

To: Sparks, Silas[sspark@blm.gov]; Amber Johnson[a2johnson@blm.gov]
From: Ashcroft, Tyler
Sent: 2017-05-16T10:06:57-04:00
Importance: Normal
Subject: Indian Creek Climbing EA
Received: 2017-05-16T10:07:33-04:00
[EA DOI-BLM-UT-Y020-2016-0065 IC SRPs \(current draft\) AG TA.docx](#)
[Checklist DOI-BLM-UT-Y020-2016-0065 AG TA.docx](#)

Silas,

The EA looks great. I did not identify any fatal flaws. All edits are basically suggestions. Sorry this took so long. The Secretary's visit and now the DOI data call are consuming most of my time.

Cheers,

--

Tyler Ashcroft
Project Manager
Bureau of Land Management
(801)-539-4068

INTERDISCIPLINARY TEAM CHECKLIST

OFFICE: Monticello Field Office

TRACKING: DOI BLM UT Y020 2016 0065	CASEFILE #:
PROPOSED ACTION TITLE: Indian Creek Commercial Climbing Special Recreation Permits Phase II <u>Walls</u>	LOCATION: Monticello BLM Indian Creek
APPLICANT: Bureau of Land Management	APPLICANT ADDRESS: Monticello BLM

The BLM Monticello Field Office (MFO) proposes expand the number of climbing walls available to Special Recreation Permit (SRP) operators for commercial guided climbing in Indian Creek on BLM administered lands. BLM currently authorizes guided climbing on Battle of the Bulge, Donnelly Canyon, Supercrack Buttress, and Blue Gramma under EA DOI BLM UT Y020 2014 024. Additional walls authorized for guided climbing under this proposal would include: Reservoir Wall, Cat Wall, Scarface Wall, Six Star Wall, Selfish Wall, 4x4 Wall, Rambo Wall, Optimator Wall, South Six Shooter, North Six Shooter, and Pistol Whipped. Guided climbing would be authorized year round, but would generally be concentrated in the spring and fall. In order to evaluate the entire SRP program for commercial climbing guides MFO is conducting a programmatic analysis of existing and projected use.

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STIPULATIONS

The proposal would include the following design features that would be applied as stipulations to each permit upon authorization.

Areas of Operation

Criteria for prioritizing areas of operation included reported use by current operators, requested use by applicants, availability of facilities (such as parking and toilets), and prior assessment of associated trails and parking areas.

The following walls would be available for guided climbing:

- Battle of the Bulge
- Donnelly Canyon
- Supercrack Buttress
- Blue Gamma
- Reservoir Wall
- Cat Wall
- Scarface Wall
- Six Star Wall
- Selfish Wall
- 4x4 Wall
- Rambo Wall
- Optimator Wall
- South Six Shooter
- North Six Shooter
- Pistol Whipped

Commented [GAL2]: On the map this is listed as "Way Rambo" are these two separate walls? Should this be "Way Rambo Wall"? Just looking for consistency.

Commented [AT3]: In the Checklist it looks like Cameron recommend excluding Rochambeau located on the Rambo Wall.

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Commented [AT4]: In the Checklist it looks like Cameron Recommended removal of all south six shooter routes.

Season of Operation

Guided climbing would be authorized year-round, but historic visitor use data shows that use is concentrated in the spring and fall. Guides will provide a pre-trip itinerary before using Monticello BLM public lands.

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Access

Parking would be authorized only in parking areas identified in the Indian Creek Corridor Plan (2005). Guides would only be authorized to access climbing walls using existing trails. The creation of new hiking trails is prohibited unless analyzed and authorized in a separate National Environmental Policy Act (NEPA) document.

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Camping

Camping would be limited to the following designated sites:

- Bridger Jack Designated Sites
- Superbowl Campground
- Creek Pasture Campground
- Creek Pasture Group Site
- Hamburger Rock
- Indian Creek Falls Group Site

Group campsites would be scheduled in advance through the Recreation.gov website. Campsites and use areas will be maintained in a neat and clean condition with no litter. A fire pan must be used for campfires in the absence of a metal fire ring. All garbage must be packed out to an approved disposal location. No wood cutting would be allowed. Acceptable toilet facilities that meet industry standards for appropriate human waste capacity for clients must be provided by the permittee if there is no pit toilet on site. Camping may not exceed 14 days.

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Cultural Resources

Cultural resource surveys have been completed for all of the proposed routes. Approval of the proposed action would have no effect on historic properties.

The permit holder will be held legally and financially responsible for historical, archaeological, cultural, or ecological values damaged, destroyed, or removed by trip participants. Cultural artifacts located on the surface of an archaeological site or isolated artifacts are not to be disturbed. Moving or disturbing cultural artifacts from any location is a violation of federal law.

Wildlife

To avoid disturbance to wildlife during the nesting season (March 1- August 31), the following limitations apply during the nesting season:

- No climbing will be allowed on any wall until the activity has been determined to be non-disturbing to wildlife by a qualified BLM wildlife biologist, contingent on the results of standard wildlife surveys conducted each spring. Climbing guides will be provided with a list of approved routes and closed walls prior to each nesting season.
- The permittee will not hike past the climbing wall into Donnelly Canyon one-half hour before or after sunrise or sunset.

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Commented [GAL10] I'm trying to get away from insinuating that the wildlife biologist is approving an action... I'm sure a biologist could improve this statement.

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Commented [AT11] Based on past surveys, are there routes that are under consideration that serve as frequent nest sites? If so, we should consider removing those routes up front.

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Miscellaneous

- Permittee must allow the BLM to accompany tours for monitoring purposes.

Indian Creek Commercial Climbing EA

Page 2

- Pets must be kept on a leash at all times and out of springs, pot holes and other natural water sources. Pet owners must pack out all pet waste.

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Commercial Climbing-SRP, Indian Creek

NEPA Log Number: DOI-BLM-UT-Y020-2016-065

File/Serial Number:

Project Leader: Misti Haines

Commented [GAL12]: Replace with current Monticello FO staff member??

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

- NP not present in the area impacted by the proposed or alternative actions
 NI present, but not affected to a degree that detailed analysis is required
 PI present with potential for relevant impact that need to be analyzed in detail in the EA
 NC (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale column may include NI and NP discussions.

The following elements are not present in the Monticello Field Office and have been removed from the checklist: Farmlands (Prime or Unique), Wild Horses and Burros.

Determination	Resource	Rationale for Determination*	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)				
NI	Air Quality Greenhouse Gas Emissions	<p>The proposed action will result in emissions from engine exhaust and dust from the operation of vehicles on unpaved road surfaces. These emissions will be minor, temporary, and will rapidly disperse. The proposed action includes stipulations to minimize disturbance to vegetation and soils, thereby reducing the generation of airborne dust. San Juan County is currently considered to be in compliance with the NAAQS criteria pollutants (Utah Division of Air Quality 2013 Annual Report). The proposed action is not likely to cause or contribute to a violation of the NAAQS.</p> <p>The proposed action is consistent with the recreation management decisions in the MTFO ROD/RMP. The MTFO PRMP/FEIS concluded that impacts from recreation management decisions to air quality would be negligible in the short term and negligible to minor beneficial in the long term (MTFO PRMP/FEIS chapter 4.3.1.3.7.2, pg. 4-30).</p> <p>Air quality need not be further analyzed.</p>	CGiffen	11/8/16
NI	Floodplains	<p>Pedestrian (i.e. foot) access to some of the walls cross washes on existing established hiking trails. These washes are ephemeral drainages that only flow in response to storm events. The proposed action does not result in any permanent fills or diversions, or placement of permanent facilities in floodplains or special flood hazard areas. No new surface</p>	Jed Carling	11/17/16

Determination	Resource	Rationale for Determination*	Signature	Date
		disturbance is proposed. All motorized use would occur on designated roads, which is not considered a surface disturbing activity in the 2008 MFO RMP. Thereby, floodplains are not impacted to a degree that detailed analysis is required.		
NI	Soils	The proposed action limits the operation of motorized vehicles to designated roads and trails open in the MFO Travel Plan. No new surface disturbance will result from the proposed action. The proposed action is consistent with the recreation decisions in the MFO ROD/RMP. The MFO PRMP/FEIS states in chapter 4.3.13.2.4 (pg.4-455) that managing recreation to meet Utah's Rangeland Health Standards, including the soil resource, would ensure that standards for rangeland health are met within the recreation program, thereby beneficially impacting soil productivity. Soils need not be further analyzed.	CGiffen	11/8/16
NI	Water Resources/Quality (drinking/surface/ground)	The climbing routes are located in the uplands from Indian Creek and North Cottonwood. The Proposed Action would not impact water resources or quality.	M. Scott	11/8/16
NP	Wetlands/Riparian Zones	The immediate area of analysis for the proposed action to issue commercial climbing permits at 11 defined walls does not occur in any defined wetlands / riparian zones. They occur on uplands / talus slopes away from Indian Creek.	Jed Carling	11/17/16
NP	Areas of Critical Environmental Concern	There are no Areas of Environmental Concern within the use area of the Proposed Action	C. Worth	02/13/17
PI	Recreation	The proposed action is located within the Indian Creek SRMA. Primary activities within the SRMA include rock climbing, OHV riding, hiking, equestrian, rock art viewing/heritage tourism, sight-seeing, and camping. Impacts to non-climbers are expected to be negligible since non-climbers typically do not use access the recreation sites in the Proposed Action. The issuance of Special Recreation Permits for commercially guided climbing would enhance recreation experiences for inexperienced climbers by providing opportunities for guided climbing trips. This is an important resource for those lacking the skill or equipment for a self-supported trip. The proposed action as written may negatively affect non-guided climbers, because although guided climbing forms a small percentage of overall climbing at Indian Creek, the action may have the effect of concentrating guided climbing onto some of the more popular walls. During the peak seasons this could potentially reduce choices for other climbers and intensify a feeling of crowding.	C. Worth	02/13/17
NP	Wild and Scenic Rivers	There would be no impacts to eligible Wild and Scenic River segments with the approval of the proposed action.	C. Worth	02/13/17
NI	Visual Resources	The activity would conform to the decisions analyzed in the MFO ROD/RMP and EIS 2008. [This proposal is located in an area that is managed as VRM II and the proposed activity would be in conformance with all VRM management goals and objectives.] The proposed action would not result in any new surface disturbance. Therefore there would be no changes in form, line, color, or texture. Camping in association with all commercial SRPs would be limited to designated campsites.	S. Sparks	2/1/17
NP	BLM Natural Areas	The use area of the Proposed Action is not located in any BLM Natural Areas.	C. Worth	02/13/17

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Determination	Resource	Rationale for Determination*	Signature	Date
NI	Socio-Economics	There would be negligible impact to Socio-Economics with the approval of the Proposed Action.	S. Sparks	2/1/17
NP	Wilderness/WSA	There are no designated Wilderness or WSAs in the area of the Proposed Action.	C. Worth	02/13/17
NI	Lands with Wilderness Characteristics	The Proposed Action would occur within inventoried lands found to have Wilderness Characteristics, <u>although</u> these lands are not managed to preserve those characteristics (i.e., <u>not a BLM Natural Area</u>). <u>Climbing is an example of a primitive and unconfined recreational opportunity</u> . Because the Proposed Action would make use of developed parking areas, pit toilets, <u>existing</u> trails, designated campsites, and heavily used climbing walls, there would be <u>no effect on BLM's determination of the presence or absence of wilderness characteristics</u> . There would be negligible impact to the appearance of naturalness or to opportunities for primitive and unconfined recreation or solitude caused by the Proposed Action.	C. Worth	02/13/17
NI	Cultural Resources	Exclusion of the "Pink Flamingo" route located on the Supercrack Butress, All South Six Shooter Routes, and the "Rochambeau" Route on the Way Rambo Wall from the Proposed Action will result in a <i>no historic properties affected</i> determination, pursuant to 36CFR800.4(d)(1). The cultural resources inventory conducted for the Proposed Action falls within the thresholds defined in the Programmatic Agreement between the Advisory Council on Historic Preservation, the Bureau of Land Management (BLM), Utah and the Utah State Historic Preservation Office (SHPO) regarding small scale undertakings. The cultural inventory report detailing the <i>no historic properties affected</i> determination will be submitted to SHPO according to the BLM-Utah Field Office Quarterly Reporting Schedule.	Cameron Cox	2/2/17
NI	Native American Religious Concerns	No cultural sites are identified in the Area of Potential Effects (APE) for the Proposed Action during the cultural inventory. Native American Tribes have not expressed concerns with the area.	Cameron Cox	2/1/17
NI	Environmental Justice	There would be no impacts to Environmental Justice.	S. Sparks	2/1/17
NI	Wastes (hazardous or solid)	The proposed action includes mitigation that prevents impacts from solid wastes (pack in pack out). No hazardous wastes would be produced, treated, stored or transported. In addition, the Special Recreation Permit standard stipulations provide for adequate mitigation to prevent impacts from solid wastes.	N. Noyes	2/7/2017
NI	Threatened, Endangered or Candidate Animal Species	Indian Creek contains potential habitat for Southwestern willow flycatcher and yellow-billed cuckoo. Surveys have been <u>completed</u> and no birds have been found. The area also contains nesting and foraging habitat for Mexican spotted owls. Most routes are on walls that do not contain the primary constituents required for nesting owls. Two year survey protocols have been completed for Mexican spotted owl in 2015 and 2016. <u>Owls have been detected near one of the climbing routes</u> . <u>To protect owls and their young, no activities will be permitted within 0.5 miles of the identified PAC during breeding and nesting season (March 1-August 31) and no hiking is permitted thirty minutes before and after sunrise and sunset.</u>	M. Scott	2/6/17

Commented [GAL16]: It looks like the 4x4 and Optimator Walls are within the Bridger Jack Mesa WSA from the maps provided the 1979 intensive inventory does state:
 "The top of the cliffline of Bridger Jack Mesa forms the boundaries of the unit... This unit consists of the top of a narrow, elongated mesa rimmed by cliffs of the Wingate and Kayenta formations." I will send a cleaned version of a shapefile to more accurately display the WSA boundaries for the map.

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Determination	Resource	Rationale for Determination*	Signature	Date
NI	Migratory Birds	Indian Creek provides habitat for a variety of migratory birds and raptors. This area is monitored and surveyed annually for these species. A complete raptor survey was done of all the climbing routes in 2016. Annual monitoring will continue to take place. Seasonal closures will be put in place to protect nesting raptors and their young.	M. Scott	2/6/17
NP	Utah BLM Sensitive Species	There are no known Utah BLM Sensitive Species near the climbing routes.	M. Scott	2/6/17
NI	Fish and Wildlife Excluding USFW Designated Species	Wildlife may be temporarily displaced from the area during high use. There is adequate habitat adjacent to the climbing areas that may be used. There are no anticipated adverse effects to wildlife from the Proposed Action.	M. Scott	2/6/17
NI	Invasive Species/Noxious Weeds	The proposed action of issuance 27 SRPs for commercial guided climbing will result in no new surface disturbance, which is the greatest vector for invasive species and noxious weed establishment and spread. This is due to associated SRP activities would occur in previously disturbed areas (e.g. camping) and motorized travel on designated routes. Overall, the MFO does not anticipate any changes in the proportion of controllable spreading agents to contribute in the establishment and spread of invasive plants as a result of the proposed action. Thereby, invasive species and noxious weeds are not impacted to a degree that detailed analysis is required.	N. Noyes	2/7/2017
NP	Threatened, Endangered or Candidate Plant Species	There are no known threatened, endangered, or candidate plant species within the proposed project area.	M. Scott	2/6/17
NI	Livestock Grazing	The proposed action of issuing commercial climbing permits at the 11 walls occurs in the Indian Creek Allotment. The grazing permit is for 1004 cows with a grazing season from 10/01 through 06/15 across 228,184 acres of public land. Past conflicts have arisen between livestock management and climbing activities, such as gates left open and climbing use influencing cattle movements. Yet overall, the proposed action will not measurably influence livestock grazing management, cattle distribution, and/or available forage across the entire allotment. This is due to no proposed new surface disturbances, the area of the climbing walls is a minor component of the larger grazing operation, livestock use is already restricted in this area by the narrow linear corridor of the canyon, motorized travel would be limited to existing designated routes, the allotment is already open and subjected to multiple-uses, including climbing in Indian Creek, and the commercial users are a minor component of the overall climbing use. Thereby, there are no impacts to a degree that detailed analysis is required.	Jed Carling	11/17/16
NI	Rangeland Health Standards	Utah Standards for Rangeland Health are individually addressed as separate resources for determination of impacts in this checklist (Standard #1-Soils, #2-Riparian, #3-Biotic (vegetation/wildlife), and #4-Water Quality). Thereby, there are no impacts that require detailed analysis to Rangeland Health Standards and Guidelines that are not already being considered by the individual resource.	Jed Carling	11/17/16
NI	Vegetation Excluding USFW Designated Species	The activities associated with the proposed issuance of commercial climbing permits occur on talus slopes, which are steep, rocky, and naturally have minimal vegetation.	Jed Carling	11/17/16

Commented [AT18]: What were the results of the survey?

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Determination	Resource	Rationale for Determination*	Signature	Date
		There are no proposed new surface disturbances from the action of issuing an commercial guided climbing, as all use is within established climbing areas. All motorized travel will occur on designated routes, which is not considered a surface disturbing activity in the 2008 MFO RMP, and will not further impact vegetative communities. Climbing occurs on slickrock faces essentially devoid of vegetation. Access to the climbing walls occurs on established / existing foot trails. Thereby, for reasons listed above, the use associated with the issuance of commercial guided climbing at 11 new walls in Indian Creek will not impact vegetation to a degree that detailed analysis is required.		
NP	Woodland / Forestry	There are no woodland or forestry resources within the proposed climbing areas.	M. Scott	2/6/17
NI	Fuels/Fire Management	The vegetation found in the SRP area of activity generally consists of fine fuels (annual and perennial grasses and forbs) and various species of sparse and scattered brush. The abundance and continuity of these fuels will change annually as precipitation dictates resulting in different fire danger ratings in the area. Parking associated with these climbing routes usually occurs in previously disturbed areas that are generally lacking in vegetation. It is not expected that accidental ignitions will increase as a direct result of this SRP. There are currently no hazardous fuels reduction projects planned for this area. Fire and fuels need not be analyzed further in the E.A.	P. Plemons	9/30/16
NI	Mineral Resources/Energy Production	The proposed action is located within the Bears Ears National Monument (BENM). Pursuant to the Presidential Proclamation, the BENM is withdrawn from all forms of entry, location, selection, sale, or other disposition under the public land laws. This precludes any future exploration and development of mineral resources in the monument, with exception of valid existing rights which are not known to occur in proximity of the proposed action. Therefore, the proposed action would not interfere with mineral development.	T. McDougall	2/13/17
NI	Lands/Access	This proposal would have a negligible impact on the Lands Program. The permits <u>do not grant</u> exclusive use so there will be no impact on access to public lands.	N. Norton	2/6/17
NI	Paleontology	Permittees will be provided with a copy of the following stipulation: Paleontological resources will not be collected under a commercial Special Recreation Permit. All collection of paleontological resources will otherwise be in accordance with the Paleontological Resources Preservation Act of 2009 and a permit may be required. The permit holder will be held legally and financially responsible for paleontological resources damaged, destroyed, or removed by trip participants. All vertebrate fossils are prohibited from collection, and require a valid permit. Common invertebrate and plant fossils may be collected without a permit. Collection of petrified wood is limited to 25 pounds a day, 250 pounds a year, for non-commercial purposes.	R. Hunt-Foster	12/1/2016

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FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator			
Authorized Officer			

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

**Environmental Assessment
DOI BLM UT Y020 2016 0065**

April 2017

**Indian Creek Commercial Climbing
Special Recreation Permits
Phase II Walls**

Location: Indian Creek, Monticello Field Office

Applicant/Address: BLM Monticello Field Office

Monticello Field Office
365 N. Main St.
Monticello, Utah 84534
Phone: 435 587 1500
Fax: 435 587 1518

BLM



**Indian Creek Guided Climbing
Special Recreation Permits Phase II Walls
DOI-BLM-UT-Y020-2016-0065**

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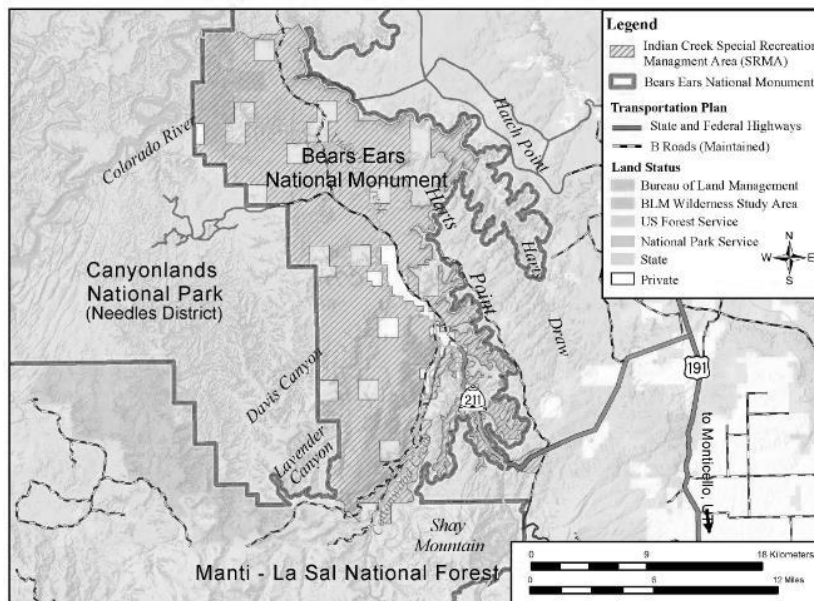
**INDIAN CREEK GUIDED CLIMBING
SPECIAL RECREATION PERMITS PHASE II WALLS
DOI BLM UT Y020 2016 0065**

**CHAPTER 1
INTRODUCTION AND NEED FOR THE PROPOSED ACTION**

1.1 INTRODUCTION

This Environmental Assessment (EA) has been prepared to disclose and analyze the environmental consequences of expanding the number of climbing walls and user days available to Special Recreation Permit (SRP) operators for commercial and organized group guided climbing in the Indian Creek Special Recreation Management Area (SRMA), which is within Bears Ears National Monument.

The Bureau of Land Management (BLM) Monticello Field Office (MFO) currently authorizes SRPs for guided climbing on Battle of the Bulge, Donnelly Canyon, Supercrack Butte, and Blue Gramma under EA DOI BLM UT Y020 2014 024. That EA also set a limited allocation system for guided climbing based on the small number of walls made available to permitted climbing guides. Climbing guides have requested access to guide on walls that were not authorized under the previous EA. MFO currently permits 24 guided climbing operators in the Indian Creek SRMA.



Indian Creek Guided Climbing SRPs Phase II Walls EA

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Page 1

Map 1: Vicinity Map for Proposed Action Project Area

Additional walls authorized for guided climbing under this proposal would include: Reservoir Wall, Cat Wall, Scarface Wall, Six Star Wall, Selfish Wall, 4x4 Wall, Rambo Wall, Optimator Wall, Pistol Whipped, and North Six Shooter. These walls were selected for analysis based on applicant requests, historically high guided use, and the presence of infrastructure in the form of parking areas, trails, and signs. This Proposed Action considers existing, proposed, and projected guiding use on BLM land only. BLM does not permit use on private or State Institutional Lands Trust Administration (SITLA) lands.

Commented [AT1]: The IDT checklist states that Rochambeau needs to be excluded because of cultural concerns.

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Commented [AT2]: South Six Shooter is included in the IDT checklist, but was recommended for removal by Cameron. Just need to confirm that it has been removed.

1.2 PURPOSE AND NEED FOR THE PROPOSED ACTION

The purpose of the proposed action is to grant commercial guiding companies and organized groups with authorization to provide visitors with desired recreational opportunities for guided rock climbing in the Indian Creek SRMA.

The need for this action is to respond to applications by commercial operators and organized groups to offer recreation based trips on public lands managed by BLM, as required by regulation 43 CFR 2932.25. BLM's authority to offer Special Recreation Permits (SRPs) for recreational commercial and organized group use is established by BLM's responsibility under the Federal Land Policy and Management Act (FLPMA). FLPMA establishes outdoor recreation as one of the principal uses of public lands and directs the Department of Interior (DOI) to regulate through permits or other instruments the use of the public lands, which includes commercial recreation use.

The decision to be made is whether or not to expand the number of walls available for guided climbing, and whether the increased availability of walls should then result in the lifting the allocation system set in EA DOI BLM UT Y020 2014 024. BLM will consider approval of the proposed recreational activity in a manner that avoids or reduces impact on other recreational users and prevents unnecessary or undue degradation of the public lands.

1.3 SCOPING AND IDENTIFICATION OF ISSUES

The BLM used an interdisciplinary team (IDT) and public scoping comments to identify issues. The resources and issues considered by the IDT are provided in the IDT Checklist (Appendix A). The BLM posted the proposed action on the ePlanning website in October 2016, to solicit public input and concerns. No comments were received from the public during this period.

Commented [GAL3]: Note the length of the comment period 30 days?

Two issues discussed in internal scoping were considered but eliminated from analysis based upon design features incorporated within the action alternatives. These included the potential for damage to cultural sites and potential impacts to raptors and migratory birds and resulted in the exclusion of the "Pink Flamingo" route located on the Supercrack Butte, all South Six Shooter Routes, and the "Rochambeau" Route on the Way Rambo Wall from BLM's proposed action. See the Interdisciplinary Team Checklist (Appendix A) for the full rationale for eliminating these resources from analysis.

Commented [AT4]: Excellent addition.

Indian Creek Guided Climbing SRPs Phase II Walls EA

DOI-BLM-UT-Y020-2016-0065

As a result of internal scoping, the following issues were carried forward for further analysis:

- **Recreation** How would the proposed action impact climbers and other recreational users in the Indian Creek SRMA?
- **Recreation** How would the no action alternative impact climbers and other recreational users in the Indian Creek SRMA?

1.4 CONFORMANCE WITH BLM LAND USE PLAN(S)

Monticello Field Office Resource Management Plan (2008)

The proposed action analyzed in this environmental assessment (EA) has been determined to be in conformance with the current land use plan referred to as the Monticello Field Office Resource Management Plan (RMP), which was approved on November 17, 2008. The RMP states the following:

- **REC 17** “Special Recreation Permits will be issued as a discretionary action as a means to help meet management objectives, contact visitor use, protect recreational and natural resources and provide for the health and safety of visitors.” (page 91)
- **REC 18** “All SRPs will contain standard stipulations appropriate for the type of activity and may include additional stipulations necessary to protect lands or resources, reduce user conflicts, or minimize health and safety concerns.” (page 91)
- **Indian Creek SRMA Goals and Objectives:** “Provide for premier rock climbing experiences, outstanding OHV opportunities, scenic vistas, cultural site interpretation at Newspaper Rock, destination camping areas, and a gateway to Canyonlands National Park.” (107)
- **REC 128** “Indian Creek SRMA boundary matches the boundary for the Indian Creek Corridor Plan (EA UT 090 00 47, BLM 2005). Management of the Indian Creek Corridor will be in conformance with the decisions outlined in the Indian Creek Corridor Plan.” (107)
- **TM 24** “Indian Creek Climbing Trails include the following: Bridger Jack Mesa, Super Crack Buttress, Cat Wall, Broken Tooth Wall, Scarface, and Battle of the Bulge.” (145)

Indian Creek Corridor Plan (2005)

The proposed action is consistent with the Indian Creek Corridor Plan of 2005. This plan attempts to balance Indian Creek’s increasing popularity as a recreation destination with the need to protect the abundant cultural and natural resources in the area.

The Indian Creek Corridor Plan states:

- **“Rock Climbing:** Climbing will continue to remain open to the public. New routes and bolting will be allowed. Alteration of rock surfaces and removal of vegetation will be

prohibited. The BLM will post signs at known cultural sites, where necessary, to alert climbers about restrictions.” (UT 090 047 Decision Record, page 1)

1.5 RELATIONSHIPS TO STATUTES, REGULATIONS AND OTHER PLANS

Proclamation for the Establishment of the Bears Ears National Monument (2016)

The proposed action is consistent with the Proclamation for the Establishment of the Bears Ears National Monument (BENM Proclamation). Recreation and rock climbing are specifically addressed in the BENM Proclamation as follows:

- “The area contains numerous objects of historic and scientific interest, and it provides world class outdoor recreation opportunities, including rock climbing, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding. Because visitors travel from near and far, these lands support a growing travel and tourism sector that is a source of economic opportunity for the region.”

The BENM Proclamation mandates that BLM and the United States Forest Service (USFS) prepare a joint Monument Management Plan. If any potential constraints on the proposed action were to be identified in subsequent land use planning for BENM, SRP general terms state that, “...should circumstances warrant, the permit may be modified by the BLM at any time, including modification of the amount of use. The authorized officer may suspend or terminate an SRP if necessary to protect public resources, health, safety, the environment, or because of non compliance with permit stipulations.”

Master Plan for San Juan County (1996)

The proposed action is consistent with the Master Plan for San Juan County of July 8, 1996. The Master Plan identifies recreation and tourism as an economic opportunity and aims to promote recreation and tourism within the county while maintaining a rural lifestyle.

The County Master Plan states:

“The county views recreation and tourism as an additional economic opportunity. The County believes this opportunity may only be in its infant stage. The County will continue to assist the travel council in promoting the county’s tourist industry. San Juan County believes and encourages private sector development of recreational facilities and services. The county will also continue to support and work in partnership with agencies, entities and interest groups to promote recreation and tourism in San Juan County.” (Page 54)

In developing the proposed action, the BLM has also taken into consideration the additional following laws, rules, and regulations.

Table 1: Regulatory Authorities and Guidance

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Agreed.

Federal Authorities and Responsibilities	
Cultural Resources	
BLM Native American Trust Resource Policies (303 DM 2 and 512 DM 2); BLM H-8120-1 General Procedural Guidance for Native American Consultation; BLM Manual 8120, Tribal Consultation under Cultural Resources; Executive Order (EO) 13175 Consultation and Coordination with Indian Tribal Governments (65 FR 67249, November 2000); EO 13007 Indian Sacred Sites (61 FR 26671, May 1996); American Indian Religious Freedom Act of 1978 (Public Law [PL] 95-341; 42 United States Code [USC] 1996)	Native American consultation regarding possibly affected traditional cultural properties.
Archaeological and Historic Data Preservation Act of 1974 (PL 86-253, as amended by PL 93291; 16 USC 469); Archaeological Resources Protection Act of 1979 (PL 96-95; 16 USC. 470aa-mm); National Historic Preservation Act of 1966, Section 106, (PL 89-665; 16 USC 407(f) and 36 CFR Part 800)	Requirement for cultural resource inventories to determine the presence of cultural resources and protection of sites discovered during project operations.
Land Management and Use	
Federal Land Policy and Management Act of 1976, Section 201(a) (PL 94-579; 43 USC 1701 et seq.)	Management of federal lands under principles of multiple use and sustained yield while protecting environmental resources.
National Environmental Policy Act of 1969 (PL 91-190; 42 USC 4321); 40 CFR Parts 1500-1508 CEQ implementation of NEPA; BLM Handbook H-1790-1; U.S. Department of the Interior Department Manual 516, Environmental Quality	Evaluation of impacts to environmental resources that may result from a proposed action prior to its implementation.
Wildlife	
Bald Eagle and Golden Eagle Protection Act of 1940 (16 USC 668-668d, 54 Stat. 250) as amended [PL 95-616 (92 Stat. 3114)] November 8, 1978.	Coordination, consultation and impact review regarding eagles.
Endangered Species Act of 1973 (PL 85-624; 16 USC 661, 664 1008)	Coordination, consultation and impact review regarding federally listed threatened and endangered species.
Migratory Bird Treaty Act of 1918 (16 USC 703-712, as amended); EO 13186 Responsibilities of Federal Agencies to Protect Migratory Birds; BLM Memorandum of Understanding WO-230-2010-04 To Promote the Conservation of Migratory Birds	Migratory bird impact coordination and protection of nesting migratory birds.
State of Utah Authorities and Responsibilities	
Cultural Resources	
Section 106 of National Historic Preservation Act of 1966, as amended (16 USC 470 et seq.) and Advisory Council Regulations on the Protection of Historic and Cultural Properties, as amended (36 CFR Part 800)	Utah State Historic Preservation Office consultation on cultural resource survey, evaluation, and mitigation.
Wildlife	
Utah Division of Wildlife Resources (UDWR) Rules and Regulations, Rule 657 series; UAC Title 23, Wildlife Resources of Utah.	Coordination on wildlife and state-sensitive species; management of big game and wildlife.

CHAPTER 2 DESCRIPTION OF ALTERNATIVES

2.1 INTRODUCTION

The BLM IDT explored all reasonable alternatives that meet the purpose and need for the proposed project and that respond to the issues. BLM carried forward two alternatives for full analysis within this EA, the Proposed Action and the No Action alternative. The No Action alternative is considered and analyzed to provide a baseline for comparison of the impacts of the proposed action.

2.2 PROPOSED ACTION

The BLM MFO proposes to expand the number of climbing walls available to SRP operators and eliminate current user day limits for guided climbing in the Indian Creek SRMA on lands managed by the (MFO). All walls analyzed in EA DOI BLM UT Y020 2014 024 and the proposed action would be made available to new SRP applicants and existing SRP holders. Walls referenced in the proposed action would be added to the list of approved areas of operation for current permits authorized under EA DOI BLM UT Y020 2014 024 or tiered documents. Additional walls authorized for guided climbing under this proposal would include: Reservoir Wall, Cat Wall, Scarface Wall, Six Star Wall, Selfish Wall, 4x4 Wall, Rambo Wall (except Rochambeau), Optimator Wall, Pistol Whipped, and North Six Shooter. Conformance to the proposed action would be implemented through stipulations added to all SRPs for guided climbing in the Indian Creek SRMA.

Authorized Use: Permitted activities would include guided climbing on authorized walls in the Indian Creek SRMA. Trips would be authorized year round, but would generally be concentrated in the spring and fall. Trip duration typically ranges from 1 day to 5 days. Guides would provide a proposed itinerary to BLM in advance of all trips and report all use at the end of the year.

Areas of Operation: Criteria for prioritizing areas of operation included reported use by current operators, requested use by applicants, availability of facilities (such as parking and toilets), and prior assessment of associated trails and parking areas.

The following walls would be available for guided climbing (see Map 2):

- | | | |
|-----------------------|-----------------|---------------------|
| • Battle of the Bulge | • Cat Wall | • Rambo Wall |
| • Donnelly Canyon | • Scarface Wall | • Optimator Wall |
| • Supercrack Buttress | • Six Star Wall | • Pistol Whipped |
| • Blue Gamma | • Selfish Wall | • North Six Shooter |
| • Reservoir Wall | • 4x4 Wall | |

Allocation: No allocation would be set for number of permitted guides or individual operator user days under this alternative. The allocations set under EA DOI BLM UT Y020 2014 024 would be lifted for current permit holders. Events and large groups would be analyzed on a case by case basis. Indian Creek Guided Climbing SRPs Phase II Walls EA DOI-BLM-UT-Y020-2016-0065

Commented [GAL6]: On the map this is listed as "Way Rambo" are these two separate walls? Should this be "Way Rambo Wall"? Just looking for consistency.

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basis. If lifting current allocation limits results in future exceedance of the aggregate annual user day cap of 1,126 user days, established in EA DOI-BLM-UT-Y020-2014-024, BLM would reconsider instituting an allocation system.

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Access/Travel: Parking would be in parking areas identified in the 2005 Indian Creek Corridor Plan or subsequent plans. Participants would be shuttled to trailheads exclusively on designated routes, no off-route travel is allowed. Guides would access climbing walls using only existing roads and trails.

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Camping: Camping would be limited to the following designated sites:

- Bridger Jack Designated Sites
- Superbow/I Campground
- Creek Pasture Campground
- Creek Pasture Group Site
- Hamburger Rock
- Indian Creek Falls Group Site

No dispersed camping would be allowed. Group campsites would be scheduled in advance through the Recreation.gov website. Individual campsites would be paid for on-site. Campsites and use areas would be maintained in a neat and clean condition with no litter. A fire pan would be used for campfires if there is no metal fire ring. All garbage would be packed out to an approved disposal location. No wood cutting would be allowed. Acceptable toilet facilities for clients would be provided by the permittee if there is no pit toilet on site. Camping is not to exceed 14 days.

Cultural Resources: No climbing would occur over known structures, artifacts, petroglyphs or pictographs. The permit holder would be held legally and financially responsible for historical, archaeological, cultural, or ecological values damaged, destroyed, or removed by trip participants. Cultural artifacts located on the surface of an archaeological site or isolated artifacts are not to be disturbed. Moving or disturbing cultural artifacts from any location is a violation of federal law.

Deleted Climbing guides would be provided with a list of approved and closed routes based on cultural surveys.

Wildlife: To avoid disturbance to wildlife during the nesting season March 1- August 31, the following limitations apply during the season:

- No climbing would be allowed on any wall until the activity has been determined to be non-disturbing to wildlife by a qualified BLM wildlife biologist. This approval would be contingent on the results of standard wildlife surveys conducted each spring. Climbing guides would be provided with a list of approved routes and closed walls prior to each nesting season.
- Permittees would not hike past the climbing wall into Donnelly Canyon one-half hour before or after sunrise or sunset.

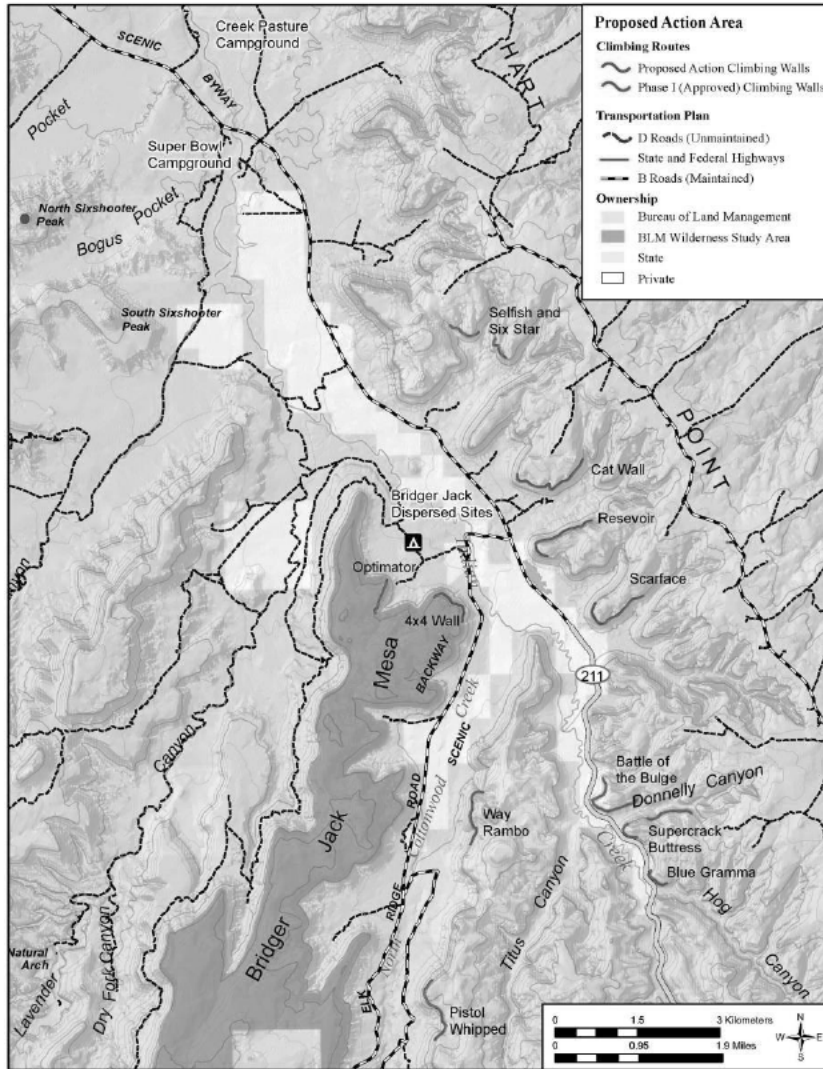
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Miscellaneous: Permittees must allow the BLM to accompany tours for monitoring purposes. Pets must be kept on a leash at all times and out of springs, pot holes and other natural water sources. Pet owners must pack out all pet waste.

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Map 2: Walls analyzed in Phase I (EA DOI-BLM-UT-Y020-2014-024) and the current proposed action 2.3

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Commented [GAL10]: Please see comment on checklist it looks as if the 4x4 and Optimator Walls are within the Bridger Jack Mesa WSA on this map. I'll work with GIS to get you a clean layer that displays the routes as outside the WSA.

Commented [AT11R10]: Thanks, Allison. Include new map showing these walls outside the WSAs.

NO ACTION

The No Action Alternative is to continue to authorize permitted climbing guides to operate on the four currently approved walls as per EA DOI BLM UT Y020 2014 024 and to continue the limited user day allocation system.

CHAPTER 3 AFFECTED ENVIRONMENT

3.1 INTRODUCTION AND GENERAL SETTING

Chapter 3 presents the potentially affected existing environment (i.e., the physical, biological, social, and economic values and resources) of the impact area as identified in the IDT Checklist (Appendix A) and presented in Chapter 1 of this assessment. This chapter provides the baseline for comparison of impacts/consequences described in Chapter 4.

The Indian Creek Corridor is located 30 miles northwest of Monticello, UT and 50 miles southwest of Moab, UT. The upper portion of Indian Creek is a deeply entrenched narrow canyon with massive Wingate Formation cliffs perched on vibrant Chinle talus slopes. The lower portion of Indian Creek broadens out into a valley with flat to gently rolling terrain bracketed by Wingate cliffs and spires. The intermittent waterways of Indian Creek and North Cottonwood Creek wind through the corridor and provide riparian habitat in an otherwise semi arid, sagebrush dominated landscape. The average annual precipitation is 7 8 inches. Soils are fine sands, fine sandy loams, and gravelly loamy sands.

With the exception of the BLM developed recreational facilities and the Dugout Ranch, the Indian Creek corridor is generally primitive and undeveloped. Land ownership in the Indian Creek Corridor along Highway 211 is a patchwork, with SITLA sections and private property interlaced with BLM.

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3.2 RESOURCE A: RECREATION

The proposed action is located within the Indian Creek SRMA. The SRMA follows the Indian Creek and Cottonwood Creek drainages from the Needles Overlook in the north to Newspaper Rock and the Manti La Sal National Forest to the south. The SRMA is roughly bounded to the east by Hart's Point and to the west by Canyonlands National Park. The SRMA includes all of the Indian Creek and Bridger Jack Mesa WSAs, the Shay Canyon, Lavender Mesa and Indian Creek Areas of Critical Environmental Concern (ACECs), the Indian Creek Corridor Scenic Byway SR 211, and the Newspaper Rock Historic Site.

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The goals and objectives for the SRMA are to provide outstanding recreational opportunities and visitor experiences including rock climbing, outstanding OHV opportunities, scenic vistas, cultural site interpretation at Newspaper Rock, destination camping areas, and a gateway to Canyonlands National Park while protecting natural and cultural resource values through integrated management between the BLM, National Park Service (NPS) State of Utah and the Nature Conservancy. Primary activities within the SRMA include rock climbing, OHV riding, backcountry hiking and backpacking, horseback riding, sight seeing, cultural site visitation, swimming, camping, wilderness education, and research (RMP 2008, Appendix O, pg. 9).

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Casual Use (non guided) Climbing: Indian Creek is widely considered a premier crack climbing destination and is internationally known for the quality of climbs (Bloom, 2009; Green, 1998). Friends of Indian Creek identify 45 climbing walls along Highway 211 and Cottonwood Creek as “main crags”, but new routes are constantly being pioneered (Bloom, 2009). Most of the main crags are located on the east side of Highway 211, but several popular climbs can also be found on either side of Cottonwood Creek and side drainages. Visitor use estimates for Indian Creek climbing average about 25,000 visitors per year, putting Indian Creek climbing among the largest recreational uses in the MFO. Climbing at Indian Creek occurs year round, but is concentrated in the spring and fall seasons. In the popular months of March through May and October through November, staff experience indicates that it is common for the parking lot at Donnelly Canyon to fill completely during peak hours.

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Site specific plans have been completed in order to facilitate climbing in the Indian Creek area. Plans that implement the goals of the RMP and Indian Creek Corridor Plan include:

- Creek Pasture and Super Bowl Campsite Project (DOI BLM UT Y020 2012 0023EA)
- Trail Relocation and New Vehicle Parking for Pistol Whipped Climbing Route (DOI BLM UT Y020 2012 0046EA)
- Creek Pasture Toilets Amended (DOI BLM UT Y020 2001 0009EA)
- Trail Stabilization Blue Gramma Wall (DOI BLM UT Y020 2010 026EA)
- Donnelly Canyon/Supercrack Buttress Parking Area (DOI BLM UT Y020 2010 0012DNA)
- Kiosk Replacement and Installation (DOI BLM UT Y020 2010 0011CX)
- Trail Alignment and Stabilization 4X4 Wall (DOI BLM UT Y020 2010 0014EA)
- North Cottonwood/Cat Wall/Reservoir Wall Parking Area (DOI BLM UT=Y020 2010 0017DNA)
- Donnelly Canyon Trail Relocation and Stabilization (DOI BLM UT Y020 2010 0033EA)

In response to concentrated climbing use on private and public land at the mouth of Donnelly Canyon (Map 2), BLM has collaborated with advocacy organizations including the Access Fund, Rocky Mountain Field Institute, and Friends of Indian Creek to build and maintain a 57 vehicle parking lot, two pit toilets, interpretive signs and access trails that reach Battle of the Bulge, Donnelly Canyon, and Supercrack Buttress. Additional trails and parking areas have been built near Cat Wall, Broken Tooth Wall, Scarface, Pistol Whipped Wall, and 4x4 Wall. Facilities at Creek Pasture and Superbowl campgrounds have been expanded and improved, including road improvements and the installation of new campsites, fire grates, and vault toilets.

Guided Climbing: Special Recreation Permit (SRP) holders are required to report use each year in order to determine appropriate fees and to track use in a given area. Based on reported use from

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current and expired SRPs, total reported visitors on guided trips at all walls within the Indian Creek SRMA range from 98 (2013) to 273 (2016) with a yearly average of 162 total visitors. Comparatively, BLM estimates that there were 33,648 participants engaged in rock climbing in the Indian Creek SRMA in 2016. Guided climbing accounts for less than 1% of annual climbing visitation to the Indian Creek SRMA.

Table 2: Indian Creek SRMA – Average Climbing SRP Use by Year

Year	Active SRP Holders	Total Trips	Day Use Trips	Average Overnight Trip Days	Visitors	Average Group Size	User Days
2012	12	32	24	3	174	5	329
2013	10	23	16	3	98	4	218
2014	12	31	20	4	129	4	274
2015	9	32	24	3	137	4	204
2016	15	60	43	3	273	5	389
Average	12	36	25	3	162	4	282

In 2014, an SRP allocation system was implemented which limited the amount of use for current and renewing SRP holders to their respective maximum historic user day levels, and limited new SRP applicants to a maximum allocation of 50 user days per year. Renewing SRP holders and new applicants are currently limited to four climbing walls: Battle of the Bulge, Donnelly Canyon, Supercrack, and Blue Gramma. Guided climbing use of the four walls and implementation of limited allocation system were analyzed in EA DOI BLM UT Y020 2014 024.

OHV Riding: The Indian Creek area is popular for 4x4 and ATV use. These areas are used to access a network of trails, including the ATV Safari designated routes at Bridger Jack Mesa and Falls Missile trails. Lockhart Basin and Lavender Canyon OHV routes are also accessed from the Indian Creek SRMA.



Figure 1: Newspaper Rock is a popular tourist destination
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Sight seeing: The scenery of Indian Creek is world renowned and is a popular photography and filming destination because of its classic “western” look. Those users primarily interested in sight seeing/scenic driving include an estimated 127,000 visitors driving through the Indian Creek Corridor Scenic Byway SR 211 to its terminus at the Needles District of Canyonlands National Park. The project area is located in Visual
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Resource Management (VRM) Class II, in which the objective is to retain the existing character of the landscape. Management activities may be seen, but should not attract the attention of the casual observer.

Rock Art Viewing: Approximately 80,000 vehicles top at the Newspaper Rock Interpretive site each year. Newspaper Rock provides interpretation and some amenities in addition to the well known panel. While most sightseers are content with observing and photographing the large panel at Newspaper Rock, a handful of visitors seek out the abundant but inaccessible rock art and surface site sites winding along the base of the Wingate formation.

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Camping: Campsites in the Indian Creek SRMA includes fee sites at Hamburger Rock Campground (11 sites), the Indian Creek Falls Group Site (up to 30 people in a group), Creek Pasture Campground (32 sites) and Group Site, and Superbowl Campground (17 sites). In addition, there are 19 undeveloped designated sites at Bridger Jack Mesa and dispersed camping along the Lockhart Basin and Cottonwood Roads. Campers include mainly a mix of overflow campers from Canyonlands National Park and Indian Creek climbers. Average annual camping visitation for the Indian Creek SRMA is estimated to total about 45,000 visitors.



CHAPTER 4 ENVIRONMENTAL IMPACTS

4.1 INTRODUCTION

This section analyzes the direct, indirect and cumulative impacts of the proposed action and the potentially impacted resources described in the affected environment Chapter 3.

4.2 RESOURCE A: RECREATION

Proposed Action *How would the proposed action impact climbers and other recreational users in the Indian Creek SRMA?*

This section analyzes the impacts of the proposed action on recreation users in the Indian Creek SRMA. Guided climbing is geographically separated from backcountry hiking and backpacking, horseback riding, wilderness education, and research to such a degree that impacts to those uses will not be analyzed.

Casual Use (non guided) Climbing: It is anticipated that broadening the number of walls available to climbing guides would help reduce competition between guided and casual climbers for climbing walls and parking areas. The four walls currently authorized for use by commercial guides are all in the Donnelly Canyon area and use the high traffic Donnelly Canyon parking lot. Spreading guided climbing use throughout the Indian Creek SRMA would decrease competition for parking and walls in the Donnelly Canyon area and options for both guided and casual climbers are expected to increase. However, since guided climbing represents less than 1% of total climbing visitation to Indian Creek, most competition for climbing walls and parking areas can be attributed to other casual use climbers.

Guided Climbing: It is expected that the number of user days for guided climbing would remain below the total annual allocation of 1,126 user days set in EA DOI BLM UT Y020 2014 024. Removing the individual allocation limits could cause an increase in visitation by individual guides; however, reported use by permitted climbing guides suggests that in aggregate the climbing guides use far less user days than the 1,126 total user day cap set in EA DOI BLM UT Y020 2014 024. Table 2 shows that during the last five years annual guided climbing use peaked at 389 user days in 2016, which is 35% of the current user day allocation. The few permitted climbing guides who use more than 50 user days per year are offset by the sporadic use by the majority of guides in this area. If aggregate use reaches the 1,126 annual user day cap, BLM would reconsider instituting an allocation system.

Climbing guides would be able to offer visitors opportunities for guided climbing trips at ten additional walls within the Indian Creek SRMA to suite visitors' various skill levels and desired recreation experiences. Lifting the user day limits would allow visitors more options when

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choosing guided climbing services, because individual guides would not be limited by their respective user day caps and potentially have to deny services.

OHV Riding: OHV riders do not access the same trailheads or trails as the guided climbers. Therefore, impacts to OHV riders from the proposed action would be limited to highway access on 211 and potential competition for developed campgrounds. The Needles District averages about 126,000 visitors, or approximately 50,400 vehicles per year traveling the length of Highway 211, assuming the standard 2.5 passengers per car. The average guided climbing group size is four people and the average annual trips per year is 36 (Table 2), resulting in approximately 72 vehicles per year traveling the highway for guided climbing, which is negligible when compared to total vehicle traffic.

Sight seeing: Visitors seeking out scenic opportunities in the Indian Creek corridor might experience negative effects of climbing in the form of chalk stains left on walls or ropes and climbers marring views. These visitors benefit from the infrastructure placed in response to climbers, such as pit toilets, parking areas, campgrounds, and trails. For many visitors, seeing climbers on the wall may add a novel element to their overall experience and a desired sight. Because guided climbing forms such a small percentage of climbing in Indian Creek, permitted outfitters would have negligible positive or negative outcomes for sight seeing visitors.

Rock Art Viewing: Some rock art panels at Indian Creek show signs of damage from climbing including abrasion, flaking, bolts, and even occasional damage to elements. Intensive cultural resource surveys resulted in the removal of some walls and routes from the proposed action to avoid the potential for resource damage. See ID Team Checklist in Appendix A for details.

Camping: The total level of overnight guided climbing trips is expected to remain similar if the user day limits are lifted because average annual use levels are so far below what the allocation limits allow. Therefore, no new impacts to other camping users would be expected. 71% of guided climbing trips over the last five year period are day use trips. Overnight use for guided climbing averages 11 trips annually and two nights per trip, which results in approximately 22 camping nights per year. Given the small amount of camping nights, guided climbing trips create minimal additional competition for campsites in the Indian Creek SRMA.

No Action *How would no action impact climbers and other recreational users in the Indian Creek SRMA?*

The No Action alternative, while meeting the BLM's purpose and need of responding to an SRP application, would not allow for the increased recreational benefits of issuing the permits.

Casual Use (non guided) Climbing: Although as a percentage, the total number of guided climbers is small, the no action alternative has the effect of continuing to concentrate guided climbing onto Indian Creek Guided Climbing SRPs Phase II Walls EA

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four popular walls in the Donnelly Canyon area. This concentration of use likely causes some degree of impact to causal use climbers by reducing wall choice, parking space, and intensifying a feeling of crowding.

Guided Climbing: Retaining the limited user day allocation system is expected to have little impact on total guided climbing use in the Indian Creek SRMA because total average annual use is at 25% of what is allowed under the allocation system. However, retaining the limited allocation system may impact individual SRP holders who may reach their respective user day maximum limit and be forced to decline additional clients on this basis. This has the effect of limiting visitors' choices in guided climbing providers and restricts the potential for organization or business growth for SRP holders.

OHV Riding: Impacts to OHV riders would be the same as under the Proposed Action alternative.

Sight seeing: Impacts to sight seeing visitors would remain the same as under the Proposed Action alternative.

Rock Art Visitation: Impacts to rock art visitors would remain the same as under as under the Proposed Action alternative.

Camping: Impacts to campers would remain the same as under as under the Proposed Action alternative.

4.3 CUMULATIVE IMPACTS

"Cumulative impacts" are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions. The cumulative impact area is the Indian Creek SRMA, which encompasses 89,271 acres. The timeframe for cumulative impacts is five to ten years, which is the duration of most existing and proposed guided climbing permits in the area.

Past actions were described as part of the affected environment section in Chapter 3. Present and reasonably foreseeable actions that affect the same components of the environment as the proposed action and no action alternatives are:

- Development and expansion of the Superbowl campground from 17 campsites to 38 campsites. (BLM)
- Development of a parking area, restroom facility, and trailhead at Shay Canyon.
- Construction of a 5.7 mile ATV trail connecting San Juan County Road B122 (near Hamburger Rock campground) to road D05071

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The present and reasonably foreseeable actions above are projections and assumptions made only for the purpose of projecting future cumulative impacts, and are not linked to the proposed action. Inclusion in this document does not constitute a decision or commitment or resources, and does not satisfy the respective NEPA compliance requirements for these actions.

Visitor use numbers in RMIS demonstrate an upward trend in recreational climbing and overall visitation in Indian Creek. This is likely due to a combination of factors, including an overall increase in the popularity of climbing, the publication of more and better climbing guidebooks for the Indian Creek area, and a general increase in tourism in Southeastern Utah, and the inclusion of Indian Creek in the Bears Ears National Monument.

The identified reasonably foreseeable actions provide more recreation infrastructure for casual use and guided climbing users, as well as other recreation visitors in Indian Creek SRMA, and are in response to increasing recreational use. Improvement and development of parking areas, campgrounds, climbing access trails, ATV access trails, and vault toilets helps reduces impacts to natural and cultural resources that occur from dispersed camping and parking and development of user created trails. Development of recreation amenities also can reduce user conflicts, traffic congestion, and improve recreational experiences for users in Indian Creek. Development and

The proposed action responds to increasing visitor use by increasing the number of areas available for guided climbing opportunities in Indian Creek. Impacts to visitors' recreation experiences from user conflict and traffic congestion would be reduced by dispersing use at the currently approved guided climbing areas.

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CHAPTER 5 CONSULTATION AND COORDINATION

5.1 INTRODUCTION

The issue identification section of Chapter 1 identifies those issues analyzed in detail in Chapter 4. The ID Team Checklist (Appendix A) provides the rationale for issues that were considered but not analyzed further. The BLM posted the proposed action on the ePlanning website in October 2016, to solicit public input and concerns. No comments were received from the public during this period.

5.2 LIST OF PREPARERS

Table 4: List of BLM Preparers

Name	Title	Responsible for the Following Section(s) of the Document
Silas Sparks	Outdoor Recreation Planner	NEPA coordination; Environmental Justice; Socioeconomics; Visual Resources
Casey Worth	Outdoor Recreation Planner	ACECs; Recreation Management, Wild and Scenic Rivers; BLM Natural Areas; Wilderness/WSA; Lands w/ Wilderness Characteristics
Misti Haines	Outdoor Recreation Planner	NEPA coordination
Jed Carling	Range Management Specialist	Floodplains; Wetlands/ Riparian; Livestock Grazing; Rangeland Health Standards; Vegetation;
Mandy Scott	Wildlife Biologist	Water Resources; Wildlife; Special Status Plant and Wildlife Species; Migratory Birds Woodlands/Forestry
Cameron Cox	Archaeologist	Cultural Resources; Paleontology; Native American Concerns
Cliff Giffen	Natural Resource Specialist	Air Quality; Soils
Ted McDougall	Geologist	Mineral Resources/Energy Production
Paul Plemons	Fuels Specialist	Fuels/Fire Management
Nephi Noyes	Range Management Specialist	Invasive Species/Noxious Weeds, Wastes
Norbert Norton	Realty Specialist	Lands/Access
Rebecca Hunt-Foster	Paleontologist	Paleontology

CHAPTER 6 REFERENCES

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Proclamation for the Establishment of the Bears Ears National Monument (BENM Proclamation), enacted by President Obama on December, 28, 2016 under the authority of the Antiquities Act of 1906.

APPENDIX A
Interdisciplinary Team Checklist

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