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From: Johnson, Amber
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[SRP EA 10 11 12 FINAL 508C.pdf](#)
[SRP EA Decision Record 10 15 2012 FINAL.pdf](#)
[SRP FONSI 10 11 12 FINAL.pdf](#)

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----- Forwarded message -----

From: **Johnson, Amber** <a2johnson@blm.gov>
Date: Mon, Jan 30, 2017 at 6:42 PM
Subject: Fwd: EA examples/SRP training
To: Silas Sparks <ssparks@blm.gov>

Programmatic EA for SRPs that Grand Staircase is using.

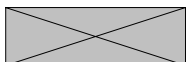
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From: **Beal, Jeffrey** <jbeal@blm.gov>
Date: Mon, Jan 30, 2017 at 4:37 PM
Subject: Re: EA examples/SRP training
To: "Johnson, Amber" <a2johnson@blm.gov>

I think I have to send this in stages. More to come.

Jabe Beal, Outdoor Recreation Planner
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On Mon, Jan 30, 2017 at 12:39 PM, Johnson, Amber <a2johnson@blm.gov> wrote:

Thanks for your help today Jabe!
EA examples that would be helpful for us going forward.

Motorized events
Canyoneering/Backpacking guiding
Rock climbing guiding

An example of an agenda from one of your SRP training workshops.

Best! Amber

**Amber Denton Johnson
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BLM, Monticello Field Office
435-587-1505**

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

**Environmental Assessment
DOI-BLM-UT-0030-2011-0002-EA**

October 11, 2012

**Programmatic EA for Issuing Special Recreation Permits
within Grand Staircase – Escalante National Monument**

Location: Grand Staircase – Escalante National Monument located in Garfield
County and Kane County, Utah.

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BLM

Programmatic EA for Issuing Special Recreation Permits within Grand Staircase – Escalante National Monument

DOI-BLM-UT-0030-2011-0002-EA

Table of Contents

	<u>Page</u>
1.0 PURPOSE and NEED.....	4
1.1 Introduction.....	4
1.2 Background.....	4
1.3 Need for the Proposed Action.....	4
1.4 Purpose of the Proposed Action.....	5
1.5 Conformance with BLM Land Use Plan(s).....	5
1.6 Relationship to Statutes, Regulations, or other Plans.....	5
1.7 Identification of Issues.....	7
1.8 Issues Considered, but Eliminated from Further Analysis.....	8
1.9 Summary.....	8
2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION.....	8
2.1 Introduction.....	8
2.2 Alternative A – No Action	8
2.3 Alternative B – Proposed Action	8
2.4 Alternatives Considered, but Eliminated from Further Analysis.....	10
3.0 AFFECTED ENVIRONMENT.....	11
3.1 Introduction.....	11
3.2 General Setting.....	11
3.3 Resources Brought Forward for Analysis.....	11
3.3.1 Cultural Resource	11
3.3.2 Wildlife Resource	12
3.3.3 Recreation Resource.....	14
3.3.4 Wilderness Study Area Resource.....	17
4.0 ENVIRONMENTAL IMPACTS.....	18
4.1 Introduction.....	18
4.2 General Analysis Assumptions.....	18
4.3 Direct & Indirect Impacts.....	19
4.3.1 Alternative A - No Action	19
4.3.1.1 Cultural Resource	19
4.3.1.2 Wildlife Resource	19
4.3.1.3 Recreation Resource.....	20
4.3.1.4 Wilderness Study Area Resource.....	20
4.3.1.5 Monitoring and / or Compliance.....	21
4.3.2 Alternative B – Proposed Action	21
4.3.2.1 Cultural Resource	21
4.3.2.2 Wildlife Resource	22

4.3.2.3 Recreation Resource.....	22
4.3.2.4 Wilderness Study Area Resource.....	23
4.3.2.5 Monitoring and / or Compliance.....	23
4.4 Cumulative Impacts Analysis.....	23
4.4.1 Cultural Resource	24
4.4.1.1 Cumulative Impact Area.....	24
4.4.1.2 Past and Present Actions.....	24
4.4.1.3 Reasonably Foreseeable Action Scenario (RFAS).....	24
4.4.1.4 Cumulative Impact Analysis.....	25
4.4.2 Wildlife Resource	26
4.4.2.1 Cumulative Impact Area.....	26
4.4.2.2 Past and Present Actions.....	26
4.4.2.3 Reasonably Foreseeable Action Scenario (RFAS).....	26
4.4.2.4 Cumulative Impact Analysis.....	27
4.4.3 Recreation Resource	27
4.4.3.1 Cumulative Impact Area.....	27
4.4.3.2 Past and Present Actions.....	27
4.4.3.3 Reasonably Foreseeable Action Scenario (RFAS).....	28
4.4.3.4 Cumulative Impact Analysis.....	29
4.4.4 Wilderness Study Area Resource	29
4.4.4.1 Cumulative Impact Area.....	29
4.4.4.2 Past and Present Actions.....	30
4.4.4.3 Reasonably Foreseeable Action Scenario (RFAS).....	30
4.4.4.4 Cumulative Impact Analysis.....	30
5.0 CONSULTATION & COORDINATION.....	31
5.1 Introduction.....	31
5.2 Persons, Groups, & Agencies Consulted.....	31
5.3 Summary of Public Participation.....	31
5.4 List of Preparers.....	32
6.0 REFERENCES.....	32
6.1 References Cited.....	32
6.2 List of Acronyms Used in this EA.....	34
APPENDICES	
Appendix A – Interdisciplinary Team Checklist.....	35
Appendix B – SRP Application Evaluation Form.....	39
Appendix C – Special Recreation Permit (SRP) Stipulations.....	45
Appendix D – Operating Plan.....	53
Appendix E – Archaeological and Historic Site Etiquette.....	60
Appendix F – Annual Performance Evaluation	62
Appendix G – Bighorn sheep habit map, nine mile buffer.....	63
Appendix H – Backcountry Impact Monitoring, Map 1.....	64
Appendix I – Backcountry Impact Monitoring, Map 2.....	65

Programmatic EA for Issuing Special Recreation Permits within Grand Staircase – Escalante National Monument

DOI-BLM-UT-0030-2011-0002-EA

1.0 PURPOSE & NEED

1.1 Introduction

This Programmatic Environmental Assessment (EA) has been prepared to disclose and analyze the environmental consequences of issuing Special Recreation Permits (SRP's) as proposed by Grand Staircase – Escalante National Monument. The EA is a BLM analysis of potential impacts that could result with the implementation of the proposed action or alternatives to the proposed action. The EA assists the BLM in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination as to whether any “significant” impacts could result from the analyzed actions. “Significance” is defined by NEPA and is found in regulation 40 CFR 1508.27. An EA provides evidence for determining whether to prepare an Environmental Impact Statement (EIS) or a statement of “Finding of No Significant Impact” (FONSI). If the decision maker determines that this project has “significant” impacts following the analysis in the EA, then an EIS would be prepared for the project. If not, a Decision Record may be signed for the EA approving the selected alternative, whether the proposed action or another alternative. A Decision Record (DR), including a FONSI statement, documents the reasons why implementation of the selected alternative would not result in “significant” environmental impacts (effects) beyond those already addressed in Grand Staircase – Escalante National Monument Management Plan (MMP) (February, 2000).

1.2 Background

Grand Staircase – Escalante National Monument (GSENM) was created on September 18, 1996 by President Clinton under the authority of the Antiquities Act of 1906. Since that time, interest in GSENM and southern Utah has grown, creating increased demands for recreation on public lands. Although recreation is not mentioned in the Proclamation as a GSENM object, value or quality, recreation is clearly a valued and important component to the local economy and people visiting the area. The Monument Management Plan clearly addressed recreation in Chapter 2 under *Management of Visitors and Other Uses*. Within this section, group size limits, outfitter and guide operations, recreation allocations, and transportation and access objectives are addressed.

1.3 Need for the Proposed Action

The need for the proposed action is to provide an updated and timely SRP application and authorization process to meet public demands for commercial and organized group permits within GSENM. Since the creation of GSENM, overall visitation to GSENM has increased 76% from 456,369 visitors in 1996 to 803,811 visitors in 2010. In 2000, GSENM authorized 32 Special Recreation Permits (SRP's) for commercial and organized groups. In 2010, 87 SRP's were issued. This is a 172 % increase in

commercial and organized groups. In the last two years, commercial and organized groups applying to GSENM have not obtained SRP authorizations within a timely manner. Timing of the receipt of an application combined with other workload priorities creates inefficiency in processing new applications within the 43 CFR 2932 policy requirements of 180 days. Furthermore, BLM IM 2011-019 directs “*If the field office cannot fulfill, or complete, all the necessary steps of a use authorization, then no SRP shall be issued.*” During 2011, GSENM received 12 new SRP applications for various uses on GSENM. In addition, many educational institutions and organizations are required to obtain an SRP because they charge fees, publicly advertise or have a duty of care to their participants. A duty of care is a legal obligation imposed on an individual requiring that they adhere to a standard of reasonable care while performing any acts that could foreseeably harm others. These groups may arrive to GSENM without obtaining an SRP, decreasing permit compliance and increasing potential for resource impacts.

1.4 Purpose(s) of the Proposed Action

The purpose of the action is to streamline the process of reviewing and issuing SRP’s within Grand Staircase – Escalante National Monument. These permits would authorize SRP recreational operations for commercial and non-commercial activities within GSENM. The proposed action would allow GSENM to respond and process SRP applications in a more timely manner utilizing a tiered site-specific NEPA analysis to review SRP applications. This will allow for more sustainable recreation opportunities and good customer service, while providing protective measures for GSENM objects and values. The proposed action should reduce the standard 180-day processing period, increase opportunities for SRP authorized uses, as well as increase compliance with the BLM SRP policy, SRP stipulations and MMP prescriptions.

Decision to be made: The BLM will decide to issue SRPs based on the proposed action or analyze each SRP application received independently.

1.5 Conformance with BLM Land Use Plan(s)

The proposed action is in conformance with the Grand Staircase-Escalante National Monument Management Plan and is supported in the following plan decisions:

Grand Staircase – Escalante National Monument Management Plan (2000)

OG-1. Outfitter and guide operations will be allowed throughout the Monument in compliance with the constraints of the zones and other plan provisions.

OG-2. Training will be provided on an annual basis to keep outfitters and guides current on appropriate research studies occurring in the Monument.

OG-3. Outfitters and guides will be strongly encouraged to incorporate interpretive/educational components into their trips.

1.6 Relationship to Statutes, Regulations, or Other Plans

The proposed action is consistent with federal environmental laws and regulations, Executive Orders, and Department of Interior and GSENM policies. It is in compliance with state laws and local and county ordinances and plans, including the following:

Federal Lands Policy and Management Act (1976)

Title III, Sec. 302. [43USC 1732] (b) “the Secretary shall... regulate, through easement, permits, leases...the use, occupancy, and development of public lands...”

Federal Lands Recreation Enhancement Act (2004)

Section 803(f). “The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, and motorized recreational vehicle use.”

National Historic Preservation Act (1966)

Proclamation for the Grand Staircase-Escalante National Monument (1996)

The proposed action and no action alternative have been evaluated for consistency with the proclamation, particularly in reference to the specific objects and values that were identified with the Proclamation. No effects of the proposed action, with the included design features and stipulations included, are anticipated on any of objects or values identified within the Proclamation. If any potential effects of the proposed action were to be identified, the adaptive management prescriptions are designed to provide further protection of objects and values from impacts.

43 CFR 2932 (BLM) – Special Recreation Permits for Commercial Use, Competitive, Events, Organized Groups, and Recreational use in Special Areas.

BLM Handbook H-2930-1 – Recreation Permit Administration

Utah State Hunting Laws

Rule R156-79. Hunting Guides and Outfitters Licensing Act Rule.

Utah Wilderness Therapy Laws

Rule R501-2. Core Rules & Rule R501-8. Outdoor Youth Programs.

BLM Instructional Memorandum No. 2011-019

Garfield County General Plan (1998, amended with Resource Plan 2007)

The Garfield County General Plan includes an Outfitters and Guide Resolution (pages 6-29 and 6-30) recommending “that guiding and outfitting lifestyles be maintained and held inviolable as it pertains to...Antiquities Act”. It goes on to state: “Be it further resolved that outfitting and guiding be continued and based on existing levels with provisions for additional interim non-binding permits for the period prior to the implementation of the monuments (sic) final plan, unless

prudent management practices dictate otherwise. Be it further resolved that management of new outfitting and guiding permits be based on sound practices and that day to day management be the result of joint methods of determination between the outfitters or guide permit holder and appropriate BLM Resource Specialist.

The management of outfitter and guide operations and commercial groups are not specifically addressed in the Garfield County Resource Management Plan, a review of which revealed that the Proposed Action and alternatives would not conflict with it.

Thus, a review of those documents reveals that the Proposed Action and alternatives would not conflict with it.

Kane County Plan General Management Plan (1998, updated 2010)

Although the management of outfitter and guide operations and commercial groups are not specifically addressed in the Kane County General Plan or Resource Management Plan, a review of those documents reveals that the Proposed Action and alternatives would not conflict with it.

1.7 Identification of Issues

A scoping letter was mailed on December 15, 2010 to the public, soliciting comments for this EA. The scoping period ended on January 19, 2011. The proposed action was posted on the Utah BLM Environmental Notification Bulletin Board (ENBB) website for public review on December 15, 2010. Eleven comment letters were received.

On March 25th, 2011, GSENM employees met to discuss the development of an EA for the proposed action. In this meeting, staff identified issues to be addressed in the EA. On May 9th, 2011, a meeting was held among GSENM management and staff specialists to discuss management plan prescriptions and identify management issues associated with the project. During this meeting, land use plan consistencies and differences were outlined to provide direction in developing project alternatives. Further interdisciplinary scoping was conducted among GSENM interdisciplinary teams prior to completion of the EA.

Scoping issues identified during internal and external scoping:

1.7.1 Cultural

- How will BLM protect historical sites, cultural sites, GSENM resources with the implementation of the action?
- What type of cultural monitoring plan is in place for SRP holders who wish to visit a cultural site?

1.7.2 Wildlife

- How will the potential for the spread of disease from domestic sheep and goat species to desert bighorn sheep be addressed in the SRP permit?

1.7.3 Recreation

- How will SRP's be monitored?

- What qualifications must a SRP applicant have in order to be permitted?
- What performance standards does BLM have in place to monitor SRP holders?
- What mandatory criteria and terms will be established for an SRP application?
- What evaluation factors will be considered before the SRP is issued?
- What types of comprehensive evaluation system does BLM have in place to monitor SRP holders?
- How will BLM protect GSENM monument objects and values while allowing recreation permit uses?

1.7.4 Wilderness Study Areas

- How will Wilderness Study Areas (WSA) be affected by day or overnight use authorized by SRP permits?

1.8 Issues Considered but Eliminated from Further Analysis

Some issues brought up in internal and external scoping were considered, but eliminated from analysis based upon design features incorporated within the action alternatives. See the Interdisciplinary Team Checklist (Appendix A) for the full rationale for eliminating these resources from analysis.

1.9 Summary

This chapter has presented the purpose and need of the proposed project, as well as the relevant issues, i.e., those elements of the human environment that could be affected by the implementation of the proposed project. In order to meet the purpose and need of the proposed project in a way that resolves the issues, the BLM has considered and/or developed a range of action alternatives. These alternatives are presented in Chapter 2. The potential environmental impacts or consequences resulting from the implementation of each alternative considered in detail are analyzed in Chapter 4 for each of the identified issues.

2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION

2.1 Introduction

GSENM proposes two alternatives: a No Action and a Proposed Action alternative.

2.2 Alternative A – No Action

Under the No Action alternative, BLM would work to process SRP applications in accordance with applicable laws, policies and guidance, including a 180-day processing period. It is likely that the number of new SRP's issued would be limited because of workload required to process individual environmental analysis for each similar permit application.

2.3 Alternative B – Proposed Action

The proposed action would provide the BLM a more efficient process to authorize Special Recreation Permits (SRP's) within Grand Staircase – Escalante National Monument. The proposed action would allow BLM staff to be more responsive to current, future, and renewal SRP applicants.

The proposed action would address those commercial and organized groups providing services for day hikes, backpacking, mountain biking, hunting, bus and auto tours, ATV tours, outdoor educational courses, equestrian uses, photography, vending, fishing, weddings and other permitted uses under the BLM SRP regulations, 43 CFR 2930. Under the proposed action, GSENM would develop and update GSENM SRP forms, which include standard SRP stipulations, operating plan, pre-application checklist, SRP pre-evaluation and Annual Performance Evaluation forms. These forms are used as tools in the GSENM SRP application and post-season evaluation process. See Appendix B – F for the proposed SRP Application Evaluation, Special Recreation Permit (SRP) Stipulations, Operating Plan, Archaeological and Historic Site Etiquette, and Annual Performance Evaluation.

Permits would only be authorized where or when such uses would be compatible with GSENM objects and values, planning decisions, non-impairment to wilderness characteristic values in Wilderness Study Areas (WSA). All applications within WSAs and LWCs would be closely reviewed to determine whether the proposal meets the "non-impairment criteria". Permit requests for uses that would impair WSA or LWC lands would be denied.

The proposed action would address processing of all future SRPs, except for climbing, canyoneering, and wilderness therapy programs. This EA would allow GSENM to differentiate between long term and short term users for groups requiring a permit. Long term users would include operators who intend to work for multiple years. Short term users would be considered one time users and include many university, college and educational groups operating programs as well as civic organizations conducting organized trips. Many short term users charge fees and provide a service to their group members. The proposed action would allow GSENM to review uses annually, permit or deny those uses and collect fees for the use of public lands.

Adaptive Management

Adaptive Management is an ongoing management practice under the Proposed Action alternative. "Adaptive management, as defined here, is a formal process for continually improving management policies and practices by learning from the outcomes of operational programs and new scientific information. Under adaptive management, plans and activities are treated as working hypotheses rather than final solutions to complex problems. The process generally includes four phases: planning, implementation, monitoring, and evaluation (MMP, p. 70)." These phases are well established within GSENM. Based on the issues addressed in this environmental analysis, GSENM will evaluate and may make changes to SRP management practices

and stipulations based on 43 CFR 2932.56. GSENM will consider but not limit itself to the following actions when considering adaptive management for SRP holders:

Cultural

- Commercial visitation to cultural sites may be reduced or completely eliminated if it is determined that undue degradation to a site is occurring.
- O&G's may be required to sign up and complete training as an official site steward, depending on impacts and/or the significance of a cultural site.

Wildlife

- Western Association of Fish and Wildlife Agencies (WAFWA) Wild Sheep Working Group and Utah Division of Wildlife Resources (UDWR) periodically review and make recommendations for management of bighorn sheep habitat. These reviews and recommendations may require BLM to update the boundary area and buffer zones identified for bighorn sheep habitat. These updates may affect the future use of domesticated sheep and goats as pack animals in GSENM.

Recreation

- Allocations of use for O&G's may be established in the future if the demand for use of specific areas becomes too high or unnecessary resource damage occurs. This may include, but is not limited to: establishing a cap on outfitters in a recreational zone, seasonal or temporal limitations, limiting use in an area due to limits of social carrying capacity or acts of god and/or man, i.e. wild land fire.
- If human effluence becomes a resource concern, public health and safety issue, or affects water quality standards, O&Gs may be required to adopt new practices in order to mitigate potential impacts, such as use of Wag Bags or use of portable latrines.
- Civic organizations, such as church groups and Boy Scouts of America typically are not required to obtain an SRP if they stay within GSENM management plan prescriptions. The authorizing officer may determine an SRP is required for these groups based on planning decisions, resource concerns, potential user conflicts, unauthorized oversized groups or public health and safety issues.
- Guide-to-client ratios may be imposed if events or incidences occur that identify this need.
- Updates to the proposed action, including the forms and stipulations, may be made to achieve consistency with new national BLM policy.

Wilderness Study Areas

- Limitations on use may be imposed if the "non-impairment criteria" is not being met within a WSA.
- Long-term O&Gs may be asked to participate in "Leave No Trace" training or other educational training on mitigating resource impacts. These training would be offered to SRPs by the BLM.

2.4 Alternatives Considered, but Eliminated from Further Analysis

Commercial Climbing and Canyoneering – To date, BLM has not established climbing area plans within GSENM. BLM has identified climbing and canyoneering as an activity with specific complex issues and resource concerns that should be addressed through a separate planning process. In addition, wildlife biologists have identified the need to perform inventories in potential climbing areas in order to address any potential impacts to species, which would include Peregrine Falcons and Owls. Climbing and Canyoneering SRPs are not being considered under this EA.

Wilderness Therapy programs – Therapy programs using GSENM-administered lands for daily field operations generate a high number of user days increasing potential resource impacts and user conflicts. Therefore, a therapy program applying for an SRP on GSENM-administered lands, who's intent is to use GSENM lands as their primary land base for their operations, or the use on GSENM lands is greater than 25% of the operations total public land use, would require a separate NEPA evaluation be completed.

3.0 AFFECTED ENVIRONMENT

3.1 Introduction

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

3.2 General Setting

Grand Staircase – Escalante National Monument (GSENM) is located in Garfield and Kane Counties in south-central Utah. GSENM includes approximately 1.9 million acres with about 9,000 acres of private inholding. State Highway 12 traverses the northern portion of GSENM and US 89 provides access across the southern portion. The communities of Boulder, Escalante, Cannonville, Henrieville, Tropic, and Big Water are adjacent to GSENM. GSENM is bounded by Dixie National Forest, Capitol Reef and Bryce Canyon National Parks, and Glen Canyon National Recreation Area (Proclamation, 1996).

3.3 Resources/Issues Brought Forward for Analysis

3.3.1 Cultural

Cultural resources within GSENM consist of a wide variety of both historic and prehistoric sites. Prehistoric sites include such types as structural sites (generally Anasazi and Fremont storage or residential structures), camp locations, resource collection and processing locations, sheltered sites such as rock overhangs and shelters, rock art, artifact concentrations, and other sites related to prehistoric use of the landscape. Historic sites within GSENM are generally associated with pioneer settlement and early ranching operations. These include roads and trail systems,

structures (cabins, corrals, etc.), spring developments, historic signature panels, wooden troughs, burial locations, and mining related sites. Both historic and prehistoric sites are found across GSENM, in all land forms, geographic settings, and elevations. Prehistoric use is evident from at least 13,000 years ago to the early 1800s (the end of the prehistoric period), while historic sites generally date between the early 1800s to the mid-1900s. Prehistoric site densities can be as high as 80 or more sites/square mile, while historic site densities are considerably lower. Cultural resources also include Traditional Cultural Properties (TCPs). These can be recognizable historic or prehistoric sites, but may also include geographic locations or geologic features important to cultural groups and the perpetuation of their cultural beliefs and institutions. TCPs may or may not be recognized by non-members of any given cultural group, and it is important to consult with members of the various cultural groups to identify these sites and locations that might not be otherwise recognized by BLM specialists.

Regardless of site type or prehistoric/historic affiliation, all sites are considered potentially important. These sites are usually fragile by nature, and once damaged, cannot be returned to their original condition. Sites are also limited and irreplaceable; once a site has been lost, all potential scientific information from that site has also been lost. It is important to recognize that the loss of a site may be significant in a cultural context as well. Many Native American groups, for example, believe that archaeological sites are the “footprints” of their ancestors, and the loss of such a site, or artifacts within the site, is a loss of a direct tie to their past. Cultural resources are protected by a series of Federal laws, most notably the National Historic Preservation Act (NHPA) and the Archaeological Resources Protection Act (ARPA). These laws and related regulations detail how sites are to be recorded, evaluated, and if necessary, protected or otherwise mitigated.

GSENM has an active road cultural resource inventory program, with an emphasis on roads and trails used by SRP activities oriented towards ATV and 4x4 vehicle tours. Under this inventory program, at-risk sites are identified and measures (permit denial, road closure, road re-routing, data recovery, etc.) taken into consideration and applied as necessary.

3.3.2 Fish and Wildlife Excluding USFWS Designated Species

Desert Bighorn Sheep (*Ovis canadensis nelsoni*)

Bighorn sheep inhabit the most rugged and remote areas of GSENM. Topography is the primary source of cover for bighorns. Steep broken escarpments or rock outcrops with traversable terraces provides optimum escape cover. Bighorn sheep are adaptable foragers. Grasses have high importance, but a healthy mix of forbs and shrubs is also important. Males and females form separate herds throughout much of the year, but come together during the mating season. Mating season generally starts in October, but may initiate as early as July in some instances. Males fight aggressively for female approval, rising up on their hind feet and butting heads with tremendous force. Females give birth in May or June to usually one lamb. After parturition, females with lambs form separate herds and distance themselves from males until the following mating season (Burt 1952, Flinders 2002).

Historically, desert bighorn sheep were probably the most common big game animal inhabiting most of present-day GSENM. Evidence for this comes from numerous petroglyph panels and archaeological digs, as well as accounts from early explorers and settlers. When Father Escalante traversed this area in 1776, he noted in his diary “through here wild sheep live in such abundance that their tracks are like those of great herds of domestic sheep” (Rawley 1985).

The demise of the bighorn began occurring in the late 19th century, when white settlers began moving into the area. They hunted the sheep for meat and also brought their own domestic sheep and released them onto the rangelands. Competition for resources, shifts in vegetation, and new diseases carried by domestic sheep proved too much for the bighorn to handle and they died off in large numbers. By the 1960’s, only a few scattered bands remained of a once large herd (Shields 1999).

After the domestic sheep market declined drastically, most sheep ranchers sold their sheep and began running cattle. By the 1970’s, there were no domestic sheep grazing on what is now GSENM. The Utah Division of Wildlife Resources (UDWR) saw an opportunity to re-introduce bighorn sheep without the concern for large die-offs due to disease transmission from domestic sheep. Re-introductions began in 1975 when sheep from southeast Utah were captured and released in the Escalante Canyons. Additional releases occurred in the 1980’s in the Kaiparowits region and also along the Paria/Wahweap corridor. Releases have continued periodically since that time with the last release occurring in November 2009 when 21 bighorn from the Lake Mead area were released on Last Chance Creek.

The releases have been successful and bi-annual census counts from UDWR biologists show that the herds have increased steadily. The current population estimates and desired population numbers, as set by UDWR are shown in the following table:

Area	Current Population	Desired Population	Trend
Escalante Canyons	400	600	Up
Kaiparowits	200	350	Up
Paria/Wahweap	50	100	Stable

The Escalante and Kaiparowits herds can sustain hunting pressure and a total of 5-6 rams are harvested from these areas annually (UDWR Unit 26 Management Plan).

Evidence strongly suggests that domestic sheep/goats and native bighorn sheep are incompatible and should be separated. Instances where bighorn sheep have come in contact with domestic sheep have proven that in almost all instances, the bighorn sheep contract respiratory illness and pneumonia and subsequently die. In all cases, the domestic sheep remain healthy (Foreyt and Jessup 1982). Domestic goats have also been implicated in fatal disease transmission to bighorn sheep, as they also carry bacterial strains that have been identified in bighorn sheep disease events (Schommer and Woolever 2008). Genetic investigation strongly suggests that domestic goats have transmitted disease to native bighorn sheep (Jansen 2006). Although all ungulates except

llamas carry some strains of potentially harmful bacteria, domestic sheep and goats are more harmful to bighorn sheep as the species appear to be behaviorally attracted to one another and more likely to have direct contact (Foreyt 1995, Dixon 2002).

Due to the potential irreversible effects of disease to bighorn sheep populations, in 2007, the Western Association of Fish and Wildlife Agencies (WAFWA) Wild Sheep Working Group published the “Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat” (WAFWA 2007). Those guidelines clearly outline steps that should be taken by federal land management agencies to reduce conflicts between wild sheep and domestic sheep and goats. Some of the WAFWA findings include:

- The use of domestic sheep or goats as pack animals by hunters, anglers, and other recreational or commercial users that travel in identified wild sheep habitat **should be prohibited**
- Manage domestic sheep or goat grazing to achieve **effective separation**, reduce risk of association, and avoid range overlap with wild sheep
- WAFWA collectively believes that **effective separation** between wild sheep and domestic sheep or goats should be a primary management goal of state, provincial, or territorial agencies responsible for wild sheep management
- Domestic sheep or goats **should not concurrently share or occupy** the same range where conservation of wild sheep is a clearly-stated management goal
- Land management agencies responsible for domestic sheep or goat grazing allotments, trailing routes, vegetation management (e.g., weed control, enhancement of conifer regeneration), use as pack stock, or any other uses involving domestic sheep or goats should **only authorize such use outside of occupied wild sheep range** (WAFWA 2007)

Based upon WAFWA recommendations, the question becomes one of the degree or distance of separation. Because bighorn sheep move seasonally in search of the habitat requirements needed for survival, they roam great distances. Sub-adult males can roam great distances to seek out new territories and search for potential mates. The generally accepted buffer distance is a minimum of nine air miles from occupied bighorn sheep habitat. While not guaranteed to be perfectly safe, this distance takes into account the majority of seasonal movements and the potential for individual wanderers to come into contact with domestic sheep and goats that may be in the area (WAFWA 2007). This buffer distance is also in agreement with BLM Instruction Memorandum No. 98-140 which recommends the following action:

- Native wild sheep and domestic sheep or goats should be spatially separated to reduce the potential of interspecies contact . . . buffer strips surrounding native wild sheep habitat should be developed . . . Buffer strips could range up to nine miles (Instruction Memorandum No. 98-140).

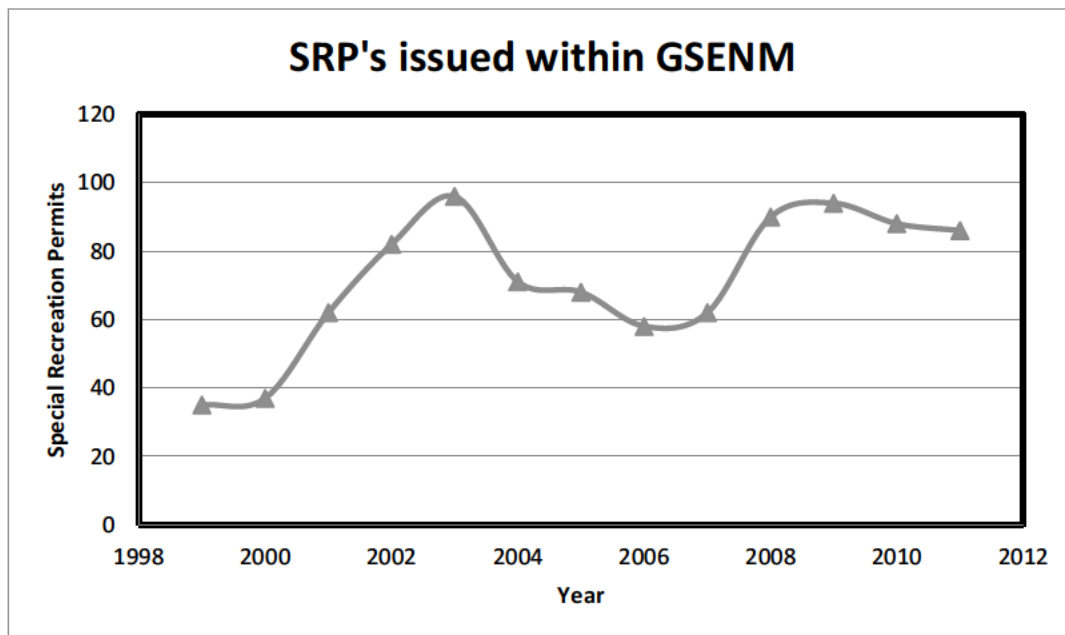
See Appendix G for a map of bighorn sheep habitat within GSENM.

3.3.3 Recreation

Within Kane and Garfield Counties, many recreational opportunities are available to local, regional, national and international visitors, which include general tourism, outdoor adventure, and enjoying natural scenic beauty, natural resources and national parks.

Special Recreation Permit (SRP) holders provide many services, including recreational and educational opportunities, to visitors traveling through the region. GSENM authorized 32 SRPs in 2000, 68 in 2005 and 87 in 2010, representing a 172% percent overall increase of SRPs issued from 2000 to 2010. In 2003, GSENM authorized 93 SRPs, the most SRPs authorized in any one year since the creation of GSENM. Figure 1 shows the trend of SRPs authorized between 2000 and 2010.

Figure 1, SRP's issued per year



Recreation Management Information System 2010

Within the past few years, permits have been authorized for the following activities: outfitting and/or guiding for hunting, hiking tours, vehicle tours, horseback trail rides, photography, backpacking and camping, wilderness therapy, outdoor education, fishing and ATV tours. The average demand for permits has increased by about five permits per year for the past ten years on GSENM.

SRP uses occur at any time during the year, but historically, most operators are working in GSENM during spring, summer and fall. Permits have not been authorized for uses that would not be compatible with planning decisions or BLM Manual 6330—Management of BLM Wilderness Study Areas or where impacts could not be

successfully mitigated. OHV use in WSAs is limited in accordance with the GSENM Travel Management Plan and the non-impairment criteria of BLM Manual 6330.

In 2011, GSENM reviewed all SRP holders authorized to work in GSENM, calculating a total of 85 current SRP holders. Existing SRP uses are clearly separated into two regions within GSENM. The North region includes the Escalante Canyons, Highway 12 Corridor and Fiftymile Mountain Special Recreation Management Areas (SRMA). The Southern region encompasses the Paria Hackberry, Paria Canyon and Plateaus, and Highway 89 Corridor SRMAs. The North region (Escalante Canyons SRMA) receives the highest use by SRP holders.

Eighty-two SRP files were reviewed to analyze the types and numbers of authorized activities occurring within GSENM administered lands. The current breakdown of SRP holders shows that thirty O&Gs (38%) are local operations which operate within the immediate area of the GSENM. Thirty-nine O&Gs (49%) are regional operations who travel two to eight hours to operate on the GSENM. Ten O&Gs (13%) are national operations and must drive greater than eight hours to operate on GSENM. Regional and national outfitters travel from Arizona, Colorado, California, Montana, Nevada, Idaho, Minnesota, Michigan, Wyoming, Oregon, New Mexico and Alberta, Canada. See Figure 2 for a breakdown of local, regional and national O&G authorized on the GSENM. Figure 3 identifies authorized activities within the GSENM.

Figure 2

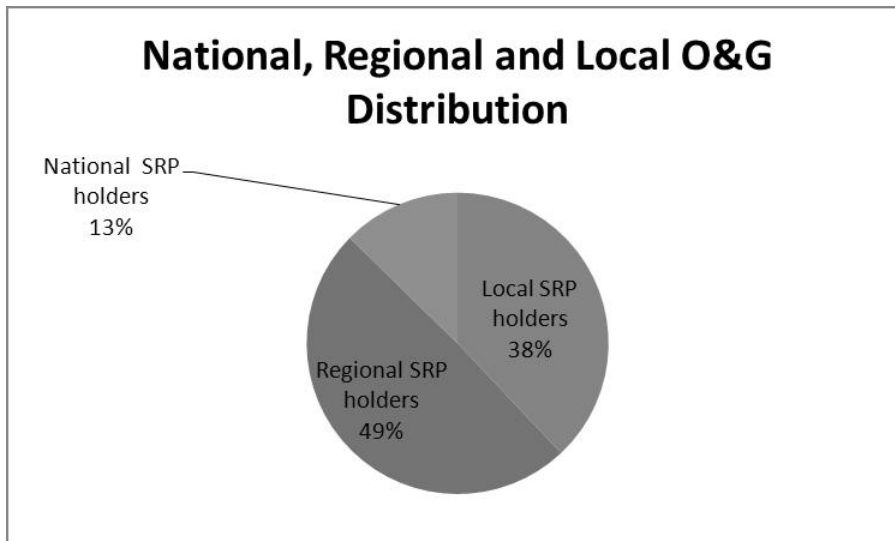
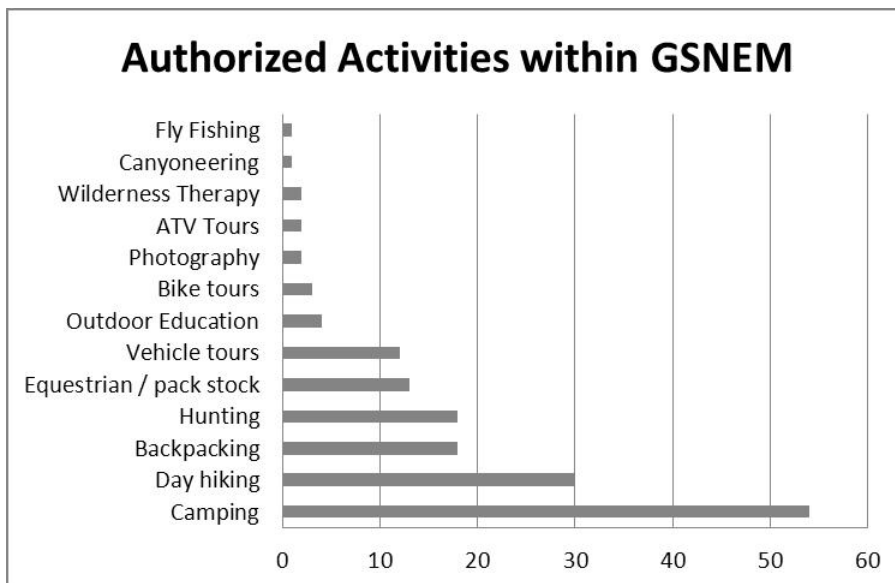


Figure 3



To analyze O&G uses, GSENM reviewed where SRP holders are authorized to operate within GSENM managed lands. Utilization of the seven Special Recreation Management Areas (SRMA) and Extended Recreation Management Areas (ERMA) established in the Monument Management Plan in conjunction with the 139 Recreation Permit Zones offers an understanding of where current SRP holders are authorized to operate. Based on the findings, O&G authorizations are concentrated in the Paria Hackberry SRMA and the Escalante Canyons SRMA. Table 1 focuses on Recreation

Permit Zones with ten or more authorized SRP's in the Paria Hackberry and Escalante Canyons SRMA.

Table 1

		O&G Use 2009	Gen Public 2009	Percentage of O&G use	O&G Use 2010	Gen Public Use 2010	Percentage of O&G use
Recreation Permit Zones	Paria Hackberry SRMA						
	Cottonwood Road	Unknown	52510		Unknown	46618	
	Cottonwood Passage / Narrows	115	391	29.41%	41	811	5.06%
	Paria River Corridor	293	2184	13.42%	433	699	61.95%
	Willis Creek	367	2021	18.16%	747	2458	30.39%
Recreation Permit Zones	Escalante Canyons SRMA						
	Calf Creek	233	24528	0.95%	210	20862	1.01%
	Dry Fork	131	16184	0.81%	66	8126	0.81%
	Death Hollow / Sand Creek†	91	1020	8.92%	91	873	10.42%
	Escalante River Gorge	66	2642	2.50%	117	2540	4.61%
	The Gulch	144	1433	10.05%	126	842	14.96%
	Hole-in-the-Rock Road	Unknown	52569		Unknown	50048	
	Phipps Wash*	93	660	14.09%	74	635	11.65%
		† Estimation of O&G use					
		* Estimation of use by general public					

Northern Arizona University (NAU) has conducted backcountry and dispersed monitoring on GSENM since 2001. Impacts monitored include access and social trial, fire scars, site capacity, litter, human waste, tree and shrub damage, rock damage; stream bank, ATV, climbing and mountain biking impacts. The monitoring reports address impacts as a whole and do not differentiate between O&G and general public use.

3.3.4 Wilderness Study Areas

Wilderness preservation is part of the BLM's mandate. Pursuant to this mandate, certain areas within the GSENM have been identified for wilderness review. The purpose of these areas, referred to as Wilderness Study Areas (WSAs), is to protect potential wilderness values until further study is completed, recommendations on their suitability for wilderness designation are made, and legislation takes effect to designate them as part of the National Wilderness Preservation System or release them from further study or protection (MMP, p. 62).

GSENM contains 16 WSAs, totaling approximately 881,997 acres, or about 47 percent of the BLM acres in GSENM. These WSAs were identified in a 1978-80 inventory as having wilderness character and thus, worthy of further study to determine their suitability for designation as part of the National Wilderness Preservation System (MMP, p. 62). Reviews of actions on WSAs are based upon policy contained within BLM Manual 6330 under the "non-impairment criteria".

The WSAs within the analysis area are: Burning Hills, Carcass Canyon, Death Ridge, Devils Garden, Escalante Canyons (tract 1), Escalante Canyons (tract 2), Fifty Mile Mountain, Mud Spring Canyon, North Escalante Canyons/The Gulch ISA complex, Paria-Hackberry, Phipps-Death Hollow, Scorpion, Steep Creek, The Blues, The Cockscomb, and Wahweap WSAs.

Three WSAs, Escalante Canyons, Phipps Death Hollow ISA and Paria Hackberry receive the highest use by the general public and Outfitter and Guides in GSENM. The Escalante Canyons WSA and Phipps Death Hollow ISA are located in the Escalante Canyon SRMA. During 2010, GSENM reported 162,625 total visits by the general public in the Escalante and Phipps Death Hollow WSAs. The Paria-Hackberry WSA is located in the Paria Canyons and Plateaus SRMA. During 2010, GSENM reported 112,475 total visits by the general public in this area. These total visitation numbers to the WSA are not specific to one location. Visitation numbers include trails, roads, destination locations, and campgrounds.

Table 1 represents a general comparison between general public visitation and O&G visitation in these locations. A full analysis comparing visitation is not available, based on the lack of available data. Based on this analysis, overall O&G visitation compared to general public use in these areas is low. Table 1 data has been compiled from RMIS reports and SRP Post Use Trip logs.

NAU compiled a report in 2010 to review backcountry monitoring reports between 2001-2009. An average of 112 sites were monitored each season and identifies that 0.81% of site have extreme impacts, 11.9% have heavy impacts, 36.5% have moderate impacts, 41.3% have slight impacts and 9.3% are not impacted. Appendix H & I provides two maps showing backcountry monitoring impacts.

Impacts have increased in these zones from 2001 to 2009. Based on the best available data at this time, it would be difficult to differentiate the resource impacts caused by the general public compared to O&Gs.

4.0 ENVIRONMENTAL IMPACTS

4.1 Introduction

As identified in Chapter 3, Cultural, Wildlife, Recreation and Wilderness Study areas will be analyzed. Each issue identifies current policies and procedures required by local, state and federal agencies. The proposed action incorporates design features in lieu of mitigation measures.

4.2 General Analysis Assumptions and Guidelines

Issues analyzed in this EA are addressed from a monument-wide approach. The extensive land base of GSENM, 1.9 million acres, necessitates issues brought forward to be analyzed on a broad scale.

Cultural and wildlife sections follow state and federal laws and policies and makes general determinations on environmental impacts. The cultural review is broad and outlines GSENM practices and assumptions, based on archaeologists experience working on GSENM lands. The wildlife issue addresses GSENM-wide concern regarding the interaction of bighorn sheep and domestic goats and sheep.

Recreation is also analyzed on a broad scale, following federal and state laws and policies. Data from O&Gs was compiled to review authorized uses for specific regions and areas within the GSENM. This data provides an understanding of where O&G use

occurs, as well as how it compares to general public use. The best available data has been provided in order to identify impacts to other recreational users.

4.3 Direct and Indirect Impacts

Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.

4.3.1 Alternative A – No Action

4.3.1.1 Cultural

Under the No Action alternative, visitation to cultural resource sites would continue under current policies and patterns. Visitors would continue to access sites of particular interest or chance upon sites while hiking or exploring GSENM. Monitoring of these sites would be accomplished by BLM personnel or the GSENM Site Stewards on an “as possible” basis, without the benefit of increased monitoring by any additional SRP holders that might come about from adoption of the Proposed Action alternative. Cultural educational and interpretive opportunities provided by the SRP holders would be limited to those SRPs already issued and those permits BLM would be able to process under the existing system. Cultural resource issues and etiquette discussions would continue at the annual training sessions for GSENM SRP holders, and cultural resource road inventories would continue, as per an “as needed” schedule.

4.3.1.2 Fish and Wildlife Excluding USFWS Designated Species

Desert Bighorn Sheep (*Ovis canadensis nelsoni*)

There are currently no stipulations in place to mitigate potential effects to desert bighorn sheep by permitted SRP actions. Under the No Action alternative, this would not change, meaning there would continue to be no protective measures to curb potential effects. Currently, there is one SRP holder who uses domestic goats as pack animals to carry supplies in and out of popular hiking areas. The potential exists for disease transmission from domestic goats to bighorn sheep, which could have detrimental impacts to individual bighorn sheep and possibly entire herds which become infected. Because contact between bighorn sheep and domestic pack goats is possible, this increases the risk of subsequent bighorn sheep mortality due to respiratory disease. Because bighorn sheep are gregarious animals, if one sheep contracts a disease, it is likely that the entire herd will suffer the effects and possibly adjacent herds that share habitat during certain times of the year. If an outbreak occurs, it could potentially devastate the bighorn sheep population that UDWR and GSENM have dedicated countless hours and money to restoring. In 1982 Foreyt and Jessup summarized several instances where catastrophic die-offs occurred to bighorn sheep after contact with domestic sheep. In one example, 43 out of 43 bighorn sheep (100%) died after confirmed nose-to-nose contact with domestic sheep at Lava Beds National Monument, California. In another case in Washington State, 13 out of 14 bighorn sheep (93%) died within weeks of close contact with domestic sheep. There are many other examples

demonstrating that the bighorn sheep and domestic sheep and goats cannot coexist without impacting bighorn sheep (Foreyt and Jessup 1982).

If such catastrophic die-offs were to occur on the GSENM due to disease transmission, tourists, hunters, outfitter/guides and the general public may lose the opportunity to view one of the icons of GSENM.

4.3.1.3 Recreation

The No Action alternative would require each SRP application to be analyzed individually. Processing separate environmental analysis for each application can take up to 180 days to process one SRP application, creating a backlog for processing applications. This would dramatically reduce the number of permits and recreational opportunities available to commercial and organized groups requiring an SRP. Ultimately, some applications would not be processed or they would be denied based on the GSENM inability to process applications in a timely manner, in accordance with BLM IM 2011-019.

Currently, GSENM has identified commercial operators and organized groups who conduct their trip without a permit when a permit is required. Backcountry and Law Enforcement Rangers do perform SRP compliance checks on O&Gs, although it is impossible to make contact with all authorized and unauthorized permit holders while they are operating on GSENM. In 2011, six commercial operations/organized groups were contacted who were operating on GSENM without a permit. It is known that some groups know they need a permit but still conduct their trips. Therefore, under the No Action alternative, illegal outfitting would likely continue, creating potential future impacts, reducing compliance with GSENM SRP management policies and potentially creating conflicts with authorized permit holders.

NAU monitoring has identified active fire scars, shrub damage, access trails and social trails as some of the greatest impacts identified on GSENM. Under the No Action alternative, GSENM would continue to monitor recreational impacts although GSENM would have limited ability to educate permitted user groups on proper backcountry ethics which may have adverse effects on the resource area. For example, improper disposal of human waste may adversely affect water quality or vandalism of a cultural site would affect the archaeological record.

4.3.1.4 Wilderness Study Areas

The No Action alternative would have no increase or decrease of uses in WSAs. Current use levels would likely remain the same, as it has for the past several years. WSAs receiving high visitation are located in easily accessible locations, such as Calf Creek Recreation Area (Phipps-Death Hollow ISA). These areas would not see decreases to visitation or impacts, due to the high numbers of visits by the general public. WSA impacts would therefore likely continue at current levels.

4.3.1.5 Monitoring and/or Compliance

Backcountry

- Backcountry patrols will be performed on a regular basis by BLM backcountry rangers. Monitoring reports will be entered into the backcountry database system and provide current and historical field reports to BLM staff evaluating SRP applications.
- NAU backcountry monitoring will continue to be a component of GSENM backcountry program. This monitoring program provides backcountry impact data which GSENM is able to use as a tool to review impacts to the resources area and make changes through adaptive management.
- Post-use reports and trip logs will be a requirement of the all SRP holders. This information provides BLM with the number of clients served annually, location of use areas and frequency of use in an area.
- An Outfitter and Guide Workshop will be held annually, providing education and interpretation in recreation, archeology, paleontology, wildlife and other scientific research occurring on GSENM.

4.3.2 Alternative B – Proposed Action

4.3.2.1 Cultural

Under the Proposed Action alternative, an increase in the number of SRP holders on GSENM, and associated numbers of clients and tours, would be expected. Some of these SRP holders may wish to visit archaeological and historical sites. While increased visitation to cultural resource sites would not initially appear to be in the best interest of the resource, we must consider the larger picture. GSENM hosts hundreds of thousands of visitors every year, but only a very small fraction of these visitors are clients of GSENM SRP holders. Overall, the increased visitation to cultural resource sites due to additional SRP holders would be negligible.

SRP holders generally take great ownership in the GSENM landscape, particularly with cultural resource sites they visit. GSENM SRP holders are encouraged to attend an annual workshop session in which cultural resource discussions are a regular feature. Our SRP holders tend to act as unofficial “Site Stewards” in that they monitor the sites each time they visit; they have the ability to visit sites more frequently than BLM personnel. Using the information provided at the SRP annual workshops, SRP holders act as educators regarding cultural resource issues. While an increase in visitation by additional SRP holders may initially seem counterproductive, it is anticipated that the benefit of extra monitoring and educational opportunities associated with guides informed about cultural resource site impacts and protection would outweigh potential negative effects of increased visitation.

A large source of impacts to cultural resource sites is unintentional, such as use of roads where sites are located. A small fraction of road and trail use within GSENM comes from SRP holders and their clients. Under the Proposed Action alternative, use of some of these roads and trails may increase, posing a slightly elevated rate of impacts to sites

found in roads and trails. The potential for a slight increase in SRP use of certain roads and trails under the Proposed Action alternative does not greatly add to GSENM concerns regarding cultural resource sites in roads and trails.

4.3.2.2 Fish and Wildlife Excluding USFWS Designated Species

Desert Bighorn Sheep (*Ovis canadensis nelsoni*)

Under the Proposed Action alternative, WAFWA and BLM IM 98-140 protective measures would be fully adopted and become a stipulation common to all SRP permits where pack animals are involved. The proposed stipulation reads as follows:

“To protect desert bighorn sheep from disease, domestic sheep or goats are not allowed as pack/companion animals within a nine mile buffer of mapped bighorn sheep habitat. Bighorn sheep habitat is mapped by UDWR and is subject to change as herds expand and move into previously unoccupied areas.”

By applying this stipulation, potential irreversible effects to desert bighorn sheep populations in the GSENM would be greatly reduced. The nine-mile buffer surrounding occupied bighorn sheep habitat would greatly reduce the possibility of domestic sheep/goats coming into contact with bighorn sheep and transmitting deadly disease. The herds should continue to grow and eventually meet the UDWR population objectives, as outlined in the affected environment chapter.

4.3.2.3 Recreation

Under the Proposed Action alternative, GSENM would likely see an increase in SRPs issued due to its ability to issue permits in a more timely manner. Nonetheless, use levels by O&Gs and organized groups, permitted and non-permitted, would likely remain the same. This is due to the fact that many groups requiring permits are not obtaining permits. The Proposed Action alternative would allow GSENM to educate and issue permits to groups like colleges, universities, and civic organizations that may not know they are required to obtain a permit. This would increase reported visitation numbers but is expected to increase compliance with GSENM management plan prescriptions, i.e. group size limits, fire restrictions, collection of GSENM monument objects, and promote resource protection. Issuance of SRPs is expected to increase more for regional and national operators, whereas issuance of SRPs for local operators is not expected to increase as fast as regional or national operators. Regional and national operators promote specialty trips and may visit GSENM two to three times annually. Overall, their use and impacts is less than a local guide who may operate five out of seven days each week during the summer. NAU back country and dispersed monitoring would continue and allow GSENM to make changes in policies and management direction. The adaptive management section in Chapter 2 identifies potential issues that may be addressed in the future.

4.3.2.4 Wilderness Study Areas

Under the Proposed Action alternative, WSAs would not see a great increase in use or an increase in impacts by O&Gs. O&Gs have a vested interest in protecting their use

areas so future and returning clients may have the same recreational experience as previous visitors. O&Gs are often the first to communicate resource issue they encounter. These encounters have provided BLM the necessary information to make important group contacts and in some cases issue citations for illegal actions. SRP holders also are required to report their trips including number of clients and guides, location and if there were issues encountered.

In the Proposed Action alternative, group size and location visits may be adjusted through the adaptive management process in order to better protect the wilderness experience of all users.

It is acknowledged that the presence of commercial groups may occasionally conflict with the wilderness experience of other individual users, i.e. opportunity for solitude. However, in order for many members of commercial groups to safely experience wilderness and the characteristics of wilderness, they choose to participate through a guided experience. The SRP holders have the potential to build constituency for the WSAs and help better protect wilderness character and resources and values over the long-term.

4.3.2.5 Monitoring and/or Compliance

- Backcountry patrols will be performed on a regular basis by BLM backcountry rangers. Monitoring reports will be entered into the backcountry database system and provide historical information to BLM staff evaluating SRP applications.
- NAU backcountry monitoring will continue to be a component of GSENM backcountry monitoring program. This monitoring program provides backcountry impact data, which GSENM is able to use as a tool to review impacts to the resource area and make changes through adaptive management.
- Post use reports and trip logs will be a requirement of all SRP holders. This information provides BLM with the number of clients served annually, location of use areas and the frequency of use in an area.

Outfitter and guides workshop will continue to be held annually, providing educational information on topics such as recreation, archeology, paleontology, wildlife, culture or other scientific information as well as Leave No Trace principles and other backcountry etiquette.

4.4 Cumulative Impacts Analysis

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

4.4.1 Cultural Resources

4.4.1.1 Cumulative Impact Area (CIA)

The CIA for cultural resources is the public land within the GSENM boundary.

4.4.1.2 Past and Present Actions

Past or ongoing actions that may affect cultural resources from the Proposed Action alternative or No Action alternative include:

- Use by the general public recreating on GSENM. These uses include dispersed hiking, camping, hunting, ATV use, and touring on GSENM roads.
- Grazing has occurred in the GSENM region for more than 100 years, actions include both active livestock grazing and grazing-related developments constructed in the past or in the process of construction or maintenance.
- Many developments have been constructed and maintained by BLM on GSENM to provide recreational, natural, and cultural benefits.
- Vegetation management activities include chaining, seeding, invasive plant removal and fire suppression.
- Rights-of-ways have been issued and are currently being evaluated within GSENM.
- Road maintenance within GSENM has been and will continue to be a regular activity.
- In addition to man-caused actions, natural erosion, fire and wildlife activities continue across GSENM.

4.4.1.3 Reasonably Foreseeable Action Scenario (RFAS)

The following scenarios identifies reasonably foreseeable future actions that would cumulatively affect the same resources in the cumulative impact area as the Proposed Action alternative and No Action alternatives.

- Use by the general public is expected to continue and increase in the foreseeable future. These actions include dispersed hiking, camping, hunting, ATV use, and touring on GSENM roads.
- Grazing activities are expected to continue on GSENM, but may be adjusted by actions related to a livestock management plan amendment process due to initiate in 2013.
- Other BLM developments to address recreational, natural and cultural resource needs are being evaluated and are expected to be proposed in the future.
- Invasive weed removal actions are expected to continue in GSENM, and are the subject of programmatic environmental analysis currently underway.
- Fire for resource benefits as well as suppression efforts are anticipated to continue within GSENM.
- Rights-of-way are expected to continue to be issued on GSENM.
- Road maintenance activities are expected to continue across GSENM and may be affected by current RS2477 litigation.

- Natural activities, including erosion, wildfire, and wildlife activities will continue on GSENM.

4.4.1.4 Cumulative Impact Analysis

The No Action alternative is expected to include different types of impacts that can have varying effects on archaeological sites. Grazing-related impacts are usually surface and near-surface effects such as trampling, artifact dispersal and damage, and disturbance of features such as structures, fire hearths, rock alignments, and artifact concentrations. These effects can be concentrated, such as along a stock trail, or dispersed across the site. Natural impacts, such as burrowing animals, can affect the deeper portions of a site, while erosion can affect widespread areas (sheet wash) as well as narrow, deep corridors (gully formation). While an issue of concern, wildlife and erosion in a general sense are natural, landscape-wide phenomena over which archaeologists have little control. Human-caused impacts are usually considered to be the most important impacts, in that they are generally more common than livestock impacts, tend to be destructive (e.g. roads, gravel pits, mineral exploration), and often target the most important elements of a site (looting, vandalism, artifact collection, defacing rock art). While all forms of adverse impacts are of concern to archaeologists, human-caused impacts are usually placed at the top of the list.

Combined with the actions discussed above related to the No Action alternative, additional SRP holders associated with the Proposed Action alternative may provide the potential for additional, guided access to cultural resource sites. However, visitation to GSENM is increasing regardless of the number of SRP holders, so this is essentially a minor issue in relation to overall man-caused impacts. SRP clients are generally not the type of persons who vandalize or knowingly impact cultural resource sites, but it is reasonably foreseeable that guided access to cultural resource sites can increase the awareness of cultural resource site importance and fragility. Educated clients will take this knowledge home with them, and possibly spread the knowledge elsewhere as well. While it is possible that increased SRP visitation could adversely impact sites in the long-term, design features and stipulations included within the Proposed Action alternative (including adaptive management) are expected to curtail adverse impacts. Therefore, it is expected that supervised SRP visitation and the associated education/interpretation would have a greater positive, counter effect. The impacts associated with the Proposed Action alternative and impacts from other projects and activities within GSENM are not expected to provide a large cumulative impact to cultural resources.

4.4.2 Fish and Wildlife Excluding USFWS Designated Species

Desert Bighorn Sheep (*Ovis canadensis nelsoni*)

4.4.2.1 Cumulative Impact Area (CIA)

The CIA for Fish and Wildlife encompasses the entirety of bighorn sheep habitat and potential habitat on GSENM, buffered by nine miles. This accounts for approximately 90% of GSENM.

4.4.2.2 Past and Present Actions

Past or ongoing actions that may affect Desert Bighorn Sheep from the Proposed Action alternative or No Action alternative include:

- In the past, areas of GSENM were heavily stocked with domestic sheep and are currently grazed by cattle.
- Bighorn sheep have been hunted for sustenance and for sport. These activities continue currently, managed by the Utah Department of Wildlife Resources (UDWR).
- The Kaiparowits region has immense coal reserves and prospecting/mining activities have taken place from early settlement times until the establishment of GSENM.
- There is presently one SRP holder using pack goats on GSENM.
- Mining is no longer allowed on GSENM and all domestic sheep grazing has been removed and is not likely to return.

4.4.2.3 Reasonable Foreseeable Action Scenario (RFAS)

The following scenarios identifies reasonably foreseeable future actions that would cumulatively affect the same resources in the cumulative impact area as the Proposed Action alternative and No Action alternatives.

- It is expected that Western Association of Fish and Wildlife Agencies (WAFWA) Wild Sheep Working Group and the UDWR will continue to promote healthy herd management and monitor bighorn sheep herds and habitat. Such actions as herd augmentations are expected to continue until herd objectives are met. There have been several proposals from UDWR to expand existing wildlife guzzlers in the Sunday Canyon and Little Valley areas of GSENM to insure a reliable water supply to wild sheep. As this herd continues to expand future recommendations regarding herd management and habitat boundaries may change.
- Hunting of bighorn sheep is expected to continue at low levels.
- Cattle grazing is a permitted use on GSENM and is expected to continue.
- The use of pack goats by SRP holders is expected to continue outside of the nine mile buffer zone for bighorn sheep habitat. This use will be adjusted utilizing adaptive management.

4.4.2.4 Cumulative Impact Analysis

The No Action alternative would include cumulative impacts from other bighorn-related activities that have occurred on GSENM and are expected to continue. Hunting bighorn sheep is allowed on GSENM at low levels which are sustainable; hunting is expected to continue. Cattle grazing occurs on GSENM and can have positive or negative effects. Water developments related to the cattle industry generally benefit bighorn sheep where water may be limited. Areas occupied by bighorn sheep are usually so rugged and

remote that cattle grazing appears to be a minor impact. In the past, domestic sheep directly competed with native sheep and introduced bacterial infections and diseases previously not found in the area. Subsequently, native sheep populations declined dramatically. Grazing domestic sheep no longer occurs on GSENM. Some areas where O&G pack goats are currently used are in or near occupied bighorn sheep habitat. This allows the potential for disease transmission from domestic goats to wild sheep which could have a devastating impact on individual sheep or populations. Although this is concerning, most of the past actions limiting the bighorn sheep herd are no longer a threat and the wild sheep herd is expected to continue to grow at a slow to moderate rate until herd objectives are met.

With the application of the Proposed Action alternative, design features in the SRP stipulations address current use of goats as pack animals in bighorn sheep habitat. The Proposed Action alternative includes a stipulation that should fully protect wild sheep from disease transmission from domestic sheep or goats, allowing this herd to reach full potential. Disease transmission is currently the most menacing remaining impact. The impacts associated with the Proposed Action and impacts from other projects and activities within GSENM are not expected to provide a large cumulative impact to bighorn sheep.

4.4.3 Recreation

4.4.3.1 Cumulative Impact Area (CIA)

The CIA for recreation consists of the entire GSENM, as recreation-related activities exist across almost the entire GSENM.

4.4.3.2 Past and Present Actions

Past or ongoing actions that may affect recreation from the Proposed Action alternative or No Action alternative include:

- Use by the general public has increased since 1996. These actions include dispersed hiking, camping, hunting, ATV use, and touring on GSENM roads. The creation of GSENM in itself created an increase in public and organized recreational use.
- Grazing has historically occurred on GSENM. User conflicts with grazing and recreational users have been identified through verbal and written comments to GSENM.
- BLM developments that address recreational, natural and cultural resource needs have been evaluated for past and future actions.
- Organized trips by oversized groups (>12) unknown to, nor authorized by BLM has occurred and continues to occur. Much of this use has been from groups such as colleges, universities and civic organizations i.e. church groups and Boy Scouts of America. Many of these groups exceed group size requirements or hold a duty of care to participants and therefore legally require an SRP.
- Past and present SRP use, including commercial and noncommercial use.

- Intensive use of specific recreation sites on GSENM, such as Calf Creek, Dry Fork, and Willis Creek.
- Legal and illegal OHV use.
- Transportation management and maintenance has and will continue to occur on GSENM.
- Wilderness Therapy Programs currently operate on GSENM.

4.4.3.3 Reasonable Foreseeable Action Scenario (RFAS)

The following scenario identifies reasonably foreseeable future actions that would cumulatively affect the same resources in the cumulative impact area as the Proposed Action alternative and No Action alternatives.

- Use by the general public is expected to continue and increase in the foreseeable future. These actions include dispersed hiking, camping, hunting, ATV use, and touring on GSENM roads.
- New recreational developments across GSENM. These include:
 - Nephi Pasture Trailhead improvements
 - Dry Fork Trailhead improvements
 - Dance Hall Rock improvements
- Hole-in-the-Rock Corridor Management Plan has been identified as a possible future planning effort.
- Grazing activities are expected to continue on GSENM, but may be adjusted by actions related to a livestock management plan amendment process due to initiate in 2013.
- Natural activities, including erosion, wildfire, and wildlife activities will continue on GSENM.
- Garfield and Kane Counties assertions on R.S. 2477 roads within GSENM. Hole-in-the-Rock, Cottonwood and Skutumpah Roads are included in the lawsuit and are primary access roads to the Escalante and Paria Hackberry areas.
- Garfield County has approach BLM about paving the Hole-in-the-Rock Road.
- It is anticipated that new Wilderness Therapy programs will be interested in operating on GSENM. Environmental analysis would need to be completed for new applications.

4.4.3.4 Cumulative Impact Analysis

The No Action alternative would include cumulative impacts from other activities that have occurred on GSENM. Tourist and recreational use on GSENM has become the predominant use of GSENM lands and is expected to grow. Past, present and reasonably foreseeable future actions will continue although these actions have varying effects on recreational use. For instance, road maintenance allows for easier access to recreational destinations yet greater use often leads to increased resource impacts. Also, GSENM's

current inability to process SRP applications for various user groups does not reduce visitation numbers; it does limit GSENM ability to educate user groups on standard SRP policies, monument objects and values, and GSENM ability to track and manage resource use.

The Proposed Action alternative would also see increased use by all user groups. Future allocations of use may be required for some areas in GSENM and is identified in the adaptive management section.

Adjudication of R.S. 2477 roads would not create an immediate increase of visitation to GSENM lands. Court decisions on maintenance and improvements to adjudicated R.S. 2477 roads may affect future recreation visitation requiring BLM to address specific resource concerns. Paving of secondary roads, i.e. Hole-in-the-Rock Road would increase visitation and provide easier access to all visitors. Paving this road would increase visitation to all areas along the road and may increase resource impacts and provide a negative impact on the visitor experience.

O&Gs promote and are a component of increased recreational opportunities. They offer services for tourists and provide a recreational and educational experience to their clientele. Supply and demand may limit new local O&Gs due to the operating season as well as other established businesses holding market share. It is anticipated that regional and national O&G SRPs will grow because the GSENM is an additional area that provides new destinations for their clientele. Overall cumulative impacts would affect the recreational experience for many visitors; authorized SRP groups would have a minimal effect considering the general public is the primary user group.

4.4.4 Wilderness Study Areas

4.4.4.1 Cumulative Impact Area (CIA)

The CIA for Wilderness Study Areas consists of all WSAs within GSENM, as WSA-related activities exist across 47% of GSENM.

4.4.4.2 Past and Present Actions

Past or ongoing actions that may affect WSAs from the Proposed Action alternative or No Action alternative include:

- Wilderness Study Areas within GSENM where established in November 1990.
- WSAs are monitored annually as identified in section 201 of FLPMA.
- Grazing and maintenance of existing range improvements is permitted within WSAs.
- Recreational activities such as hiking, backpacking, equestrian, and pack stock use occur within WSAs.
- WSAs have been, and will continue to be managed based on non-impairment criteria as outlined in BLM Manual 6330.
- Climbing bolts have been placed in WSAs even though this is in conflict with BLM Manual 6330.

4.4.4.3 Reasonable Foreseeable Action Scenario (RFAS)

The following scenarios identifies reasonably foreseeable future actions that would cumulatively affect the same resources in the cumulative impact area as the Proposed Action alternative and No Action alternative.

- Monitoring of WSAs will continue until Congress determines wilderness suitability for these areas.
- Grazing and range improvements maintenance will continue within WSAs.
- Recreational activities such as hiking, backpacking, equestrian, and pack stock use will continue to occur within WSAs. WSAs will be managed based on non-impairment criteria under BLM Manual 6330.
- It is anticipated that climbers will unknowingly and knowingly install climbing bolts in WSAs even though this is prohibited in BLM Manual 6330. GSENM has identified the need to develop a climbing management plan.

4.4.4.4 Cumulative Impact Analysis

Cumulative impacts in the No Action alternative may have impacts on WSAs. Cattle ranching will leave noticeable impacts on the ground. Cattle eat vegetation, create paths to water sources and seek shade under trees which in turn creates impacts. Cattle ranching is also a historical use in this region of the state.

Recreational use has increased in all WSAs on GSENM. People recreating within WSAs also create impacts on the ground. Hikers and backpackers hike and create trails, disturb vegetation when camping, and impact monument objects and values by their presence. Backcountry monitoring will continue as a social science component on the monument. Visitation is not likely to change in WSAs.

Cumulative Impacts in the Proposed Action alternative would be much the same as the No Action alternative. However, GSENM would increase its ability to issue more SRP's to commercial and organized groups who recreate in WSAs. This would allow GSENM the opportunity to better educate SRP user groups about monument objects and values. It would allow BLM to manage and track these uses to better managed WSA-designated lands. The percentage of SRP use in most WSAs on the GSENM is minimal as compared to general public and other permitted uses.

5.0 CONSULTATION AND COORDINATION

5.1 Introduction

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

5.2 Persons, Groups, and Agencies Consulted:

Table 5-1

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

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Jim Buchanan, Research Coordinator Utah Office of Tourism	Obtain visitation numbers for federal properties within the region.	Information provided and included within analysis
Ken Gottzen berg, Director Kane County Office of Tourism and Film Commission	Review EA for county plan consistency	Comments related to processing times, scope of analysis, cultural monitoring, and increased tourism within the area. Document was clarified to address concerns.
Brian Bremner, Engineer Garfield County	Review EA for county plan consistency	Comments related to coordination with county, bighorn sheep restrictions, tourism numbers, motorized recreation, lands with wilderness characteristics terminology, and consistency with county plan resource directives. Document was clarified to address concerns.

5.3 Summary of Public Participation

During preparation of the EA, the public was notified of the proposed action by posting on the Utah Internet Homepage on December 15, 2010. The process used to involve the public included a letter to interested parties which included SRP holders, environmental groups, state senators and representatives, area residents and county, state, tribal and federal governments. Approximately ten letters were received in response to the scoping period.

On August 23, 2012 BLM posted the Draft EA and FONSI to ENBB for public review. Public review closed September 23, 2013; four comment letters were received containing 16 individual comments. Comments proposed other elements to be added to the purpose and need, stipulations, and evaluation criteria. Minor edits to language within the EA were performed to clarify the scope of analysis, stipulations, and evaluation process.

5.4 List of Preparers

Table 5.4 List of Preparers

5.4.1 BLM

Name	Title	Responsible for the Following Section(s) of this Document
Jabe Beal	Outdoor Recreation Planner	Project lead, Recreation section, WSA sections.
Joe David	Environmental Coordinator	NEPA compliance, overall document review
Cameron McQuivey	Wildlife Biologist	Wildlife section
Matthew Zweifel	Archaeologist	Cultural Resources
Aaron Curtis,	BLM Utah State Office Recreation Lead	Overall document review

6.0 REFERENCES, GLOSSARY AND ACRONYMS

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6.2 List of Acronyms

BLM - Bureau of Land Management

CIA – Cumulative Impact Area

EA – Environmental Assessment

FLPMA – Federal Land Policy and Management Act

GSENM – Grand Staircase – Escalante National Monument

ISA – Instant Study Area

LWC – Lands with Wilderness Characteristics

NAU – Northern Arizona University

O&G - Outfitter and Guides

FRAS – Future Reasonable Action Scenerio

SRMA – Special Recreation Management Area

SRP – Special Recreation Permit

UDWR – Utah Division of Wildlife Resources.

USFWS – United States Fish and Wildlife Service

WAFWA - Western Association of Fish and Wildlife Agencies

WSA – Wilderness Study Areas

GSENM Programmatic SRP EA DOI BLM UT 0030 2011 0002 EA

Environmental Analysis

APPENDICES**APPENDIX A****INTERDISCIPLINARY TEAM CHECKLIST****Project Title:** Programmatic EA for Special Recreation Permits on GSENM**NEPA Log Number:** DOI BLM UT 030 2011 0002 EA**File/Serial Number:** DOI BLM UT 030 2011 0002 EA**Project Leader:** Jabe Beal**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.

Determination	Resource	Rationale for Determination*	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H 1790 1)				
NI	Air Quality (Norman)	The permitted recreational activities would result in minimal surface disturbance. Any particulates generated would be quickly dispersed and non measurable.	/s/ J. Norman	12/16/11
NP	Areas of Critical Environmental Concern	No ACEC are located within the project area.	/s/ J. Beal	12/20/11
NI	Biological Soil Crusts (Anderson)	No foreseeable impacts beyond current level	K Anderson	14 Dec 2011
NP	BLM Natural Areas	No Natural Areas are located within the project area.	/s/ J. David	11/29/11
PI	Cultural Resources (Zweifel)	As discussed in the EA, more control over the SRP process and the use of SRP holders as Site Stewards and the potential for public education and interpretation will be beneficial to cultural resources.	/s/ M. Zweifel	05/15/12
NI	Greenhouse Gas Emissions (Norman)	The permitted recreational activities would result in minimal vehicle emissions on an occasional basis over a large area. The emissions would disperse quickly and are non measurable.	/s/ J. Norman	12/16/11
NP	Environmental Justice	According to the EPA Region VIII, State of Utah, Environmental Justice Map, the region has been categorized as a minority population area of 0 10% and a poverty population area of 10 20%. No minority or economically disadvantaged communities or populations are present which could be affected by the proposed action or alternatives. (see http://epamap14.epa.gov/ejmap/entry.html , 11/29/11).	/s/ J. David	11/29/11
NP	Farmlands (Prime or Unique)	No Prime or Unique Farmlands exist within the project area. (see http://www.ut.nrcs.usda.gov/technical/nri/1997resultscropland .)	/s/ J. David	11/29/11
PI	Fish and Wildlife Excluding USFW	Under the No Action Alternative, the potential exists for impacts to wild bighorn sheep. Currently, there is one SRP	/s/ C. McQuivey	12/19/11

GSENM Programmatic SRP EA DOI BLM UT 0030 2011 0002 EA

Environmental Analysis

Determination	Resource	Rationale for Determination*	Signature	Date
	Designated Species (McQuivey)	holder who uses domestic goats to pack tourists into the back country. The potential exists for disease transmission to wild bighorn sheep. The Proposed Action includes stipulations to mitigate any potential impact to general wildlife species. A special stipulation to avoid bighorn habitat by nine miles was added and if adhered to, should fully mitigate any potential impacts.		
NI	Floodplains (Norman)	The proposed stipulations in the SRP permitting process should be adequate to mitigate any potential impact to floodplains.	/s/ J. Norman	12/16/11
NI	Fuels/Fire Management (Madril)	The proposed stipulations contained in the appendices will adequately mitigate any need for further analysis in the EA. Fuels are present but should not be affected. Existing monument fire units specify any wildland fire suppression for areas within the monument.	/s/ Richard D. Madril	1/5/12
NI	Geology / Mineral Resources / Energy Production (Titus)	Scale and scope of proposed action would not impact known producing mineral and energy leases or affect energy corridors and inactive leases. Because collecting is illegal in GSENM, commercial guiding activities would not significantly impact on the ground resources such as petrified wood or moki marbles. Outfitters would ensure that damage to rock formations by climbing, vandalism, etc., would not occur.	/s/ Alan Titus	12/19/11
NI	Hydrologic Conditions (Norman)	The proposed stipulations in the SRP permitting process should be adequate to mitigate any potential impact to hydrologic conditions.	/s/ J. Norman	12/16/11
NI	Invasive Species / Noxious Weeds (Hughes)	The proposed stipulations in the SRP permitting process should be adequate to mitigate any potential impact to invasive plant species. In the SRP stipulations, there is language in regards to avoid the spread of weeds, i.e. weed free hay and not cleaning trailers/truck beds on the Monument.	/s/ A. Hughes	12/21/11
NI	Lands/Access (Wolfe)	The issuing of SRPs would have no impacts to lands or access as the action does not convey any possessory rights and are temporary in nature.	/s/H. Wolfe	12/5/11
NI	Livestock Grazing (S. Stewart)	Routine SRP administration and monitoring, combined with mitigation measures contained in the EA, sufficiently address potential impacts to livestock grazing and are adequate to mitigate potential impacts to the livestock grazing program.	/s/S. Stewart	1/9/12
NI	Migratory Birds (McQuivey)	The permitted recreational activities would result in minimal impacts to <i>individual</i> Migratory Birds on a rare and infrequent basis and over a vast area. However, the permitted activities would not cause measurable impacts to Migratory Bird <i>populations</i> as a whole. The disturbance mechanisms would be of short duration and would cause no measurable impact.	/s/ C. McQuivey	12/19/11
NI	Native American Religious Concerns (Zweifel)	This proposal will be included in the annual 2012 GSENM Native American consultations, but due to the positive aspects of this proposal for cultural resources, and due to a lack of impacts to Native American religious concerns no negative comments are anticipated.	/s/ M. Zweifel	05/15/12
NI	Paleontology (Titus)	Fossil resource sites are not generally destinations for SRP authorized activity and those well known sites that are (e.g. Wolverine Petrified Wood area or Oyster Shell Reefs) are not significantly impacted by permit holders or clients since collecting is illegal.	/s/Alan Titus	12/13/11

GSENM Programmatic SRP EA DOI BLM UT 0030 2011 0002 EA

Environmental Analysis


Determination	Resource	Rationale for Determination*	Signature	Date
NI	Rangeland Health Standards (S. Stewart)	The proposed stipulations in the SRP permitting process are adequate to mitigate any potential impact to Rangeland Health Standards including standards for hydrology, vegetation and soil. Routine monitoring and administration of the SRP permit would identify and address any high use areas where action needs to be taken.	/s/S. Sean	1/4/12
PI	Recreation (J. Beal)	Recreation will be analyzed in the EA.	/s/ J. Beal	7/31/2012
NI	Socio Economics (David)	Proposed action will have an impact on economics of individual guides and outfitters, but impacts are expected to be negligible beneficial impacts in the context of the whole SRP program within the GSENM region. Social impacts as a result of the proposed action are not likely to be noticeable, as the SRP program is well established within GSENM and accepted within local communities.	/s/ J. David	11/29/11
NI	Soils (Norman)	The proposed stipulations in the SRP permitting process should be adequate to mitigate any potential impact to soils.	/s/ J. Norman	12/16/11
NI	Threatened, Endangered, Candidate Plant Species (Anderson)	Three T & E plant species are recognized on the monument. There are currently no known impacts from SRP activities affecting any of the three species. Should SRP activity be proposed for a T or E plant species site, mitigation measures would be applied. Currently, there are no issues identified that cannot be resolved through the permitting process.	K Anderson	14 Dec 2011
NI	Threatened, Endangered or Candidate Animal Species (McQuivey)	Three T & E animal species are recognized on the Monument. There are currently no known impacts from SRP activities affecting any of the three species. Should SRP activity be found to cause potential impacts to T & E animal species, mitigation measures would be applied through the permitting process and on a case by case basis. Currently, there are no issues identified that cannot be resolved through the permitting process.	/s/ C. McQuivey	12/19/11
NP	Wastes (Hazardous or Solid) (Pierson)	There are no hazardous wastes or solids associated with this project.	/s/ B Pierson	12/5/11
NI	Water Resources/Quality (drinking/surface/ground) (Norman)	The proposed stipulations in the SRP permitting process should be adequate to mitigate any potential impact to water quality.	/s/ J. Norman	12/16/11
NI	Wetlands/Riparian Zones (Anderson)	Distance from water/riparian areas are addressed in SRP permit.	K Anderson	14 Dec 2011
NI	Wild & Scenic Rivers (Beal)	Authorization of SRPs would not affect river section suitability or the BLM's recommendation to Congress to add river sections into NWSRS.	/s/ J. Beal	12/20/11
PI	Wilderness Study Areas (Beal)	Analyzed within EA	/s/ J. Beal	12/20/11
NI	Woodland / Forestry (Bate)	SRP activities would not impact forestry and woodland resources on the Monument.	/s/ A. Bate	1/11/12
NI	Vegetation Excluding USFW Designated Species (Hughes)	There are 9 BLM special status plant species that exist on the Monument. Currently there are no known impacts to any of these species from SRP activities. Should an SRP be proposed within one of these sites, mitigation measures would be applied.	/s/ A. Hughes	12/21/11
NI	Visual Resources (Angus)	SRP operations as described would not allow the activities that would alter the characteristic landscape (i.e. constructing a structure or removal of rock or areas of vegetation) thus there would be no visual impacts from issuing SRPs per this analysis.	/s/A. Angus	12/16/2012

GSENM Programmatic SRP EA DOI-BLM-UT-0030-2011-0002-EA

Environmental Analysis

Determination	Resource	Rationale for Determination*	Signature	Date
NP	Wild Horses and Burros (S. Stewart)	There are no active WHMAs on GSENM administrated lands.	/s/S. Stewart	1/4/12
NI	Lands with Wilderness Characteristics (Beal)	The Proposed Action identifies that authorization would need to meet the "Non-impairment Criteria" for WSA and LWC lands. Use of LWC lands does not constitute a significant issue or impact to be analyzed in detail. Current land planning process does not preclude short term uses of LWC lands nor would it reduce or eliminate protection of LWC lands for future SRP authorizations. Authorization of SRPs in LWC would not in itself produce a net loss of LWC lands. Currently GSENM has 26 LWC areas with 465,025 acres, a review of these lands would be economically infeasible (H-1790-1, p.52) for this EA.	/s/ J. Beal	12/16/11

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	/s/ Joseph David	10/10/12	
Authorized Officer		10/11/2012	

APPENDIX B**Application Evaluation Form**

**United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Grand Staircase-Escalante National Monument
669 South Hwy 89A, Kanab, UT 84741**

**SPECIAL RECREATION PERMIT
APPLICATION EVALUATION FORM**

This form provides for both a qualitative and quantitative evaluation of Special Recreation Permit (SRP) applications. Using this form the Monument will review, evaluate and compare applicants. Those applications that comply with the "application review criteria" identified in the Monument SRP Policy will be accepted (possibly with modifications).

Applicant Name:

Application Assigned Number:

Evaluator:

Date:

QUALITATIVE EVALUATION

1. APPLICATION DEADLINE

- A. One time user, organized group, or special event has submitted all application materials 180 days prior to the start date of their proposed use? ☐ Yes ☐ No
- B. Multi year user has submitted all application materials by close of business, January 31 for the upcoming use season ☐ Yes ☐ No

A “**one-time user**” is defined as a commercial user required to obtain a SRP, who intends only to operate in the Monument once in a single year, not to exceed 14 days and not return for a time period of three years.

A “**multi-year user**” is defined as a commercial user required to obtain a SRP, who intends to operate in the Monument multiple times in a single year, or in consecutive years.

2. APPLICATION MATERIALS

A. Special Recreation Application Form (2930-1), completed and signed.☐ Yes ☐ No

Operating Plan Form, completed and signed.

☐ Yes ☐ No

Detailed topographic map(s) showing travel routes, primary use areas, camp locations, archaeological, cultural and paleontological sites planning to visit, temporary facilities, cache locations, staging facilities, parking areas and any private, State or agency administered public lands used in the proposal. Applicants must use U.S. Geological Survey 1:24,000 or 1:100,000 scale topographic maps, or BLM Special Edition 1:100,000 scale topographic maps.

☐ Yes ☐ NoEvidence of permission to use private, State, or other agency administered public lands. ☐ Yes ☐ No

If all application materials have not been submitted, or if incomplete information has been provided, the permit application is denied or returned to the applicant for completion.

3. COMPLIANCE HISTORY**A. Applicant has demonstrated, through their operating plan, that they are in compliance, and/or have a history of compliance, with local, State and Federal laws and regulations in connection with the proposed activity?**☐ Yes ☐ No If no, provide reason:

If applicant has not demonstrated their operation would be in compliance, or they have a history of noncompliance with local, State and Federal regulations, the application may be denied.

4. SAFETY AND SAFETY HISTORY**A. Applicant has demonstrated, through their operating plan, safety measures to be applied and/or a history of providing a reasonable level of safety for clients. ☐ Yes ☐ No If no, provide reason:**

If the applicant has a history of not providing a reasonable level of safety for

clients, the application may be denied.

5. COMPLIANCE WITH MONUMENT SRP POLICY, STIPULATIONS AND MANAGEMENT PLAN

- A. Applicant has demonstrated, through their operating plan that their proposed activity is consistent with current Monument SRP Policy, Stipulations and the Monument Management Plan? ☐ Yes ☐ No If no, provide reason:

If an inconsistency is identified, the application may be denied or accepted with modifications, i.e., group size.

6. CONFLICTS

- A. Conflicts currently exist, or would potentially occur as a result of permitting the proposed activity? Conflicts could include but are not limited to: 1) use levels during specific time periods or overall, 2) unacceptable resource impacts and, 3) Monument inability to properly monitor an activity and/or enforce regulations. ☐ Yes ☐ No If yes, provide reason:

If a conflict is identified the application may be denied, or accepted with modifications, i.e., time and location of activity.

QUANTITATIVE EVALUATION

1. EXPERIENCE

A. Work experience in leading the proposed activity?

Yes ☐ (please describe) No ☐ If No, what training has been completed or work experience shows the applicant is taking initiative to lead the proposed activities?

Directly related work experience entails successfully operating a commercial guiding business, or leading organized groups in similar activities for a time period of two years. Indirectly related work experience entails working for a commercial guiding business, assist in leading organized groups in similar activities, or owning or managing another type of business.

B. Experience in offering similar activities within a remote desert, or other extreme environment?

Yes ☐ (please describe below) No ☐ If No, what training has been completed or work experience shows the applicant is taking initiative to lead the proposed activities?

Directly related experience entails leading similar activities within a remote desert environment. Indirectly related experience entails leading similar activities within another extreme environment, i.e., alpine tundra. Not related experience entails not leading similar activities in a remote desert or extreme environment, or leading similar activities in an unrelated environment, i.e., tropical forest.

C. Education and training experience?

Yes ☐ (please describe below) No ☐ If No, what training has been completed or work experience shows the applicant is taking initiative to lead the proposed activities?

Directly related experience entails having education or training related to public safety or resource protection, i.e., Leave No Trace, TREAD Lightly!, Guide Training School, Standard First Aid Training, Wilderness First Response Training. Indirectly related experience entails having education or training that will assist in providing education/interpretation of Monument resources: geology, biology, paleontology, archaeology, history.

2. INTERPRETATION/EDUCATION

A. Extent to which interpretation/education of Monument resources (geology, biology, paleontology, archeology, history) will be incorporated into the proposed activity?

Yes ☐ (please describe below) No ☐ If No, what training has been completed or initiative shows the applicant is taking to lead the proposed activities?

Thoroughly incorporated is accomplished when an applicant has made interpretation/education of Monument resources the focal point of their proposed activity, i.e., archaeology trip. Moderately incorporated is accomplished when an applicant has incorporated interpretation/education of Monument resources into their proposed activity, i.e., backpacking trip that will include interpretation/education of native plants.

RESULTS OF EVALUATION ☐ Approved ☐ Denied If denied, identify reason(s):

Applicant has been notified in writing of their conditional approval and required to meet the conditions outlined below prior to their Special Recreation Permit being authorized. ☐ Yes ☐ No

Date notified:

- A. Provide a copy of insurance certificate. ☐ Yes ☐ No
- C. Provide a signed copy of GSENM SRP Stipulations. ☐ Yes ☐ No
- D. Commercial permittees provide the minimum pre-season fee of \$100.00 and the balance of 3% anticipated gross revenues if greater than the \$100.00 fee already paid. ☐ Yes ☐ No
- E. Organized group and special event permittees provide the balance of charges by applying the \$5.00 per person per day fee to the estimated number of persons and days they propose to operate on the Monument. ☐ Yes ☐ No
- F. If Applicable provide copies of Food Safety Manager Certification and Food Handlers Card(s) from the Southwest Utah Public Health District Office. Any commercial permittee directly preparing meals for customers is required to have one Certified Food Safety Manager, and a Food Handler Card(s) for any person(s) assisting in food preparation or cleanup. ☐ Yes ☐ No
- G. Provide a copy of American Red Cross Standard First Aid and CPR Training Cards (or their equivalent) for all authorized representatives working with customers in the field. ☐ Yes ☐ No
- H. Provided a copy of commercial filming permit. ☐ Yes ☐ No
- I. Combine SRP and film permit. ☐ Yes ☐ No

All conditions listed above have been met. ☐ Yes ☐ No
 If no, conditional approval is revoked and applicant must reapply or resubmit their application and operating plan.

*Appendix C**SRP Stipulations*

**United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Grand Staircase-Escalante National Monument
669 South Hwy 89A, Kanab, UT 84741**

SPECIAL RECREATION PERMIT (SRP) STIPULATIONS

GENERAL

- 1) Permittee shall follow all procedures and requirements set forth in the Utah SRP Policy.
- 2) Permittee shall comply with all stipulations listed on the back of Form (2930-1).
- 3) For “multi-year” SRP’s, two consecutive seasons of nonuse may result in cancellation of the SRP and would require the permittee to apply for a new SRP.

APPLICABLE LAWS AND REGULATIONS

- 1) The permittee shall comply with all Federal, State, and local laws, ordinances, regulations, orders, postings, or written requirements applicable to the area or operations covered by the SRP. The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses, permits, and/or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents, employees, and/or representatives of the permittee and by all clients, customers, or participants under the permittee’s supervision.
- 2) SRP’s for commercial recreation uses requiring a business license or licenses from the State of Utah (i.e., outdoor youth programs, hunting guides), will be authorized only when accompanied by a valid State license.

NON-ESCLUSIVE USE

- 1) Unless expressly stated, the SRP does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the Federal land by other users. The United States reserves the right to use any part of the area for any purpose.
- 2) Unless use allocations are in place, the public lands will generally remain available on a first-come first-served basis to as many other commercial and private users as desire to use them, except as otherwise provided for in these stipulations. Nothing herein implies that the first permittee into any area has been authorized an exclusive use privilege.
- 3) Nothing in this SRP will be construed as license for the permittee, employees, or clients to use an area of the public lands which are otherwise restricted or closed e.g., restrictive off-highway vehicle designation area.

CONDUCT AND MANNERS

- 1) The permittee is at all times responsible for the actions of himself, his employees, and guests in connection with the authorized operations, and shall not cause a public disturbance or engage in activities which create a hazard or nuisance.
- 2) Permittees are strongly encouraged to follow *Leave No Trace* and *TREAD Lightly!* land ethics as included in the stipulations, inform their clients about these practices and ensure that guides and clients follow them.
- 3) The permittee shall inform employees, agents and representatives, clients, customers and participants under its supervision, of the terms and conditions of the authorized SRP.
- 4) No one shall intentionally or wantonly destroy, deface, remove, or disturb any public building, sign, equipment, marker, or other government property, cultural sites, historic structures, natural features of the land, vegetation, or wildlife, except as legally taken.

MODIFICATION, AMENDMENT, OR CANCELLATION

- 1) A SRP authorizes special uses of the public lands and related waters and, should circumstances warrant, the SRP may be amended or modified by the Monument at any time, including the amount of use. The Monument may suspend or cancel an SRP, if necessary, to protect public resource, health, safety, the environment, or noncompliance with SRP stipulations.

FINANCIAL

- 1) No value shall be assigned to or claimed for the SRP, or for the occupancy or use of Federal lands or related waters granted thereupon. The SRP privileges are not and shall not be considered to be protected property interests, which the permittee shall be entitled to earn or receive any return, income, price or compensation. The use of a SRP as collateral is not recognized by the BLM.

FEES

- 1) If permittee fails to submit any required form or fee by the specified deadline, an Annual SRP Authorization will not be issued until the form or fee is received and processed by the Monument, and late fees will be assessed using the following schedule:
 - More than 15 days but less than 30 days after the due date: \$125
 - More than 30 days after the due date, but less than 45 days: \$250
 - Post use reports submitted more than 45 days after the due date may result in criminal, civil, and/or administrative action to protect the interest of the United States.
- 2) The permittee shall pay visitor use fees for each of its clients recreating in fee areas.

TRANSFERS AND OWNERSHIP

- 1) A SRP may be transferred at the discretion of the Monument.
- 2) In the event of default on any mortgage or other indebtedness, such as bankruptcy, creditors shall not succeed to the operating rights or privileges of the permittee's SRP.

INSPECTIONS OF RECORDS AND PREMISES

- 1) The permittee must present or display a copy of Form (2930-1) and its Annual SRP Authorization to Monument personnel or law enforcement officers upon request. If required, the permittee must display a copy of the SRP on equipment used during the period of authorized use.
- 2) The Monument, or other duly authorized representative of the BLM, may examine any of the records or other documents related to the SRP, held by or in the custody of the permittee or the permittee's operator, employee, or agent for up to 3 years after expiration of the SRP.

RESOURCE PROTECTION

General

- 1) The permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon leaving, the lands must be restored as nearly as possible to pre-existing conditions.
- 2) Hammering nails into trees is prohibited.

Archaeological/Cultural/Paleontological

- 1) All persons associated with operations under this SRP are informed that any objects or sites of cultural, paleontological, and scientific interest, such as historic or prehistoric resources, graves or grave markers, human remains, ruins, cabins, rock art, fossils, or artifacts shall not be damaged, destroyed, removed or disturbed. If in connection with operations under this SRP any of the above resources are discovered, the permittee shall immediately stop operations in the immediate area of the discovery, protect such resources, and notify the Monument as soon as possible of the discovery.
- 2) Intentional visitation to cultural and paleontological sites require prior approval by BLM. Failure to do so may result in the suspension of the permit.

Camping

- 1) Dispersed primitive camping is not allowed in the Frontcountry and Passage Zones. Camping in the Frontcountry and Passage Zones must be in developed campgrounds or in designated primitive camping areas. Designated primitive camping areas have not been identified in the Monument to date.
- 2) Motorized or mechanized vehicles may pull off designated routes no more than 50 feet for direct access to dispersed camping areas in the Outback Zone, except in Wilderness Study Areas; threatened and endangered plant areas, relict plant areas and riparian areas.
- 3) Camping within 200 feet of an isolated water source, i.e., spring, pond, rock pool, water pocket, is prohibited. Camping and the practice of woodcraft or primitive technology in archeological sites are prohibited.
- 4) Permittee will maintain all premises to standards of repair, orderliness, neatness, and sanitation acceptable to the Monument. Camp areas will be regularly cleaned and no trash or litter will be allowed to accumulate.
- 5) Food and/or equipment caches will not be allowed unless prior approval is obtained from the Monument. Location of proposed caches must be identified in the permittees operating plan.

Collections

- 1) Collection of Monument resources, objects, rocks, petrified wood, fossils, plants, animals, fish, insects or other invertebrate animals, bones, waste, or other products from animals, or of other items from within the Monument is prohibited. The collection of small amounts of fruits, nuts, and berries for personal, noncommercial use is allowed.

Fire

- 1) Campfires are not allowed in the Escalante and Paria/Hackberry Canyons, No Mans Mesa, and in archaeological sites, rock shelters and alcoves throughout the Monument.
- 2) Campfires are allowed only in designated fire grates or mandatory fire pans in Frontcountry and Passage Zones burn all wood and coals to ash, put out campfires completely, then pack out cool ashes. However, wood collection for campfires is not allowed in Frontcountry and Passage Zones, therefore you must bring your own.
- 3) Campfires are allowed in Outback and Primitive Zones. The use of fire pans or an existing fire ring are encouraged and only dead and down wood can be collected or bring your own. Burn wood to ashes and douse with water, making sure that your fire is DEAD OUT and that the area is restored to a natural condition before leaving.
- 4) When using designated fire grates in the Frontcountry and Passage Zones, burn all wood and coals to ash, put out campfires completely, then leave cool ashes.
- 5) The use of billy can stoves in areas where fires are not allowed is prohibited.
- 6) Permittee may be held responsible for fire suppression costs resulting from wildfire caused by the permittee, its employees, agents, and/or representatives and by all clients, customers and participants under the permittee's supervision.
- 7) Wildfires should be reported immediately to the nearest BLM office. Permittee is responsible for informing employees, clients, and participants of the current fire danger and required precautions that may be placed in effect by BLM or the State of Utah.

Group Size Limits

- 1) Group size is limited to 25 people in the Passage and Outback Zones including guides.
- 2) Group size within the Primitive Zone is limited to 12 people and 12 pack animals including guides. Within the Paria River corridor in the Primitive Zone, permits could be approved for groups over 12 people up to a maximum of 25 people with prior approval by the BLM.
- 3) Group size limits cannot be achieved by staggering individual groups along a single route by time or distance. Instead, individual groups must comply with group size limits by utilizing separate and unique routes, or by traveling from opposite ends of a single route. If traveling from opposite ends of a single route, groups may pass each other, however they cannot gather at a single location.

Wilderness Study Areas

- 1) Permittee is responsible for knowing where wilderness study areas (WSA) and other special management areas (i.e., Area of Critical Environmental Concern, Outstanding

Natural Areas, Instant Study Areas, etc.) are and use restrictions that may apply to such areas. Maps and information concerning restrictions are available at the Monument.

TRANSPORTATION AND ACCESS

- 1) All machinery (street legal motorized vehicles, non-street legal all-terrain vehicles, dirt bikes etc.) that have been used outside the Monument must be cleaned prior to use in the Monument, to prevent the possible introduction and spread of noxious weeds.
- 2) Access onto the Monument will be along defined roads listed on the transportation map in the Grand Staircase-Escalante National Monument Management Plan.
- 3) Cross-country motorized travel on the Monument is prohibited. All motorized and mechanized (bicycles, deer carts) vehicles must stay on designated roads while traveling in the Monument.
- 4) Permittee shall not construct new trails, or maintain existing trails without written authorization from the Monument.
- 5) The permittee shall not use paint or flagging, or construct cairns to mark trails, unless specifically allowed for in its Annual SRP Authorization.

SANITATION AND AESTHETICS

- 1) Operation and maintenance of all sanitation, food service, water supply systems, and facilities shall comply with the standards of the local department of health and the United States Public Health Service.
- 2) Pack it in, pack it out. Inspect your campsite and rest areas for trash or spilled foods. Pack out all trash, leftover food, litter, toilet paper and hygiene products.
- 3) Burning and burying food waste is prohibited.
- 4) In an area where there is less than a 200-foot distance (about 70 adult steps) from water sources, camp, and trails, permittees must use a portable self-contained toilet system. All human waste must be packed out and disposed of at a certified disposal site.
- 5) If a small portable toilet cannot be used, deposit solid human waste in catholes dug 4 to 6 inches deep at least 200 feet (about 70 adult steps) from water sources, camp, and trails. Cover and disguise the cathole when finished. Never dig a cathole under an overhang, in a shelter or archeological site.
- 6) If necessary, i.e., camping in one location for multiple days, a trench may be dug to dispose of human waste. To dig a trench, start with a cathole dug 6 to 8 inches deep and expand it in one direction as additional people use it; soil dug from the trench should be used to cover feces.
- 7) If camping in an area for more than one night, cathole sites must be widely distributed.
- 8) To wash yourself or your dishes, carry water 200 feet away from water sources and use small amounts of biodegradable soap. Scatter strained dishwater and pack out remaining food particles.
- 9) Wash water must be emptied over sand, gravel, or another filtering surface.

SAFETY AND EQUIPMENT

- 1) The permittee shall provide equipment necessary to serve clients, customers, and/or participants under its supervision in a safe manner.
- 2) A copy of any accident report involving property damage (in excess of \$200.00), personal injury, or death must be submitted to the Monument within ten days of the accident. Other accidents shall be reported in the Post Use Report.
- 3) The permittee shall carry a first aid kit on all permitted trips. A first aid kit is required to be with each sub-group should a trip be split into more than one activity.
- 4) Unless specifically authorized in the SRP, discharge of firearms is allowed only for legal pursuit of game animals by a licensed hunter.
- 5) Use of explosive, pyrotechnics, and fireworks is prohibited.
- 6) The permittee must assume responsibility for inspecting the permitted area for any existing or new hazardous conditions, e.g., trail and route conditions, land slides, avalanches, rocks, changing water or weather conditions, falling limbs or trees, submerged objects, hazardous plants or wildlife, or other hazards that present risks for which the permittee assumes responsibility.

USE OF EQUIPMENT NOT OWNED BY THE PERMITTEE

- 1) Written notice of intent to use vehicles and other equipment with outfitter markings (company names, logos, etc.) other than those of the permittee (or another outfitter permitted to operate by the Monument) must be made to the Monument office at least one (1) day prior to the scheduled trip. If the markings are those of an outfitter not permitted by BLM, the markings of equipment used must not be visible. The use of unmarked rental vehicles, or such equipment clearly marked as rental, is not restricted by this provision.

ASSIGNMENT, SUBLETTING AND RELATED PROHIBITED ACTS

- 1) The permittee or permittee's representative may not assign, contract, or sublease any portion of the SRP authorization or interest therein, directly or indirectly, voluntarily or involuntarily. However, contracting of equipment or services may be approved by the Monument in advance, if necessary to supplement a permittee's operations. Such contracting should not constitute more than half the required equipment or services for any one trip and the permittee must retain operational control of the permitted activity. If equipment or services are contracted, the permittee shall continue to be responsible for compliance with all stipulations and conditions of the SRP.
- 2) The following list of prohibited acts has been developed to ensure that the permittee outfits and retains operational control of trips conducted under the SRP. Therefore, the Monument may amend, modify, or revoke a SRP upon determining that any of the following have taken place:
 - a) a third party advertisement used to book a trip does not clearly indicate that the trip will be operated by the company holding the SRP.
 - b) the booking agent or advertiser provides both passenger transportation to the public lands and equipment used on the activity.

- c) the booking agent or advertiser provides more than half of the equipment or livestock provided on the trip.
- d) more than two (2) representatives or employees of the booking agent or advertiser (employed during the same calendar year) act as guides or crew during a trip. Such representatives or employees must constitute less than 50 percent of the crew.
- e) a trip is represented to the participants as being conducted by other than the permittee.
- f) equipment to be used or guide clothing carries the name, markings, or logo of the booking agent or advertiser involved with the trip (this does not apply to booking agents who are permitted outfitters).
- g) the passengers and crew are not covered by the insurance carried by the permittee.

An advertiser or booking agent for the purposes of this section is defined as an individual or organization that advertises or books trips for the permittee but does not hold a SRP to run commercial trips within the Monument. Upon submission of a request from the permittee, the Monument may authorize trips that do not strictly meet the above requirements.

SIGNING AND ADVERTISING

- 1) All advertising and representations made to the public and the Monument must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, official agency symbols may not be used. The permittee shall not use advertising that attempts to portray or represent the activities as being conducted by the BLM. The permittee may not portray or represent the SRP fee as a special Federal user's tax. The permittee must furnish the Monument with any current brochure and price list if requested by the Monument.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES GUIDING HUNTERS

- 1) Hunters are prohibited from field dressing game animals within 200 feet of trails and water sources.
- 2) Shooting at rocks, signs, trees, or non-game animals for target practice is prohibited.
- 3) Hunting must be in full compliance with State of Utah and Federal wildlife laws and regulations and the rules of fair chase.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES GUIDING CLIMBERS

- 1) Climbing, bouldering, or any form of canyoneering is not allowed in archaeological sites, on natural bridges or arches, or within sensitive species and identified threatened and endangered species nesting areas.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES USING RIDING OR PACKING ANIMALS

- 1) Horses or other pack animals are not allowed in relict plant communities, archaeological sites, rock shelters, or alcoves.
- 2) To protect desert bighorn sheep from disease, domestic sheep or goats are not allowed as pack animals within a nine mile buffer of mapped bighorn sheep habitat. Bighorn sheep habitat is mapped by UDWR and is subject to change as herds expand and move into previously unoccupied areas. Consult with BLM to identify available use areas.

- 3) Riding and pack stock are limited to 12 animals in the Primitive Zone.
- 4) Only weed free hay, straw and non-germinable grains may be used to feed and bed livestock, or be placed in the bottom of stock carrying vehicles.
- 5) Permittees may not clean out stock trucks or trailers on the Monument.
- 6) Hobbles, pickets, high lines or temporary corrals shall be used to control livestock.
- 7) Riding and pack stock may not be tied to a live tree for more than one hour.
- 8) Riding and pack stock may not be confined within 200 feet of water sources, camp and trails, or 100 feet of an archaeological site. If it is necessary to keep riding and pack stock confined for an extended period of time, select a site where damage to vegetation is minimized.
- 9) All animals will be under control in route and in camp to protect wildlife, other livestock, and range forage.
- 10) Stock may not travel in streams except when crossing.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES USING OFF HIGHWAY VEHICLES AND MOUNTAIN BIKES

- 1) Permittee will be familiar with and comply with State of Utah law regarding Off Highway Vehicles. All trips and trip participants must follow state regulations and manufactures recommendations regarding operations.
- 2) Permittees will operate in accordance with 43 CFR 8340, concerning OHV use on public land. Only routes specifically approved in the permittee's operating plan on file with the Monument may be utilized. Permittee must be familiar with the Monument's OHV designations, whether posted on the ground or not.
- 3) OHV operators must yield to non-motorized users. Mountain bikers must stay on designated roads/routes and must yield to pedestrians and pack stock.

SPECIAL RECREATION PERMIT (SRP) STIPULATIONS

CERTIFICATION

- 1) I have read these terms, conditions and stipulations and understand that I must abide by them while performing activities in connection with the permitted operations, and I understand that failure to comply with all terms, conditions, and stipulations may result in the Monument canceling my SRP.

Signature:

Name Printed:

Date:

GSENM Programmatic SRP EA DOI BLM UT 0030 2011 0002 EA

Environmental Analysis

Appendix D

Operating Plan Form

**United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Grand Staircase-Escalante National Monument
669 South Hwy 89A, Kanab, UT 84741**

OPERATING PLAN FORM

SRP #

Agency Use Only

Make sure information is complete and that all proposed service, facilities, and dates of use are described. Please respond to all applicable items to avoid delays in processing the application. If a section does not apply, indicate with N/A.

1. GENERAL INFORMATION

A. Type of Special Recreation Permit Applying For:	one-time user,	multi-year user
organized group, or		
special event		

A “**one-time user**” is defined as a commercial user required to obtain a SRP, who intends only to operate in the Monument once in a single year, not to exceed 14 days and not return for a time period of three years.

A “**multi-year user**” is defined as a commercial user required to obtain a SRP, who intends to operate in the Monument multiple times in a single year, or in consecutive years.

B. Name of company, organization, university, individual, other:

C. If not an individual, provide name of owner(s), trip leaders(s), other:

D. If a company, what type: Individual Partnership Corporation

E. Telephone number: _____ E-mail address: _____

F. Internet Site Address:

G. Describe the specific service or activity you propose to operate on the Monument:

Does the service or activity described above include day use only, or overnight use?

Is your service or activity consistent with Monument Special Recreation Permit Policy, Stipulations and the Monument Plan? Yes No If no, identify inconsistencies:

Will your proposed activity impact any of the following Monument resources: geology, biology, paleontology, archaeology, or history? Yes No

If yes, how do you propose to mitigate impacts, i.e., using a portable toilet, high ratio of guides to clients, not building fires in permitted areas, small group size:

How will your proposed activity provide interpretation/education of one or more of the following Monument resources: geology, biology, paleontology, archaeology, or history?

Will your proposed service or activity include visiting any archaeological, cultural, or paleontological site(s)? Yes No If yes, describe the site(s), i.e., rock shelter, petroglyph, identify their locations(s) on the enclosed map:

Are you willing to operate at times and locations different than what you have proposed if necessary? Yes No

Will your operation be using firearms? Yes No If yes, please provide a description of use of firearms.

During your proposed activity are you planning to take photographs, or do filming that would be sold commercially or used in advertising? If yes, you may need to obtain a Filming Permit. To determine if a Filming Permit is required contact the Realty Specialist at (435) 644 1200.

2. EXPERIENCE

A. How much experience (months, years, classes) do you have in leading the activity you are proposing? Experience can include education, training, employment, or personal experience, i.e., formal education, Wilderness First Response Training.

B. How much experience (months, years, classes) do you have in leading the proposed activity within a remote desert or other extreme environment, i.e., alpine tundra? Experience can include education and training, employment or personal experience.

C. Has any person(s) under your care been seriously injured (requiring medical treatment, death) while participating in an activity similar to, or the same as the one you are proposing? If yes, provide details of the incident (date, outcome):

3. ESTIMATED USE AND SEASON

A. For each proposed activity, complete the following:

Activity	Begin Date	End Date	Visitor Days (estimated)	# of Clients (estimated)	Location ¹

¹Identify location by specific area, trail or canyon.

B. Estimated percent of time (if applicable) on:

Monument Other BLM Field Office FS NPS
Private Other (Please specify)

4. UPLAND USE AND ACTIVITIES

A. Are you proposing to set up temporary facilities, caches, or event staging areas?

Yes No If yes, provide the following:

¹ Location and Description of Facility(ies)	Date(s) of Use

¹Describe location (by Township, Range and Section), or show on enclosed map.

B. Riding and pack livestock: Indicate number and type of livestock available:

None Riding Horses/Mules Pack Horses/Mules other (Please Specify)

Describe how livestock is fed, watered and controlled while on public land (corrals, tethers, pickets, highline):

5. TRANSPORTATION VEHICLES

A. List and describe all vehicles used (trucks, buses, vans, trailers, OHVs)

Year	Make and Model	Type	Color	State License or Registration #

6. FOOD/BEVERAGE

A. Check all applicable items:

Food:	None	Breakfast	Lunch	Dinner	Snack
Cooking Facilities:	None	Stove	Campfires	Others (specify)	
Drinking Water	None	Spring	Stream	City/Municipal	Other
Water Treatment:	None	Bottled	Filtered	Boiled	Chemical

Are you directly preparing meals for customers? Yes No Food Handlers Card

7. SANITATION FACILITIES

A. Check all applicable items and describe as necessary:

Hand washing facilities:	None	Basins/buckets	Soap	Disinfectant
Toilet Facilities:	None	Pit Latrine	Porta-John	Other ()

If human waste is packed out, describe handling and disposal:

8. SAFETY AND RESCUE

A. Check items provided at campsites or carried on each trip:

First Aid Kit	First Aid Station	Signaling Device	Fire Extinguisher	Radio/Cell Phone
---------------	-------------------	------------------	-------------------	------------------

If radio, provide frequencies used (Hertz), cellular or satellite phone number:

B. Describe contingency plans in case of bad weather, accident or other emergency:

9. AUTHORIZED REPRESENTATIVES

A. List name(s), address(es), and jobs/positions of all employees, guides, and helpers. List must be updated within 2 weeks of any changes.

Name	Address	Job/Position

10. BACKGROUND INFORMATION

A. List other permitted areas (include agency and office location):

B. Are you or any of your authorized representatives, employees or guides currently being investigated or prosecuted for violation of any Federal, State or local law or regulation in connection with the proposed activity? Yes No If yes, please explain:

- C.** Have you or any other authorized representatives, employees or guides been convicted of a Federal, State or local violation in connection with the proposed operations or activities?

Yes No

If yes, please explain:

- D.** Have you or any other authorized representatives, employees or guides had a permit for operations on public lands denied, suspended, or revoked? Yes No If yes, please explain:

I certify that the information given by me in this application is true, accurate, and complete to the best of my knowledge. I acknowledge that I (we) am (are) required to comply with requirements and stipulations on Form 2930-1 and any additional stipulations that are required by the authorized officer when the permit is issued. I further understand that the provision of false information, or the failure to keep this Operating Plan or other permit information updated, are grounds for probation, suspension, or revocation of the permit.

Applicant

Date

Appendix E***Archaeological and Historic Site Etiquette*****Grand Staircase-Escalante National Monument**

Archaeological and Historic Site Etiquette
For
Outfitters and Guides Operating on
Grand Staircase-Escalante National Monument

Cultural resource sites are a non-renewable resource. That is, once a historic or prehistoric site has been lost due to intentional or unintentional destruction, it cannot be replaced. Similarly, any disturbance to cultural resource sites can seriously affect our ability to understand the site and to provide an accurate interpretation of the site, its history, age, and function. Following basic cultural resources etiquette will insure that archeological and historical sites still exist in the future in undisturbed condition, so that they may be enjoyed by future generations of scientists and interested public.

Artifacts found at sites must be left on the site, in the locations at which they were found, that is in context. Not only is the presence of the artifacts important, but where these artifacts are found on the site provides critical information. In the same way that a book with re-arranged pages, or missing a series of pages, will be hard or impossible to understand, an archaeological site missing artifacts will be difficult to accurately interpret. Features such as middens (prehistoric trash dumps), upright sandstone slabs, and the walls of historic and prehistoric structures are easily impacted, and walking over or climbing on such features will almost certainly damage them. Rock art should never be touched as oils and acids from fingers damage both petroglyphs and pictographs, and can seriously compromise potential dating. Fires built on or near archaeological sites introduce modern charcoal, making it difficult or impossible to identify an accurate age of the site. The removal of artifacts, digging, or other vandalism is also against Federal law.

In summary, basic rules governing the visitation or discovery of archaeological sites include:

1. Do not touch any rock art.
2. Do not remove or alter the location of artifacts (feel free to look, but return them to the exact location where you found them)
3. Do not walk on or damage site features such as standing architecture, rock alignments, middens, or other features that would suffer from physical contact.
4. Do not drive across sites with mechanized vehicles, such as cars, trucks, OHVs, or bicycles, and avoid riding livestock across or through sites whenever possible.
5. Leave the site in the same condition as you found it.
6. Pets in sites can cause irreparable damage through digging or using the site as a toilet.

Please feel free to observe the sites and artifacts. Take photographs, draw pictures, try to figure out who used the site and when. Most people are interested in such things, and your clients will enjoy learning about the history and prehistory of this area. By not disturbing these sites, and educating your clients about archaeological etiquette, these sites will be part of a fun and educational experience now and in the future. You are leading clients through this part of the country because you know and appreciate its beauty, and are passing that appreciation along. Archaeological and historical sites are an important part of the history of this area, and you

GSENM Programmatic SRP EA DOI BLM UT 0030 2011 0002 EA

Environmental Analysis

should be equally proud of this part of the landscape as you are of the canyons, cliffs, wildlife, and scenery.

Updated and reviewed 2012

GSENM Programmatic SRP EA DOI BLM UT 0030 2011 0002 EA

Environmental Analysis

*Appendix F**Annual Performance Evaluation*

**United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Grand Staircase-Escalante National Monument
669 South Highway 89A, Kanab, UT 84741**

Annual Performance Evaluation

Permittee:
Business Name:

Year:
Expires:

- | | | | |
|---|--------------------------------|------------|--|
| 1. Insurance: | Expiration Date: | Current | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| | Acceptable Limits: | Liability: | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| | | Property: | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| | US named additionally insured? | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Fees Paid? | Date | Amount | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Credit Forward | | | |
| Previous balance due | | | |
| Minimum Annual Fee | | | |
| Assigned site fee | | | |
| 3. Operations conform to operating plan? | | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Performance bond statues effective? | Expires: | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. Post Use report in on date: | | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 6. Utah Hunting Guide license current and in file? | | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 7. Number of days on BLM land: | Number of clients & guides | | |
| 8. Free of Violations or public complaints? | | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 9. On-the-ground inspection completed? | | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 10. Permittee performance rating: <input type="checkbox"/> Superior <input type="checkbox"/> Acceptable <input type="checkbox"/> Probationary <input type="checkbox"/> Unacceptable | | | |
| 11. Superior Performance Documented? (Note in comment section) <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| 12. Permittee sent results of annual Evaluation? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |

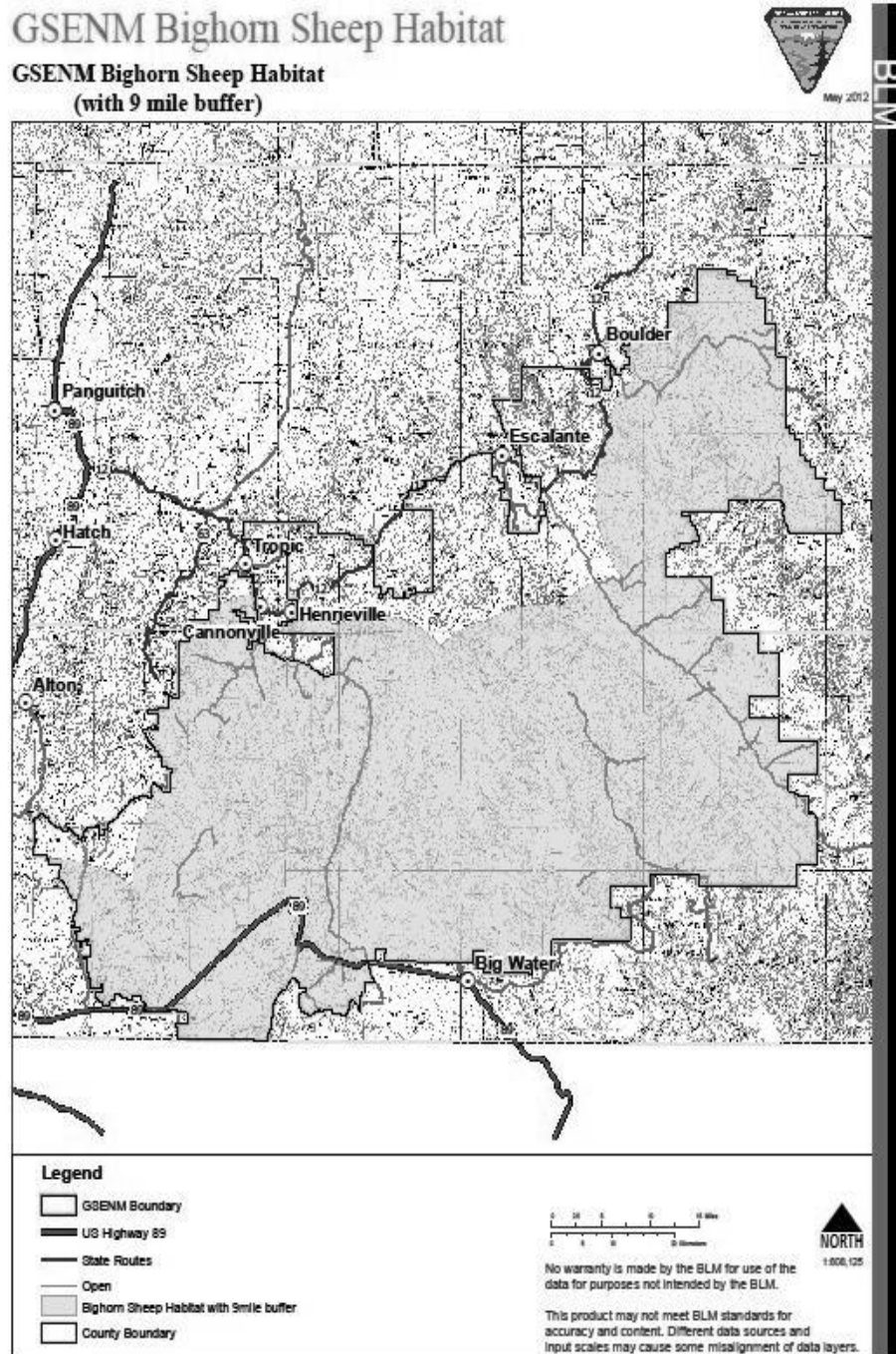
Comments:

Annual Performance Evaluation completed by:

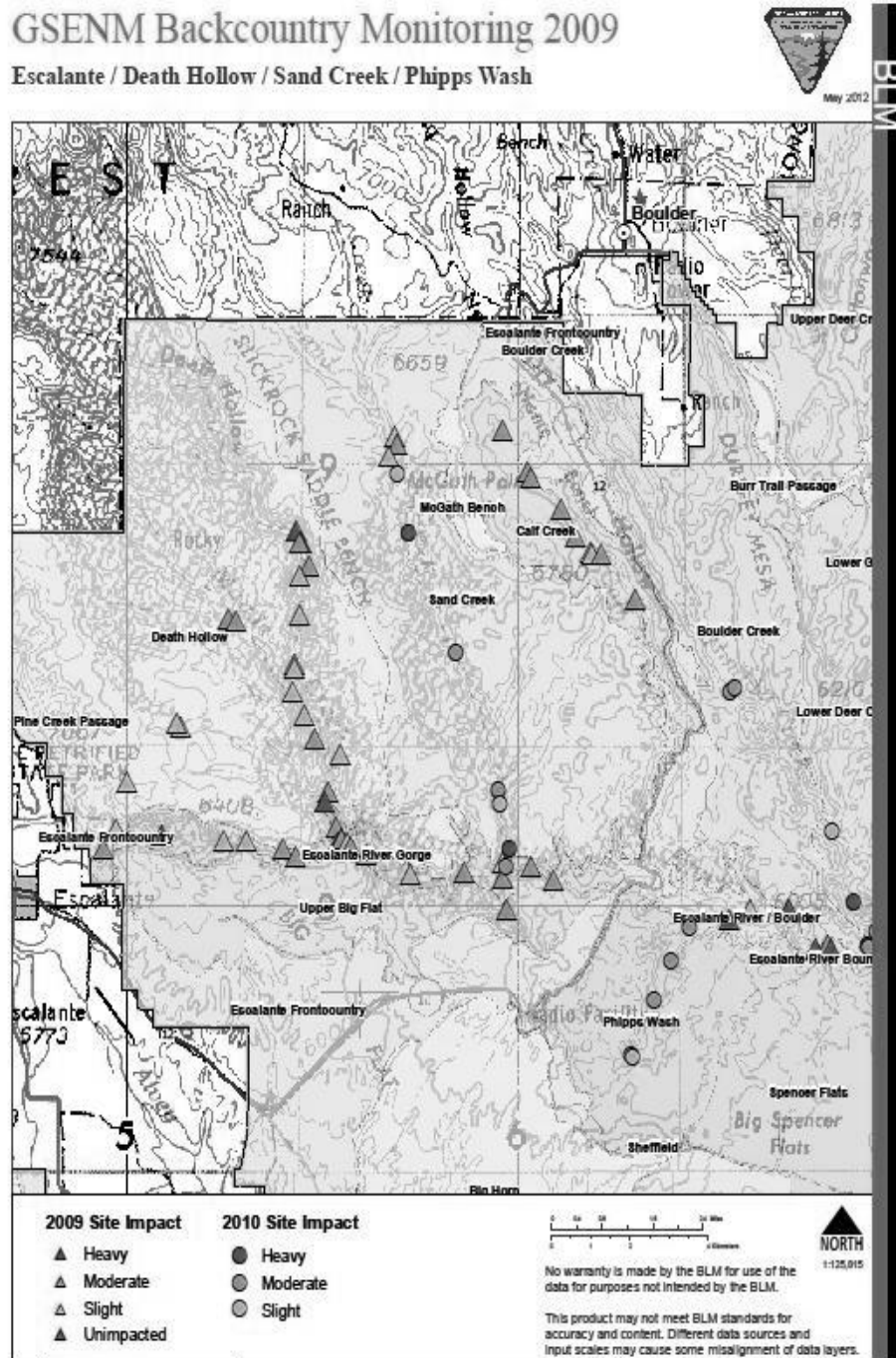
Date:

GSENM Programmatic SRP EA DOI BLM UT 0030 2011 0002 EA

Environmental Analysis

Appendix G – Big Horn Sheep habitat in GSENM

DOI-2020-11 02798

Appendix I – Backcountry Impact Monitoring, Map 2

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

**Decision Record
Environmental Assessment
DOI-BLM-UT-0030-2011-0002-EA**

October 15, 2012

**Programmatic EA for Issuing Special Recreation Permits withi
Grand Staircase – Escalante National Monument**

Location: Grand Staircase – Escalante National Monument located in Garfield County
Kane County, Utah.

***U.S. Department of the Interior
Bureau of Land Management
Grand Staircase-Escalante National Monument
669 South HWY 89A
Kanab, Utah 84741
Phone: 435-644-1200
Fax: 435-644-1305***



DECISION RECORD
Environmental Assessment
DOI-BLM-UT-0300-2011-0002-EA

**Programmatic Environmental Assessment for Special Recreation
Permits within Grand Staircase - Escalante National Monument**

It is my decision to authorize Alternative B (the Selected Alternative) of the Programmatic Environmental Assessment (EA) for Special Recreation Permits within Grand Staircase - Escalante National Monument, with the stipulations and forms shown in Appendices B-F of the attached EA (DOI-BLM-UT-0300-2011-0002-EA) and attached below. The Selected Alternative will allow GSENM to respond and process SRP applications in a more timely manner utilizing a tiered site-specific NEPA analysis to review SRP applications. This will allow for more sustainable recreation opportunities and good customer service, while providing protective measures for GSENM objects and values. The Selected Alternative should reduce the standard 180-day processing period, increase opportunities for SRP authorized uses, and increase compliance with the BLM SRP application process policy, SRP stipulations and MMP prescriptions. The Finding of No Significant Impact found no significant impacts, thus an EIS is not required.

Authorities for this decision are contained in:

Federal Lands Policy and Management Act (1976)

Title III, Sec. 302. [43USC 1732] (b) “the Secretary shall... regulate, through easement, permits, leases...the use, occupancy, and development of public lands...”

Federal Lands Recreation Enhancement Act (2004)

Section 803(f). “The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, and motorized recreational vehicle use.”

Compliance and Monitoring:

Cultural – Cultural sites, including archeological and historical sites will be monitored on an annual basis and as determined necessary. While an increase in visitation by additional SRP holders may initially seem counterproductive, it is anticipated that the benefit of extra monitoring and educational opportunities associated with guides informed about cultural resource site impacts and protection would outweigh potential negative effects of increased visitation. An Outfitter and Guide Workshop will be held annually, providing education and interpretation in recreation, archeology, paleontology, wildlife and other scientific research occurring on GSENM. At this time, it is unnecessary to modify the cultural monitoring program for the proposed uses.

Wildlife - Under the Selected Action alternative, WAFWA and BLM IM 98-140 protective measures will be fully adopted and become a stipulation common to all SRP permits where pack animals are involved. The stipulation reads as follows:

“To protect desert bighorn sheep from disease, domestic sheep or goats are not allowed as pack/companion animals within a nine-mile buffer of mapped bighorn sheep habitat. Bighorn sheep habitat is mapped by UDWR and is subject to change as herds expand and move into previously unoccupied areas.”

By applying this stipulation, potential irreversible effects to desert bighorn sheep populations in the GSENM will be greatly reduced. The nine-mile buffer surrounding occupied bighorn sheep habitat will greatly reduce the possibility of domestic sheep/goats coming into contact with bighorn sheep and transmitting deadly disease. The herds should continue to grow and eventually meet the UDWR population objectives, as outlined in the affected environment chapter.

Recreation –Backcountry and dispersed monitoring will continue and allow GSENM to make changes in policies and management direction. The adaptive management section in the Selected Alternative identifies potential issues that may be addressed in the future.

Outfitter and guides workshop will continue to be held annually, providing educational information on topics such as recreation, archeology, paleontology, wildlife, culture or other scientific information, as well as Leave No Trace principles and other backcountry etiquette.

Wilderness Study Areas – Backcountry patrols will be performed on a regular basis by BLM backcountry rangers. Monitoring reports will be entered into the backcountry database system and provide historical information to BLM staff evaluating SRP applications. NAU backcountry monitoring will continue to be a component of GSENM backcountry monitoring program. This monitoring program provides backcountry impact data, which GSENM is able to use as a tool to review impacts to the resource area and make changes through adaptive management. Post-use reports and trip logs will be a requirement of all SRP holders. This information provides BLM with the number of clients served annually, location of use areas and the frequency of use in an area.

Terms / Conditions / Stipulations:

Based on the Selected Alternative, Special Recreation Permits may be authorized for commercial and organized groups under 43 CFR 2930. The stipulations in Appendix C identified stipulations specific to GSENM. In addition, the Adaptive Management in section 2.3 identifies issues where BLM may make changes to SRP operations, based on identified issues.

Potential resource conflicts were resolved through environmental commitments integral to the Selected Alternative and monitoring stipulations. These are fully described in the subject EA, which is incorporated by reference in this decision record. The Stipulations incorporate standard GSENM SRP language developed during project planning, involving all participants in the project.

Adaptive Management Actions - Changes to GSENM management of SRP permitted activities within the GSENM may include:

Cultural

- Commercial visitation to cultural sites may be reduced or completely eliminated if it is determined that undue degradation to a site is occurring.
- Outfitter and guides may be required to sign up and complete training as an official site steward, depending on impacts and/or the significance of a cultural site.

Wildlife

- Western Association of Fish and Wildlife Agencies (WAFWA) Wild Sheep Working Group and Utah Division of Wildlife Resources (UDWR) periodically review and make recommendations for management of bighorn sheep habitat. These reviews and recommendations may require BLM to update the boundary area and buffer zones identified for bighorn sheep habitat. These updates may affect the future use of domesticated sheep and goats as pack animals in GSENM.

Recreation

- Allocations of use for outfitter and guides may be established in the future if the demand for use of specific areas becomes too high or unnecessary resource damage occurs. This may include, but is not limited to: establishing a cap on outfitters in a recreational zone, seasonal or temporal limitations, limiting use in an area due to limits of social carrying capacity or acts of god and/or man, i.e. wildland fire.
- If human effluence becomes a resource concern, public health and safety issue, or affects water quality standards, outfitter and guides will be required to adopt new practices in order to mitigate potential impacts, such as use of Wag Bags or use of portable latrines.
- Civic organizations, such as church groups and Boy Scouts of America typically are not required to obtain an SRP if they stay within GSENM management plan prescriptions. The authorizing officer may determine an SRP is required for these groups based on planning decisions, resource concerns, potential user conflicts, unauthorized oversized groups or public health and safety issues.
- Guide-to-client ratios may be imposed if events or incidences occur that identify this need.
- Updates to the proposed action, including the forms and stipulations, may be made to achieve consistency with new national BLM policy.

Wilderness Study Areas

- Limitations on use may be imposed if the “non-impairment criteria” is not being met within a WSA.
- Long-term outfitter and guides may be asked to participate in “Leave No Trace” training or other educational training on mitigating resource impacts. These training would be offered to SRPs by the BLM.

PLAN CONFORMANCE AND CONSISTENCY:

The Selected Alternative is in conformance with the Grand Staircase-Escalante National Monument Management Plan and is supported in the following plan decisions:

Grand Staircase – Escalante National Monument Management Plan (2000)

OG-1. Outfitter and guide operations will be allowed throughout the Monument in compliance with the constraints of the zones and other plan provisions.

OG-2. Training will be provided on an annual basis to keep outfitters and guides current on appropriate research studies occurring in the Monument.

OG-3. Outfitters and guides will be strongly encouraged to incorporate interpretive/educational components into their trips.

The proposed action is consistent with federal environmental laws and regulations, Executive Orders, and Department of Interior and GSENM policies. It is in compliance with state laws and local and county ordinances and plans, including the following:

Federal Lands Policy and Management Act (1976)

Title III, Sec. 302. [43USC 1732] (b) “the Secretary shall... regulate, through easement, permits, leases...the use, occupancy, and development of public lands...”

Federal Lands Recreation Enhancement Act (2004)

Section 803(f). “The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, and motorized recreational vehicle use.”

*National Historic Preservation Act (1966)**Proclamation for the Grand Staircase-Escalante National Monument (1996)*

The proposed action and no action alternative have been evaluated for consistency with the proclamation, particularly in reference to the specific objects and values that were identified with the Proclamation. No effects of the proposed action, with the included design features and stipulations included, are anticipated on any of objects or values identified within the Proclamation. If any potential effects of the proposed action were to be identified, the Adaptive Management prescriptions are designed to provide further protection of objects and values from impacts.

*43 CFR 2932 (BLM) – Special Recreation Permits for Commercial Use, Competitive, Events, Organized Groups, and Recreational use in Special Areas.**BLM Handbook H-2930-1 – Recreation Permit Administration**Utah State Hunting Laws*

Rule R156-79. Hunting Guides and Outfitters Licensing Act Rule.

Utah Wilderness Therapy Laws

Rule R501-2. Core Rules & Rule R501-8. Outdoor Youth Programs.

BLM Instructional Memorandum No. 2011-019

Garfield County General Plan (1998, amended with Resource Plan 2007)

The Garfield County General Plan includes an Outfitters and Guide Resolution (pages 6-29 and 6-30) recommending “that guiding and outfitting lifestyles be maintained and held inviolable as it pertains to...Antiquities Act”. It goes on to state: “Be it further resolved that outfitting and guiding be continued and based on existing levels with provisions for additional interim non-binding permits for the period prior to the implementation of the monuments (sic) final plan, unless prudent management practices dictate otherwise. Be it further resolved that management of new outfitting and guiding permits be based on sound practices and that day to day management be the result of joint methods of determination between the outfitters or guide permit holder and appropriate BLM Resource Specialist.

The management of outfitter and guide operations and commercial groups are not specifically addressed in the Garfield County Resource Management Plan, a review of which revealed that the Proposed Action and alternatives would not conflict with it.

Thus, a review of those documents reveals that the Selected Alternative would not conflict with it.

Kane County Plan General Management Plan (1998, updated 2010)

Although the management of outfitter and guide operations and commercial groups are not specifically addressed in the Kane County General Plan or Resource Management Plan, a review of those documents reveals that the Selected Alternative would not conflict with it.

Alternatives Considered:

The EA considered two alternatives: the No Action and the Proposed Action Alternative, which is the alternative that has been selected by the BLM.

Under the No Action alternative, BLM would work to process SRP applications in accordance with applicable laws, policies and guidance, including a 180-day processing period. It is likely that the number of new SRP's issued would be limited because of workload required to process individual environmental analysis for each similar permit application. The No Action alternative was not selected, since it would not have addressed the purpose and need to provide a more efficient SRP application and authorization process, while incorporating resource protection measures and adaptive management options for the protection of monument objects, values and other resource concerns.

Under the Proposed Action alternative, GSENM would develop and update GSENM SRP forms, which include standard SRP stipulations, operating plan, pre-application checklist, SRP pre-evaluation and Annual Performance Evaluation forms. Permits would only be authorized where or when such uses would be compatible with GSENM objects and values, planning decisions, non-impairment to wilderness characteristic values in Wilderness Study Areas (WSA). All applications within WSAs and LWCs would be closely reviewed to determine whether the proposal meets the "non-impairment criteria". Permit requests for uses that would impair WSA or LWC lands would be denied. Adaptive management would be utilized, as necessary, to address potential impacts to resources identified through monitoring. See the resource-specific actions identified in the “Terms / Conditions / Stipulations”. The Proposed Action Alternative (Alternative B) was selected since it would better address the purpose and need for action. The

Selected Alternative will provide an updated and timely SRP application and authorization process to meet public demands for commercial and organized group permits within GSENM. The Selected Alternative should also reduce the standard 180-day processing period, increase opportunities for SRP authorized uses, as well as increase compliance with the BLM SRP policy, SRP stipulations and MMP prescriptions.

Alternatives Considered, But Eliminated from Detail Analysis:

Commercial Climbing and Canyoneering – To date, BLM has not established climbing area plans within GSENM. BLM has identified climbing and canyoneering as an activity with specific complex issues and resource concerns that should be addressed through a separate planning process. In addition, wildlife biologists have identified the need to perform inventories in potential climbing areas in order to address any potential impacts to species, which would include Peregrine Falcons and Owls. Climbing and Canyoneering SRPs are not being considered under this EA.

Wilderness Therapy programs – Therapy programs using GSENM-administered lands for daily field operations generate a high number of user days increasing potential resource impacts and user conflicts. Therefore, a therapy program applying for an SRP on GSENM-administered lands, who's intent is to use GSENM lands as their primary land base for their operations, or the use on GSENM lands is greater than 25% of the operations total public land use, would require a separate NEPA evaluation be completed.

Rationale for Decision:

The Proposed Action Alternative (Alternative B) was selected since it would better address the purpose and need for action. The Selected Alternative will provide an updated and timely SRP application and authorization process to meet public demands for commercial and organized group permits within GSENM. The Selected Alternative should also reduce the standard 180-day processing period, increase opportunities for SRP authorized uses, as well as increase compliance with the BLM SRP policy, SRP stipulations and MMP prescriptions. The Selected Alternative is in conformance with the GSENM Monument Management Plan prescriptions. The Selected Alternative would also better address the protection of monument objects and values identified within the Proclamation for the GSENM. Design features would avoid impacts to these objects and values and adaptive management strategies would further avoid impacts to objects and values from any future permitted uses.

Summary of Public Participation

During preparation of the EA, the public was notified of the proposed action by posting on the Utah Internet Homepage on December 15, 2010. The process used to involve the public included a letter to interested parties which included SRP holders, environmental groups, state senators and representatives, area residents and county, state, tribal and federal governments. Approximately ten letters were received in response to the scoping period.

On August 23, 2012 BLM posted the Draft EA and FONSI to ENBB for public review. Public review closed September 23, 2013; four comment letters were received containing 16 individual substantive comments. Comments proposed other elements to be added to the purpose and need, stipulations, and evaluation criteria. Minor edits to language within the EA were performed to clarify the scope of analysis, stipulations, and evaluation process.

Appeal Language:

Persons adversely affected by this decision may appeal the decision to the Interior Board of Land Appeals in accordance with the procedures found in Title 43, Part 4 of the Code of Federal Regulations (43 CFR 4). In accordance with 43 CFR 2931.8(b), this decision shall take effect immediately upon the date it is signed by the Authorized Officer and shall remain in effect while any appeal is pending unless the Interior Board of Land Appeals issues a stay.

You must file a *notice of appeal* within 30 days of the decision to the Authorized Officer at the Grand Staircase-Escalante National Monument at 669 South Hwy 89 A, Kanab, Utah 84741. Your *notice of appeal* must include a *statement of reasons* and *proof of service* (see 43 CFR 4). You, the appellant, have the burden of showing that the decision appealed from is in error.

If you wish to file a request (petition) for a suspension (stay) of the effectiveness of this decision during the time your appeal is being reviewed by the Interior Board of Land Appeals, the request must accompany your *notice of appeal*. If you request a suspension, you have the burden of proof to show sufficient justification why the suspension should be granted based on the following standards, except as otherwise provided by law or other pertinent regulations (43 CFR 4.21):

Standards for Obtaining a Stay

1. The relative harm to the parties if the stay is granted or denied;
2. The likelihood of the appellant's success on the merits;
3. The likelihood of immediate and irreparable harm if the stay is not granted; and
4. Whether the public interest favors granting the stay.

Future decisions by the Grand Staircase-Escalante National Monument to issue individual Special Recreation Permits based on this Environmental Assessment would also be appealable to the Interior Board of Land Appeals under the same procedures described above.


Authorized Officer

October 15, 2012
Date

Attachments: Public Comments on EA and Responses (Appendix A) and Selected Alternative SRP Stipulations and SRP Forms (Appendices B-F)

Appendix A - GSENM Programmatic SRP EA Summarized Comments and Responses

#	COMMENT	BLM response
1	It would be helpful for BLM to identify in the EA specific triggers that would lead to implementation of these measures (Wag Bags).	The adaptive management section, section 2.3, identifies potential triggers i.e. resource concerns, public health and safety and water quality standards.
2	It would be helpful for BLM to identify specific areas within the Monument where these management strategies are being considered.	The geographic scope of the potential adaptive management prescriptions was not identified explicitly in the Proposed Action, as such actions may be area-specific or GSENM-wide. Management prescriptions and the use of backcountry monitoring will be used as adaptive management tools to identify resource issues in distinct areas or across the planning area.
3	Extensive comment related to experience using Wag Bags as SRP operator.	The BLM will consider resource needs, feasibility and effectiveness of any potential adaptive management prescriptions prior to applying them to permits. The information provided in the comment related to the SRP holder's experience using Wag Bags will be useful in determining the feasibility in portable toilet systems in the future.

4	The mandatory compliance visits mentioned in the Proposed Action are of concern.	Mandatory compliance visits have always been a component of all BLM SRP authorizations to ensure the terms and conditions of the permit are followed. These compliance visits are conducted in a manner to minimize impacts to SRP activities.
5	Comment letter requested GSENM change SRP stipulations for staggering groups in the Paria River, i.e. group size, page 43, paragraph 3. "We do not understand why staggering groups with a time distance option would be any less acceptable than starting each groups from opposite ends of the travel route (which is currently allowed)...Adaptive management would allow for future adjustments if found to be necessary."	Staggering groups along a travel route has not been authorized in the past and would not be incorporated within the Proposed Action alternative, since the BLM does not consider it an effective design feature to address potential resource impacts associated with large group activities that have been split up to address MMP prescriptions.
6	If the BLM cannot provide assurances that it will be able to effectively manage certain SRPs in the monument, it should not be issuing those SRPs. Instruction Memorandum (IM) 2011-019..."If the field office cannot fulfill, or complete, all the necessary steps of a use authorization, then no SRP shall be issued."	This EA is addressing the directives of IM 2011-019, as referenced within section 1.6 Relationship to Statutes, Regulations, or Other Plans, page 6 of the EA, in order to provide SRP opportunities, while complying with this BLM policy. The language referenced has been included in the Need for action (Section 1.4).
7	Streamlining SRPs should not be the overarching purpose of the PEA. Instead, BLM should manage SRPs monument-wide in a more sustainable, least disruptive and efficient manner based on reasonable predictions of the amount and type of use in the future.	The purpose has been identified in Section 1.4 of the EA (page 5) to include not only streamlining SRP issuance, but protecting monument objects and values and providing a more sustainable recreational opportunity. In addition, an immediate purpose is to increase compliance with the BLM SRP application process. Although SRP compliance is anticipated to increase, BLM anticipates that use levels would

		<p>remain the same (as discussed in Section 4.3.2.3 Recreation - Proposed Action, page 22). Figure 3 on page 16 provides a detailed list of the types of uses by SRP holders. BLM tracks annual visitation on multiple trailheads throughout the monument.</p>
8	<p>In order to determine the type and amount of SRPs that should be issued, BLM should set management criteria based on carrying capacity, type of use and management zone.</p>	<p>Carrying capacity and types of use based upon management zones has been identified as more appropriately addressed within SRMA planning efforts. The Monument Management Plan already establishes group size limits based upon management zone. The Recreation adaptive management section of the SRP EA (Section 2.3, page 10) does provide for adjustments of SRPs based upon allocation of use.</p>
9	<p>In order to set appropriate programmatic criteria for issuing SRPs, BLM must have a reasonable expectation of the amount and type of use from organized group recreation in the monument. The PEA examines the past and current uses of SRPs, but does not make an assumption to the future uses and needs other than general statements that it is expected to increase. If this general assumption is correct, then there is no more appropriate time or document than the PEA for BLM to analyze the carrying capacity of the area to determine the thresholds and criteria for managing SRPs in the monument.</p>	<p>As mentioned in the response to comment #8 above, the BLM has identified carrying capacity as best addressed within a SRMA planning effort. The Recreation adaptive management section does provide for adjustments of SRPs based upon allocation of use if and when such a planning process is completed. Therefore, the assumption of increased use is the least speculative assumption that can be made based upon available past and present data and trends.</p>

10	<p>Due to these concerns with streamlining SRPs without the proper checks in place to manage the resources and visitor safety, we strongly urge BLM to include programmatic criteria for administering all SRPs within the monument. This would be similar to the approach taken in the Programmatic EA for organized group SRPs along the Hole-in-the-Rock Road, which sets limits by management zone, group size, number of vehicles, sanitation requirements, fees, camping, length of stay and number of concurrent permits as well as restrictions for specific campgrounds. In order to ascertain the right criteria BLM should perform a carrying capacity and allocation needs study similar to the approach taken in the PEA for Commercial Motorized SRPs at the Vermilion Cliffs National Monument.</p>	<p>Programmatic criteria for issuance of SRPs has been addressed through the Stipulations included within the Proposed Action (Appendix C of the EA). These include limits based upon MMP management zone group size, sanitation requirements, etc. The HITSR Organized Group EA focused on more site-specific analysis of areas and capacities due to the type and scale of activity considered. This programmatic analysis defers capacity and allocation analysis to future SRMA planning efforts, since these planning efforts would approach the appropriate scale of analysis. The Recreation adaptive management section of the SRP EA (Section 2.3, page 10) does provide for adjustments of SRPs based upon allocation of use.</p>
11	<p>In addition to management criteria for SRPs, BLM should also set criteria for evaluating SRPs that provides a barometer for whether a permit may or may not be issued. This would provide more certainty to both BLM and permit applicants to show the type of permits BLM may be more or less inclined to approve. The following comments provide a framework for BLM's decision-making process: As a baseline, BLM regulations require the agency to apply the following criteria to SRPs:</p> <ul style="list-style-type: none"> (a) Conformance with laws and land use plans; (b) Public safety, (c) Conflicts with other uses, (d) Resource protection, (e) The public interest served, (f) Whether in the past you complied with the terms of your permit or other authorization from BLM and other agencies, and (g) Such other information that BLM finds appropriate. 	<p>Criteria for evaluation SRPs was included within the Proposed Action, as the SRP Application Evaluation Form (Appendix B), the SRP Stipulations (Appendix C), the Operating Plan (Appendix D), and existing 43 CFR 2930 direction were incorporated within the Proposed Action. These design features address items a-g referenced within the comment.</p>

12	Due to the nature of SRPs, BLM can set evaluation criteria for all permits across the board in order to better anticipate challenges that may arise from an increase in conflicts stemming from these permits. This approach allows BLM more of a rational basis and control of groups requesting permits, whether anticipated or not. This also allows the agency with the discretion to grant or deny the permit based on these factors. (Outline provided in comment letter)	The BLM does not identify a need to establish further evaluation criteria (such as those referenced in the Vermilion Cliffs NM Programmatic EA for Commercial Motorized SRPs), as the GSENM MMP prescriptions already address many of these evaluation criteria. Any adjustment the Proposed Action and MMP evaluation criteria would be provided for based upon future need and adaptive management prescriptions.
13	Due to the nature of these types of large group events, it is critical that BLM set the right criteria up front for the safety of those involved and to protect the natural and cultural resources—this is especially true in a remote and often-unforgiving landscape like the Grand Staircase-Escalante National Monument. We urge BLM to include evaluation criteria in the PEA for the purposes of administering permits in a more efficient and sustainable manner and providing more certainty to applicants.	Stipulations and design features of the Proposed Action to address public safety and the protection of natural and cultural resources (including monument objects and values) have been incorporated within the analysis. See response to comments #11 & 12 above.
14	Require permittees to carry out human waste rather than dig catholes or other methods of disposal. Due to the impact that large group events can have on a particular area, it is not sustainable to use catholes or other methods for most SRP permittees.	No resource issue has been identified at the present time to necessitate such management prescriptions in the Proposed Action. The Proposed Action on page 10, bullet 2, provides for the consideration of this management action based upon monitoring data under the Recreation Adaptive Management section (Section 2.3).
15	Designate primitive camping areas. As stated in Appendix C at p. 47, “[d]esignated primitive camping areas have not been identified in the Monument to date.” Rather than allowing permittees to create new camping areas throughout the monument as part of their permitted use, BLM should proactively designate areas for SRP	MMP Camp-2 and FAC-22 identify that BLM could designate primitive camp locations for resource protection. Current backcountry monitoring has not identified an immediate need to designate campsites in response to resource issues. Current SRP administration encourages the identification of specific sites and

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

	primitive campsites like it did in the PEA for Organized Group SRPs along the Hole-in-the-Rock Road.	requires identification of use areas. The Recreation adaptive management section has been expanded to include the opportunity to designate specific areas in the future, if resources issues are identified.
16	Require the use of stoves for cooking while camping rather than burning wood.	MMP prescriptions CAMP-6 and CAMP-7 address fire use. This EA does not address the types of fuels an O&G's can use to cook meals for their clients. No resource issues have been identified to require this stipulation.

APPENDIX B**Application Evaluation Form**

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Grand Staircase-Escalante National Monument
669 South Hwy 89A, Kanab, UT 84741

SPECIAL RECREATION PERMIT
APPLICATION EVALUATION FORM

This form provides for both a qualitative and quantitative evaluation of Special Recreation Permit (SRP) applications. Using this form the Monument will review, evaluate and compare applicants. Those applications that comply with the "application review criteria" identified in the Monument SRP Policy will be accepted (possibly with modifications).

Applicant Name:

Application Assigned Number:

Evaluator:

Date:

QUALITATIVE EVALUATION**1. APPLICATION DEADLINE**

- A. One-time user, organized group, or special event has submitted all application materials 180 days prior to the start date of their proposed use? ☐ Yes
- ☐ No

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

- B. Multi-year user has submitted all application materials by close of business, January 31 for the upcoming use season ☐ Yes ☐ No

A “**one-time user**” is defined as a commercial user required to obtain a SRP, who intends only to operate in the Monument once in a single year, not to exceed 14 days and not return for a time period of three years.

A “**multi-year user**” is defined as a commercial user required to obtain a SRP, who intends to operate in the Monument multiple times in a single year, or in consecutive years.

2. APPLICATION MATERIALS

- A. Special Recreation Application Form (2930-1), completed and signed.
☐ Yes ☐ No

Operating Plan Form, completed and signed. ☐ Yes ☐ No

Detailed topographic map(s) showing travel routes, primary use areas, camp locations, archaeological, cultural and paleontological sites planning to visit, temporary facilities, cache locations, staging facilities, parking areas and any private, State or agency administered public lands used in the proposal. Applicants must use U.S. Geological Survey 1:24,000 or 1:100,000 scale topographic maps, or BLM Special Edition 1:100,000 scale topographic maps. ☐ Yes ☐ No

Evidence of permission to use private, State, or other agency administered public lands. ☐ Yes ☐ No

If all application materials have not been submitted, or if incomplete information has been provided, the permit application is denied or returned to the applicant for completion.

3. COMPLIANCE HISTORY

- A. Applicant has demonstrated, through their operating plan, that they are in compliance, and/or have a history of compliance, with local, State and Federal laws and regulations in connection with the proposed activity?
☐ Yes ☐ No If no, provide reason:

If applicant has not demonstrated their operation would be in compliance, or they have a history of noncompliance with local, State and Federal regulations, the application may be denied.

4. SAFETY AND SAFETY HISTORY

- A. Applicant has demonstrated, through their operating plan, safety measures to be applied and/or a history of providing a reasonable level of safety for clients. ☐ Yes ☐ No If no, provide reason:

If the applicant has a history of not providing a reasonable level of safety for clients, the application may be denied.

5. COMPLIANCE WITH MONUMENT SRP POLICY, STIPULATIONS AND MANAGEMENT PLAN

- A. Applicant has demonstrated, through their operating plan that their proposed activity is consistent with current Monument SRP Policy, Stipulations and the Monument Management Plan? ☐ Yes ☐ No If no, provide reason:

If an inconsistency is identified, the application may be denied or accepted with modifications, i.e., group size.

6. CONFLICTS

- A. Conflicts currently exist, or would potentially occur as a result of permitting the proposed activity? Conflicts could include but are not limited to: 1) use levels during specific time periods or overall, 2) unacceptable resource impacts and, 3) Monument inability to properly monitor an activity and/or enforce regulations. ☐ Yes ☐ No If yes, provide reason:

If a conflict is identified the application may be denied, or accepted with modifications, i.e., time and location of activity.

QUANTITATIVE EVALUATION**1. EXPERIENCE**

A. Work experience in leading the proposed activity?

Yes ☐ (please describe) No ☐ If No, what training has been completed or work experience shows the applicant is taking initiative to lead the proposed activities?

Directly related work experience entails successfully operating a commercial guiding business, or leading organized groups in similar activities for a time period of two years. Indirectly related work experience entails working for a commercial guiding business, assist in leading organized groups in similar activities, or owning or managing another type of business.

B. Experience in offering similar activities within a remote desert, or other extreme environment?

Yes ☐ (please describe below) No ☐ If No, what training has been completed or work experience shows the applicant is taking initiative to lead the proposed activities?

Directly related experience entails leading similar activities within a remote desert environment. Indirectly related experience entails leading similar activities within another extreme environment, i.e., alpine tundra. Not related experience entails not leading similar activities in a remote desert or extreme environment, or leading similar activities in an unrelated environment, i.e., tropical forest.

C. Education and training experience?

Yes ☐ (please describe below) No ☐ If No, what training has been completed or work experience shows the applicant is taking initiative to lead the proposed activities?

Directly related experience entails having education or training related to public safety or resource protection, i.e., Leave No Trace, TREAD Lightly!, Guide Training School, Standard First Aid Training, Wilderness First Response Training. Indirectly related experience entails having education or training that will assist in providing education/interpretation of Monument

resources: geology, biology, paleontology, archaeology, history.

2. INTERPRETATION/EDUCATION

A. Extent to which interpretation/education of Monument resources (geology, biology, paleontology, archeology, history) will be incorporated into the proposed activity?

Yes ☐ (please describe below) No ☐ If No, what training has been completed or initiative shows the applicant is taking to lead the proposed activities?

Thoroughly incorporated is accomplished when an applicant has made interpretation/education of Monument resources the focal point of their proposed activity, i.e., archaeology trip.

Moderately incorporated is accomplished when an applicant has incorporated interpretation/education of Monument resources into their proposed activity, i.e., backpacking trip that will include interpretation/education of native plants.

RESULTS OF EVALUATION ☐ Approved ☐ Denied If denied, identify reason(s):

Applicant has been notified in writing of their conditional approval and required to meet the conditions outlined below prior to their Special Recreation Permit being authorized.

Date notified:

A. Provide a copy of insurance certificate. ☐ Yes ☐ No

C. Provide a signed copy of GSENM SRP Stipulations. ☐ Yes ☐ No

D. Commercial permittees provide the minimum pre-season fee of \$100.00 and the balance of 3% anticipated gross revenues if greater than the \$100.00 fee already paid.

E. Organized group and special event permittees provide the balance of charges by applying the

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

\$5.00 per person per day fee to the estimated number of persons and days they propose to operate on the Monument.

☐ Yes ☐ No

F. If Applicable provide copies of Food Safety Manager Certification and Food Handlers Card(s) from the Southwest Utah Public Health District Office. Any commercial permittee directly preparing meals for customers is required to have one Certified Food Safety Manager, and a Food Handler Card(s) for any person(s) assisting in food preparation or cleanup. ☐ Yes ☐ No

G. Provide a copy of American Red Cross Standard First Aid and CPR Training Cards (or their equivalent) for all authorized representatives working with customers in the field.

H. Provided a copy of commercial filming permit. ☐ Yes ☐ No

I. Combine SRP and film permit. ☐ Yes ☐ No

All conditions listed above have been met. ☐ Yes ☐ No

If no, conditional approval is revoked and applicant must reapply or resubmit their application and operating plan.

*Appendix C**SRP Stipulations*

**United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Grand Staircase-Escalante National Monument
669 South Hwy 89A, Kanab, UT 84741**

SPECIAL RECREATION PERMIT (SRP) STIPULATIONS

GENERAL

- 1) Permittee shall follow all procedures and requirements set forth in the Utah SRP Policy.
- 2) Permittee shall comply with all stipulations listed on the back of Form (2930-1).
- 3) For “multi-year” SRP’s, two consecutive seasons of nonuse may result in cancellation of the SRP and would require the permittee to apply for a new SRP.

APPLICABLE LAWS AND REGULATIONS

- 1) The permittee shall comply with all Federal, State, and local laws, ordinances, regulations, orders, postings, or written requirements applicable to the area or operations covered by the SRP. The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses, permits, and/or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents, employees, and/or representatives of the permittee and by all clients, customers, or participants under the permittee’s supervision.
- 2) SRP’s for commercial recreation uses requiring a business license or licenses from the State of Utah (i.e., outdoor youth programs, hunting guides), will be authorized only when accompanied by a valid State license.

NON-ESCLUSIVE USE

- 1) Unless expressly stated, the SRP does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the Federal land by other users. The United States reserves the right to use any part of the area for any purpose.
- 2) Unless use allocations are in place, the public lands will generally remain available on a first-come first-served basis to as many other commercial and private users as desire to use them, except as otherwise provided for in these stipulations. Nothing herein implies that the first permittee into any area has been authorized an exclusive use privilege.
- 3) Nothing in this SRP will be construed as license for the permittee, employees, or clients to use an area of the public lands which are otherwise restricted or closed e.g., restrictive off-highway vehicle designation area.

CONDUCT AND MANNERS

- 1) The permittee is at all times responsible for the actions of himself, his employees, and guests in connection with the authorized operations, and shall not cause a public disturbance or engage in activities which create a hazard or nuisance.
- 2) Permittees are strongly encouraged to follow *Leave No Trace* and *TREAD Lightly!* land ethics as included in the stipulations, inform their clients about these practices and ensure that guides and clients follow them.
- 3) The permittee shall inform employees, agents and representatives, clients, customers and participants under its supervision, of the terms and conditions of the authorized SRP.
- 4) No one shall intentionally or wantonly destroy, deface, remove, or disturb any public building, sign, equipment, marker, or other government property, cultural sites, historic structures, natural features of the land, vegetation, or wildlife, except as legally taken.

MODIFICATION, AMENDMENT, OR CANCELLATION

- 1) A SRP authorizes special uses of the public lands and related waters and, should circumstances warrant, the SRP may be amended or modified by the Monument at any time, including the amount of use. The Monument may suspend or cancel an SRP, if necessary, to protect public resource, health, safety, the environment, or noncompliance with SRP stipulations.

FINANCIAL

- 1) No value shall be assigned to or claimed for the SRP, or for the occupancy or use of Federal lands or related waters granted thereupon. The SRP privileges are not and shall not be considered to be protected property interests, which the permittee shall be entitled to earn or receive any return, income, price or compensation. The use of a SRP as collateral is not recognized by the BLM.

FEES

- 1) If permittee fails to submit any required form or fee by the specified deadline, an Annual SRP Authorization will not be issued until the form or fee is received and processed by the Monument, and late fees will be assessed using the following schedule:
 - More than 15 days but less than 30 days after the due date: \$125
 - More than 30 days after the due date, but less than 45 days: \$250
 - Post use reports submitted more than 45 days after the due date may result in criminal, civil, and/or administrative action to protect the interest of the United States.
- 2) The permittee shall pay visitor use fees for each of its clients recreating in fee areas.

TRANSFERS AND OWNERSHIP

- 1) A SRP may be transferred at the discretion of the Monument.
- 2) In the event of default on any mortgage or other indebtedness, such as bankruptcy, creditors shall not succeed to the operating rights or privileges of the permittee's SRP.

INSPECTIONS OF RECORDS AND PREMISES

- 1) The permittee must present or display a copy of Form (2930-1) and its Annual SRP Authorization to Monument personnel or law enforcement officers upon request. If required, the permittee must display a copy of the SRP on equipment used during the period of authorized use.

- 2) The Monument, or other duly authorized representative of the BLM, may examine any of the records or other documents related to the SRP, held by or in the custody of the permittee or the permittee's operator, employee, or agent for up to 3 years after expiration of the SRP.

RESOURCE PROTECTION

General

- 1) The permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon leaving, the lands must be restored as nearly as possible to pre-existing conditions.
- 2) Hammering nails into trees is prohibited.

Archaeological/Cultural/Paleontological

- 1) All persons associated with operations under this SRP are informed that any objects or sites of cultural, paleontological, and scientific interest, such as historic or prehistoric resources, graves or grave markers, human remains, ruins, cabins, rock art, fossils, or artifacts shall not be damaged, destroyed, removed or disturbed. If in connection with operations under this SRP any of the above resources are discovered, the permittee shall immediately stop operations in the immediate area of the discovery, protect such resources, and notify the Monument as soon as possible of the discovery.
- 2) Intentional visitation to cultural and paleontological sites require prior approval by BLM. Failure to do so may result in the suspension of the permit.

Camping

- 1) Dispersed primitive camping is not allowed in the Frontcountry and Passage Zones. Camping in the Frontcountry and Passage Zones must be in developed campgrounds or in designated primitive camping areas. Designated primitive camping areas have not been identified in the Monument to date.
- 2) Motorized or mechanized vehicles may pull off designated routes no more than 50 feet for direct access to dispersed camping areas in the Outback Zone, except in Wilderness Study Areas; threatened and endangered plant areas, relict plant areas and riparian areas.
- 3) Camping within 200 feet of an isolated water source, i.e., spring, pond, rock pool, water pocket, is prohibited. Camping and the practice of woodcraft or primitive technology in archeological sites are prohibited.
- 4) Permittee will maintain all premises to standards of repair, orderliness, neatness, and sanitation acceptable to the Monument. Camp areas will be regularly cleaned and no trash or litter will be allowed to accumulate.
- 5) Food and/or equipment caches will not be allowed unless prior approval is obtained from the Monument. Location of proposed caches must be identified in the permittees operating plan.

Collections

- 1) Collection of Monument resources, objects, rocks, petrified wood, fossils, plants, animals, fish, insects or other invertebrate animals, bones, waste, or other products from animals, or of other items from within the Monument is prohibited. The collection of small amounts of fruits, nuts, and berries for personal, noncommercial use is allowed.

Fire

- 1) Campfires are not allowed in the Escalante and Paria/Hackberry Canyons, No Mans Mesa, and in archaeological sites, rock shelters and alcoves throughout the Monument.
- 2) Campfires are allowed only in designated fire grates or mandatory fire pans in Frontcountry and Passage Zones burn all wood and coals to ash, put out campfires completely, then pack out cool ashes. However, wood collection for campfires is not allowed in Frontcountry and Passage Zones, therefore you must bring your own.
- 3) Campfires are allowed in Outback and Primitive Zones. The use of fire pans or an existing fire ring are encouraged and only dead and down wood can be collected or bring your own. Burn wood to ashes and douse with water, making sure that your fire is DEAD OUT and that the area is restored to a natural condition before leaving.
- 4) When using designated fire grates in the Frontcountry and Passage Zones, burn all wood and coals to ash, put out campfires completely, then leave cool ashes.
- 5) The use of billy can stoves in areas where fires are not allowed is prohibited.
- 6) Permittee may be held responsible for fire suppression costs resulting from wildfire caused by the permittee, its employees, agents, and/or representatives and by all clients, customers and participants under the permittee's supervision.
- 7) Wildfires should be reported immediately to the nearest BLM office. Permittee is responsible for informing employees, clients, and participants of the current fire danger and required precautions that may be placed in effect by BLM or the State of Utah.

Group Size Limits

- 1) Group size is limited to 25 people in the Passage and Outback Zones including guides.
- 2) Group size within the Primitive Zone is limited to 12 people and 12 pack animals including guides. Within the Paria River corridor in the Primitive Zone, permits could be approved for groups over 12 people up to a maximum of 25 people with prior approval by the BLM.
- 3) Group size limits cannot be achieved by staggering individual groups along a single route by time or distance. Instead, individual groups must comply with group size limits by utilizing separate and unique routes, or by traveling from opposite ends of a single route. If traveling from opposite ends of a single route, groups may pass each other, however they cannot gather at a single location.

Wilderness Study Areas

- 1) Permittee is responsible for knowing where wilderness study areas (WSA) and other special management areas (i.e., Area of Critical Environmental Concern, Outstanding Natural Areas, Instant Study Areas, etc.) are and use restrictions that may apply to such areas. Maps and information concerning restrictions are available at the Monument.

TRANSPORTATION AND ACCESS

- 1) All machinery (street legal motorized vehicles, non-street legal all-terrain vehicles, dirt bikes etc.) that have been used outside the Monument must be cleaned prior to use in the Monument, to prevent the possible introduction and spread of noxious weeds.

- 2) Access onto the Monument will be along defined roads listed on the transportation map in the Grand Staircase-Escalante National Monument Management Plan.
- 3) Cross-country motorized travel on the Monument is prohibited. All motorized and mechanized (bicycles, deer carts) vehicles must stay on designated roads while traveling in the Monument.
- 4) Permittee shall not construct new trails, or maintain existing trails without written authorization from the Monument.
- 5) The permittee shall not use paint or flagging, or construct cairns to mark trails, unless specifically allowed for in its Annual SRP Authorization.

SANITATION AND AESTHETICS

- 1) Operation and maintenance of all sanitation, food service, water supply systems, and facilities shall comply with the standards of the local department of health and the United States Public Health Service.
- 2) Pack it in, pack it out. Inspect your campsite and rest areas for trash or spilled foods. Pack out all trash, leftover food, litter, toilet paper and hygiene products.
- 3) Burning and burying food waste is prohibited.
- 4) In an area where there is less than a 200-foot distance (about 70 adult steps) from water sources, camp, and trails, permittees must use a portable self-contained toilet system. All human waste must be packed out and disposed of at a certified disposal site.
- 5) If a small portable toilet cannot be used, deposit solid human waste in catholes dug 4 to 6 inches deep at least 200 feet (about 70 adult steps) from water sources, camp, and trails. Cover and disguise the cathole when finished. Never dig a cathole under an overhang, in a shelter or archeological site.
- 6) If necessary, i.e., camping in one location for multiple days, a trench may be dug to dispose of human waste. To dig a trench, start with a cathole dug 6 to 8 inches deep and expand it in one direction as additional people use it; soil dug from the trench should be used to cover feces.
- 7) If camping in an area for more than one night, cathole sites must be widely distributed.
- 8) To wash yourself or your dishes, carry water 200 feet away from water sources and use small amounts of biodegradable soap. Scatter strained dishwater and pack out remaining food particles.
- 9) Wash water must be emptied over sand, gravel, or another filtering surface.

SAFETY AND EQUIPMENT

- 1) The permittee shall provide equipment necessary to serve clients, customers, and/or participants under its supervision in a safe manner.
- 2) A copy of any accident report involving property damage (in excess of \$200.00), personal injury, or death must be submitted to the Monument within ten days of the accident. Other accidents shall be reported in the Post Use Report.
- 3) The permittee shall carry a first aid kit on all permitted trips. A first aid kit is required to be with each sub-group should a trip be split into more than one activity.

- 4) Unless specifically authorized in the SRP, discharge of firearms is allowed only for legal pursuit of game animals by a licensed hunter.
- 5) Use of explosive, pyrotechnics, and fireworks is prohibited.
- 6) The permittee must assume responsibility for inspecting the permitted area for any existing or new hazardous conditions, e.g., trail and route conditions, land slides, avalanches, rocks, changing water or weather conditions, falling limbs or trees, submerged objects, hazardous plants or wildlife, or other hazards that present risks for which the permittee assumes responsibility.

USE OF EQUIPMENT NOT OWNED BY THE PERMITTEE

- 1) Written notice of intent to use vehicles and other equipment with outfitter markings (company names, logos, etc.) other than those of the permittee (or another outfitter permitted to operate by the Monument) must be made to the Monument office at least one (1) day prior to the scheduled trip. If the markings are those of an outfitter not permitted by BLM, the markings of equipment used must not be visible. The use of unmarked rental vehicles, or such equipment clearly marked as rental, is not restricted by this provision.

ASSIGNMENT, SUBLETTING AND RELATED PROHIBITED ACTS

- 1) The permittee or permittee's representative may not assign, contract, or sublease any portion of the SRP authorization or interest therein, directly or indirectly, voluntarily or involuntarily. However, contracting of equipment or services may be approved by the Monument in advance, if necessary to supplement a permittee's operations. Such contracting should not constitute more than half the required equipment or services for any one trip and the permittee must retain operational control of the permitted activity. If equipment or services are contracted, the permittee shall continue to be responsible for compliance with all stipulations and conditions of the SRP.
- 2) The following list of prohibited acts has been developed to ensure that the permittee outfits and retains operational control of trips conducted under the SRP. Therefore, the Monument may amend, modify, or revoke a SRP upon determining that any of the following have taken place:
 - a) a third party advertisement used to book a trip does not clearly indicate that the trip will be operated by the company holding the SRP.
 - b) the booking agent or advertiser provides both passenger transportation to the public lands and equipment used on the activity.
 - c) the booking agent or advertiser provides more than half of the equipment or livestock provided on the trip.
 - d) more than two (2) representatives or employees of the booking agent or advertiser (employed during the same calendar year) act as guides or crew during a trip. Such representatives or employees must constitute less than 50 percent of the crew.
 - e) a trip is represented to the participants as being conducted by other than the permittee.
 - f) equipment to be used or guide clothing carries the name, markings, or logo of the booking agent or advertiser involved with the trip (this does not apply to booking agents who are permitted outfitters).
 - g) the passengers and crew are not covered by the insurance carried by the permittee.

An advertiser or booking agent for the purposes of this section is defined as an individual or organization that advertises or books trips for the permittee but does not hold a SRP to run commercial trips within the Monument. Upon submission of a request from the permittee, the Monument may authorize trips that do not strictly meet the above requirements.

SIGNING AND ADVERTISING

- 1) All advertising and representations made to the public and the Monument must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, official agency symbols may not be used. The permittee shall not use advertising that attempts to portray or represent the activities as being conducted by the BLM. The permittee may not portray or represent the SRP fee as a special Federal user's tax. The permittee must furnish the Monument with any current brochure and price list if requested by the Monument.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES GUIDING HUNTERS

- 1) Hunters are prohibited from field dressing game animals within 200 feet of trails and water sources.
- 2) Shooting at rocks, signs, trees, or non-game animals for target practice is prohibited.
- 3) Hunting must be in full compliance with State of Utah and Federal wildlife laws and regulations and the rules of fair chase.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES GUIDING CLIMBERS

- 1) Climbing, bouldering, or any form of canyoneering is not allowed in archaeological sites, on natural bridges or arches, or within sensitive species and identified threatened and endangered species nesting areas.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES USING RIDING OR PACKING ANIMALS

- 1) Horses or other pack animals are not allowed in relict plant communities, archaeological sites, rock shelters, or alcoves.
- 2) To protect desert bighorn sheep from disease, domestic sheep or goats are not allowed as pack animals within a nine mile buffer of mapped bighorn sheep habitat. Bighorn sheep habitat is mapped by UDWR and is subject to change as herds expand and move into previously unoccupied areas. Consult with BLM to identify available use areas.
- 3) Riding and pack stock are limited to 12 animals in the Primitive Zone.
- 4) Only weed free hay, straw and non-germinable grains may be used to feed and bed livestock, or be placed in the bottom of stock carrying vehicles.
- 5) Permittees may not clean out stock trucks or trailers on the Monument.
- 6) Hobbles, pickets, high lines or temporary corrals shall be used to control livestock.
- 7) Riding and pack stock may not be tied to a live tree for more than one hour.
- 8) Riding and pack stock may not be confined within 200 feet of water sources, camp and trails, or 100 feet of an archaeological site. If it is necessary to keep riding and pack stock confined for an extended period of time, select a site where damage to vegetation is minimized.
- 9) All animals will be under control in route and in camp to protect wildlife, other livestock, and range forage.

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

- 10) Stock may not travel in streams except when crossing.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES USING OFF HIGHWAY VEHICLES AND MOUNTAIN BIKES

- 1) Permittee will be familiar with and comply with State of Utah law regarding Off Highway Vehicles. All trips and trip participants must follow state regulations and manufactures recommendations regarding operations.
- 2) Permittees will operate in accordance with 43 CFR 8340, concerning OHV use on public land. Only routes specifically approved in the permittee's operating plan on file with the Monument may be utilized. Permittee must be familiar with the Monument's OHV designations, whether posted on the ground or not.
- 3) OHV operators must yield to non-motorized users. Mountain bikers must stay on designated roads/routes and must yield to pedestrians and pack stock.

SPECIAL RECREATION PERMIT (SRP) STIPULATIONS

CERTIFICATION

- 1) I have read these terms, conditions and stipulations and understand that I must abide by them while performing activities in connection with the permitted operations, and I understand that failure to comply with all terms, conditions, and stipulations may result in the Monument canceling my SRP.

Signature:

Name Printed:

Date:

Appendix D

Operating Plan Form

**United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Grand Staircase-Escalante National Monument
669 South Hwy 89A, Kanab, UT 84741**

OPERATING PLAN FORM

SRP #

Agency Use Only

Make sure information is complete and that all proposed service, facilities, and dates of use are described. Please respond to all applicable items to avoid delays in processing the application. If a section does not apply, indicate with N/A.

1. GENERAL INFORMATION

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

- A. Type of Special Recreation Permit Applying For: one-time user, multi-year user
 organized group, or special event

A “**one-time user**” is defined as a commercial user required to obtain a SRP, who intends only to operate in the Monument once in a single year, not to exceed 14 days and not return for a time period of three years.

A “**multi-year user**” is defined as a commercial user required to obtain a SRP, who intends to operate in the Monument multiple times in a single year, or in consecutive years.

- B. Name of company, organization, university, individual, other:
- C. If not an individual, provide name of owner(s), trip leaders(s), other:
- D. If a company, what type: Individual Partnership Corporation
- E. Telephone number: E-mail address:
- F. Internet Site Address:
- G. Describe the specific service or activity you propose to operate on the Monument:

Does the service or activity described above include day use only, or overnight use?

Is your service or activity consistent with Monument Special Recreation Permit Policy, Stipulations and the Monument Plan? Yes No If no, identify inconsistencies:

Will your proposed activity impact any of the following Monument resources: geology, biology, paleontology, archaeology, or history? Yes No

If yes, how do you propose to mitigate impacts, i.e., using a portable toilet, high ratio of guides to clients, not building fires in permitted areas, small group size:

How will your proposed activity provide interpretation/education of one or more of the following Monument resources: geology, biology, paleontology, archaeology, or history?

Will your proposed service or activity include visiting any archaeological, cultural, or paleontological site(s)? Yes No If yes, describe the site(s), i.e., rock shelter, petroglyph, identify their locations(s) on the enclosed map:

Are you willing to operate at times and locations different than what you have proposed if necessary?
Yes No

Will your operation be using firearms? Yes No If yes, please provide a description of use of firearms.

During your proposed activity are you planning to take photographs, or do filming that would be sold commercially or used in advertising? If yes, you may need to obtain a Filming Permit. To determine if a Filming Permit is required contact the Realty Specialist at (435) 644 1200.

2. EXPERIENCE

A. How much experience (months, years, classes) do you have in leading the activity you are proposing? Experience can include education, training, employment, or personal experience, i.e., formal education, Wilderness First Response Training.

B. How much experience (months, years, classes) do you have in leading the proposed activity within a remote desert or other extreme environment, i.e., alpine tundra? Experience can include education and training, employment or personal experience.

C. Has any person(s) under your care been seriously injured (requiring medical treatment, death) while participating in an activity similar to, or the same as the one you are proposing? If yes, provide details of the incident (date, outcome):

3. ESTIMATED USE AND SEASON

A. For each proposed activity, complete the following:

Activity	Begin Date	End Date	Visitor Days (estimated)	# of Clients (estimated)	Location ¹

¹Identify location by specific area, trail or canyon.

B. Estimated percent of time (if applicable) on:

Monument Other BLM Field Office FS NPS
Private Other (Please specify)

4. UPLAND USE AND ACTIVITIES

A. Are you proposing to set up temporary facilities, caches, or event staging areas?

Yes No If yes, provide the following:

¹ Location and Description of Facility(ies)	Date(s) of Use

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

¹Describe location (by Township, Range and Section), or show on enclosed map.

B. Riding and pack livestock: Indicate number and type of livestock available:

None Riding Horses/Mules Pack Horses/Mules other (Please Specify)

Describe how livestock is fed, watered and controlled while on public land (corrals, tethers, pickets, highline):

5. TRANSPORTATION VEHICLES

A. List and describe all vehicles used (trucks, buses, vans, trailers, OHVs)

Year	Make and Model	Type	Color	State License or Registration #

6. FOOD/BEVERAGE

A. Check all applicable items:

Food:	None	Breakfast	Lunch	Dinner	Snack
Cooking Facilities:	None	Stove	Campfires	Others (specify)	
Drinking Water	None	Spring	Stream	City/Municipal	Other
Water Treatment:	None	Bottled	Filtered	Boiled	Chemical

Are you directly preparing meals for customers? Yes No Food Handlers Card

7. SANITATION FACILITIES

A. Check all applicable items and describe as necessary:

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

Hand washing facilities: None Basins/buckets Soap Disinfectant
 Toilet Facilities: None Pit Latrine Porta-John Other ()

If human waste is packed out, describe handling and disposal:

8. SAFETY AND RESCUE

A. Check items provided at campsites or carried on each trip:

First Aid Kit First Aid Station Signaling Device Fire Extinguisher Radio/Cell Phone

If radio, provide frequencies used (Hertz), cellular or satellite phone number:

B. Describe contingency plans in case of bad weather, accident or other emergency:

9. AUTHORIZED REPRESENTATIVES

A. List name(s), address(es), and jobs/positions of all employees, guides, and helpers. List must be updated within 2 weeks of any changes.

Name	Address	Job/Position

10. BACKGROUND INFORMATION

A. List other permitted areas (include agency and office location):

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

B. Are you or any of your authorized representatives, employees or guides currently being investigated or prosecuted for violation of any Federal, State or local law or regulation in connection with the proposed activity? Yes No If yes, please explain:

C. Have you or any other authorized representatives, employees or guides been convicted of a Federal, State or local violation in connection with the proposed operations or activities? Yes No
If yes, please explain:

D. Have you or any other authorized representatives, employees or guides had a permit for operations on public lands denied, suspended, or revoked? Yes No If yes, please explain:

I certify that the information given by me in this application is true, accurate, and complete to the best of my knowledge. I acknowledge that I (we) am (are) required to comply with requirements and stipulations on Form 2930-1 and any additional stipulations that are required by the authorized officer when the permit is issued. I further understand that the provision of false information, or the failure to keep this Operating Plan or other permit information updated, are grounds for probation, suspension, or revocation of the permit.

Applicant

Date

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

Appendix E

Archaeological and Historic Site Etiquette

Grand Staircase-Escalante National Monument

Archaeological and Historic Site Etiquette
For
Outfitters and Guides Operating on
Grand Staircase-Escalante National Monument

Cultural resource sites are a non-renewable resource. That is, once a historic or prehistoric site has been lost due to intentional or unintentional destruction, it cannot be replaced. Similarly, any disturbance to cultural resource sites can seriously affect our ability to understand the site and to provide an accurate interpretation of the site, its history, age, and function. Following basic cultural resources etiquette will insure that archeological and historical sites still exist in the future in undisturbed condition, so that they may be enjoyed by future generations of scientists and interested public.

Artifacts found at sites must be left on the site, in the locations at which they were found, that is in context. Not only is the presence of the artifacts important, but where these artifacts are found on the site provides critical information. In the same way that a book with re-arranged pages, or missing a series of pages, will be hard or impossible to understand, an archaeological site missing artifacts will be difficult to accurately interpret. Features such as middens (prehistoric trash dumps), upright sandstone slabs, and the walls of historic and prehistoric structures are easily impacted, and walking over or climbing on such features will almost certainly damage them. Rock art should never be touched as oils and acids from fingers damage both petroglyphs and pictographs, and can seriously compromise potential dating. Fires built on or near archaeological sites introduce modern charcoal, making it difficult or impossible to identify an accurate age of the site. The removal of artifacts, digging, or other vandalism is also against Federal law.

In summary, basic rules governing the visitation or discovery of archaeological sites include:

1. Do not touch any rock art.
2. Do not remove or alter the location of artifacts (feel free to look, but return them to the exact location where you found them)
3. Do not walk on or damage site features such as standing architecture, rock alignments, middens, or other features that would suffer from physical contact.
4. Do not drive across sites with mechanized vehicles, such as cars, trucks, OHVs, or bicycles, and avoid riding livestock across or through sites whenever possible.
5. Leave the site in the same condition as you found it.
6. Pets in sites can cause irreparable damage through digging or using the site as a toilet.

Please feel free to observe the sites and artifacts. Take photographs, draw pictures, try to figure out who used the site and when. Most people are interested in such things, and your clients will enjoy learning about the history and prehistory of this area. By not disturbing these sites, and educating your clients about archaeological etiquette, these sites will be part of a fun and educational experience now and in the future. You are leading clients through this part of the country because you know and appreciate its beauty, and are passing that appreciation along. Archaeological and historical sites are an important part of the history of this area, and you should be equally proud of this part of the landscape as you are of the canyons, cliffs, wildlife, and scenery.

Updated and reviewed 2012

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

GSENM Programmatic SRP EA

DOI BLM UT 0030 2011 0002 EA

Decision Record

Appendix F Annual Performance Evaluation

**United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Grand Staircase-Escalante National Monument
669 South Highway 89A, Kanab, UT 84741**

Annual Performance Evaluation

Permittee:
Business Name:

Year:
Expires:

1. Insurance: Expiration Date: Current ☐ Yes ☐ No
 Acceptable Limits: Liability: ☐ Yes ☐ No
 Property: ☐ Yes ☐ No
 US named additionally insured? ☐ Yes ☐ No
2. Fees Paid? Date Amount ☐ Yes ☐ No
 Credit Forward
 Previous balance due
 Minimum Annual Fee
 Assigned site fee
3. Operations conform to operating plan? ☐ Yes ☐ No
4. Performance bond statues effective? Expires: ☐ Yes ☐ No
5. Post Use report in on date: ☐ Yes ☐ No
6. Utah Hunting Guide license current and in file? ☐ Yes ☐ No
7. Number of days on BLM land: Number of clients & guides
8. Free of Violations or public complaints? ☐ Yes ☐ No
9. On-the-ground inspection completed? ☐ Yes ☐ No
10. Permittee performance rating: ☐ Superior ☐ Acceptable ☐ Probationary ☐ Unacceptable
11. Superior Performance Documented? (Note in comment section) ☐ Yes ☐ No
12. Permittee sent results of annual Evaluation? ☐ Yes ☐ No

Comments:

Annual Performance Evaluation completed by:

Date:

United States Department of the Interior Bureau of Land Management

**Finding of No Significant Impact
Environmental Assessment
DOI-BLM-UT-0030-2011-0002-EA**

**October 11, 2012
Programmatic EA for Issuing Special Recreation Permits within Grand Staircase –
Escalante National Monument**

Location: Grand Staircase – Escalante National Monument located in Garfield County and Kane County, Utah.

***Grand Staircase – Escalante National Monument
669 South HWY 89A
Kanab, Utah 84741
(435) 644-4300 PH.
(435) 644-4350 FX.***



BLM

FINDING OF NO SIGNIFICANT IMPACT
Environmental Assessment
DOI-BLM-UT-0030-2011-0002-EA
Programmatic EA for Issuing Special Recreation Permits within
Grand Staircase – Escalante National Monument

INTRODUCTION:

The Bureau of Land Management (BLM) has conducted an environmental analysis (DOI-BLM-UT-0300-2011-0002-EA) for a proposed action to address the issuance of Special Recreation Permits (SRP) within Grand Staircase – Escalante National Monument (GSENM).

The purpose of the action is to streamline the process of reviewing and issuing SRP's within Grand Staircase – Escalante National Monument. These permits will authorize SRP recreational operations for commercial and non-commercial activities within GSENM. The proposed action will allow GSENM to respond and process SRP applications in a more timely manner utilizing a tiered site-specific NEPA analysis to review SRP applications. This will allow for more sustainable recreation opportunities and good customer service, while providing protective measures for GSENM objects and values. The proposed action should reduce the standard 180-day processing period, increase opportunities for SRP authorized uses, and increase compliance with the BLM SRP application process.

DOI-BLM-UT-0300-2011-0002-EA is attached and is incorporated by reference for this Finding of No Significant Impact (FONSI). A no action alternative and action alternative were analyzed in the EA.

FINDING OF NO SIGNIFICANT IMPACT:

Based upon a review of the EA and the supporting documents, I have determined that the project is not a major federal action and will not significantly affect the quality of the human environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity as defined in 40 CFR 1508.27. Despite the sensitivity of the area (i.e., context), impacts will not be significant because the intensity of the impacts discussed below is low. Impacts do not exceed those described in the Grand Staircase – Escalante National Monument MMP/FEIS. Therefore, an environmental impact statement is not needed.

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

Context: The project is a programmatic action involving BLM administered lands that are of national importance. This project is locally, regionally and nationally important to commercial groups and organized groups wishing to visit the GSENM. This project will allow commercial

and organized groups the opportunity to visit the national monument, while providing resource protection within Grand Staircase – Escalante National Monument administered lands.

Intensity:

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

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

1. **Impacts may be both beneficial and adverse.** The Proposed Action alternative will impact resources as described in the attached EA. Authorizing commercial and organized group SRPs will increase opportunities for authorized visitation, which is a beneficial impact to recreational opportunities in the area. Measures to reduce the identified adverse impacts to cultural resources, wildlife, recreation, and Wilderness Study Areas were incorporated in the design of the Proposed Action alternative. None of the adverse environmental effects discussed in detail in the EA and associated appendices are considered significant, nor do the effects exceed those described in the Grand Staircase – Escalante National Monument MMP/FEIS.
2. **The degree to which the selected alternative will affect public health or safety.** Risks to public health and safety will not increase or decrease based on this decision. There are inherent dangers in all outdoor activities that include, but are not limited to: driving an automobile, hiking, and camping. This project does not increase any health and safety concerns beyond current conditions.
3. **Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wilderness, wild and scenic rivers, or ecologically critical areas.** The following components of the Human Environment and Resource Issues are not affected because they are not present in the project area. Resources not present include: areas of critical environmental concern, BLM natural areas, environmental justice, farmlands, wastes, and wild horses and burros.

In addition, the following components of the Human Environment and Resource Issues, although present, will not be affected by this proposed action for the reasons listed in Appendix A of the EA: air quality, biological soil crusts, greenhouse gas emissions, floodplains, fuels/fire management, geology/mineral resources/energy production, hydrologic conditions, invasive species/noxious weeds, lands/access, livestock grazing, migratory birds, Native American religious concerns, paleontology, Rangeland Health Standards, socio-economics, soils, threatened, endangered, candidate plant species, threatened, endangered or candidate animal species, water resources/quality (drinking/surface/ground), wetlands/riparian zones, Wild and Scenic Rivers, woodland/forestry, vegetation excluding USFW designated species, visual resources, and lands with wilderness characteristics.

Cultural resources, wildlife, recreation, and Wilderness Study Areas were analyzed in detail in Chapter 4. None of these resources will be significantly impacted because the overall cumulative impact among the identified issues within cultural resources, wildlife, recreation

and Wilderness Study Areas have been determined minimal. BLM is currently engaged in formal consultation with the State Historic Preservation Officer regarding the bureau determination of no adverse effect to historic properties. The nine-mile buffer surrounding occupied bighorn sheep habitat will greatly reduce the possibility of domestic sheep/goats coming into contact with bighorn sheep and transmitting deadly disease. GSENM will likely see an increase in SRPs issued due to its ability to issue permits in a more timely manner, but use levels by O&Gs and organized groups, permitted and non-permitted, will likely remain the same. WSAs will not see a great increase in use or an increase in impacts by O&Gs.

4. **The degree to which the effects on the quality of the human environment are likely to be highly controversial.** There is no scientific controversy over the nature of the impacts to cultural resources, wildlife, recreation, and Wilderness Study Areas. Cultural resource impacts are expected to provide no adverse impact to historic properties due to the design features incorporated within the Proposed Action alternative. Wildlife concerns regarding bighorn sheep mortality through disease transmission from domestic sheep and goats are based upon the best available scientific data and are addressed through application of the WAFWA and BLM IM 98-140 protective measures, considered by resource specialists to be the best management practices. Recreational demand is clearly established within the past SRP use data relied upon within the analysis. Potential impacts to WSAs are based upon existing GSENM monitoring data conducted on a yearly basis.
5. **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.** The project is not unique or unusual. The BLM has experience implementing similar actions (i.e., commercial and organized group SRPs) bureau-wide. The environmental effects to the human environment are fully analyzed in the EA. There are no predicted effects on the human environment that are considered to be highly uncertain or involve unique or unknown risks. GSENM will apply adaptive management practices by monitoring and recording SRP activities. Through an adaptive management framework built into the Proposed Action alternative, and based on findings from SRP monitoring, BLM will make necessary changes to future permit stipulations to minimize potential risks.
6. **The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.** The Proposed Action alternative was evaluated in the EA for potential future impacts related to increased interest and application numbers, as well as a cumulative impacts reasonable foreseeable action scenario that included other future actions. No significant impacts were identified as a result of these direct, indirect, or cumulative impacts. Although the analysis is programmatic in nature, the decision to approve or deny BLM SRPs remains at the discretion of the authorized official on a permit-by-permit basis.
7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts – which include connected actions regardless of land ownership.** The actions considered in the Proposed Action alternative were considered by the interdisciplinary team within the context of past, present, and reasonably foreseeable future actions. Significant cumulative effects are not predicted. A complete analysis of the direct, indirect, and cumulative effects of the Proposed Action alternative and all other alternatives is described in Chapter 4 of the EA. BLM has identified many future actions as

outlined in the EA. These reasonably foreseeable future actions will be addressed in separate environmental analysis.

8. **The degree to which the action may adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.** The project will not adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places, nor will it cause loss or destruction of significant scientific, cultural, or historical resources. BLM is currently engaged in formal consultation with the State Historic Preservation Officer regarding the bureau determination of no adverse effect to historic properties.
9. **The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973, or the degree to which the action may adversely affect: 1) a proposed to be listed endangered or threatened species or its habitat, or 2) a species on BLM's sensitive species list.** Three T & E animal species are recognized on the GSENM. There are currently no known impacts from SRP activities affecting any of the three species. Should SRP activity be found to cause potential impacts to T & E animal species, mitigation measures will be applied through the permitting process and on a case-by-case basis.
10. **Whether the action threatens a violation of a federal, state, local, or tribal law, regulation or policy imposed for the protection of the environment, where non-federal requirements are consistent with federal requirements.** The project does not violate any known federal, state, local or tribal law or requirement imposed for the protection of the environment. State, local, and tribal interests were given the opportunity to participate in the environmental analysis process. Furthermore, letters were sent to seven Native American tribes concerning consulting party status; there was one response from tribes. The Hopi tribe has requested a copy of the EA when it is available for public comment. The project is consistent with applicable land management plans, policies, and programs.


Authorized Officer

October 15, 2012
Date