendments to the Grand Resource Area Resource Area Management Plan. All other proposed actions have been determined to be in conformance with the terms and conditions of the Grand Resource Area Resource Management Plan (July, 1985) as required by 43 CFR 1610.5. (Note that the Grand RMP covers the northern third of San Juan County). The Grand RMP included no recreation directives specifically for the Cameo Cliffs area.

Under the Grand Resource Area Resource Management Plan (1985), the entire Cameo Cliffs area is open to cross country motorized travel. With expected increased vehicle use of the area, the open OHV designation will no longer be appropriate, and the BLM needs to consider changing the OHV designation to "limited" through the planning process. Increased motorized use has the potential for resource impacts unless vehicles are restricted to a limited set of roads. A Notice of Intent to Plan was published in the Federal Register on December 3, 2002 regarding a possible change in OHV designation.

RELATIONSHIP TO STATUTES, REGULATIONS, OR OTHER PLANS

The proposed actions are consistent with the provisions of the current San Juan County General Plan (San Juan County, 1996 and amended in 2002). The San Juan County policy on public land recreation and tourism is as follows (p. 17): "While the County supports increased recreational activity on public lands, it also feels that federal and state agencies should acknowledge and aggressively address the impacts associated with these decisions. San Juan County supports responsible public land recreation and tourism."

The 1996 San Juan County Master Plan continues, (p. 18): "When responding to public land recreation proposals, the county will consider the following: 1) provision of essential services; 2) impacts on traditional recreation use, such as hiking and/or riding trails; 3) impacts on grazing, mineral development and wildlife; 4) formation of partnerships with agencies; 5) anticipated economic returns." On page 29, the San Juan County general Plan states that "the county views recreation and tourism as an additional economic opportunity."

The proposed actions directly address concerns in the San Juan County All-terrain Vehicle Plan, which was appended to the San Juan County Master Plan on August 12, 2002. This Plan calls for:

1) identifying areas where ATV use can be developed in a partnership with other governmental agencies and user groups,
2) providing consistent direction for enhancements to those route systems within the county for such things as signing, staging areas, information kiosks, restroom facilities and other needs,
3) developing maps and other aids to assist visitors to the area, and,
4) promoting education, a strong public land use ethic and a respect for the land and its many uses, including the use of ATV's as a legitimate and accepted recreation use.

There are no known plans prepared for this area by the State of Utah or by any other Federal Agency.

PROPOSED ACTION AND ALTERNATIVES

Proposed Action

San Juan County has proposed to partner with the BLM and to mark fourteen ATV routes within the Cameo Cliffs area (50 linear miles) These routes will utilize portions of the 140 miles of constructed vehicular routes that exist throughout the planning area from past mineral exploration activities. San Juan County has jointly proposed with the BLM to identify Cameo Cliffs as an SRMA and to mark ATV routes in that area.

The BLM and San Juan County propose channeling and directing ATV use in the Cameo Cliffs area through route marking, constructing a new motorized route along the southern side of Cameo Butte, establishing a non-motorized hiking and equestrian area within the proposed SRMA, and limiting camping to designated sites after a camping area (near the staging area on County Road 114) is constructed. In addition, it is proposed to make the Cameo Cliffs area a Special Recreation Management Area.

The Proposed Action is to implement the following five actions to accommodate increased vehicular use in the Cameo Cliffs Recreation Management Area:

1. Amend the Grand RMP to establish Cameo Cliffs as a Special Recreation Management Area (see maps 1 and 3 for boundaries) which would have the following prescriptions:
    a. Allow no vending in the planning area
    b. Make the Cameo Route System open to commercial recreation use (for which a Special Recreation Permit is required)
    c. Focus management on non-competitive use of the Marked Route System. Events would be allowed only where speed is not the determining factor
    d. Allow no competitive motorized events within the planning area
    e. Establish a non-motorized hiking and equestrian zone in the Hook and Ladder Gulch area, with a separate trailhead facility
    f. Limit mountain bike use to designated routes
    g. Designate developed sites as no shooting zones
    h. All refuse (including human waste) must be packed out

2. Amend the Grand RMP to change the OHV designation from "open" to "limited to designated roads" for the Cameo Cliffs Recreation Management Area. This would affect 20,050 acres of public land (see Map 2). This action requires a Plan Amendment to the Grand RMP. This limitation would be applied to mountain bikes as well through publication of a Federal Register notice.

3. Mark a network of motorized routes in the planning area (see Map 4). There are 14 routes, with 50 miles of route at varying levels of difficulty. Provide a staging area to access these routes. These marked motorized routes would be a subset of the routes designated under Action 1. The marked routes would be made no wider than the confines of the original roadbed. The staging area would include informational signing and restroom facilities.

4. Construct approximately 4.5 miles of motorized vehicle route along the southern side of Cameo Butte (connecting the already existing Cameo Ridge Route to the already existing Cameo Terrace Route). See Map 4.

5. Develop a fee campground on the east side of the County Road 114 staging area by installing a Class C toilet, picnic tables and fire grates if use levels warrant and funding allows. A site-specific Environmental Assessment will be done when the campground is to be constructed. Following construction of the campground, prohibit dispersed camping in the Recreation Area upon publication of a special rule via Federal Register notice.

Alternatives Analyzed in Detail

1) Alternative A: BLM proposes the establishment of an SRMA with modified boundaries. This alternative to the boundary of the SRMA as proposed by San Juan County is shown on Map 3. The adjusted boundary would remove 4,353 public land acres on the southeastern side of the planning area from Special Recreation Management Area designation in order to avoid ATV use near oil and gas wells and numerous mining disturbances. The objective of this alternative is to avoid threats to public safety by limiting public interaction with on-going oil and gas operations. No ATV routes would thus be planned to go through this area that could be dangerous to the public. This alternative does not adjust the number of miles of marked trail in the current proposed action. This alternative is analyzed in detail in this EA; this area will be called the "modified planning area" throughout this document.

2) Alternative B: Alternative B would change the OHV designation to "Limited to Existing Roads. This alternative would leave the identification of existing roads open to interpretation by BLM. This alternative is analyzed in detail in this EA.

Alternatives Considered but Rejected

1) Marking roads for use as ATV trails without designating the area as limited to designated roads and trails and undergoing a Plan Amendment on OHV category was considered. Under this alternative, BLM could not enforce compliance with use of the marked trails. Therefore, the impacts would be as described for the No Action Alternative; thus, this alternative is not

analyzed as a separate alternative.

2) Marking roads for use as ATV trails without designating Cameo Cliffs as an SRMA was considered but rejected from further consideration. However, the Bureau's Land Use Planning Handbook (H-1601-1) directs BLM to establish SRMA's as areas become popular with recreationists. In addition, intensive management will be required as motorized recreation use increases.

3) Changing VRM classes, oil and gas categories, rights-of-way corridors, or avoidance and exclusion areas were considered but rejected from further consideration. VRM classes are adequate as inventoried for the intended use, ATV riding. Practically the entire planning area as proposed by San Juan County is already leased for oil and gas; the planning area is in Category 1 (except for riparian areas, which are Category 2). Should new production facilities be constructed under lease, access to these facilities would be by administrative use only. That is, access roads to new oil and gas facilities would not be open to recreation use.

4) Not building the new route sections was considered, but rejected. One of these reroutes is necessary to avoid an oil and gas production facility. Failure to build this reroute would result in concerns for human health and safety. Another of the reroutes is necessary to avoid private property that adjoins the potential SRMA.

5) Closing the planning area to ATV use was considered by rejected. ATV use is a viable recreation use when responsibly undertaken. The purpose and need for this proposal is to promote responsible, sustainable ATV use.

No Action Alternative

Under this alternative:

1) Cameo Cliffs would not be managed as a Special Recreation Management Area; there would be no special rules for responsible recreation.

2) The OHV designation for Cameo Cliffs would remain open to cross country travel. Use would continue to occur on all existing roads, and new unauthorized routes and tracks would be allowed to develop throughout the area.

3) Motorized routes would not be marked in the Cameo Cliffs area, the staging area would not be further developed, extensive educational information on responsible motorized recreation would not be posted and toilet facilities would not be provided.

4) The proposed 4.5 mile motorized route on the south side of Cameo Butte would not be constructed.

5) A campground would not be built, toilet facilities would not be provided, and dispersed camping would continue throughout the area.

AFFECTED ENVIRONMENT

Proposed Action

General Setting

Cameo Cliffs (named by guidebook author F. A. Barnes) lies within an arid region composed of rock bluffs, short canyons, and minimal soil cover. Entrada sandstone domes, pinnacles, and spires are found in the area. Hook and Ladder Gulch, an intermittent stream system, runs through the central portion of the planning area in a westerly direction. When looking to the north from high points, one sees the LaSal Mountains. Looking south, the Abajo Mountains can be seen. Looking west reveals Hatch Point and the Canyon Rims area. There is variety in vegetation within the planning area, ranging from grasses and shrubs to the pinyon-juniper forest in the higher elevations.

Visitors are attracted to the area for the opportunity to drive off-highway vehicles (OHVs), mountain bike, ride horses, camp, hunt, and hike. Visitation is highest during spring and fall, when ambient air temperatures are relatively cool.

Critical Elements

Certain elements of the human environment that are subject to requirements specified in statute, regulation, or executive order must be considered in all EAs along with any other issues of concern. These mandatory critical elements have been considered for this EA (see attached checklist in the Appendix). The critical elements that would be affected are Threatened and Endangered Animals, Riparian Values, Cultural and Native American Concerns.

The following Critical Elements would not be affected by this proposal: Air Quality, Noxious Weeds, Floodplains, Farmlands, Water Quality, ACEC's, Wild and Scenic Rivers, Threatened and Endangered Plants, Hazardous and Solid Waste, Paleontology, Wilderness Values and Environmental Justice.

Resources Brought Forward for Analysis

Existing Authorizations (Grazing and Minerals)

There are three grazing permits authorized within the proposed Cameo Cliffs SRMA. The very large Lisbon Allotment (number 5388), which covers most of the proposed SRMA area, is permitted for 1634 cattle and 23 horses from November 1 to June 10. (This allotment is much larger than the proposed SRMA area.) Approximately five percent of the Hatch Point Allotment is in the far northern boundary of the proposed SRMA (number 5389), which permits 1164 cattle from October 15 to June 15, and 2455 sheep from November 15 to May 31 over the entire allotment. Approximately five percent of the Rocky Allotment (number 5390) is in the northeast part of the planning area. This permits 7 cattle from October 15 to June 15 on the entire allotment. Visitor use of Cameo Cliffs is presently at very low levels. This means that harassment of livestock and loss of forage from ATV disturbance is also very minimal.

There are 10 historic uranium/vanadium mine sites within the proposed Cameo Cliffs SRMA. Mining activity was focused along the eastern boundary of the area. Only one has been reclaimed, and in only one is the shaft fenced. Open shafts and numerous adits pose a public safety issue.

Twenty-seven oil and gas wells have been drilled within the proposed Cameo Cliffs SRMA; four are in the central portion of the San Juan County proposed SRMA, and 23 are in the eastern portion. Eight of the 27 wells are currently producing, 14 are plugged and abandoned, one is a gas shut-in, one is an oil shut-in, two are temporarily abandoned, and one is abandoned. Ancillary production of hydrogen sulfide, a poisonous gas is characteristic of oil and gas wells in this area.

Thirty-one rights-of-way have been granted within the proposed San Juan County SRMA. These include highways, powerlines, buried gas pipelines, an electrical substation, an oil and gas gathering system, telephone and cable lines, access roads, a nitrogen plant site, telephone servicing site, an oil nitrogen plant, a fence, and rights of way for San Juan County road construction. The following is a list of the rights-of-way in the planning area:

Serial #	Right-of-way Holder	R/W Width	Authorized Facility
U0-14470	Federal Highway Administration	400 feet	U.S. Highway 191
U0-15364	Pacificorp	40 feet	powerline
U0-15595	Pacificorp	125 feet	69kVpowerline and LaSal Substation
U0-15664	Northwest Energy	50 feet	buried 24” gas pipeline
U0-16311	Pacificorp	100 feet	12.5kV powerline
U0-16345	Pacificorp	50-100 feet	69kV, 12.5 & 7.2 kV Powerlines
U0-16856	Federal Highway Administration	100-200 feet	State Highway 46
U0-19510	Pacificorp	100 feet	12.5kV powerline-Lisbon Uranium Company
U0-29799	Pacificorp	10-20 feet	14.4 kV powerline
U0-35443	Pacificorp	100 feet	138 kV powerline
U0-44075	Federal Highway Administration	200-400feet	U.S. Highway 191
U-5708	Tom Brown, Inc.	50 feet	Lisbon Unit gathering system Surface & buried natural gas Pipelines
U-10361	Pacificorp	80 feet	138kV powerline
U-10657	Pacificorp	130 feet	345 kV powerline
U-16709	Utah Gas Service Company	50 feet	4” buried gas pipeline
U-16968	Pacificorp	25 feet	12.5 kV powerline
U-34075	Citizens Communications	10 feet	overhead & buried telephone Cable
U-36682	Citizens Communications	10 feet	buried cable
U-36987	Tom Brown, Inc.	18 feet	access road

U-43521	MidAmerica Pipeline Co.	50 feet	buried 10.75” pipeline
U-47079	Citizens Communications	10 feet	buried telephone line
U-49745	Air Products and Chemicals	120’ x 150 feet	Nitrogen plant site
U-50141	Citizens Communications	10 feet	telephone servicing/Union Oil Nitrogen plant
U-51320	San Juan County	100 feet	Big Indian Road
U-75270	Glaze, Philip	66 feet	2 roads near Wilson Arch
U-75288	Pacificorp	25 feet	25kV powerline
U-75393	Tom Brown, Inc.	30 feet	surface 6”natural gas pipeline
U-78872	Glaze, Philip	10 feet	fence
U-79446	BLM	R/W reservation -Wilson Arch recreation Site	
U-80109	San Juan County	ATV road segments and parking/staging Area	
U-80127	BLM	ATV Parking/staging area	

In 2002, San Juan County applied for and was granted a right of way (U-80109) for an ATV staging area and two rerouted road segments. This staging area is located just off the paved county road on the southwest side of the proposed SRMA. This right of way was analyzed in EA UT 062-02-114. One of the already constructed reroutes bypassed private land owned by Redd Ranches near Hook and Ladder Gulch. The other already constructed reroute was created to avoid a potentially hazardous gas well on “The Old Mail Route”. San Juan County has an additional right of way application pending for the construction of an ATV route around the southern edge of Cameo Butte. This latter pending application is the same route as is analyzed in this Environmental Assessment as Proposed Action #4, an ATV route around the southern edge of Cameo Butte.

Alternative A adjusts the boundary of the Cameo Cliffs Special Recreation Management Area to exclude 4,353 public land acres on the southeastern side of the San Juan County proposed SRMA. This Alternative avoids 23 of the 27 oil and gas wells in the San Juan County proposed SRMA, and also avoids all of the shafts and adits. Alternative A thus reduces the number of existing authorizations within the proposal by excluding these 4,353 acres of public land from the proposed Special Recreation Management area. The affected environment for Alternative A is thus different for existing authorizations than that of the Proposed Action.

It is important to note that at present, there has been very little vandalism to oil and gas facilities from the recreating public. Very little camping goes on within the area at this point in time. Additionally, there have been no safety issues with visitors (that the BLM is aware of) to this point. (It should be noted BLM personnel entering the oil and gas field are required to don safety equipment in order to function around the hydrogen sulfide laden oil and gas facilities.

Soils and Vegetation

Vegetation within the planning area is typical of both desert riparian and pinyon-juniper environments, including saltbush, big sage, greasewood, shadscale, Indian ricegrass, galleta grass, western wheatgrass, sand dropseed and pinyon and juniper. No special status plant species

are known to occur within the proposed Cameo Cliffs SRMA. The soils in the Cameo Cliffs area are primarily sandy. Soil disturbance and vegetation loss from motorized visitor use is fairly minimal at the present time, because the numbers of visitors are low.

Cultural Resources

Man has occupied the northern Colorado Plateau for at least the last 12,000 years. For most of this time the peoples had a foraging and hunting way of life. These were the mammoth-hunting PaleoIndian (about 14,500 to 12,000 years before present or BP) and the later small game and plant-gathering Archaic peoples (about 12,000 to 2300 BP). After about 2300 BP or 300 BC, people who made pottery, raised corn at least part-time, and built permanent houses were present in the region. These included the Basketmaker and Pueblo cultures, and, north and west of the Cisco and Green River Deserts, the Fremont culture. These were followed sometime after A.D. 1300 by the Ute-Paiute peoples who were present when Europeans entered the region in the early to mid 1800s.

The route of the Old Spanish Trail, in use through the middle of the 19th century, traverses the Cameo Cliffs area. The Macomb Expedition (a U.S. Army Corps of Topographical Engineers foray) traveled through the area in 1859. By the late nineteenth century, the cattle industry dominated the area, with livestock ranchers based in LaSal using the range, as they do to this day. The mail trail between Monticello and LaSal passed through the Cameo Cliffs area, and is now in use as a road. Historic stock watering facilities are still found in the area today.

Exploration of the mineral resources in the Cameo Cliffs area was underway by at least the 1940's, and continues through the present day. The area was also utilized during the uranium exploration period of the 1950's and 1960's – many of the current roads date from this period.

An intensive level cultural resource inventory of approximately 454 acres was done for this proposal and found or re-recorded a total of 26 sites. Two sites are historic mining-related sites, 22 prehistoric campsites and lithic scatters, and 2 sites with both historic and prehistoric materials. These sites represent all periods from the Archaic to Historic American. Of the total of 26 sites, 20 are considered eligible for the National Register of Historic Places. While the proposed Cameo Cliffs SRMA has been used extensively for resource extraction, damage to cultural resources has been minimal to this point.

Maintained roads were not inventoried due to the direction presented in Appendix 9, page 1 of the SHPPO/BLM Protocol which states that the BLM requires Section 106 surveys when widening or other surface disturbing activities will occur on BLM managed roads. Section 106 surveys are not required for normal maintenance activities where surface disturbance is confined to the existing roadbed. Since the activity of driving OHVs on these roads stays within the existing roadbed, and no new surface disturbance is created beyond what would occur during normal maintenance activities, these activities and roads are exempt from Section 106 inventories.

Native American Concerns: Religious and traditional practices of Native Americans are integral parts of their cultural identity and heritage. As such, specific locations such as burials, sacred sites and traditional cultural properties including plant gathering areas require certain

consideration under various statutes and executive orders. None are presently known in this area. Native American tribes were consulted upon concerning the Cameo Cliffs proposed actions on September 13, 2002. The concern voiced by one tribe was that all archaeological sites be avoided if possible; hence they did not agree with the undertaking of construction of the route around the south side of Cameo Butte (Proposed Action #4).

Wildlife Resources

The Cameo Cliffs Recreation Area contains wildlife values, and provides habitat for many species, including mule deer, coyotes, kit foxes, deer mice, grasshopper mice, Ord's kangaroo rats and bats. In particular, the Cameo Cliffs area supports wintering mule deer due to its proximity to the LaSal Mountains. Gunnison's prairie dog occurs in the vicinity of the area. The Utah Department of Wildlife Resources has expressed concern about the habitat of this species of prairie dog. Reptiles and amphibians found in the area include collared lizard, leopard lizard, side-blotched lizard, plateau whiptail lizard, racer, gopher snake and night snake. No special status species are known to occur within the proposed SRMA.

The more common bird species include turkey vulture, bald eagle, red-tailed hawk, golden eagle, mourning dove, great-horned owl, common poorwill, white-throated swift, Say's phoebe, cliff swallow, pinyon jay, American crow, common raven, canyon wren, mountain bluebird, and house finch.

Mexican spotted owl potential habitat is within the Cameo Cliffs area; two-year surveys were undertaken (2002 and 2003) by Southwest Research Associates (under contract to the BLM) to ascertain whether that habitat is being utilized by Mexican spotted owl. The result of the two-year study (with eight complete MSO protocol surveys over two consecutive years) was that no owls were found. The Southwest Research Associates report states that "there is no known MSO occupation or anecdotal reports of MSOs in the Cameo Cliffs or surrounding areas." Thus, the area is "clear" for MSO's as of 2003. The planning area thus does not currently include Critical Mexican Spotted Owl habitat.

Current trends of impacts on wildlife species from ATV and other motorized use is minimal, due to the fact that there is very little visitation to the area at present. While cross-country travel is legal, it is not very frequently undertaken due to low visitation numbers. However, San Juan County's proposal to use the Cameo Cliffs area for intensive ATV use has brought Cameo Cliffs to the attention of the recreating public. More ATV and other motorized users are seeking out the area for recreation use; it is the intent of this EA to be proactive in guiding and directing this use so as to minimize impacts to other resources.

Recreation Resources

Recreation use is occurring within the planning area, with an estimated 4,000 visits occurring yearly. Visitation is highest during April and May, and in September and October, when ambient air temperatures are relatively cool (80% of the use occurs during these months). All Terrain Vehicle riding, dirt biking and mountain biking on the existing network of old mining roads are the predominant recreation uses, although there is some cross country hiking. Viewing

scenic resources by motorized vehicle is the primary recreation activity within the planning area. However, there are excellent opportunities for horseback riding, although very few people engage in this activity in the Cameo Cliffs area. Currently, the area is open to cross country travel; there are no restrictions on driving activities within the proposed SRMA. As motorized recreation use of the area is becoming more popular, there has been more cross country travel. In particular, the route around the south side of Cameo Butte has been "ridden in" by ATV users. This cross country travel, if it continues at the present rate, may destroy the scenic resources that visitors to the area come to enjoy.

At present, dispersed camping is concentrated in the area around Casa Colorado; it also occurs near the Staging Area on County Road 114. Damage is beginning to occur from the activities associated with dispersed camping within the proposed SRMA. Sanitation problems (especially at the staging area) are beginning to be an issue as visitation increases.

Visual Resources

Cameo Cliffs contains a high level of visual appeal. View of 360 degrees are attainable throughout much of the proposed SRMA. Scenic highlights include the Hook and Ladder Gulch and its side canyons, sandstone domes and spires throughout the planning area, and the distant La Sal Mountains. The Visual Resource Management (VRM) ratings for the proposed SRMA have been inventoried as Class II, III and IV (see Map 5). The Class II-rated land (2,804 public land acres) is in the southeast center of the planning area. This rating requires management to retain the existing character of the landscape. This area is considered scenic quality class "B with high sensitivity." 8,360 acres of the planning area is inventoried as VRM III, which permits moderate changes to the landscape. A scenic quality class rating of "C" is given to this area. About 8,886 acres of the planning area is VRM Class IV, which permits substantial changes to the landscape.

Riparian Resources

Hook and Ladder Gulch is an intermittent drainage that runs in a westerly direction through the center of the planning area. The drainage in general is of low riparian quality, although the upper heads of the canyon do have some riparian value. There are a few cottonwood trees in the upper reaches of the gulch; there are also willows in the wetter areas. The lower parts of the gulch are greasewood and tamarisk. Hook and Ladder Gulch provides potential wildlife habitat, visual benefits, and shade.

ENVIRONMENTAL CONSEQUENCES

Reasonably foreseeable actions as a result of implementing these proposed actions include an increase in ATV use of the Cameo Cliffs Area. However, this use will be directed (by means of the marked trail system), rather than random, as it is at present.

For analysis purposes, the following assumptions are made:

1) Vehicle use would increase by 300 vehicles per year for the next five years
2) There would be 140 miles of "designated" roads and 50 miles of marked routes within

the SRMA
3) There are approximately 180 miles of "existing" roads within the RMA
4) Camping use would increase by 50 groups per year over the next five years.

Direct and Indirect Impacts

Existing Authorizations (Grazing and Minerals, including Human Safety)

The five proposed actions analyzed in this EA are detailed on pages 4 and 5 under "Proposed Action." These five actions would potentially impact resource utilization (grazing and minerals).

PROPOSED ACTION

The Proposed Action would designate the entire boundary of the San Juan County proposed ATV area as the boundary of the Special Recreation Management Area. The southeastern portion of this area is particularly problematic, as it includes the majority of the mining impacts, as well as 23 of the 27 oil and gas wells. Designating the entire area could impact the oil and gas industry, with increased liability and the potential for vandalism or interference with facilities. The Proposed Action could also impact human safety, as visitors might attempt to explore adits and production facilities. Even though routes would not be marked in this area (the southeastern part of the proposed SRMA), they would be designated as open for use and it is anticipated that there would be increased numbers of recreation users in these industrial areas. There are many adits and shafts in the southeastern portion of the proposed Special Recreation Management Area. In addition, visitor contact with the oil wells in the area is especially hazardous due to the presence of the extremely poisonous hydrogen sulfide gas. Although the frequency of hydrogen sulfide release is low, the consequences of such a release are great. Safety equipment is required by government personnel when entering a hydrogen sulfide area. Visitors to this area will not have access to such equipment. Thus, the environmental consequences of accepting the entire Recreation Area as proposed by San Juan County are unacceptable.

Limiting vehicles to designated roads would have beneficial impacts to livestock grazing because fewer plants would potentially be damaged or destroyed by cross country travel, leaving more plants available for grazing. Soils would not be disturbed by cross country travel and thus erosion would be lessened by this travel limitation. If vehicles are limited to designated roads, it will be less likely that stock will be harassed or chased by cross country motorized users, leading to less stress being placed on the livestock. If increased use is to be allowed, the impacts to the land from the resultant increase in cross country travel should be lessened by limiting vehicles to designated roads. A map of the designated roads within the Cameo Cliffs Special Recreation Management Area will be published as part of this Plan Amendment action.

Limiting recreation-use vehicles to designated roads would also benefit mineral extractors, as recreationists would be less likely to impact mining and mining production facilities. By providing a series of marked routes, recreation users would be more likely to stay on these routes and to not interfere with industrial use.

Marking a system of ATV routes (for a total of 50 miles) would result in less cross country driving, with the attendant beneficial impacts to grazing as fewer plants would be disturbed

directly or as the result of less soil loss from vehicle-induced erosion. The marked system of routes would be chosen so as to avoid oil and gas facilities, as well as adits and shafts.

Constructing a 4.5 mile long motorized route along the southern portion of Cameo Butte would have some deleterious effects on grazing as grass would be destroyed for the route. (The amount of destruction would be 475, 400 square feet of vegetation, or approximately 11 acres.) This would result in increased erosion and in less forage, although the present grazing permit would not be reduced. The area proposed for this route has no impacts on industrial production.

Constructing a campground adjacent to the County Road 114 staging area would benefit resource utilizers by concentrating camping in one area. Campers would not interfere with mineral activity or with grazing activities if they were concentrated in one location.

ALTERNATIVE A

The BLM has proposed Alternative A, which truncates the San Juan County proposed SRMA boundary so as to eliminate 23 of the 27 wells and all of the adits and shafts. The direct and indirect impacts to both visitors and to the resource utilizers would be greatly lessened by approving this alternative. Alternative A, accepting an Adjusted Planning Area Boundary, would have beneficial impacts to the mineral industry as it is the southeastern portion of the planning area where most of the producing oil and gas wells are located, and where all of the mining activity has occurred. All of the 10 mines and 23 of the 27 oil and gas wells are within the southeastern portion of the planning area. Although none of the marked route system is within this portion (marked routes do form boundaries of the Adjusted Planning Area), excluding the southeastern portion from the Special Recreation Management Area makes it less likely that the recreating public will find its way into that portion, with its attendant dangers and interference with mineral activity. Alternative A would reduce mine safety hazards, reduce possible exposure to hydrogen sulfide gas, and reduce potential liability to any operators of record. (Accepting Alternative A would still allow this 4,353 acre portion to be limited to designated roads, in the interest of public safety.)

The existing Rights of Way in the Cameo Cliffs area would not be affected by SRMA designation. If Alternative A were chosen, many of the potential conflicts with valid Rights of Way would be avoided, as the majority of these Rights of Way are within the southeastern portion of the planning area. By eliminating that southeastern portion, Alternative A avoids many potential conflicts between recreationists and resource utilizers, such as recreationists interfering with production facilities.

ALTERNATIVE B

Alternative B would limit vehicles to existing roads. This would have beneficial impacts to livestock grazing because fewer plants would be damaged or destroyed by indiscriminate cross-country travel, leaving more plants available for forage. Soils would not be disturbed by cross-country travel and thus erosion would be lessened by this travel limitation. If vehicles are limited to existing roads, it will be less likely that stock will be harassed or chased by cross-country motorized users, leading to less stress being placed on the livestock.

Limiting vehicles to existing roads would reduce the impacts of visitors to mineral exploration activities and to holders of rights of way, as recreation users will be less likely to encounter industrial facilities if they are required to stay on the roads. The existing road category, however, is more subjective and subject to interpretation than is the designated road category. It is estimated (through use of aerial photography) that there are 180 miles of existing roads in the area; there are 140 miles of road that would be designated under the Proposed Action.

Impacts of the No Action Alternative to Resource Utilizers

Under this alternative, none of the proposed actions would take place. Cross-country motorized use would continue to be legal, and impacts from this activity to grazing and mineral activity would accumulate as off-road motorized activity increases. Cameo Cliffs would not be managed as a Special Recreation Area, leaving motorized recreation an unmanaged, unregulated activity. Routes would not be marked, and users could go anywhere at will.

A marked route system would not be developed, leading to the recreating public attempting to find their own routes throughout the area, with deleterious effects upon resource utilization. Cattle could be harassed by unrestricted motorized use; recreationists could explore oil and gas production facilities, at their peril and to the detriment of the producers. The route on the south side of Cameo Butte would not be built, leaving more forage for cattle. Special recreation rules will not be instituted; although they are discretionary, competitive motorized events could be authorized, which could lead to the harassment of cattle and destruction of vegetation. Under this alternative, the campground would not be built and damage to grazing and mineral activity would continue from dispersed camping.

Vegetation and Soil Resources

PROPOSED ACTION

Creating an SRMA with special recreation rules (including no competitive events) would have beneficial impacts on soils and vegetation. Competitive motorized events would have negative effects on vegetation in the Cameo Cliffs area due to the rough terrain and tight turns. Riders would tend to stray off course in this area in their haste to complete the course in a certain time. While issuing such permits is always discretionary, prohibiting these events throughout the SRMA would lessen impacts to soils and vegetation. (In addition, competitive motorized events are not compatible with the intended recreation use of the area as a place where scenic motorized touring should occur.)

Changing OHV category from “open” to “Limited to Designated Roads” will reduce the amount of impact to vegetation and soil resources as cross country travel would be prohibited and motorized vehicles would be limited to designated roads. This means that fewer plants would be damaged or destroyed by indiscriminate cross-country travel, and that soils would not be disturbed by such travel; erosion would be lessened by this travel limitation. Currently, the area is open to cross country travel. Requiring vehicles to stay on designated roads would have great benefits to vegetation and soils.

Establishing a staging area and putting in a toilet would have beneficial impacts to soils and vegetation as parking would be controlled. This means that fewer plants would be damaged or destroyed by indiscriminate parking.

Establishing a new ATV route along the southern side of Cameo Butte would impact a linear route of approximately 4.5 miles in length. The vegetation along the length of this route would be lost in creating the proposed route. The area of this potential disturbance is 10.9 acres of vegetation lost. Soils would also be negatively impacted by the creation of a new travel route.

Establishing a camping area near the staging area on County Road 114 would have beneficial impacts to soils and vegetation as camping would be restricted to the developed camping area and dispersed camping would decrease. Established, defined camping areas have less impact on the land than dispersed camping, where each and every group tries to define its own camping space. Less vegetation would be destroyed, and less soil disturbed if one camping area were established, rather than multiple camping sites.

Thus, while increased OHV traffic may seem to increase impacts to vegetation and soils, this traffic will be directed use. Under the proposed actions, vehicles will be limited to designated roads, and will be encouraged to use only the marked routes. This will decrease impacts to vegetation and soils.

ALTERNATIVE A

Alternative A, SRMA with Adjusted Boundary, would potentially increase damage to vegetation and soils as the area limited to designated or existing roads would be decreased by 4,353 acres. This would mean that 4,353 fewer acres would have the protection of a limited OHV category. However, the change in OHV category should occur throughout the entire 20,050 acre area, thus affording vegetation and soils the protection of the change in OHV category without adding the 4,353 acre southeast section to the Special Recreation Management Area. That is, the SRMA would encompass only the western portion of the analyzed area; the southeastern portion of 4,353 acres would also be limited to designated roads, but not included in the SRMA.

ALTERNATIVE B

Alternative B, Limiting Vehicles to Existing Roads, would have beneficial impacts to vegetation and soils, as cross country recreational travel would be eliminated. Erosion to soils would be lessened, and damage to plants would also be lessened. However, since there are more “existing” roads (180 miles) than “designated” roads (140 miles), the beneficial impacts would not be as great. In many of these old seismic lines, vegetation has started to grow back in. Allowing vehicles to drive on these “existing roads” would damage the regrowing vegetation. In addition, the “Limited to Existing Roads” category is subject to greater visitor interpretation than is the “Limited to Designated Roads” category. Visitors often adopt cross country vehicle tracks as “roads”, following a user made track rather than an actual mapped road. Designating a set of roads upon which visitors can travel is exact and leaves no room for visitor interpretation.

Impacts of the No Action on Vegetation and Soils

Without a change in OHV Designation, damage and disruption of vegetative and soil resources would continue to occur, and the rate of such could increase as OHV use increases. Presently, there has been an increase in cross country OHV tracks. Without a marked route system, visitors to the area may stray off the designated routes, increasing damage to vegetation and soils. By not building the ATV route on the south side of Cameo Cliffs, 4.5 linear miles of vegetation and soils would not be disturbed by new construction. By not concentrating camping in one area (adjacent to the staging area on County Road 114), impacts to vegetation and soils would continue as dispersed camping proliferates. By not instituting special recreation rules, competitive events could potentially occur, with the increased impacts to vegetation and soils that such events bring.

Cultural Resources

PROPOSED ACTION

The five proposed actions analyzed in this EA are detailed under "Proposed Actions." Proposed Actions #1,#2, #3, and #5 have the potential to provide added protection to cultural resources and aid in the proactive management of archaeological resources. Proposed Action #4 does not add protection to cultural resources.

Establishing an SRMA and instituting special rules could beneficially impact cultural resources as stricter boundaries can be placed on recreation users within the confines of an SRMA.

Changing the OHV category from "open" to "limited to designated roads," would reduce potential impacts to cultural resources, as cross-country travel would be prohibited. While there are 140 linear miles of designated roads proposed, there are many more potential miles of cross-country travel that are possible in the planning area. Cultural resources are at risk from cross-country travel, and the cessation of such would provide protection to documented and undocumented archaeological sites. This action was noted as beneficial by one of the tribes in Native American consultations.

Marking a 50 mile route system in the Cameo Cliffs area would also have overall beneficial impacts to cultural resources. By utilizing a defined set of routes for OHV travel, this would concentrate use on those routes and minimize the disturbance of cultural resources away from the Route System. However, an increase in use of the routes will likely have a negative impact on those cultural resources located on or near the Route System. A potential direct impact is inadvertent damage to artifacts by trail users (i.e., motorcyclists and ATV'ers running over lithic scatter with their vehicles). However, this type of damage has already occurred, and any subsequent damage could very well be minor compared to what has taken place in the past.

The great majority of the routes (48 out of 50 miles) proposed for marking constitute maintained, county inventoried routes not subject to Section 106 inventories. (Appendix 9, page 1 of the SHPO/BLM Protocol states that BLM requires Section 106 surveys when widening or other surface disturbing activities will occur on BLM managed roads. Section 106 surveys are not

required for normal maintenance activities where surface disturbance is confined to the existing roadbed. OHV's will be required to stay on the existing roadbed; therefore these activities and roads are exempt from Section 106 inventories.) Routes proposed for marking that are not county maintained roads have been the subjects of Section 106 inventories.

Creating a camping area near the staging area on County Road 114, and disallowing dispersed camping, could benefit cultural resources by concentrating this activity in a single location. This would decrease the level of disturbance to cultural resources. Cultural clearances of the proposed camping areas have been conducted and no cultural sites were found.

The impacts to cultural resources from Proposed Action #4 are negative. Only with mitigation such as excavation would Alternative 4 be acceptable and not adversely impacting to cultural resources. Archaeological data recovery can be an effective tool in minimizing the impact of construction activities on the scientific values of these sites.

Constructing an ATV route on the south side of Cameo Butte would cause direct and indirect impacts to occur at several cultural resource sites. These impacts have the potential to adversely affect the integrity of eligible archaeological resources.

Native American Concerns: No tribe ascribed specific religious significance to the archaeological sites in this region. However, the tribes have stated that they would prefer to have all cultural sites avoided as a general principle.

ALTERNATIVE A

There are no effects on cultural resources from adopting Alternative A.

ALTERNATIVE B

This alternative would change the current open OHV category to Limited to Existing Roads. This category would be more protective of cultural resources than is the current open category, but not as protective as the Proposed Action, which is Limited to Designated Roads, because there are more "existing" roads (180 miles) than would be "designated" (140 miles) under this EA. In addition, the Designated category is less subject to visitor interpretation than is the Existing category. Visitors often interpret existing cross country user made tracks as "roads", and follow these tracks. It is possible that these user made tracks may be causing damage to archeological resources. Designating roads is more exact, and leaves no question as to which road is available for visitor use.

Impacts of the No Action Alternative on Cultural Resources

Many cultural resources are within the area currently designated as open to cross-country OHV travel. Without a marked route system, visitors tend to wander off-road; this poses a potential threat to these resources. The route along the south side of Cameo Cliffs has been "ridden in" and is impacting the integrity of several cultural sits along the way. Without managing cross-country travel, the impacts to cultural resources grow exponentially every year. Likewise, the

possibility of motorized competitive events (although the issuance of such a permit is discretionary) may increase the chance that sensitive cultural sites will be disturbed during the course of such an event.

Wildlife Resources

The Proposed Action, detailed above, would potentially impact wildlife resources.

PROPOSED ACTION

Establishing an SRMA and instituting special rules, would have beneficial impacts upon wildlife as special recreation rules would be written to accommodate wildlife's utilization of the area. Although the Cameo Cliffs area is deer winter range, recreation activity is very limited during the winter; conflicts with wintering deer are not expected to occur.

Changing OHV designation to "limited to designated roads" would have beneficial impacts to wildlife. This change would prohibit cross-country travel; motorized vehicles would be limited to the 140 miles of designated roads within the planning area. This means that fewer plants (upon which wildlife depends) would be damaged or destroyed by indiscriminate cross-country travel. There would also be less erosion of soils, which also leads to a loss of vegetation upon which wildlife depends. In addition, wildlife would not be disturbed by motorized activity off the 140 miles of designated routes. Limiting vehicles to designated roads is especially beneficial to burrowing animals such as prairie dogs.

Marking a route system will indeed likely increase visitation to the Cameo Cliffs Area. This rise in use could potentially increase the impact of recreationists to wildlife resources. However, the increased use would be *directed*. Although the frequency of use would be higher, the impacts would be confined to designated travel corridors. The presence and use of these corridors would leave sections of the planning area largely unaffected by motorized recreationists. These unaltered areas would be preserved to encourage and sustain wildlife populations.

The Cameo Cliffs area is heavily used by wintering mule deer, due to its proximity to the LaSal Mountains. However, because of the elevation of the area and because of its relatively harsh winter weather, Cameo Cliffs is not used by recreationists during the winter months. During most years, snow accumulations are such that ATV use is not desirable. Thus, impacts to the wintering mule deer are expected to be minimal or non-existent. For the same reason, no impacts to wintering bald eagles are expected.

Constructing a 4.5 mile route on the south side of Cameo Butte, could possibly impact wildlife by opening up a new motorized route through the area. Potential Gunnison's prairie dog habitat could be destroyed by the construction of a new route. The Utah Department of Wildlife Resources has expressed concern for the habitat of this species.

Constructing a camping area near the staging area on County Road 114 and closing the area to dispersed camping would benefit wildlife resources by concentrating the disturbance caused by camping to one area which could then be avoided by wildlife.

ALTERNATIVE A

This alternative would provide equivalent protection to wildlife resources if Limiting Travel to Designated Roads applied to the 4,353 acres of public land that would be removed from the Special Recreation Management Area under this alternative. In other words, the OHV designation of "Limited to Designated" should apply to the entire planning area, even if Alternative A is adopted.

ALTERNATIVE B

This alternative changes the current open OHV category to Limited to Existing Roads. This category would be more protective of wildlife resources than the current open category, but not as protective as the Proposed Action, which is Limited to Designated Roads. There are a greater number of roads that are "existing" in the eye of the user than would be designated under the planning process. Visitors often utilize cross country vehicle tracks as "existing roads", leading to greater disturbance of wildlife, especially to burrowing animals such as burrowing owls and prairie dogs.

Impacts of the No Action Alternative on Wildlife Resources

Many wildlife resources, including prairie dogs and wintering mule deer, are within the area currently designated as open to cross-country OHV travel. Without a marked route system, motorized visitors tend to wander off-road; this poses a threat to these resources. With OHV use expected to increase, wildlife resources are at risk without the protection of limiting OHV's to designated routes. Should the route on the south side of Cameo Cliffs not be constructed, wildlife will not be disturbed. Unregulated camping throughout the entire planning area increases the chance that wildlife will be disturbed. The possibility of motorized competitive events also increases the chance that wildlife may be disturbed during the course of such an event.

Recreation Resources

PROPOSED ACTION

It is anticipated that marking the routes for ATV (and other) travel will result in increased use of the area by recreationists, and especially by motorized recreationists. Use is expected to double with the marking of these routes, as industry figures and State registration of off-road vehicles show that the numbers of OHV's are increasing throughout the State and the region.

Defining a Special Recreation Management Area boundary would affect recreation resources positively. Creating a managed recreation area in the Cameo Cliffs unit would provide for recreation services, provide information encouraging resource protection behavior and highlight opportunities for motorized and other types of recreation. The special recreation rules that would accompany the SRMA designation would benefit recreationists seeking motorized travel routes because the nature of the recreation experience (family backcountry motorized touring) would be preserved by prohibiting competitive events and by prohibiting vending. Cameo Cliffs would be available for motorized trail events where speed is not the determining factor.

Limiting vehicles to 140 miles of designated roads, would affect recreation resources beneficially. Viewing scenic resources by motorized vehicle is the primary recreation activity in the planning area. Limiting cross country driving by limiting vehicles to designated roads would benefit these scenic resources by preserving the scenery that the visitors came to see. The proposed action balances the protection of scenic resources while maintaining traditional backcountry travel routes.

Supplying a marked route system for travel would positively affect recreation resources. Organized and directed use will be beneficial for the recreation resource, BLM personnel, and the recreational visitor. The proposed 50 mile Route System would provide a unique resource for visitors because the views from the Cameo Cliffs area are one-of-a-kind. Marked travel routes would make route-finding less difficult, reducing the possibility of visitors becoming lost. Installing a toilet at the staging area would prevent sanitation problems, which are increasing as a result of greater visitation.

Negative impacts may also occur as a result of the proposed action. Motorized use of the area is very likely to at least double. This doubling would most probably occur with or without SRMA designation, as Cameo Cliffs is part of the San Juan County ATV system. Increased motorized use may upset and possibly displace local non-motorized recreationists who have been visiting the planning area for many years. A rise in recreational conflict would intuitively parallel a rise in recreational use of the area. It is hoped, however, that measures taken to initiate the proposed action (i.e., educating users about the multiple-use concept) would reduce the amount, or at least degree, of conflict.

Creating a new 4.5 mile route on the south side of Cameo Butte, would beneficially impact recreation resources by providing another route for motorized recreationists to enjoy. This route would also add a loop to the designated route system.

Confining camping to one camping area would benefit recreationists because camping facilities would be provided which would enhance the camping experience for the visiting public.

ALTERNATIVE A

Alternative A (reducing the size of the Special Recreation Management Area boundary) would have beneficial impacts to motorized recreationists because people would not be encouraged to explore unsafe areas. Altering the boundary removes all 10 of the mine sites (with their sometimes deep and dangerous shafts) and 23 of the 27 oil and gas wells (with their accompanying hydrogen sulfide gas). This is done by excluding the southeastern side of the planning area, thus reducing its size.

ALTERNATIVE B

Alternative B (limiting motorized travel to existing roads) would affect recreation resources beneficially. Viewing scenic resources by motorized vehicle is the primary recreation activity in the planning area. Limiting cross country driving by limiting vehicles to existing roads would benefit these scenic resources by preserving the scenery that the visitors came to see. The

proposed action balances the protection of scenic resources while maintaining traditional backcountry travel routes. However, it can be argued that the level of protection afforded scenic resources by the "Existing" category is less than that afforded by the "Designated" category. This is because "existing" is open to interpretation on the part of the user, whereas "designated" is a defined set of roads. That is, using the "existing" road category, visitors often follow unplanned, user made tracks, thus creating a new travelway, and thus negatively impacting scenic resources. While people view scenic resources from a road, the views they seek are of untracked vistas.

Impacts of the No Action Alternative on Recreation Resources

Under this alternative, cross country vehicle travel would remain legal as vehicle designations would not change. The recreation area would not be established, leading to undirected recreational use at higher levels, due to the increase in motorized use and the recent publicity afforded the area. This would possibly result in additional resource damage, the creation of additional unauthorized routes (potentially in very sensitive areas), and recreational conflict between visitors. The route system would not be marked, leading to perhaps more cross country travel as visitors get confused and lost. The route on the South side of Cameo Butte would not be constructed; the camping area adjacent to the staging area on County Road 114 not be constructed, leaving dispersed camping to continue with its negative impacts upon soils, vegetation, wildlife, cultural and scenic resources. There would be no special recreation rules, meaning that competitive motorized events could be authorized within the area. This would conflict with the needs of family-oriented motorized touring that now occurs within the area.

Visual Resources

PROPOSED ACTION

As stated above, keeping vehicles on already constructed roads would benefit visual resources by preserving the scenic quality of the planning area. Constructing the route on the south side of Cameo Butte, however, would impact visual resources as an approximate 4.5 miles of new route would be added to the route inventory. (This area is currently in VRM inventory class III; while the construction of a new route would be allowed, it would add scenic degradation.) Constructing a campground could also have potential impacts to visual resources, as campers in a camping area would be visible to other visitors. However, the campground is proposed for construction in an area that is VRM IV, and thus visual intrusions are not of great concern.

ALTERNATIVE A

This alternative would provide equivalent protection to visual resources only if Proposed Action #1 (limiting travel to designated roads) applied to the 4,353 acres of public land that would be removed from the Special Recreation Management Area under this alternative.

ALTERNATIVE B

Alternative B (Existing Roads) potentially has more impacts to visual resources than does the

Proposed Action (Designated Roads) as the Designated category would do the most to lessen the impacts to visual resources. This is because "designated" defines a set of roads, whereas "existing" is prone to visitor interpretation. Visitors often engage in cross country motorized travel under the rubric of "limited to existing", as they follow any random set of tracks cross country, interpreting the set of tracks as an "existing road." This leads to impacts to soils, vegetation, wildlife, cultural and scenic resources that are not present when travel is limited to designated roads.

Impacts of the No Action Alternative on Visual Resources

The visual quality of the area would decline as more areas are denuded and more user-made tracks are haphazardly developed in the absence of designated and marked routes. This is occurring now, as motorized use of the area is increasing. Dispersed camping, with its associated impacts to visual resources, would continue. The route on the south side of Cameo Butte would not be built, avoiding the impact to visual resources that would result from construction of the proposed 4.5 miles of additional road.

Riparian Resources

PROPOSED ACTION

There is only one crossing of Hook and Ladder Gulch on the proposed marked route system. This crossing already exists, and is, as a result, hardened and well established. Designating roads and marking an ATV route system would have overall positive impacts on the Hook and Ladder Gulch riparian system. The creation of a marked route system would reduce the amount of off-route OHV use (and therefore, OHV-caused riparian damage) within the remainder of the drainage, because there would no longer be any ambiguity about where motorized/mechanized travel is permitted. Disallowing cross-country motorized travel would greatly benefit riparian resources. While increased visitation is expected to cause an indirect impact to riparian resources, this increase is expected to occur anyway, given the publicity that San Juan County has devoted to the Cameo Cliffs area. The designated camping area does not lie within the Hook and Ladder Gulch drainage; therefore it would have no direct impact on the riparian system.

ALTERNATIVE A

This alternative would provide equivalent protection to riparian resources, as limiting travel to designated roads will be applied to the 4,353 acres of public land that would be removed from the Special Recreation Management Area under this alternative.

ALTERNATIVE B

Limiting Vehicles to Existing Roads has the same positive impact upon riparian values in Hook and Ladder Gulch as does limiting vehicles to designated roads. The protection afforded riparian resources with the "Existing" classification does not equal the protection afforded with the "Designated" classification because "Existing" roads are subject to visitor interpretation. Visitors often engage in cross country motorized travel under the rubric of "limited to existing", as they

follow any random set of tracks cross country, interpreting the set of tracks as an "existing road." This leads to impacts to riparian (as well as to soils, vegetation, wildlife, cultural and scenic) resources that are not present when travel is limited to designated roads.

Impacts of the No Action Alternative to Riparian Resources

Under this alternative, an increase in motorized and mechanized travel would occur in the Hook and Ladder Gulch Creek riparian system as trails will not be marked or designated. Approximately four miles of the drainage are level and wide enough to be easily confused for a road or trail, which could lead to intentional and unintentional OHV riparian damage. There are 114 acres of riparian habitat within the planning area, including cottonwoods, willows, box elders, lentic grasses and tamarisk..

Mitigation: None

Cumulative Impacts

The Cameo Cliffs Recreation Area has been heavily impacted in the past by mining and oil and gas activities. One hundred and forty miles of roads and trails have been constructed as well as 27 oil and gas pads. Pipelines and powerlines criss-cross the area. Only recently have recreationists started to visit the area, primarily for ATV'ing and mountain biking activities. The intent of the Proposed Action in this Environmental Assessment is to reduce intentional and unintentional environmental impacts of recreation users.

San Juan County has proposed this area for intensively-managed OHV use as part of the San Juan County General Plan. (San Juan County All-terrain Vehicle Plan, 2002). San Juan County's economic development outlook relies heavily on promoting ATV touring. With or without BLM planning, ATV use in Cameo Cliffs is expected to double. Providing managed and directed use is expected to lessen the impacts of this increase in motorized recreation use. These impacts include impacts to the environment, as well as impacts to other non-motorized users.

Accepting the entire boundary of the planning area and encouraging people to explore the eastern part of the area) would have deleterious cumulative impacts upon both industry and recreational visitors. Public safety issues and industry liability are concentrated in the southeastern portion of the planning area. Accepting Alternative A to this proposed action would eliminate many of these concerns. Four oil and gas wells remain within the SRMA boundary; the impacts of increased visitation upon this resource use are expected to negatively effect oil and gas operations.

As the number of registered Off Highway Vehicles continues to climb, demand for this type of recreational activity is expected to increase. By moving to a more restrictive travel designation, and by providing a system of marked ATV/OHV routes, use can be directed in a sustainable fashion. That is, use can be directed toward high-quality roads in areas that can sustain frequent use, and away from areas where motorized and/or mechanized use is not sustainable. Combined, these two actions will lessen the likelihood of cross-country travel that is damaging to wildlife, vegetation, riparian, and cultural resources.

Continued cross-country travel and the use of the route on the south side of Cameo Cliffs threatens the integrity of eligible archaeological sites. The potential impacts to eligible sites are such that adverse and irreversible damage may occur to known cultural resources.

A paradox presents itself, however, in that changing the travel designation and creating the Cameo Cliffs Trail System will surely attract more visitors. The simple act of creating the area will result in increased visitation. This triggers the generalized idea that more visitors result in more impacts. However, the positive cumulative impacts associated with directing use are expected to outweigh the negative cumulative impacts resulting from increased visitation.

Increased visitation (estimated to be 4000 visitors annually) would have a beneficial economic impact to San Juan County's economic development. Local businesses could benefit by increased visitation to the area.

The cumulative impacts of camping restrictions are positive, in that visitor behavior will be directed and controlled, and that camping will be restricted to designated sites if use levels warrant. The harmful impacts to the environment of uncontrolled and unconfined recreation will be mitigated through these actions.

Cumulative Impacts of Alternatives

Alternative A (a truncated Recreation Area, removing 4,353 public land acres from the Recreation Area) would eliminate the majority of the safety hazards inherent in the area to the visiting public. It would also lessen impacts to industry (in terms of both safety and liability) as visitors would not be encouraged to recreate in areas around industrial development.

Monitoring

An OHV Monitoring protocol will be established for the Cameo Cliffs SRMA. The SRMA will be monitored to ensure that responsible OHV use is being fostered by the marked route system.

CONSULTATION AND COORDINATION

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Persons, Groups and Agencies Consulted

Native American consultation was initiated on July 23, 2003; five tribes were contacted regarding the proposal. A two year Mexican spotted owl survey was started in the spring of 2002. This was conducted by Southwest Research (SWR). No Mexican spotted owls were located over the two years of protocol surveys.

San Juan County contacted the State of Utah School and Institutional Trust Lands Administration concerning marked routes that would cross SITLA land in Spring of 2002. San Juan County is pursuing formal easements across these lands. On March 14, 2002, San Juan County coordinated with Paul Redd, owner of Redd Ranches, concerning activities which would take place near his private land (as well as on his grazing permit). At this time, Mr. Redd asked for a reroute of an ATV route across his land; this was accomplished with San Juan County's Right of Way U-80109 (analyzed in EA #062-02-114).

Public Notice and Availability

The proposed action for the Cameo Cliffs Recreation Management Area was posted on the Electronic Notification Bulletin Board on June 26, 2002. This document has been maintained on the Moab Field Office Internet site on a continual basis. Two comments were received as a result of that posting. One individual supported the notice of an OHV-focused recreation area, and one organization asked that a San Juan county-wide EIS be prepared on vehicle designations and route systems.

Public Comment and Response to the Federal Register Notice

A Federal Register Notice of Intent to Plan was published on December 3, 2002 concerning the proposal. This notice provided for a 30-day comment period for the proposed Plan Amendment. Articles appeared in the *Moab Times Independent* (December 12, 2002) and in the *San Juan Record* (December 11, 2002) notifying the public of the scoping period published in the Federal Register, and inviting comments. At that time, six persons and two organizations provided comment.

Two persons supported the concept of an OHV-focused recreation area, one person asked that no amendments be made to the Grand Resource Management Plan, and three persons asked to be placed on the mailing list for the upcoming Environmental Assessment.

The State of Utah Resource Development Coordinating Committee relayed concerns from the State of Utah Division of Wildlife Resources concerning wildlife issues in Cameo Cliffs. UDWR pointed out that Gunnison's prairie dog occurs in the vicinity of the area. UDWR also

noted that the area supports wintering mule deer and bald eagles. Kit foxes are also likely to inhabit the area. The need for Mexican spotted owl surveys was also noted.

The Southern Utah Wilderness Alliance raised the following issues: 1) increased visitor use of the area should be analyzed, 2) environmentally degrading routes should be closed as part of the action, 3) the conflict of OHV use with other uses, including hunting, grazing, hiking, wildlife habitat and viewing and scenic quality.

The issues raised above have been addressed in the Environmental Assessment.