

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

**Programmatic Environmental Assessment
for the
McInnis Canyons National Conservation Area
Special Recreation Permit Program**

Grand Junction Field Office
McInnis Canyons National Conservation Area
2815 H Road
Grand Junction, Colorado 81506

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CHAPTER 1 – INTRODUCTION

1.1 IDENTIFYING INFORMATION

BACKGROUND:

The Bureau of Land Management (BLM) is preparing this Environmental Assessment (EA) to analyze the opportunity for properly permitted commercial outfitters and guides to access public land under BLM administrative jurisdiction within the McInnis Canyons National Conservation Area (MCNCA). It also analyzes Special Recreation Permits (SRP) issued for competitive events, vending services, and group use. The SRP program is a major BLM recreation management component. It is a valuable management tool in helping to accomplish the BLM's recreational program goals. SRPs are required for all competitive, commercial, vending, special area, and organized group/event uses of public lands.

The MCNCA processes approximately 20 individual SRPs per year. Preparing a programmatic EA for SRPs rather than preparing individual EAs for each SRP will allow the BLM to examine the impacts from these types of events at a landscape-level and respond appropriately. It also sets an expectation for applicants as to the type of standards proposals must meet to be considered as eligible for an SRP, thus making the permitting process more efficient for everyone. Setting criteria for SRPs would determine the thresholds for issuing future permits in the planning area.

The intent of this programmatic EA is to provide a broad analysis of the different types of SRPs that may be authorized in the MCNCA, and to determine the potential mitigation measures that may be required to reduce impacts. New SRPs in the MCNCA that are within the scope of the proposal, analysis, and mitigation/stipulations in this EA would qualify for review through Documentation of NEPA Adequacy (DNA) and would not require new analysis. While site-specific National Environmental Policy Act (NEPA) analyses may be required for permits whose effects are not adequately analyzed by this EA, the BLM would likely tier to the programmatic EA for applicable portions of the analysis, thus reducing the costs and time in completing the NEPA process.

PROJECT NAME:

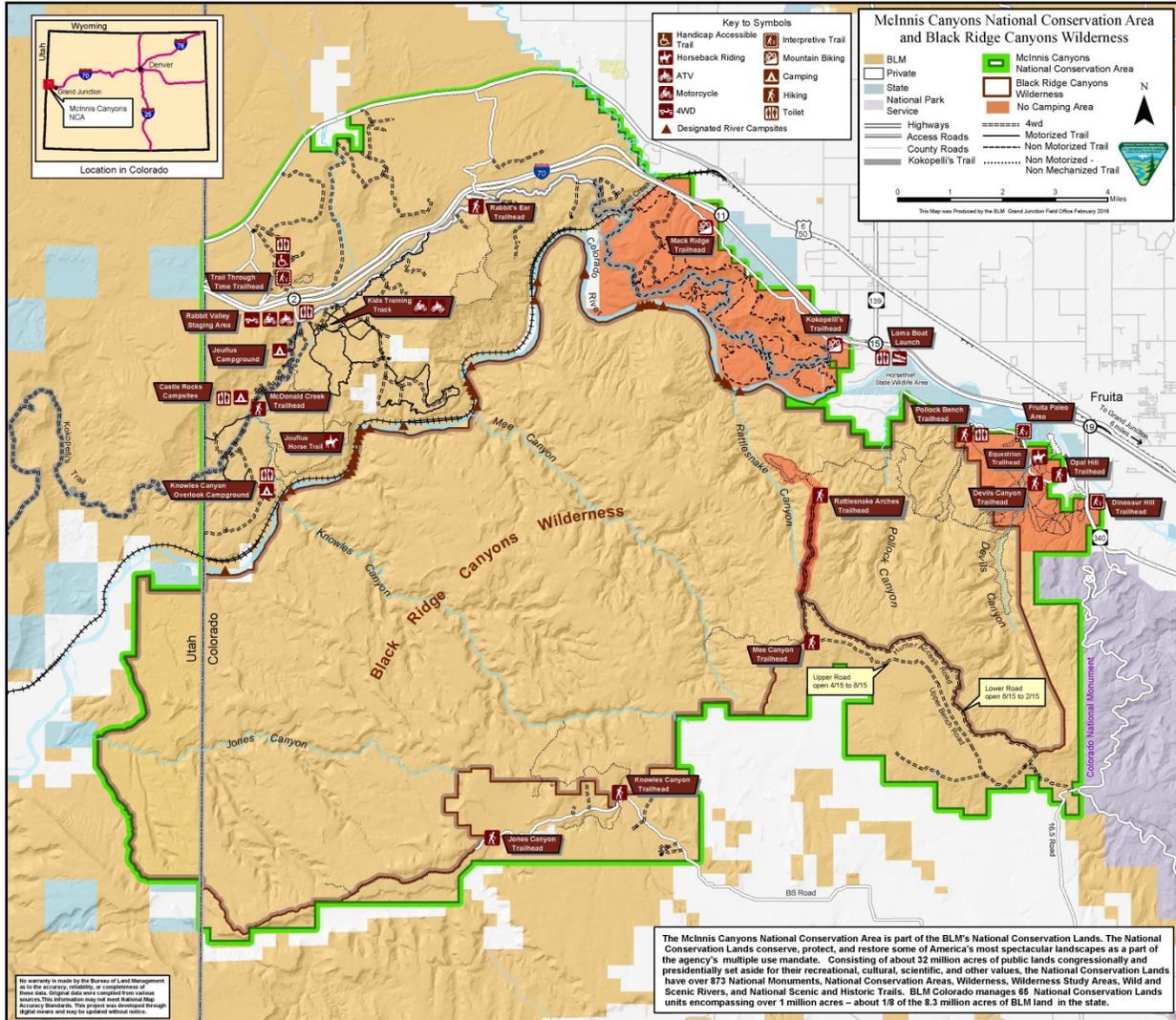
McInnis Canyons National Conservation Area Special Recreation Permit Programmatic EA.

PLANNING UNIT:

McInnis Canyons National Conservation Area

1.2 PROJECT LOCATION

McInnis Canyons National Conservation Area planning area (including the Colorado River); Mesa County Colorado and Grand County, Utah



1.3 PURPOSE AND NEED

The purpose of this action is to programmatically evaluate the issuance of SRPs throughout the MCNCA planning area for commercial and group activities on land managed by the BLM. SRPs provide a means to manage visitor use, protect natural and cultural resources, and achieve the goals and objectives outlined in the Resource Management Plan. The Proposed Action is needed to assist the BLM with responding in a timely manner to requests from the public for specialized recreation use (commercial, competitive, and organized groups) on BLM-administered lands within the MCNCA. It is the BLM's policy to require Special Recreation Permits for these types of specialized recreation uses (43 Code of Federal Regulations (CFR) §2930). Often, the BLM's issuance of SRPs is categorically excluded from documentation in an EA or Environmental

Impact Statement (EIS) under H-1790-1 Appendix 4 H. (1); however this categorical exclusion cannot be used in “Special Areas” including National Conservation Areas, therefore an EA is required.

1.4 PUBLIC PARTICIPATION

1.4.1 Public Scoping: Scoping, by posting this project on the Grand Junction Field Office NEPA website, was the primary mechanism used by the BLM to invite public involvement. No comments were received.

Issues Identified: No issues were identified during public scoping.

1.4.2 Internal Scoping: A description of the proposed action was distributed to the GJFO Interdisciplinary Team (IDT) and a NEPA Notification was sent to the IDT as well.

Issues Identified: The following issues were identified during Internal Scoping:

1. What are the potential impacts to cultural resources, paleontological resources, livestock grazing, vegetation, invasive/non-native species, riparian areas, and from hazardous or solid wastes associated with different types and sizes of competitive SRP events?
2. What are the potential impacts to transportation and recreation from different types of SRPs?
3. What is the extent of conflict between casual and commercial users?
4. What are the potential impacts to wilderness from different types of SRP activities and different various group sizes?

1.5 DECISION TO BE MADE

Based on this programmatic analysis and its incorporated Stipulations as Condition of Approval, the BLM MCNCA will decide whether or not to issue SRPs based on programmatic NEPA review. The BLM will decide whether to approve the proposed action based on the analysis contained in this Environmental Assessment (EA). The BLM may choose to: a) approve the project action, b) approve the proposed action with modifications/design features, c) approve an alternative to the proposed action, or d) not approve the proposed action at this time.

CHAPTER 2 – PROPOSED ACTION AND ALTERNATIVES

2.1 INTRODUCTION

The purpose of this chapter is to provide information on the Proposed Action and Alternatives. Alternatives considered but not analyzed in detail are also discussed.

The Proposed Action or Alternative chosen from this EA would be the basis for management of Special Recreation Permits within the MCNCA.

2.2 ALTERNATIVES ANALYZED IN DETAIL

2.2.1 Proposed Action

The Proposed Action would authorize SRPs for commercial, competitive, organized group events, and vending services, on approximately 123,430 acres of public land administered by the BLM MCNCA. SRPs would be issued to support management objectives in the MCNCA Resource Management Plan. BLM would only issue SRPs for activities that are consistent with the different recreation zone management objectives. The RMP identifies a variety of recreation opportunities. As such, SRPs would be issued for hiking, backpacking, hunting, cycling, running, camping, OHV riding, horseback riding, river boating, paleontological resource viewing, cultural resource viewing, picnicking, climbing, jeep tours, and OHV instruction. In accordance with the MCNCA RMP, no competitive SRPs would be issued for motorized event throughout the NCA. Additionally, no competitive SRPs for bicycle events would be issued on Mack Ridge.

Rather than preparing an individual EA for each new SRP application or renewal, this programmatic EA consolidates an authorization process for all commercial, competitive, and organized group events and recreational activities in the MCNCA. This proposal would serve to expedite the SRP process and reduce the amount of time, burden, and expense required for applicants, existing permittees, and BLM staff.

Special Recreation Permits would be issued at the discretion of the NCA Manager who may, at any time and without prior notice, choose not to issue permits for certain activities or use areas. Such decisions could be based on a variety of factors such as planning decisions, potential resource impacts, existing outfitters in the same area, overcrowding, past poor performance, and other concerns. All SRPs would include the General Terms associated with the permit, Standard Terms, Conditions, and Stipulations (see attached). Event permits would also include the SRP event stipulations.

Proposals would be evaluated to determine whether they are consistent with recreation program objectives; whether the opportunity is already available under an existing permit; whether there is adequate market competition; and whether the event would create conflict with the public and/or other existing permitted activities; among other factors.

All permit proposals would be classified using a Classification Criteria and a Classification Matrix. The purpose of classifying SRPs is to screen proposals to ensure they are consistent with and supporting planning objectives. The Classification Criteria table (Table 2.2.2-1) includes factors to determine the potential impacts to resources as a result of the proposed activities. Each factor is evaluated as either present or not present or along a continuum ranging from Low, Moderate, or High for each resource.

After permit proposals have been evaluated using the Classification Criteria Table, the results would be applied to the Classification Matrix (Table 2.2.2-2) to determine whether the proposal is either Class 1 (low impact), Class II (medium impact), Class III (moderate impact), or Class IV (high impact). Different proposed activities and outings would have different impacts to the various resources. As such, proposals would not always be clearly classified as I, II, III, or IV. In many situations there will be one or two resources where impacts are higher than impacts to the

other resources. In these cases, the BLM may deny the application, require modification to the proposal, or mitigate the resource concern through permit stipulations. The Permit Classification Criteria is intended to document that the BLM took a hard look at each permit proposal. As conditions change, criteria may also change. Some criteria may be removed and other criteria may be added.

Table 2.2.2-1: Permit Classification Criteria

Permit Classification Criteria			
Resource		Anticipated Impact	Description of Impact
Nesting Raptors		Low	Proposal is not within a half mile of a cliff nesting raptor, ferruginous hawk, bald eagle, or golden eagle nest; or a quarter of a mile of other raptors nests or is not proposed to occur between November 15 and August 31.
		Moderate	Proposal falls within a half mile of an occupied nest of a cliff nesting raptor, ferruginous hawk, bald eagle, or golden eagle nest; or a quarter mile of other raptor nests during the breeding season but is not expected to impact breeding success because of the nature of the proposal.
		High	Proposal falls within a half mile of an occupied nest of cliff nesting raptor, ferruginous hawk, bald eagle, or golden eagle nest; or a quarter mile of other raptor nests during the breeding season and has the potential to impact breeding success.
Wildlife	Visual	No	Artificial lighting system used will not be used or will be less than 1000 candle power.
		Yes	Artificial lighting system used will be 1000 candle power or greater.
	Audio	No	A loudspeaker or other broadcasting device will not be used.
		Yes	A loudspeaker or other broadcasting device will be used.
Water Quality		No	Proposal doesn't fall within a water quality impaired stream segment, a riparian area, an area with Mancos shale, or activity won't affect stream or hydrologic functions.
		Yes	Proposal falls within a water quality impaired stream segment, riparian areas will be impacted, an area comprised of Mancos shale, or the activity would affect the stream and hydrologic functions.
Cultural Sensitivity Zones		Low	Proposal within areas identified by the BLM archaeologist as being low in cultural site potential or Native American concerns.
		Moderate	Proposal within areas identified by the BLM archaeologist as being moderate in cultural site potential or Native American concerns.
		High	Proposal within areas identified by the BLM archaeologist as being high in cultural site potential or Native American concerns.
Paleontological		Low	Surface geology consists of PFYC Class 1-3 formations.

	Low (if utilizing existing routes)	Surface geology consists of PFYC Class 4-5 formations.
	High	Known vertebrate fossil site(s) can be seen.
Soils/Vegetation	Low	Site and associated features demonstrate resilience and resistance to anticipated activity or are sufficiently disturbed that they would not be impacted
	Moderate	Site and associated features demonstrate some ability to resist/recover from impacts. Locations which may be rated at moderate could occur on either fragile soils or soils with high wind erosion potential, not both.
	High	Site and associated features demonstrate limited ability to resist/recover from impacts. Location which may be rated as high would occur on fragile soils and soils with high wind erosion potentials.
Desert Salt Shrub Vegetation	Low	Proposal outside of desert shrub/saltbush community.
	Moderate	Proposal within desert shrub/saltbush community but outside intact desert shrub/saltbush vegetation.
	High	Proposal within intact desert shrub/saltbush vegetation.
Riparian Vegetation, Perennial Waters, Seeps and Springs	Low	Proposal is more than 100 meters from the edge of riparian vegetation and wetlands.
	Moderate	Proposal includes use within 100 meters of riparian vegetation on designated trails that cross riparian vegetation or camping at designated campsites.
	High	Proposal includes use within riparian vegetation off designated trails or outside designated campsites.
Bats	Low	Proposal is not within 0.25 miles of the entrance of maternity roosts or hibernacula of BLM sensitive bat species.
	Moderate	Proposal is within 0.25 miles of the entrance of maternity roosts or hibernacula of BLM sensitive bat species but is not expected to bats because of the nature of the proposal.
	High	Proposal is within 0.25 miles of the entrance of maternity roosts or hibernacula of BLM sensitive bat species and is expected to impact bats of the nature of the proposal.
Bighorn Sheep	Low	Proposal is outside Bighorn Sheep production and summer concentration areas
	Moderate	Proposal is outside Bighorn Sheep production areas and within summer concentration areas.
	High	Proposal is within Bighorn Sheep production areas.
Special Status Plant Species, BLM sensitive plants)	Low	Proposal is greater than 200 meters from sensitive species.
	Moderate	Proposal is greater than 100 meters from sensitive species.
	High	Proposal is less than 100 meters from sensitive species.
Kit Fox	Low	Proposal is greater than 200m from an active kit fox den.
	Moderate	Proposal is less than 200 m from an active kit fox den but is not expected to kit fox because of the nature of

		the proposal.
	High	Proposal is less than 200 m from sensitive species and is expected to impact kit fox of the nature of the proposal.
Sage grouse	Low	Proposal is outside of critical habitat for Gunnison sage grouse, and more than 4 miles from an active lek.
	Moderate	Proposal is within Gunnison sage grouse unoccupied critical habitat or within 4 miles of an active lek.
	High	Proposal is within occupied Gunnison sage grouse critical habitat or within 0.6 miles of an active lek.
Wintering Wildlife (Mule Deer, Elk, Desert Bighorn Sheep, Pronghorn Antelope)	Low	Proposal is not between December 1 to May 1.
	Moderate	Proposal is between December 1 to May 1 and does not affect wildlife.
	High	Proposal is between December 1 to May 1 and does affect wildlife.
Yellow-billed Cuckoo	Yes	Yellow-billed cuckoos are present or the proposal is within critical habitat.
	No	The proposal is not within critical habitat and there are not any yellow-billed cuckoos.
Migratory Birds	Low	Proposal is not between May 15 to July 15.
	Moderate	Proposal is between May 15 to July 15 and does not affect migratory birds or is not between May 15 to July 15 and does affect migratory birds
	High	Proposal is between May 15 to July 15 and does affect migratory birds.
Within Existing Disturbance (Designated routes, staging areas, designated campsites, etc.)	Low	< 5 acres
	Moderate	5 to 40 acres
	High	> 40 acres
Duration of Use	Low	One day or less
	Moderate	Two to six days
	High	> six days
Anticipated Number of Participants (including the wilderness in Recreation Management zone 10)	Low	< 12
	Moderate	13-25
	High	25+
Anticipated Number of Vehicles	Low	1-6
	Moderate	6-10
	High	10+
Competitive Event	Yes	The event or activity is competitive in nature.
	No	The event or activity is non-competitive.
Motorized/Mechanized Support	Yes	Vehicles or other mechanized equipment required in support of activity.
	No	No vehicles or other mechanized equipment required.
Wilderness (Group Size in Recreation Management zone 7 and 8)	Low	< 4
	Moderate	5 - 9
	High	10 - 12
Wilderness	Yes	The proposal is inside the Black Ridge Canyons Wilderness
	No	The proposal is not inside the Black Ridge Canyons Wilderness

BLM Monitoring and Inspection Requirements	Low	No significant pre or post permit oversight activities required.
	Moderate	Pre or post permit activities require up to eight hours BLM oversight.
	High	Pre or post permit activities require more than eight hours BLM oversight.

Table 2.2.2-2: Permit Classification Matrix

Permit Classification Matrix				
Evaluation Factors	Permit Class			
	I	II	III*	IV*
Wildlife Nesting Raptors	Low	Moderate	Moderate	High
Wildlife (Visual)	No	Yes	Yes	Yes
Wildlife (Audio)	No	Yes	Yes	Yes
Water Quality	No	Yes	Yes	Yes
Cultural/Tribal Religious Concerns	Low	Moderate	Moderate	High
Paleontological	Low	Moderate	Moderate	High
Soils/Vegetation	Low	Moderate	Moderate	High
Desert Shrub/Saltbush Vegetation	Low	Moderate	Moderate	High
Riparian Vegetation	Low	Moderate	Moderate	High
Bats	Low	Moderate	Moderate	High
Bighorn Sheep	Low	Moderate	Moderate	High
Special Status Plant Species	Low	Moderate	Moderate	High
Kit Fox	Low	Moderate	Moderate	High
Sage Grouse	Low	Moderate	Moderate	High
Wintering Wildlife	Low	Moderate	Moderate	High
Yellow-billed Cuckoo	No	No	Yes	Yes
Migratory Birds	Low	Moderate	Moderate	High
Within Existing Disturbance	Low	Low	Moderate	High
Duration of Use	Low	Moderate	Moderate	High
Anticipated Number of Participants	Low	Moderate	Moderate	High
Anticipated Number of Participants (Wilderness)	Low	Moderate	Moderate	High
Wilderness	No	No	Yes	Yes
Anticipated Number of Vehicles	Low	Low	Moderate	High
Competitive Event	No	No	Yes	Yes

<i>Motorized Support</i>	No	No	Yes	Yes
<i>Monitoring and Inspection Requirements</i>	Low	Low	Moderate	High

* Class III events are more likely to require cost recovery due to the probability of these events needing more than 50 hours of BLM staff time for permit administration.

Determining Need for an Organized Event Permit

Criteria	Permit Not Required	Permit Required	Deny as proposed
Is the activity recreational in nature?	If the use is not recreational, may require a right-of-way grant/permit or no permit.		
Is the use appropriate to the site? Is there a management concern for cultural, tribal, paleontological, livestock, or natural resources, or facilities on public land?	Yes, site very conducive to the proposed use, provided for in planning.	Site is appropriate for group size and activity, not specifically provided for in plan.	No, site is not appropriate for use as proposed. Does not conform with recreation planning goals, violates ROS Class or experience prescriptions.
Does the activity further recreation program goals and objectives?	Yes	Yes	No
Is monitoring needed?	Nothing beyond one simple site visit.	Monitoring beyond a one-time site visit required.	Long term monitoring of one or more resources required.
Health and Safety Concerns?	None	Concerns for event participants or other public land users.	Unmitigated, high risk to human health and safety. Unreasonable risk especially to non-participants.
Bonding desirable to cover reclamation, damage to government property or resources?	No	Bonding desirable or required.	
Insurance desirable to protect the U.S. Government from claims by group participants or third parties?	No, liability exposure is negligible.	Insurance is desirable due to possible claims for personal injury or property damage.	
Special services required such as Law Enforcement, fire protection, exclusive use of public lands, reserved sites etc.	No	Yes	

Additional Guidelines for Evaluating Non- Commercial Group Use Proposals

Action	Wilderness	River Corridor	North of River	
			Day Use	Overnight
Group Size Where No Authorization Required	12 or less	25 or Less	25 or Less	15 or Less
Group Size Requiring Use Authorization	12 - 25	25 - 35	25 – 35	15 - 45
Group Size Requiring Special Recreation Permit	More Than 25	More Than 35	More Than 35	More Than 45

2.2.2 Design Features of the Proposed Action

Along with planning objectives, the BLM MCNCA would use the results of the permit classification system and the organized group criteria to determine whether certain proposals are appropriate in different areas of the NCA.

All SRP applications will be evaluated to ensure consistency with recreation planning objectives.

Monitoring data for SRPs would be gathered on an on-going basis. Individual permittees would receive an annual evaluation outlining their performance related to their operations plans and the terms and conditions of their permits. Monitoring data would also be used to evaluate whether operations plans and the conduct of permittees continue to support planning objectives. Since SRP authorization is discretionary, permits that are not supporting the achievement of planning objectives would be modified or canceled.

The SRP decisions from the Resource Management Plan (RMP) for the NCA would be carried forward. Along with the SRP decisions from the RMP the following implementation-level decisions would be applied for the different areas within the NCA.

Applies to the entire MCNCA

1. The Resource Management Plan does not allow for permits for air tours or competitive motorized events within MCNCA.
2. No Class IV permits would be issued in the NCA.
3. SRP proposals would be designed to minimize route closures.
4. Event SRPs would include a rain contingency plan to ensure roads and trails are not damaged during wet conditions.
5. Commercial use SRPs would include a stipulation that prohibits use of roads and trails during wet conditions to prevent damage.

6. Courses for competitive SRPs would be required to include sections of double track trails. These SRPs would include a stipulation that there would be no passing on single-track trail sections when the participants being passed are moving.
7. Courses for competitive events would include adequate two-track sections to accommodate passing.
8. In the event that Fire Restrictions are in place, all SRPs will abide by the rules and regulations associated with the restrictions.

Mack Ridge

1. No more than 4-full time commercial bike permits would be allowed at any one time. If the existing number exceeds this when the RMP is validated, vacated permits would not be re-issued until there are less than 4 valid permits in operation. A “full time permitted mountain bike permit” is defined as a guide permitted on all Mack Ridge trails that operates more than ten trip days (not user days) a year.”
2. Each full-time commercial bike permit is limited to no more than 15 participants (clients + guides) on the trail system at any one time, and no individual groups in excess of 12 participants.
3. Commercial permits for equestrian use would not be granted.
4. Competitive events would be limited to walking/running.
5. Equestrian group-use events are limited to week-days only.
6. Events with more than 50 participants are limited to 1 event per month, plus 2 additional (14 total), with no more than 2 events occurring in a single month.

Black Ridge Canyons Wilderness

1. All SRP proposals proposed within the wilderness area would be analyzed with a Minimum Requirements Decision Guide to ensure the proposal is necessary for realization of the recreational and purposes of Black Ridge Canyon Wilderness. (see attached Minimum Requirements Decision Guide)
2. Competitive events would not be permitted inside the Black Ridge Canyons Wilderness.

Resource/Program specific stipulations that may be added to SRPs where applicable:

Livestock Grazing

1. Restrictions may be stipulated for commercial SRP operation or issuance of noncommercial SRPs, based on high-use periods such as holidays and weekends during active seasonal-use periods, or due to resource concerns related to wildlife, calving

season for active grazing allotments (January-February), weather-related concerns, and other situations where resource impacts become a concern (CCNCA RMP 2004 P. 2-63).

2. Where possible, SRP permits would avoid conflicts with livestock grazing operations that occur in the MCNCA. To avoid conflicts, camping sites, picnics and stops would be away from stock ponds, troughs, water hauling sites, and salting areas. Timing of use of trails or areas would be coordinated with the permittee to avoid use at the same time and closed gates would be kept closed. If an event is going to occur in an area where the permittee has livestock, communication and coordination with the permittee would be needed to move the cattle away from the event area or timing of the event would be changed to avoid livestock.

Hazardous Materials

1. Organized, motorized recreational activities in extremely rough terrain (e.g. “rock-crawling” activities) may increase the chances for fuel and lubricant spills. Group leaders/permittees should be required to carry spill kits and to notify the BLM Authorized Officer promptly of any spills.

Cultural Resources/Tribal Concerns:

1. Changes or modifications to SRPs may be required prior to approval to protect significant cultural resources. Some types of events (such as competitive events or surface-disturbing events) might require intensive pedestrian survey of the area (Class III [intensive] inventory) prior to SRP permitting. Specific stipulations (such as the requirement for cultural or tribal resource education or site etiquette discussions with clients/participants to occur) might be added to individual permits depending on the type of activity. Additionally, the following standard stipulations would be added to all SRPs to reduce impacts to significant cultural and tribal resources not known to the agency:
2. All persons in the area who are associated with this special recreation permit shall be informed that any person who, without a cultural resource use permit, injures, destroys, excavates, appropriates or removes any historic or prehistoric ruin, artifact, object of antiquity, Native American remains, Native American cultural item, or archaeological resources on public lands is subject to arrest and penalty of law (16 USC 433, 16 USC 470, 18 USC 641, 18 USC 1170, and 18 USC 1361). Strict adherence to the confidentiality of information concerning the nature and location of archeological resources would be required of the permittee and all of their subcontractors (Archaeological Resource Protection Act, 16 U.S.C. 470hh)
3. Inadvertent Discovery: The National Historic Preservation Act (NHPA) [16 USC 470s., 36 CFR 800.13], as amended, requires that if newly discovered historic or archaeological materials or other cultural resources are identified during the permitted activity, work in that area must stop and the BLM Authorized Officer (AO) must be notified immediately. Within five working days the AO will determine the actions that will ensure in place preservation is not necessary).
4. The Native American Graves Protection and Repatriation Act (NAGPRA) [25 USC 3001 et seq., 43 CFR 10.4] requires that if inadvertent discovery of Native American Human

Remains or Objects of Cultural Patrimony occurs, any activity must cease in the area of discovery, a reasonable effort made to protect the item(s) discovered, and immediate notice be made to the BLM Authorized Officer, as well as the appropriate Native American group(s) (IV.C.2). Notice may be followed by a 30-day delay (NAGPRA Section 3(d)).

5. The BLM will request a relocation of activities to avoid the expense of mitigation and delays associated with new discovery cultural resources such as those described above. This may change the final acres or areas available for the SRP and require bilateral agreement of the implementation contract. The BLM authorized officer will provide technical and procedural guidelines for redesign of the SRP area. Upon verification from the BLM authorized officer that the required mitigation has been completed, the permittee will be allowed to resume implementation.
6. Changes or modifications to SRP proposals may be required prior to approval to address tribal concerns and some situations may warrant that additional NEPA occur for a permit because of tribal impacts and concerns. Some types of events might require individual tribal consultation and/or intensive pedestrian survey of the area (Class III inventory) prior to SRP permitting. Specific stipulations might be added to individual permits depending on the type of activity and its possible impacts to items, resources, or areas of tribal concern, the classes of these stipulations are listed in the Proposed Action.

Riparian

1. Additional mitigation measures and/or stipulations including limiting number of participants and/or imposing timing and/or area limitations within riparian areas or up to 100 meters from riparian areas will be added to individual proposals as needed to protect riparian areas.
 - Vehicles should stay on established routes that parallel or cross riparian zones.
 - For Class III/IV permits: Vehicles should not park at creek crossing, or along sections of routes that are within 100 meters of riparian zones.
 - Vehicles should avoid passing on routes that are adjacent to (within 100 meters) riparian zones.
 - Participants in permitted activities should not congregate at riparian zones. Rest or lunch breaks should also take place outside of riparian zones.

Wildlife

1. Additional design features could be added at the time of proposal including observing appropriate wildlife buffers, light, noise, number of participant, or timing limitations, and avoidance areas.

Noxious Weeds

1. Additional mitigation measures and/or stipulations including requiring equipment cleaning and inspection, number of participant, timing, and area limitations will be added to individual proposals as needed to mitigate spread of invasive and non-native species.

Hydrology

1. For all trail based SRPs, trail maintenance will be completed on any portions of the course identified by the BLM and event organizers as needing maintenance to facilitate participant safety and/or trail sustainability. Inventory and assessment guidelines outlined in BLM Manual Handbooks H-9113-2 and H-9115-2 should be followed. Maintenance work may include reconditioning of the tread, reestablishing drainage features, reestablishing proper tread and back slope profile. All pre-race trail maintenance should follow guidance outlined in BLM Manual Handbooks H-9113-1 and H-9115-1 and must be pre-approved by the BLM.
2. Post-race trail conditions will be reviewed jointly by BLM and the permittee. Inventory and assessment guidelines outlined in BLM Manual Handbooks H-9113-2 and H-9115-2 should be followed. All post-race maintenance should follow guidance outlined in BLM Manual Handbooks H-9113-1 and H-9115-1 and must be pre-approved by the BLM. The permittee will conduct any trail rehabilitation needed to restore trails to pre-race conditions within a time period specified by BLM.
3. In the event of wet weather/muddy trail conditions, permittee will implement weather contingency plans in consultation with the BLM to decide if use of travel infrastructure should be postponed or canceled.
4. While in the river corridor, human waste must be properly disposed of in approved facilities. Approved portable toilet systems to collect and carry out solid human and dog waste are required. Dispose of waste in a sewer system or EPA-approved bag system after visits will be required.
5. Keep springs and other non-river water sources free of soap and other contaminants.
6. In the event of high wind, winds greater than 12 miles per hour, permittee will implement weather contingency plans in consultation with the BLM to decide if the activities could occur in locations that would be protected from the wind to reduce the aeolian erosion.
7. For all SRPs all BMPs determined appropriate by the BLM to protect soil and water resources shall be included in the permit.
8. For all motorized, mechanized, and equestrian event, existing trails and roads should be used.
9. Limit the number of participants or reduce the frequency between participants for all non-competitive motorized events.

2.2.3 No Action Alternative

In the No Action Alternative, SRPs would continue to be analyzed on a case by case basis. Separate environmental analysis or review would be prepared for each application.

2.3 PLAN CONFORMANCE REVIEW

PLAN CONFORMANCE REVIEW: The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

Name of Plan: Colorado (McInnis) Canyons National Conservation Area and Black Ridge Canyons Wilderness Resource Management Plan

Date Approved: September, 2004

Decision Number/Page: Pages 2-62 & 2-63

Decision Language:

Various recreational uses that occur within the CCNCA require a Special Recreation Permit (SRP). These activities include commercial use, competitive use, vending, organized group activity and event use, and special use areas.

Commercial Use involves an individual or organization providing recreational opportunities that are business related or involve financial gain. Scientific, educational and therapeutic institutions, as well as non-profit organizations, may still fall under this category.

Competitive Use refers to events/activities that include an element of competition.

Vending permits are temporary authorizations to sell goods or services on public lands and are usually in conjunction with a recreation activity.

Organized Group Activity and Event Use may require an SRP, even if not commercial or competitive in nature. The BLM Authorizing Officer determines when an SRP is needed based on resource concerns, user conflicts, public health and safety, and other factors. The Authorizing Officer may elect to issue a **Use Authorization**, which includes stipulations for use but is simple to process and does not require a fee.

Special Area Use permits may be required for individual (private, non-commercial) use in specially designated areas, including National Conservation Areas. This plan does not initially require Special Area Use permits for any locations within CCNCA, but the option remains available if needed as an adaptive management tool to manage impacts of increasing future use. If there is any question whether or not a proposed activity on public lands falls within one of the above categories, the BLM office will be contacted for additional information.

Commercial SRPs are issued based on an annual schedule. Applications must be submitted by a specified date to be considered for issuance during that year's process. Renewals are processed via the same schedule, although some SRPs are multi-year. First-time permits are issued annually on a probationary term for the first two years. If operation is acceptable and remains in compliance with permit stipulations, an SRP may be reissued for up to ten years at the discretion of the Authorizing Officer. All

commercial SRPs are reviewed on an annual basis and require all fees are paid and post-use information submitted as part of the review process.

Non-commercial SRPs require a minimum of 180 days for processing in advance of the first intended use date unless a shorter time is authorized by the Field Manager/ Authorizing Officer having jurisdiction over the public lands to be used.

Issuance of an SRP and acceptance of the proposed date(s) of use are not guaranteed and should not be assumed, until confirmed by the Authorizing Officer.

Proposed activities must be consistent with the recreation sub-zone and settings in which the activity will take place. Zones 1 – 10 are discussed in this chapter.

Limits may be set for the following as carrying capacities are determined for Recreation Opportunity Spectrum (ROS) zones through monitoring of the physical and social settings:

- Group size for commercial operations
- The number of participants allowed for competitive or organized group use events
- The number of active commercial SRPs for various uses
- The number of competitive or organized group event SRPs issued in an ROS zone per year (or other specified timeframe)

Permits will not be granted for air tours over CCNCA. Permits will not be granted to conduct competitive motorized events within CCNCA.

Restrictions may be stipulated for commercial SRP operation or issuance of noncommercial SRPs, based on high-use periods such as holidays and weekends during active seasonal-use periods, or due to resource concerns related to wildlife, calving season for active grazing allotments (January-February), weather-related concerns, and other situations where resource impacts become a concern.

Temporary closure (either full or partial) of an area may be enforced for all use not associated with a permitted event to promote health and safety concerns, to enhance resource protection and/or due to other factors deemed necessary by the Authorizing Officer.

Special Recreation Permits are issued at the discretion of the Field Manager, who may at any time and without prior notice, choose not to issue permits for certain activities or use areas. Such decisions could be based on a variety of factors such as planning decisions, potential resource impacts, existing outfitters in the same area, overcrowding, past poor performance, and other concerns.

Regulations for Specific Locations within CCNCA

Colorado River

The moratorium for issuing commercial SRPs for guided river tours will continue until an acceptable carrying capacity is determined. (*Determined in Ruby-Horsethief Recreation Area Management Plan December 2011*)

Rabbit Valley

- Permits will not be granted for competitive motorized events.

Mack Ridge

- No more than 4 full-time commercial bike permits will be allowed at any one time. If the existing number exceeds this when the RMP is validated, vacated permits will not be reissued until there are less than 4 valid permits in operation.
- Each full-time commercial bike permit is limited to no more than 15 participants (clients + guides) on the trail system at any one time, and no individual groups in excess of 12 participants.
- Commercial permits for equestrian use will not be granted for Mack Ridge.
- Competitive events permitted in Mack Ridge will be limited to walking/running.
- Equestrian group-use events are limited to week-days only.
- Events with more than 50 participants are limited to 1 event per month, plus 2 additional (14 total), with no more than 2 events occurring in a single month.

General Guidance for Evaluating Group-Use Proposals

The following matrix is a quick initial evaluation that could be used for group-use proposals that are not commercial or competitive in nature. The matrix shows the decision-making process that will be used to determine if a special recreation permit will be required.

Group-Use Guideline Example

Action	Wilderness	River Corridor	North of River	
			Day Use	Overnight
Group Size Where No Authorization Required	12 or Less	25 or Less	25 or less	15 or Less
Group Size Requiring Use Authorization	12 – 25	25 – 35	25 – 35	15 – 45
Group Size Requiring Special Recreation Permitted	More than 25	More Than 35	More Than 35	More Than 45

Permit policy is subject to change on an annual basis, so the direction included in this document is general in nature or discusses aspects of the program that are constant. More detailed information can be found in the Code of Federal Regulations (CFR), BLM

Manual and BLM Handbook H-2930-1 Recreation Permit Administration, and the BLM Special Recreation Permit Handbook for Colorado, which is updated annually.

2.4 LAND HEALTH STANDARDS

In January 1997, the Colorado State Office of the BLM approved the Standards for Public Land Health and amended all RMPs in the State. Standards describe the conditions needed to sustain public land health and apply to all uses of public lands.

Standard 1: Upland soils exhibit infiltration and permeability rates that are appropriate to soil type, climate, land form, and geologic processes.

Standard 2: Riparian systems associated with both running and standing water function properly and have the ability to recover from major disturbance such as fire, severe grazing, or 100-year floods.

Standard 3: Healthy, productive plant and animal communities of native and other desirable species are maintained at viable population levels commensurate with the species and habitat's potential.

Standard 4: Special status, threatened and endangered species (federal and state), and other plants and animals officially designated by the BLM, and their habitats are maintained or enhanced by sustaining healthy, native plant and animal communities.

Standard 5: The water quality of all water bodies, including ground water where applicable, located on or influenced by BLM lands will achieve or exceed the Water Quality Standards established by the State of Colorado.

Because standards exist for each of these five categories, a finding must be made for each of them in an environmental analysis. These findings are located in Chapter 3 of this document.

CHAPTER 3 – AFFECTED ENVIRONMENT AND EFFECTS

3.1 INTRODUCTION

This section provides a description of the human and natural environmental resources that could be affected by the Proposed Action and presents comparative analyses of the direct, indirect, and cumulative effects on the affected environment stemming from the implementation of the actions under the Proposed Action and other alternatives analyzed.

This EA draws upon information compiled in the Grand Junction Field Office Approved Resource Area RMP (BLM 2015) and the Colorado Canyons (McInnis) National Conservation Area (CCNCA) RMP (BLM 2004).

3.1.1 Elements Not Affected

The following elements, identified as not being present or not affected will not be brought forward for additional analysis:

Air and Climate – Activities permitted under this analysis should be subject to the stipulations listed in the soil and water section. If these stipulations are applied, there would be no air quality impacts.

Geological – recreation permits would not affect the geology;

Mineral Resources - The NCA is closed to mineral exploration;

Wild and Scenic Rivers - no wild and scenic rivers are in the project area;

Wild Horse and Burros - no wild horses and burros are in the project area;

Visual Resources – SRPs are temporary use authorizations that do not include permanent changes to the physical landscape. As such, any visual changes to the landscape as a result of activities authorized under an SRP would be temporary and would not impact visual resources.

Land Tenure, ROW and Other Uses – recreation permits would not affect land tenure, ROWs, and other uses.

3.1.2 Past, Present, Reasonably Foreseeable Actions

NEPA requires federal agencies to consider the cumulative effects of proposals under their review. Cumulative effects are defined in the Council on Environmental Quality (CEQ) regulations 40 CFR §1508.7 as “...the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable actions regardless of what agency...or person undertakes such other actions.” The CEQ states that the “cumulative effects analyses should be conducted on the scale of human communities, landscapes, watersheds, or airsheds” using the concept of “project impact zone” or more simply put, the area that might be affected by the proposed action. The area that may be affected by this project includes the entire McInnis Canyons NCA. To assess past, present and reasonably foreseeable actions that may occur within the affected area a review of GJFO NEPA log and our field office GIS data was completed. The following list includes all past, present and reasonably foreseeable actions known to the BLM that may occur within the affected area:

Past Actions:

Numerous dams, unauthorized trespasses (e.g., road building, stream bank manipulation), recreational activities (e.g., hiking/backpacking, boating, mountain biking, OHV use), irrigation, livestock grazing activities, rights of ways (e.g., cell tower, power lines), paleontological excavations, and introductions of non-native plant and fish or other aquatic species have occurred within the past fifty years.

Several land acquisitions have taken place over the last 25 years, including 640 acres at the mouth of Devils Canyon (acquired in 1992), 320 acres in Flume Canyon (acquired in 1996), and 60 acres where the access from the Kings View Road enters Devils Canyon (acquired in 2000). The 640 acre tract was slated for development of luxury homes accompanied with a proposed golf course. Flume Canyon was planned for community development on 35 acre parcels. In 2005 and 2006, 1,349 acres were acquired, in Rabbit Valley, from the Joufflas family. The associated land was used primarily for ranching operations.

Fires within the past 10 years have included:

Wrigley Fire – 145 acres (2005) and subsequent rehab and revegetation

Mee Canyon Fire – 58 acres (2005) and subsequent rehab and revegetation

Knowles Canyon Fire – 91 acres (2007) and subsequent rehabilitation and revegetation

Gibson fire – 7 acres (2011)

Long Mesa Fire – 157 acres (2012) and subsequent rehabilitation and revegetation

Wrigley Fire – 72 acres (2012)

Dog Canyon Fire – 50 acres (2015)

Present Actions:

Grazing operations are presently occurring in all areas except the Front Country. Recreation use in the planning area remains high and is increasing. Recreational trail rehabilitation and maintenance continue to be a strong focus in the Recreation Management Zones (Mack Ridge, Rabbit Valley, and Front Country). Weed management continues to be a major priority on the Ruby/Horstthief section of the Colorado River.

Reasonably Foreseeable Actions:

Future proposed actions are related to managing the current trails system and reclaiming any non-desirable social trails. Actions are primarily limited to closing any additional social trails that develop, relocating segments of non-sustainable trail, and the construction of additional trails designated in the Resource Management Plan. Recreation projects and activities will continue to be monitored and evaluated to determine consistency with RMP objectives and guidance. Livestock grazing operations will continue throughout the MCNCA.

Table 3.1.2

Resources	Not Present On Location	No Impact	Potentially Impacted	Mitigation Necessary?	BLM Evaluator Initial & Date
Air and Climate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y <input type="checkbox"/> N <input type="checkbox"/>	KEH 2/4/16
Water (surface & subsurface, floodplains)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	KEH 2/4/16
Soils	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	KEH 2/4/16
Geological/Mineral Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y <input type="checkbox"/> N <input type="checkbox"/>	DSG 5/13/14
Special Status Plants	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	NH 12/6/13
Special Status Wildlife	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	HLP 9/25/15
Migratory Birds	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	HLP 9/25/15
Other Important Wildlife Habitat	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	HLP 9/25/15
Vegetation, Forestry	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	NH 12/6/13
Invasive, Non-native Species	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	MT 8/26/14
Wetlands/Riparian Zones	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	NH 9/24/14
Cultural or Historical	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	ALR 8/27/15
Paleontological	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	DSG 5/13/14
Tribal & American Indian Religious Concerns	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	ALR 8/27/15
Visual Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	AW 2/19/16
Social/Economic	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	CE 8/25/15
Transportation and Access	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	AW 2/19/16
Wastes, Hazardous or Solid	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	A. Kraus 8/27/13
Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	AW 2/19/16
Special Designations (ACEC, SMAs,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	AW 2/19/16

Resources	Not Present On Location	No Impact	Potentially Impacted	Mitigation Necessary?	BLM Evaluator Initial & Date
WSR)					
Wilderness & Wilderness Characteristics	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	AW 2/19/16
Range Management	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	SC 2/23/16
Wild Horse and Burros	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	SC 8/4/14
Land Tenure, ROW, Other Uses	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	RBL 1/21/15
Fire/Fuels	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	JP 1/23/15

3.2 PHYSICAL RESOURCES

3.2.1 Soils (includes a finding on Standard 1)

Current Conditions:

Soils within the project area have been mapped by the Natural Resource Conservation Service (NRCS) in an Order III soils survey; Mesa County Soil Survey (1990). Soil survey data was accessed online through the NRCS Web Soil Survey website at <http://websoilsurvey.nrcs.usda.gov> (NRCS 2014). The semi-arid climate of the majority of the resource area is a primary influence on soil development. Low annual precipitation, hot summer temperatures, and high evaporation rates slow the chemical and biological processes needed for soil development and limits potential production of vegetation. Predominately shale and sandstone parent materials coupled with very active geologic erosion are also inhibiting soil potential.

Soils south of the Colorado River are developing in sandstone sediments and residuum of the Entrada, Wingate, and Kayenta Formations. Dakota, Morrison sandstone, and shale are also present (Blackridge area). Aeolian deposits and influences are common throughout the area. Depth to hard sandstone ranges from deep to very shallow (less than 10 inches). In the canyon bottoms and on benches and some mesa tops, soil textures may be fine sandy loam to loamy fine sand throughout the profile. Soil profiles with sandy clay loam, clay loam, and clay horizons are also present. Upland soils are often stony, particularly on the surface, and inclusions of flat-lying sandstone bedrock exposures are scattered throughout many of the soil map units. Ground cover and vegetation production is generally in static or slightly upward trends.

Soils north of the Colorado River are developing in and from shale and sandstone from the Mancos and Dakota Formations. They are generally alkaline, and some have a high salt content. Surface textures range from sandy loam to silty clay; substratum textures vary from loamy sand to silty clay or clay. Weathered shale or sandstone bedrock is at depths from less than 12 inches to many feet below the surface. Exposures of shale and sandstone bedrock are common. The area is dissected by many gullies, with runoff-producing events carrying sediment into the gully systems. Erosion of exposed geologic material on steep slopes is a major contributor of sediment. There is no indication of excessive soil erosion in the area as a whole. There are small areas scattered throughout the soil type with indicators of erosion that is taking place at greater rates than the soils resource can sustain, which is expected in this soil type. In these areas, lack of soil cover (vegetation, litter, biologic soil crust, inorganics) is a factor, and in some cases, livestock

use (season and duration), is also a contributing factor. Trends are either static or generally upward. The main factor limiting increases in ground cover and the vigor of existing plants is the lack of precipitation, a high evaporation rate, and saline/alkali conditions in many of the soils.

Finding for Public Health Standard 1 for Upland Soils:

A formal Land Health Assessment was conducted by BLM in 2002 within the MCNCA. Results from this assessment indicate that out of 124,653 total acres in the NCA, 4,043 acres or 3.24% were identified as not meeting Public Land Health Standard 1 for soils (poor condition). An additional 8,017 acres or 6.4% were identified as meeting with problems for public land health standard 1 (poor condition). Therefore, 112,592 acres or 90.36% are meeting Standard 1 and in good condition.

No Action Alternative (Direct and Indirect Effects):

Under the No Action Alternative, SRPs would be issued on a case by case basis. Each permitted activity would have the potential to affect soils and these impacts would be reviewed for each permit. Issuance of individual SRPs would not authorize new surface disturbances such as trail construction, but may result in increased use of recreational facilities (e.g. trails and campgrounds) and allow high intensity short duration activities which could degrade facilities and trail conditions leading to impacts.

Activities could include, but are not limited to, motorized, mechanized, water related activities, equestrian, and any other non-mechanized/motorized activities (e.g. hiking, fishing, etc.). These permits could increase use of recreational facilities, concentrate visitor use and traffic in the location of the events and in the NCA in general and create unintended areas of surface disturbances due to the activities themselves or from spectators. SRP activities have the potential to impact soils.

Soil impacts typical of recreation activities permitted under SRPs include soil compaction, soil particle detachment leading to accelerated erosion, and soil contamination. The intensity and extent of impacts on soil resources are determined by the type and location of the activities. Impacts on soil resources can also be affected by any applicable stipulations and plans of operations that address site-specific environmental concerns that require mitigation to stabilize soil, that prevent unnecessary erosion, and that revegetate disturbed surfaces.

Surface-disturbing activities occurring in areas of low reclamation potential (e.g., “fragile soils”) or sensitive areas such as stream channels, floodplains, wind prone areas, and riparian habitats are at higher risk for soil impacts. Fragile soils have slopes greater than 40 percent, sandy soil textures, shallow depths, minimal organic matter and structure, and may be derived of Mancos shale. These soil characteristics are described in the NRCS soil survey. Additionally, areas with soils that are subject to peak wind speeds greater than 12 miles per hour, have a high sand component, or have large gaps in vegetation canopy are subject to higher sediment-flux variation (Flagg et al. 2013). Each recreational activity has the potential to impact fragile and wind prone soils. This causes greater potential for soil impacts and soil movement.

The location of the permitted activities is not the only factor in determining the extent of impacts. The type of activity plays a vital role in the magnitude of each effect. Motorized and equestrian activities can have more pronounced and more significant impacts on soil resources (BLM, 2015). The duration and timing of each activity would also play a significant role on impacts. Conducting activities in fragile soils or in vulnerable areas can intensify impacts. In general, motorized activities would have the potential for the most severe impacts followed by mechanized, equestrian activities, and then everything else.

Motorized activities can cause the greatest compaction and soil particle detachment due to the weight and horse power of the machines. This equipment can disturb or destroy vegetation and soil stabilizing crusts. The equipment has the ability to cover more area, enlarging the area of impact. It has the greatest potential to degrade drainage features. Fueling of equipment has the potential to contaminate soils. These activities also have the greatest potential for causing impact off designated roads and trails.

Mechanized and equestrian activities have similar impact implications as motorized activities, but at a lower magnitude due to the lack of horse power and shorter distances traveled in comparison to motorized users. These activities can create soil compaction, soil particle detachment and erosion control feature degradation. Impact outside and off recreational facilities are also possible.

Other non-motorized or mechanized equipment can compact soils, cause soil particle detachment, and destroy effective ground cover including biological soil crusts. These activities can be equally damaging to soils as the numbers increase. As the number of participants increase the higher probability that soil stabilizing features such as vegetation, biological soil crusts, and soil structure would be altered increasing soil impacts. The impacts to soils increase as participation numbers increase for all activities.

If individual SRPs are issued analysis for effects for each permit would limit or mitigate damaging impacts. This may increase the workload, but it may increase the inclusion of more appropriate project stipulations. Each permit could be analyzed taking into consideration current climate and soil conditions particular to that event. Each individual permit could be analyzed to evaluate past actions and those effects on soils. With appropriate mitigation, project design and stipulations, effects can be reduced or even eliminated making effects brief or non-existent.

Cumulative Effects:

If individual SRPs are issued, the potential for cumulative effects could be reduced. This reduction in potential is due to the permit specific evaluation. Harmful soil resource effects would have a higher probability of being eliminated by design or mitigated through individual permit analysis. If the individual permit analysis does not completely eliminate effects, it could be reasonably expect that the activities would impact soils briefly.

No Action Alternative Finding for Public Health Standard:

Under the No Action Alternative areas meeting Standard 1 would remain the same or even increase. Providing analysis for individual permits increases the likelihood that degrading effects would be mitigated in areas not meeting the standard or would not further degrade the areas meeting the standard.

Proposed Action Alternative (Direct and Indirect Effects):

Under the Proposed Action Alternative, direct and indirect effects to soils are similar to the specific effects described above in the No Action Alternative. The difference being some SRPs will not have individual effects analysis based on how the activity rates in the permit classification matrix. The general stipulations will be included which may eliminate the opportunity for event specific stipulations that would be more protective. After the evaluation of the activity, a SRP will either be issued, adjusted, or be required to have individual analysis. Each rating in the matrix will have the potential to impact soils differently. Permit classes have an increasing level of potential effects on soils.

Class I permits are expected to occur in areas that have high resilience, have low potential for impacts to soil characteristic, will not increase soil erosion, or have the potential to contaminate soils. These activities should not occur on fragile soils or on soils with high potential for wind erosion. The direct and indirect effects would be minimal or non-existent.

Class II and III permits would have activities that could occur in areas with some susceptibility to vegetative cover reduction, has some recovery potential, and could occur on either fragile soils or soils susceptible to wind erosion. Impacts to soils include soil compaction, composition alteration, erosion and soil contamination.

Class IV permits would have activities that occur in locations that demonstrate limited ability to recover from adverse impacts and occur on soils that are fragile and highly susceptible to wind erosion. These permit would need to be analyzed in separate analysis to ensure all appropriate mitigation measures and project designs can be incorporated.

Listed below are the soil and water stipulations that are designed to reduce the magnitude of the impacts. Although stipulations are designed to reduce the negative impact to soils, activities allowed under class II and III SRPs could still cause soil disturbance and increase the potential for soil impacts. These stipulations should reduce the duration of effects or prevent impacts. After the events, if the effects are more substantial, stipulations or the rehabilitation process is designed to prevent impacts from perpetuating.

Cumulative Effects:

SRPs issued under this analysis should only have direct and indirect effects that are negligible, minimal, or occur for only the duration of the event. Cumulative impacts are not expected.

Proposed Action Alternative Finding for Public Health Standard 1:

Under the Proposed Action areas meeting Standard 1 should remain the same. Issued class I permits would not decrease or increase areas meeting Standard 1. Issuing class II or III permits could cause short term increase in areas not meeting Standard 1. However with the use of appropriate stipulation, areas would be expected to recover which would sustain the area meeting Standard 1. These restrictions may even lead to an increase in the area meeting Standard 1 due to post event monitoring and rehabilitation of effected areas.

3.2.2 Water (surface and groundwater, floodplains) (includes a finding on Standard 5)

Current conditions:

The MCNCA is situated within water quality stream segments 3, 13a, and 13b of the Lower Colorado River Basin. Stream segment 3 of the Lower Colorado River Basin is defined as the mainstem of the Colorado River from immediately above the confluence of the Gunnison River to the Colorado-Utah state line (CDPHE 2013b).

Stream Segment 13a of the Lower Colorado River Basin is defined as “all tributaries to the Colorado River including wetlands, from a point immediately below the confluence with Roan Creek to the Colorado-Utah border except for the specific listings in Segments 13b through 19” (CDPHE 2013b). Major drainages within stream segment 13a in the planning area include: McDonald Creek, Mee Canyon, Knowles Canyon, and the Little Dolores River. McDonald Creek flows south to the Colorado River and is ephemeral in nature. Both Mee and Knowles Canyon are northerly flowing tributaries to the Colorado River. Mee and Knowles Canyon are interrupted perennial streams in the upper reaches becoming seasonal as they near the Colorado River. The Little Dolores River is a north-easterly flowing perennial tributary to the Colorado River.

Stream segment 13b of the Lower Colorado River is defined as “all tributaries to the Colorado River including wetlands, from the Government Highline Canal Diversion to a point immediately below Salt Creek and down gradient from the Government Highline Canal, the Orchard mesa Canal No. 2., Orchard mesa Drain, Stub Ditch and the northeast Colorado National Monument boundary” (CDPHE 2013b). Major drainages within stream segment 13b of the Lower Colorado River Basin affected by the proposed action are Rattlesnake Canyon, Pollock Canyon, and Salt Creek. Both Rattlesnake and Pollock Canyons are northerly flowing ephemeral tributaries to the Colorado River. Salt Creek is southerly flowing perennial tributary to the Colorado River. However, much of the flow observed in Salt Creek is a product of irrigation return associated with water diverted from the Colorado River in the Government Highline Canal.

Table 3.2.2-1 identifies stream classifications and water quality standards for Lower Colorado Basin stream segment 3, 13a, and 13b as outlined in CDPHE, Regulation No. 37.

Table 3.2.2-1: Stream Segment	Classifications	Numeric Standards					
		Physical and Biological	Inorganic (mg/l)		Metals (µg/l)		
COLCLC03	Aq Life Warm 1 Recreation E Agriculture	T=TVS(WS-II) °C D.O.=5.0 mg/l pH=6.5-9.0 E.Coli=126/100ml	NH3(ac/ch)=TVS Cl2(ac)=0.019 Cl2(ch)=0.011 CN=0.005	S=0.002 B=0.75 NO2=0.05 NO3=100	As(ac)=340 As(ch)=7.6(Trec) Cd(ac/ch)=TVS CrIII(ac)=TVS CrVI(ac/ch)=TVS Cu(ac/ch)=TVS	Fe(ch)=1000 (Trec) Pb(ac/ch)=TVS Mn(ch)=TVS Mn(ac/ch)=TVS Hg(ch)=0.01(tot)	Ni(ac/ch)=TVS Se(ac/ch)=TVS Ag(ac/ch)=TVS Zn(ac/ch)=TVS
COLCLC13a	Use Protected Aq Life Warm 2 Recreation P Agriculture	T=TVS(WS-II) °C D.O.=5.0 mg/l pH=6.5-9.0 E.Coli=205/100ml	CN=0.2 NO2=10 NO3=100	B=0.75	As(ch)=100(Trec) Cd(ch)=100(Trec) CrIII(ac)=100(Trec) Be(ch)= 100(Trec)	CrVI(ac/ch)=TVS Cu(ac/ch)=TVS Pb(ch)=100(Trec) MN(ch)=200(Trec)	Ni(ch)=200(Trewc) Se(ch)=20(Trec) Zn(ch)=2000(Trec)
COLCLC13b	Use Protected Aq Life Warm 2 Recreation E Agriculture	T=TVS(WS-II) °C D.O.=5.0 mg/l pH=6.5-9.0 E.Coli=126/100ml	NH3(ac/ch)=TVS Cl2(ac)=0.019 Cl2(ch)=0.011 CN=0.005	S=0.002 B=0.75 NO2=0.05 NO3=100	As(ac)=340 As(ch)=100(Trec) Cd(ac/ch)=TVS CrIII(ac)=TVS CrVI(ac/ch)=TVS Cu(ac/ch)=TVS	Mn(ac/ch)=TVS Hg(ch)=0.01(tot) Fe(ch)=1000(Trec) Pb(ch)=TVS	Ni(ac/ch)=TVS Se(ac/ch)=TVS Ag(ac/ch)=TVS Zn(ac/ch)=TVS

Table data from CDPHE Regulation 37 (CDPHE 2013b)

A total of 271.5 stream miles were calculated within the planning area utilizing the USGS National Hydrography Dataset (NHD) in geographic information system (GIS) mapping software (USGS 2014). Stream miles for stream segments identified through the NHD and GIS as being included in CDPHE Regulation 93 (Colorado's list of water quality impaired streams and monitoring and evaluation list) were summarized to quantify percentage of stream miles in the NCA that are water quality impaired. Results indicate approximately 2% (5.89 miles) of all stream miles in the NCA are impaired and not meeting State water quality standards. Thus, 98% (265.61 miles) of stream miles in the NCA currently meet water quality standards. All impaired stream miles are situated in stream segment 13b of the Lower Colorado River. Impairments are due to sediment and selenium. Sediment impairments have been given a low priority by the state while selenium impairments have been given a high priority by the state (CDPHE 2012). Selenium impairments are primarily due to irrigation over Mancos shale soils on private lands north of the Colorado River and outside of BLM land management control. Sediment impairments are largely attributable to the naturally highly erosive nature of soils north of the Colorado River.

Groundwater quality:

Groundwater aquifers occur in both bedrock formations and unconsolidated quaternary sands and gravels in the planning area. However, groundwater quality data is very limited

within the MCNCA south of the Colorado River and non-existent in the planning area north of the Colorado River. This is largely due to the fact that surface water is the primary source of usable fresh water in the Lower Colorado River Basin and much of the planning area south of the Colorado River is situated within the Black Ridge Canyon Wilderness Area. Quaternary sands and gravels (alluvial deposits) are the primary source of groundwater in the planning area and groundwater discharging from alluvial deposits in drainage bottoms as springs or seeps can be vital water sources for wildlife. Groundwater discharging from bedrock sources along contact and fracture zones in the form of springs and seeps are also documented within the planning area but discharge rates are typically less than ¼ gallons/minute and permanence is highly variable. Springs and seeps are recharged by rainfall and snowmelt infiltrating permeable geologic strata or alluvial deposits with the permanence of these features being affected by variations in local climatic conditions, alteration of natural drainage patterns, and general watershed condition.

Groundwater quality within the planning area is typically a function of geologic setting. Marine derived sediments such as the Mancos Shale and Morrison Formation contain large amounts of dissolved minerals which can degrade ground water quality. Groundwater discharging as springs or seeps from bedrock sources such as the Kayenta Formation, Summerville Formation, and Entrada Sandstone typically have better water quality with lower conductivities (less than 800 µS @ 25°C based on BLM spring inventory data). Alluvial groundwater adjacent to the Colorado River and major perennial tributaries is typically similar in quality to surface water in the alluvial system.

The Colorado Water Quality Control Commission promulgates regulation No. 31 entitled “The Basic Standards for Ground Water” under the authority to classify waters of the state and to establish water quality standards to support those classifications. The regulation establishes a system for classifying ground water and describing those classifications by use and quality. The standards, when applied to specific classes of ground water, become the baseline by which one can establish if water quality has been degraded or water use has been impaired or precluded. Regulation 41 outlines both numeric and narrative standards for water quality associated with different classifications. Water developments for livestock operations (typical on public lands within the planning area) fall under the “Agricultural Uses” definition which includes existing or potential future uses of ground water for the cultivation of soil, the production of crops, and/or the raising of livestock (CDPHE, 2013b).

No Action Alternative (Direct and Indirect Effects):

Under the No Action Alternative, SRPs would be issued on a case by case basis. Each permit would have the potential to affect water resources and these impacts would be analyzed each time. Issuance of individual SRPs would not authorize new surface disturbances such as trail construction, but may result in increased use of recreational facilities (e.g. trails and campgrounds) and allow high intensity short duration activities which could degrade facilities and trail conditions leading to adverse hydrologic impacts.

Activities could include, but are not limited to, motorized, mechanized, water related, equestrian, and any other non-mechanized/motorized activities (e.g. hiking, fishing, etc.).

These permits could increase use of recreational facilities, concentrate visitor traffic in the location of the events and in the NCA in general, and require or create new areas of surface disturbances due to the activities themselves or from spectators.

The impacts could degrade surface and ground water quality, disrupt or alter natural geomorphic features, disrupt natural runoff processes, and damage riparian habitat. Water quality impacts can result from a number of causes, including transport of eroded soils into streams, poorly designed and/or maintained stream crossings, route proliferation, removal of essential soil stabilizing agents such as vegetation, soil crusts, litter or woody debris, pollutant contamination of surface and ground water and can elevate production of fugitive dust.

Surface-disturbing activities occurring in areas of low reclamation potential (e.g., “fragile soils”) or sensitive areas such as stream channels, floodplains, wind prone areas, and riparian habitats are at higher risk for impacts. Fragile soils have slopes greater than 40 percent, may be derived of Mancos shale, shallow depths, minimal organic matter and structure, and sandy soil textures. These soil characteristics are described in the NRCS soil survey. Each type of special recreation activity has the potential to cause impacts in fragile soils and wind prone areas. This causes greater potential for water quality degradation.

The location of the permitted activities is not the only factor in determining the extent of impacts. The type of activity plays a vital role in the magnitude of each effect. Motorized and equestrian activities can have more pronounced and more significant impacts on soil resources (BLM, 2015). The duration and timing of each activity would also play a substantial role on impacts. Conducting activities in fragile soils or in vulnerable areas can intensify impacts. In general, motorized activities would have the potential for the most severe impacts followed by mechanized, equestrian activities, and everything else.

Motorized activities can cause the greatest compaction and soil particle detachment due to the weight and horse power of the machines. This equipment can disturb or destroy vegetation and soil stabilizing crusts. This disturbance can decrease infiltration and increase runoff. The equipment has the ability to cover more area, enlarging the area of impact. It has the greatest potential to degrade drainage features. Fueling of equipment has the potential to contaminate soils leaching pollutants into ground water and to surface water.

Mechanized and equestrian activities have similar impact implications as motorized activities, but at a lower magnitude due to the lack of horse power. These activities can create soil compaction, soil particle detachment and erosion control feature degradation. These effects to soils can increase runoff and sediment delivery to surface water. Equestrian and water related (e.g. boating) activities can also cause exceedances of state *E. coli* standards through the direct deposition of fecal matter in water ways.

Other non-motorized or mechanized equipment can compact soils, cause soil particle detachment, and destroy effective ground cover including biological soil crusts. These activities can be equally damaging to soils as the numbers increase. As the number of participants increase the higher probability that soil stabilizing features such as

vegetation, biological soil crusts, and soil structure would be altered increasing soil erosion potential and runoff. The impacts to soils increase a participation numbers for all activities.

In general, when there are impacts to soils, water quality problems can follow. This is usually due to excessive erosion, changes in infiltration rates and changes in effective ground cover. Excess sediment can be detrimental to aquatic life and stream function. Increases in runoff can cause higher rates of overland flow and instream bank erosion. These impacts can be reduced or even eliminated with the use of proper BMPs and stipulations.

If individual SRPs are issued analysis for effects for each permit should limit or mitigate damaging impacts. This may increase the workload, but it may increase the inclusion of more appropriate project stipulations. Each permit could be analyzed taking into consideration current climate and soil conditions particular to that event. Each individual permit could be analyzed to evaluate past actions and those effects on hydrologic resources. With appropriate mitigation, project design and stipulations, effects can be reduced or even eliminated making effects brief or non-existent.

Activities beneficial to water resources are primarily defined as improving conditions by enhancing or restoring degraded water quality or by reducing infiltration of polluted water. Road or trail maintenance that includes installing or maintaining stormwater controls are beneficial to water resources. Modifying recreation uses in sensitive watersheds areas such riparian areas can benefit water quality and geomorphic function of streams. Management actions regarding closure or avoidance of specific areas or restrictions of disturbance are considered protective of environmental conditions and so are also regarded as beneficial. Mitigation measures also reduce the impacts on water resources associated with ongoing or future activities. Special recreation events or activities can be a way to highlight the need for aquatic resource protection and post event work can improve conditions thus protecting the resource.

Cumulative Effects:

If individual SRPs are issued, the potential for cumulative effects would be reduced. This reduction in potential is due to the permit specific analysis. Harmful hydrologic resource effects would have a higher probability of being eliminated by design or mitigated through individual permit analysis. If the stipulations developed during individual permit analysis do not completely eliminate effects from SRPs actions, it is expected that residual impacts from these actions would only briefly impact hydrologic resources.

No Action Alternative Finding for Public Health Standard 5:

Under the No Action Alternative, the 2% of stream miles not meeting water quality standards would remain unchanged. It could be expected that if permits were evaluated individually, there would be no increase in water quality degradation from the permitted activities. This would be a function of individualized analysis of impacts and permit specific mitigation, BMPs, and stipulations. If post event work leads to better resource protection, water quality could improve.

Proposed Action Alternative (Direct and Indirect Effects):

Under the Proposed Action Alternative, direct and indirect effects to water resources are similar to the No Action Alternative. The difference being some SRPs will not have individual effects analysis based on how the activity rates in the permit classification matrix. After the evaluation of the activity, a SRP will either be issued, adjusted, or be required to have individual analysis. Each rating in the matrix identifies the differences in potential impacts to water resources. Permit classes identify an increasing level of potential effects on water resources.

Class I permits are expected to occur in areas that do not fall within a water quality impaired stream segment, a riparian area, an area with Mancos shale, or activity won't affect any hydrologic functions. If this is the case there will be no direct or indirect effects to water resources.

Class II and III permits would have activities that falls within a water quality impaired stream segment, riparian areas will be impacted, occurs on an area comprised of Mancos shale, or the activity would affect hydrologic functions. Direct and indirect effects from these activities could include degrading surface and ground water quality, disrupting or altering natural geomorphic features, disrupting natural runoff processes, and damaging riparian habitat.

Class IV permits would have effects to water resources analyzed under a separate analysis.

Listed below are the soil and water stipulations that are designed to reduce the magnitude of the impacts. Although stipulations are designed to reduce the negative impact to water resources, activities allowed under SRPs can still create water related problems. These stipulations are designed to limit the effects during the event or reduce the time period for which the effects would occur.

Cumulative Effects:

If stipulations are applied, the short durations of effect from permitted activities will not be cumulative.

Proposed Action Alternative Finding for Public Health Standard 5

Under the proposed action alternative, the 2% of stream miles not meeting water quality standards would continue to exist. It would be expected that the SRPs issued under this analysis would include the stipulation and BMPs mentioned above. By requiring these stipulation impacts to water quality should not occur. If post event work leads to better resource protection, water quality could improve.

For all applicable class I, II and III permits, the following stipulations, included in the proposed action as design features, should be included in the permit to protect soil and water resources:

1. For all trail based SRPs, trail maintenance will be completed on any portions of the course identified by the BLM and event organizers as needing maintenance to facilitate participant safety and/or trail sustainability. Inventory and assessment guidelines outlined in BLM Manual Handbooks H-9113-2 and H-9115-2 should be

followed. Maintenance work may include reconditioning of the tread, reestablishing drainage features, and reestablishing proper tread and back slope profile. All pre-race trail maintenance should follow guidance outlined in BLM Manual Handbooks H-9113-1 and H-9115-1 and must be pre-approved by the BLM.

Effects of Design Feature: Ensuring that assessment and maintenance of travel infrastructure are completed in manner consistent with BLM Manual Handbooks would help preserve infrastructure sustainability while also limiting erosion and alteration of watershed function which could otherwise lead to water quality degradation.

2. Post-race trail conditions will be reviewed jointly by BLM and the permittee. Inventory and assessment guidelines outlined in BLM Manual Handbooks H-9113-2 and H-9115-2 should be followed. All post-race maintenance should follow guidance outlined in BLM Manual Handbooks H-9113-1 and H-9115-1 and must be pre-approved by the BLM. The permittee will conduct any trail rehabilitation needed to restore trails to pre-race conditions within a time period specified by BLM.

Effects of Design Feature: Ensuring assessment and maintenance of travel infrastructure are done in manner consistent with BLM Manual Handbooks would help preserve facility sustainability while also limiting erosion and alteration of watershed function which could otherwise lead to water quality degradation. Post event maintenance would reduce potential water quality degradation that may result from damage to travel infrastructure during the permitted use.

3. In the event of wet weather/muddy trail conditions, permittee will implement weather contingency plans in consultation with the BLM to decide if use of travel infrastructure should be postponed or canceled.

Effects of Design Feature: Implementation of weather contingency plans such as postponement, relocation, or cancelation of a scheduled event would eliminate unnecessary damage to travel infrastructure such as rutting which could modify drainage, accelerate erosion, and degrade water quality.

4. While in the river corridor, human waste must be properly disposed of in approved facilities. Approved portable toilet systems to collect and carry out solid human and dog waste are required. Dispose of waste in a sewer system or EPA-approved bag system after visits will be required.

Effects of Design Feature: Water quality degradation associated with improper disposal of solid wastes can be avoided through application of this mitigation measure. Beneficial uses within stream segment 3 would be preserved.

5. Keep springs and other non-river water sources free of soap and other contaminants.

Effects of Design Feature: Contamination of valuable fresh water sources associated with springs, seeps and other non-river water sources can be avoided by limiting activities such as bathing and dish-washing to the river corridor. Avoiding these types of activities near non-river water sources would also minimize disturbance of riparian habitats and wildlife.

6. For motorized events, have a spill prevention and cleanup plan in place.

Effects of Design Feature: Having a spill plan in place will reduce the resource exposure time with the contaminant. This should eliminate the potential for long term permanent effects.

7. In the event of high wind, winds greater than 12 miles per hour, permittee will implement weather contingency plans in consultation with the BLM to decide if the activities could occur in locations that would be protected from the wind.

Effects of Design Feature: Implementation of wind contingency would reduce the transport of sediment and reduce potential for fugitive dust.

8. For all SRPs all appropriate BMPs listed in the RMP and determined appropriate by the BLM to protect soil and water resources shall be included in the permit.
9. For all motorized, mechanized, and equestrian event, existing trails and roads should be used.

Effects of Design Feature: Compaction is an effect that can be difficult to rehabilitate. By limiting events to existing trails and roads, no new soils compaction should occur.

10. Limit the number of participants or reduce the frequency between participants for all non-competitive motorized events.

Effects of Design Feature: Limiting or staggering participants can reduce fugitive dust. This reduction should make concerns to air quality non-existent.

3.3 BIOLOGICAL RESOURCES

3.3.1 Invasive, Non-native Species

Current Conditions:

The NCA was inventoried for noxious weeds during the 2000 and 2001 field seasons by BLM weed crews and contractors. The wilderness was relatively free of noxious weeds with only isolated patches that primarily contained Russian knapweed that was found along old roads and at pond sites. The river corridor is a concentration area for many herbaceous noxious weeds including: knapweed, hoary cress, perennial pepperweed,

musk and Canada thistle, and purple loosestrife. The corridor also receives the most attention in terms of weed treatments. North of the river in the Rabbit Valley area, there are a few small patches of Russian knapweed. Throughout the NCA there are varying levels of annual weeds, most notably downy brome (cheatgrass). Rabbit Valley sustains the most annual weeds.

No Action (Direct and Indirect Effects):

If a consolidated process for issuing permits is not implemented, the permits still receive scrutiny for resource concerns, just on a case-by-case basis as requests are made. From a weed management perspective, there is no difference in the process, they are all still reviewed. The lack of a programmatic process will slow down the issuance of permits.

Proposed Action Alternative (Direct and Indirect Effects):

Consolidation of the process will still screen and classify requests for impacts to natural resources and consistency with land use planning, as well as the screening process and stipulations identified in this EA. If there are weed management concerns with a particular proposal that are not addressed under this EA, then they can still be addressed through additional NEPA analysis. Mitigation measures and/or stipulations that may be required include requiring equipment cleaning and inspection, limiting number of participants, adjusting the permit timing, and use of area limitations will be added to individual proposals as needed to mitigate spread of invasive and non-native species.

Class II and III permits would be more likely to increase invasive and non-native species, through direct introduction and creating disturbances adequate to allow invasive and non-native species, either recently introduced or pre-existing in the seedbank to be expressed. Similarly, Class I permits would be less likely to increase invasive and non-native populations through less direct introduction with fewer people, vehicles, etc. and less disturbance both in area and time.

Generally more participants would be expected to have larger effects through an increased likelihood of non-native, invasive plant introduction, and creating conditions conducive to non-native, invasive species establishment. Use of existing trails would spatially limit these effects to previously existing disturbed areas, but may not eliminate them. Best management practices (e.g. cleaning equipment) will reduce some of these impacts. Boats and watercraft should be cleaned and potentially checked for exotic species which can be transported from one area to another on watercrafts or equipment (e.g. zebra mussels). The proposed action should not significantly affect the areas ability to meet Public Land Health Standard 3.

Cumulative Effects:

It is unlikely that consolidating the permitting process will change the weed issues for the NCA.

Recreation is expected to increase in these areas. Climate change is expected to make some areas more susceptible to certain invasions and less susceptible to others. Generally, if many Class II and III permits are allowed disturbance and non-native, invasive

propagule pressure would be higher and these populations could increase. Class I permits would reduce these pressures and may show a slower spread of non-native, invasive species. Also lower impacts and disturbance would presumably promote healthier and more resilient ecological systems which would be more resistant to invasion. Proper mitigation and best management practices can reduce the spread and effects of non-native and invasive species.

Climate change may affect the distribution of some species and the suitability of some habitat. Generally more disturbances to a population or community can reduce the resilience of these populations or communities and exacerbate the effects of climate change.

3.3.2 Threatened, Endangered, and Sensitive Species (includes a finding on Standard 4)

Current conditions:

The MCNCA provides habitat to a number of federally listed, BLM sensitive, and Colorado sensitive species (see table below). The NCA also provides habitat for numerous migratory birds, including an Audubon Important Bird Area. MCNCA is home to numerous BLM Colorado sensitive plant species including: *Amsonia jonesii*, *Camissonia eastwoodiae*, *Cryptantha osterhoutii*, *Lomatium latilobum*, and *Lygodesmia dolorensis*.

Species	Status	Habitat in MCNCA	Species Recorded in MCNCA
Big free-tailed bat	BLM sensitive	Yes	No
Fringed Myotis	BLM sensitive	Yes	No
Spotted Bat	BLM sensitive	Yes	No
Townsend's Big-eared Bat	BLM sensitive	Yes	No
White-tailed prairie dog	BLM sensitive	Yes	Yes
Desert bighorn sheep	BLM sensitive	Yes	Yes
Kit Fox	BLM sensitive, state endangered	Yes	Yes
Botta's Pocket Gopher	State species of concern	Yes	No
River Otter	State threatened	Yes	Yes
Gunnison Sage Grouse	USFWS threatened	Yes, with some critical habitat	Yes
W. Yellow Billed Cuckoo	USFWS threatened	Yes, with some proposed critical habitat	Yes
Mountain Plover	BLM sensitive, state species of concern	Yes	Yes

Burrowing Owl	BLM sensitive, state threatened	Yes	Yes
Ferruginous Hawk	BLM sensitive, state species of concern	Yes	No
Golden Eagle	BLM sensitive	Yes	Yes
Bald Eagle	BLM sensitive, state threatened	Yes	Yes
American peregrine falcon	BLM sensitive, state species of concern	Yes	Yes
Brewers Sparrow	BLM sensitive	Yes	No
Colorado Pikeminnow	Federally endangered, state threatened	Yes, with critical habitat	Yes
Razorback Sucker	Federally endangered, state endangered	Yes, with critical habitat	Yes
Humpback Chub	Federally endangered, state threatened	Yes, with critical habitat	Yes
Bonytail Chub	Federally endangered, state threatened	Yes, with critical habitat	Yes
Bluehead Sucker	BLM sensitive	Yes	Yes
Flannelmouth Sucker	BLM sensitive	Yes	Yes
Roundtail Chub	BLM sensitive, state species of concern	Yes	Yes
Canyon Treefrog	BLM sensitive, state endangered	Yes	Yes
Northern Leopard Frog	BLM sensitive, state species of concern	Yes	Yes
Longnose Leopard Lizard	BLM sensitive, state species of concern	Yes	Yes
Midget Faded Rattlesnake	BLM sensitive, state species of concern	Yes	Yes

No Action Alternative (Direct and Indirect Effects):

Under the No Action Alternative BLM would not complete the comprehensive programmatic analysis for SRPs and permits would be issued and analyzed on a case by

case basis. Individual SRPs would be analyzed individually, and permitting would take longer.

Finding on Standard 4 for Special Status, Threatened, and Endangered Species:

The No Action Alternative should not affect the ability of the area to meet Public Land Health Standard 4, if each SRP is fully analyzed, and appropriate mitigation is added at the time of proposal.

Cumulative Effects:

Under the No Action Alternative no changes to the SRP process would occur, and no additional cumulative effects would be anticipated.

Proposed Action Alternative (Direct and Indirect Effects):

General:

The proposed action sets up criteria for determining impacts of SRPs on various resources including special status species and migratory birds. The proposed process is not expected to have any impacts on special status species and migratory birds as individual SRPs will undergo additional staff review upon proposal. Additional design features and/or stipulations including observing appropriate wildlife buffers, light, noise, number of participant, or timing limitations, avoidance areas, and/or other stipulations that are proposed in this EA (Table 2.2.2-1) will be added to individual proposals as needed to protect special status fish, wildlife and plants.

Sensitive Plant Species:

SRPs in classes II and III would be more likely to affect special status plants. If recreation activities occur closer to sensitive plant populations and individuals (less than 100 meters from sensitive plant species, high Table 2.2.2) than direct and indirect effects are more likely, for example trampling or dusting. As this buffer increases (greater than 100 meters, moderate, or greater than 200, low, Table 2.2.2) direct and indirect effects to sensitive plant species will decrease.

Travel on existing trails will mitigate some of these effects, however some sensitive plant species grow in close proximity to trails and buffers and this should be considered. The active growth period for most plants is spring (April to June). For example *Amsonia jonesii* is a tap-rooted perennial flowering in late April and May, *Camissonia eastwoodiae* is an annual herb from taproot flowering from May to June, *Cryptantha osterhoutii* from April to June, *Lomatium latilobum* flowers in spring, and *Lygodesmia dolorensis* flowers from May to June, and events during this time will be more impactful to sensitive plant species. Events with more participants and more disturbances will be more likely to damage sensitive plant species through direct (e.g. trampling) and indirect (e.g. dusting) means.

Finding on Standard 4 for Special Status, Threatened, and Endangered Species:

Special status, threatened, and endangered species (federal and state), and other plants and animals officially designated by the BLM, and their habitats are maintained or enhanced by sustaining healthy, native plant and animal communities.

With proper mitigation, including buffers, spatial and timing limitations, special status, threatened, and endangered plant species populations should not be substantially affected by the proposed action.

Sensitive Animal Species:

Class I SRPs would have little to no impact on special status fish and wildlife. Class II and III SRPs would be more likely to affect special status animals, and Class IV SRPs would not be approved in the MCNCA. Proposals spatially distant from areas important to sensitive animal species (e.g. low Table 2.2.2, 0.25 miles from maternity roosts or hibernacula for bats, outside of Bighorn sheep production and summer concentration areas, outside of critical habitat for Gunnison sage grouse and more than 4 miles from an active lek, etc.) would be less likely to have direct (e.g. nest trampling) or indirect (e.g. avoidance of an area, changing animal behavior, for example foraging, breeding, nesting, etc.) effects on sensitive animal populations. Similarly, proposals that are spatially close to important areas for sensitive wildlife will be more likely to have direct and indirect effects on sensitive animal individuals and populations. Proposals should generally try to avoid important areas for sensitive wildlife during times when these areas are used by sensitive species. Events with more participants and more disturbances will also be more likely to directly and indirectly effect sensitive animal populations.

Events held during important times of the year (e.g. between Nov. 15 and Aug. 31 for nesting raptors, between May 15 and July 15 for migratory birds, etc. Table 2.2.2) for sensitive animal species, will be more likely to have direct (e.g. nesting trampling) and indirect (e.g. area avoidance) effects on sensitive animal species. Proposals should generally try to avoid important times of the year for sensitive wildlife. Staying on trails will help mitigate some effects (e.g. nest trampling) but not others (e.g. changing animal behavior), and limiting proposals to times and areas that are least likely to affect animal populations is important.

Finding on Standard 4 for Special Status, Threatened, and Endangered Species:

Special status, threatened and endangered species (federal and state), and other plants and animals officially designated by the BLM, and their habitats are maintained or enhanced by sustaining healthy, native plant and animal communities.

Class II and III SRPs, where the evaluation factors relevant to fish and wildlife are either yes, moderate or high would include further coordination with the wildlife specialist and may include design features listed in the proposed Action such as: observing appropriate wildlife buffers, light, noise, number of participant or timing limitations, avoidance areas, and/or stipulations that are proposed in this EA (Table 2.2.2-1). With proper mitigation, including buffers, spatial and timing limitations, special status, threatened, and endangered animal species populations should not be substantially affected by the proposed action.

Cumulative Effects:

Use of the criteria is expected to benefit special status species, migratory birds, and their habitat in the long term as proposals will be screened and additional design features included in the Proposed Action could be added at the time of proposal including observing appropriate wildlife buffers, light, noise, number of participant, or timing limitations, avoidance areas, and/or other stipulations that are proposed in this EA (Table 2.2.2-1). Generally, if many Class II and III permits are allowed within a certain area or time frame effects to sensitive plant and animal populations may be expected. However, Class II and III permits that effect special status species would be coordinated with resource staff and proper mitigation including timing and spatial limitations should lower or eliminate these impacts. Generally, Class I permits are expected to have few if any effects on sensitive plant and animal populations, although effects to individuals may be expected. However, issuing numerous Class I permits should be carefully considered.

Climate change may affect the distribution of some species and the suitability of some habitat. Generally more disturbances to a population or community can reduce the resilience of these populations or communities and exacerbate the effects of climate change.

3.3.3 Vegetation (grasslands, forest management) (includes a finding on Standard 3)

Current conditions:

The MCNCA includes several vegetation types typical of the Colorado Plateau including; pinyon-juniper shrubland, semi-desert grassland, greasewood flats, salt desert shrubland, bedrock canyons and table lands, riparian wood and shrublands, and sagebrush shrubland.

Finding on Land Health Standard 3 for Vegetation:

Most of the Black Ridge Wilderness Area is considered to be meeting land health standards. Much of the salt desert areas north of the river are not meeting land health standards or considered meeting with problems, generally due to invasive annual plants. Some front country areas are also not meeting land health standards or considered meeting with problems.

No Action Alternative (Direct and Indirect Effects):

Under the No Action Alternative BLM would not complete the comprehensive programmatic analysis for SRPs and permits would be issued and analyzed on a case by case basis. Individual SRPs would be analyzed individually, and permitting would take longer.

Finding on Land Health Standard 3 for Vegetation:

The No Action Alternative should not affect the ability of the area to meet Public Land Health Standard 3, if each SRP is fully analyzed, and appropriate design features (in Proposed Action) are added at the time of proposal. Vegetation monitoring would continue for land health and rangeland health, however monitoring specific to SRPs may not be accomplished.

Cumulative Effects:

Under the No Action Alternative no changes to the SRP process would occur, and no additional cumulative effects would be anticipated.

Proposed Action Alternative (Direct and Indirect Effects):

The proposed action sets up criteria for determining impacts of SRPs on resources including vegetation. The proposed process is not expected to have significant impacts on vegetation as individual SRPs will undergo additional staff review upon proposal. The Proposed Action will not affect the areas ability to meet public land health standard 3.

Class II and III permits would be more likely to affect overall plant and animal community health. Generally more participants would be expected to have larger effects on overall plant and animal community health through direct (e.g. plant mortality) and indirect (e.g. dusting) effects. Use of existing trails will mitigate some of these effects (e.g. trampling, direct mortality), but not all (dusting). Direct use of particularly sensitive communities (e.g. desert salt shrub, riparian, Table 2.2.2) should include mitigation appropriate to protect these areas (e.g. limiting number of participants).

Finding on Land Health Standard 3 for Vegetation:

Healthy, productive plant and animal communities of native and other desirable species are maintained at viable population levels commensurate with the species and habitat's potential.

With proper mitigation, including spatial, timing, and participant limitations, plant communities should not be substantially affected by the Proposed Action. The Proposed Action will not affect the areas ability to meet Public Land Health Standard 3.

Cumulative Effects:

Screening all SRP proposals according to the criteria listed above should mitigate long term effects of recreation events on vegetation, as stipulations identified as design features in the Proposed Action can be added as appropriate for each proposal.

Generally, if many Class II and III permits are allowed within a certain community over a relatively short time frame effects to plant communities may be expected. However, proper mitigation including timing, spatial, and participant limitations should lower or eliminate these impacts. Generally, Class I permits are expected to have few if any effects on plant communities, although abundant Class I permits should be carefully considered. Climate change may affect the distribution of some species and the suitability of some habitat. Generally more disturbances to a population or community can reduce the resilience of these populations or communities and exacerbate the effects of climate change.

3.3.4 Wetlands & Riparian Zones (includes a finding on Standard 2)

Current conditions:

The MCNCA contains several riparian systems. Known riparian and wetland habitat occur within the MCNCA along the Colorado River, Devil’s Canyon, Jones Canyon, Knowles Canyon, Little Dolores River, Mee Canyon, Salt Creek, various springs and seeps, and other unnamed tributaries in these systems. Riparian assessments have not been completed on all of the drainages in the NCA and there is potential for additional riparian and wetland zones to be present in areas that have not been assessed by foot. Riparian plants that occur in these systems include but are not limited to: *Populus Deltoides* (Rio Grande cottonwood), *Distichlis spicata* (salt grass), *Cornus sericea* (dogwood), *Rhus trilobata* (skunkbush sumac), *Rosa woodsii* (Wood’s rose), *Salix exigua* (sandbar willow), *Carex spp.* (sedge), *Betula occidentalis* (birch), *Equisetum arvense* (horsetail), and *Tamarix ramosissima* (tamarisk).

The riparian zones within the project area have been impacted in some areas by adjacent roads, railroads, utilities, recreation use, and historic livestock grazing. Impacts from heavy historic grazing practices that contributed to the decline of riparian and wetland conditions have been reduced in many areas due to changes in livestock grazing practices.

A description of the condition of the riparian zones located within the area is provided below in Table 3.3.4-1.

Table 3.3.4-1

Riparian Area	PFC Determination	Years Assessed	Miles Assessed
Colorado River	PFC	1993	16.2
Devil’s Canyon	FAR	2010	3.35
Devil’s Canyon Trib. 3	PFC	2010	0.55
Devil’s Canyon Trib. 4	PFC	2010	0.04
Devil’s Canyon Trib. 5	PFC	2010	0.52
Jones Canyon	PFC	1993	6.38
Knowles Canyon	PFC	1993	11.78
Kodels Canyon	PFC	2010	0.19
Little Dolores River	PFC	1993	1.50
Mee Canyon	PFC	1993	9.46
Salt Creek	PFC	1993	1.87
Mark’s Spring	Not Assessed	NA	NA

Finding on Standard 2 for Riparian Systems:

Riparian systems associated with both running and standing water function properly and have the ability to recover from major disturbance such as fire, severe grazing, or 100-year floods. Previously completed PFC assessments within the project area indicate that the majority of the riparian systems are meeting the standard (Table 3.3.5-1).

No Action Alternative (Direct and Indirect Effects):

Under the No Action Alternative BLM would not complete the comprehensive programmatic analysis for SRPs and permits would be issued and analyzed on a case by

case basis. Monitoring of riparian areas for Proper Function Condition would continue, but additional SRP monitoring may not occur.

Finding on Standard 2 for Riparian Systems:

The majority of the riparian zones within the project area are meeting Standard 2. This standard would likely continue to be met under this alternative. Heavy recreation use is expected to continue to occur in Devil's Canyon, and recreation is expected to increase in general. However, properly functioning riparian systems have the ability to recover from major disturbances such as those associated with recreation, fire, grazing, and flooding. Currently, it is expected that most of these systems will remain stable under this alternative.

Cumulative Effects:

Under the No Action Alternative no changes to the SRP process would occur. Under this alternative most riparian areas are expected to remain stable for the foreseeable future.

Proposed Action Alternative (Direct and Indirect Effects):

Effects on wetland and riparian zones from recreation activities that could be permitted under the proposed action include impacts such as vegetation crushing, soil compaction, vegetation removal, and bank sheering. Crushing, trampling, and removal of vegetation for recreation use could cause a reduction in the width and extent of riparian zones along perennial and intermittent systems and near springs or seeps. Decreased riparian vegetation could lead to decreased bank stability and bank sheering or channel incising during high water events. Increased sediment transport into the riparian zone from recreation use on trails adjacent to or within the riparian zone could also result from Class 2 and Class 3 permits. The use of trails further from riparian zones for Class 2 and Class 3 permits would provide reduced direct and indirect effects. Restricting the season of use for permits that use trails adjacent to or that cross riparian habitat would also reduce impacts to riparian zones. Use of routes away from riparian zones for non-competitive motorized events or tours would allow for upland vegetation to provide a buffer from dust and sediment transport. Potential widening of routes due to mechanized or motorized uses may also increase impacts to uplands and increase sediment transport into riparian zones located adjacent to or near routes.

Monitoring of riparian areas may be necessary for Class II and III permits to ensure riparian areas are not being degraded.

Finding on Land Health Standard 2 for Riparian Systems:

Under the proposed action standard two for riparian systems would continue to be met in areas that are currently meeting the standard. The impact on areas that are functioning at risk may be negligible or substantial depending on the contributing causes for the decline in land health, and SRPs in areas functioning at risk should consider contributing causes before issuing a permit. The future ability of riparian systems to continue to meet the standard is protected by this action.

Cumulative Effects:

Recreation is expected to increase in the area in the foreseeable future. In addition, the Ruby Horsethief portion of the river has moved to a permit system for camping along the river during peak dates. Having a more standardized way to issue permits may increase consistency. The proposed action is expected to improve the BLM's ability to manage recreation and thus appropriately manage riparian resources.

Precipitation patterns are likely to change with climate change and will likely effect timing and amount of flows, which will in turn effect riparian areas. Generally more disturbances to these areas can reduce the resilience of these systems and exacerbate the effects of climate change.

3.3.5 Wildlife (includes fish, aquatic and terrestrial) (includes a finding on Standard 3)

Current conditions:

The McInnis Canyons NCA contains varied habitat from low desert and riparian habitats to sagebrush and pinion juniper woodlands. Wildlife species within the NCA include mule deer, elk, coyote, mountain lion, turkey, a variety of migratory and non-migratory birds, sport and native fish, numerous small mammals, reptiles, and amphibians.

No Action Alternative (Direct and Indirect Effects):

Direct and Indirect Effects: Under the No Action Alternative BLM would not complete the comprehensive programmatic analysis for SRPs and permits would be issued and analyzed on a case by case basis. Individual SRPs would be analyzed individually, and permitting would take longer.

Finding on Land Health Standard 3 for Plant and Animal Communities:

The No Action Alternative should not affect the ability of the area to meet Public Land Health Standard 4, if each SRP is fully analyzed, and appropriate mitigation is added at the time of proposal.

Cumulative Effects:

Under the No Action Alternative no changes to the SRP process would occur, and no additional cumulative effects would be anticipated.

Proposed Action Alternative (Direct and Indirect Effects):

Direct and Indirect Effects: The proposed action sets up criteria for determining impacts of SRPs on various resources including the wildlife resources. The proposed action will not affect the areas ability to meet Public Land Health Standard 3.

Class II and III permits would be more likely to affect overall animal population health. Generally more participants would be expected to have larger effects on overall animal populations through direct (e.g. animal mortality, nest disturbance) and indirect (e.g. changes in behavior) effects. Use of existing trails will mitigate some of these effects (e.g. trampling, direct mortality), but not all (altering behavior). Certain areas or times of year that are more likely to result in direct impacts to animal populations (e.g. Nov. 15 to

Aug. 31 for nesting raptors, Table 2.2.2) should include mitigation appropriate to protect these areas (e.g. limiting proposal spatially, temporally, or number of participants).

Finding on Land Health Standard 3 for Plant and Animal Communities:

Healthy, productive plant and animal communities of native and other desirable species are maintained at viable population levels commensurate with the species and habitat's potential.

With proper mitigation, including spatial, timing, and participant limitations, general animal populations should not be significantly affected by the proposed action. The proposed action will not affect the areas ability to meet Public Land Health Standard 3.

Cumulative Effects:

Use of the criteria is expected to benefit wildlife habitat in the long term as proposals will be screened.

Generally, if many Class II and III permits are allowed within a certain area, the animal populations that rely on that area may be effected. However, proper mitigation including timing, spatial, and participant limitations should lower or eliminate these impacts. Generally, Class I permits are expected to have few if any effects on animal populations, although issuance of numerous Class I permits should be carefully considered.

Climate change may affect the distribution of some species and the suitability of some habitat. Generally more disturbances to a population or community can reduce the resilience of these populations or communities and exacerbate the effects of climate change.

3.4 HERITAGE RESOURCES AND HUMAN ENVIRONMENT

3.4.1 Cultural Resources

Current Conditions:

The MCNCA is rich in cultural resources dating from Paleoindian times up to more modern ranching, homesteading and camping. Currently, nine percent (9%) of the MCNCA has been surveyed to current standards for cultural resources (11,268 acres). As of August 2015, these surveys have documented 1,073 total cultural resources (568 sites and 505 isolated finds), which results in a cultural resource density ratio of about one cultural resource per 11 acres. This ratio indicates that there is a high concentration of archaeological resources in the MCNCA. The permitting of SRPs does have the potential to impact historic properties (cultural resources eligible for or potentially eligible for the National Register of Historic Places) if the event or activity being permitted for causes surface disturbing activities or directs or concentrates individuals (purposefully or not) near or on significant cultural resources.

No Action Alternative (Direct and Indirect Effects):

Under the no action alternative, SRPs would be issued on a case by case basis. Each permitted activity would have the potential to affect cultural resources and these impacts would be analyzed each time an event is proposed in the MCNCA. Individual SRPs would be analyzed one at a time, and permitting under NEPA would take longer. The BLM also has to comply with Section 106 of the National Historic Preservation Act (NHPA) and sometimes completes Section 106 compliance concurrently with the NEPA process. Unless a Programmatic Agreement (PA) is in place between the BLM and the Colorado State Historic Preservation Office (SHPO), each permit would need to be individually evaluated for impacts to cultural resources.

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.

SRP activities could include, but are not limited to, motorized, mechanized, water related activities, equestrian, and any other non-mechanized/motorized activities (e.g. hiking, fishing, etc.). These permits could increase use of recreational facilities, concentrate visitor traffic in the location of the events and in the NCA in general and require or create unintended areas of surface disturbances due to the activities themselves or from spectators. SRP activities have the potential to impact significant cultural resource sites.

Because many cultural resources are found in soil, impacts to soil can increase erosion which can impact the location of artifacts and cultural features such as hearths and other features that can provide archaeologists with scientific information. As stated in the soil section above, impacts typical of recreational activities permitted under SRPs include soil/cultural site compaction, soil particle detachment leading to accelerated erosion if occurring directly on cultural sites, and soil contamination. The intensity and extent of impacts on cultural resources are determined by the type and location of the activities.

The location of the permitted activities is not the only factor in determining the extent of impacts. The type of activity and the number of participants and spectators plays a vital role in the magnitude of each effect. Motorized and mechanized activities can have more pronounced and more substantial impacts on the soil and auditory impacts where cultural and tribal resources are located. However, quiet users such as hikers, spectator groups, equestrians, tour groups, and hunters could have greater impacts on the unauthorized removal of artifacts due to their slower speeds, increased time in an area, and increased ability to travel cross country. The duration and timing of each activity would also play a significant role on impacts. Conducting activities in fragile or in vulnerable areas can intensify impacts.

If individual SRPs are issued, analysis for effects for each permit would limit or mitigate damaging impacts. This may increase the workload, but it may also increase the inclusion of more appropriate or customized permit stipulations as well as allow for increased opportunities for Native American Tribes to comment on individual permits.

Cumulative Effects:

If individual SRPs are issued, harmful cultural or tribal resource effects would have a higher probability of being eliminated by design or mitigated through individual permit analysis. Under the No Action Alternative no changes to the Section 106 of the NHPA process would occur without a signed programmatic agreement with the Colorado State Historic Preservation Officer.

Proposed Action Alternative (Direct and Indirect Effects):

Under the proposed action alternative, direct and indirect effects to soils are similar to the specific effects described above in the No Action Alternative. The difference being some SRPs will not have individual effects analysis based on how the activity rates in the permit classification matrix. After the evaluation of the activity, an SRP will either be issued, adjusted, or be required to have individual analysis. Each rating in the matrix will have the potential to impact cultural and tribal resources differently. Permit classes have an increasing level of potential effects on cultural resources.

Class I permits with a “Low” cultural or tribal resource permit classification criterion are expected to occur in areas that have high physical resilience, have low potential for impacts to cultural resources, will not increase soil and site erosion, or have the potential to contaminate cultural resource deposits. The direct and indirect effects would be minimal or non-existent as the potential for damage or impacts to cultural or tribal resources would be low.

Class II and III permits with a “Moderate” cultural or tribal resource permit classification criteria could have activities that occur in areas with moderate cultural site potential or Native American concerns. Impacts to cultural resource deposits could include soil compaction, artifact distribution alteration, site erosion, and site contamination. These events may occur in areas where significant cultural resources (historic properties under NHPA) are present.

Class IV permits with a “High” cultural or tribal resource permit classification criterion would have activities that may occur in locations with high cultural sensitivity (fragile or sensitive cultural sites or areas of Native American concerns). No Class IV permits would be issued in the NCA.

To protect cultural and tribal resources, the standard stipulations listed below in the Cumulative Effects Protective/Mitigation Measures would be added to all SRPs to reduce impacts to significant cultural and tribal resources not known to the agency:

Cumulative Effects:

Under the Proposed Action alternative, an increase in the number of SRP holders and associated numbers of clients and tours would be expected in the MCNCA. Some of these SRP holders may wish to visit archaeological and historical sites. While increased visitation to approved cultural resource sites would not initially appear to be in the best interest of the resource, through the issuance of SRPs, the agency can stipulate for operators to provide educational information and cultural resource etiquette to their clients. As a result of required education or similar stipulations, increased understanding

of cultural and tribal resource concerns may engender a greater sense of stewardship in SRP holders, their staff members and their clients.

The MCNCA is visited by tens of thousands of visitors annually, but only a small fraction of these visitors are clients of SRP holders. Overall, the increased visitation to cultural resource sites due to additional SRP holders is expected to be negligible.

Some SRP holders generally take great ownership in the MCNCA landscape, particularly with any cultural resource sites they might visit. These 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. 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 due to SRPs.

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 the MCNCA 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 on or near roads.

The Proposed Action sets up criteria for determining impacts of SRPs on various resources including significant cultural resources. The proposed change in SRP administrative process is not expected to have any impacts on significant cultural resources, as individual SRPs will undergo additional staff review for compliance with Section 106 of the NHPA upon proposal until a PA is in place between the BLM and the SHPO.

3.4.2 Paleontological Resources

Current Conditions:

Known fossiliferous, geologic formations within the NCA include the Chinle, Wingate and Morrison formations, Burro Canyon Sandstone, and the Dakota Sandstone. The BLM utilizes the Potential Fossil Yield Classification (PFYC) system to classify geologic units based on abundance of vertebrate fossils contained within the individual formations. The geologic formations are ranked in Classes 1-5, with Classes 4 and 5 being the richest in vertebrate fossil resources. The Morrison formation (PFYC Class 4-5) has consistently yielded dinosaur and other fossils. Fossil locations in the Morrison have yielded many scientifically important fossils, including over 12 varieties of small to large dinosaurs, well preserved varieties of early mammals, eggs, crocodilians, turtles, fish, numerous invertebrates, as well as a variety of fossil wood, pollen, and other plant remains. The Burro Canyon formation (PFYC Class 3) in the Black Ridge Wilderness has produced a 115-120 million year old sycamore, which may be among the world’s oldest known plants. Dinosaur track ways have been found in the Wingate formation (PFYC Class 3) in both Jones’s Canyon and Knowles Canyon. The Chinle formation is classified as a

PFYC Class 4-5, but no known vertebrate paleontological sites exist within the NCA in this formation.

No Action Alternative (Direct and Indirect Effects):

Under the No Action Alternative BLM would not complete the comprehensive programmatic analysis for SRPs and permits would be issued and analyzed on a case by case basis. Individual SRPs would be analyzed individually, and permitting would take longer. The No Action Alternative should not affect the areas paleontological resources, if each SRP is fully analyzed, and appropriate mitigation is added at the time of proposal.

Cumulative Effects:

Under the No Action Alternative no changes to the SRP process would occur, and no additional cumulative effects would be anticipated.

Proposed Action Alternative (Direct and Indirect Effects):

The proposed action sets up criteria for determining impacts of SRPs on various resources including the paleontological resources. The proposed process is not expected to have any impacts on paleontological resources as individual SRPs will undergo additional staff review upon proposal. Assuming the range of SRPs permitted all use existing routes currently being used for recreation and transportation, potential impacts from theft or vandalism may only measurably increase when SRPs are issued to visit known vertebrate fossil sites.

Cumulative Effects:

Use of the criteria is expected to benefit paleontological resources in the long term as proposals will be screened and additional mitigation and monitoring could be added at the time of proposal. Only permits issued to visit known paleontological sites are expected to see impacts from theft or vandalism, so more monitoring will be required. Permits issued using existing routes are not expected to have measurable effects on paleontological resources beyond what may already be occurring from present recreational and transportation use of existing routes.

3.4.3 Tribal and Native American Religious Concerns

Current Conditions:

American Indian religious concerns are legislatively considered under several acts and Executive Orders, namely the American Indian Religious Freedom Act of 1978 (PL 95-341), the Native American Graves Environmental Assessment Protection and Repatriation Act of 1990 (PL 101-601), and Executive Order 13007 (1996; Indian Sacred Sites). In summary, these require, in concert with other provisions such as those found in the NHPA and ARPA, that the federal government carefully and proactively take into consideration traditional and religious Native American culture and life and ensure, to the degree possible, that access to sacred sites, the treatment of human remains, the possession of sacred items, the conduct of traditional religious practices, and the preservation of important cultural properties are considered and not unduly infringed upon. In some cases, these concerns are directly related to “historic properties” and

“archaeological resources”. In some cases elements of the landscape without archaeological or other human material remains may be involved. Identification of these concerns is normally completed during the land use planning efforts, reference to existing studies, or via direct consultation.

No Action Alternative (Direct and Indirect Effects):

Under the No Action Alternative, SRPs would be issued on a case by case basis. Each permitted activity would have the potential to affect Native American religious concerns and these impacts would be analyzed and consulted on each time an event or permitted activity is proposed in the MCNCA. Individual SRPs would be analyzed one at a time, and permitting under NEPA would take longer.

SRP activities could include, but are not limited to, motorized, mechanized, water related activities, equestrian, and any other non-mechanized/motorized activities (e.g. hiking, fishing, etc.). These permits could increase use of recreational facilities, concentrate visitor traffic in the location of the events and in the NCA in general and require or create unintended areas of surface disturbances due to the activities themselves or from spectators. SRP activities have the potential to impact areas of tribal concern.

While tribes do have concerns about impacts to cultural resources, tribal religious concerns and sacred sites are broader and often occur within a larger landform or are connected through features or ceremonies to other sites or a larger sacred landscape. Impacts to areas important to tribes might extend beyond physical disturbances to include disturbances to sites or location ambiance (such as auditory or physical disturbances) or can also include disruption of access to locations needed for ceremonies or other tribal functions. The intensity and extent of impacts on Native American resources and areas of concern are determined by the type and location of the activities.

The location of the permitted activities is not the only factor in determining the extent of impacts. The type of activity and the number of participants and spectators plays a vital role in the magnitude of each effect. Motorized activities can have more pronounced and more significant impacts on the soil and auditory impacts where tribal resources are located. However, quiet users such as hikers, spectator groups, equestrians, tour groups, and hunters could have greater impacts on the unauthorized removal of artifacts due to their slower speeds, increased time in an area, and increased ability to travel cross country. The duration and timing of each activity would also play a substantial role on impacts. Conducting activities in fragile or in vulnerable areas can intensify impacts.

If individual SRPs are issued, analysis for effects for each permit would limit or mitigate damaging impacts. This may increase the workload, but it may also increase the inclusion of more appropriate or customized permit stipulations as well as allow for increased opportunities for Native American Tribes to comment on individual permits.

Cumulative Effects:

If individual SRPs are issued, harmful tribal resource and religious effects would have a higher probability of being eliminated by design or mitigated through individual permit analysis.

Proposed Action Alternative (Direct and Indirect Effects):

Under the Proposed Action Alternative, direct and indirect effects to Native American concerns are similar to the specific effects described above in the no action alternative. The difference being some SRPs will not have individual effects analysis based on how the activity rates in the permit classification matrix. After the evaluation of the activity, an SRP will either be issued, adjusted, or be required to have individual analysis. Each rating in the matrix will have the potential to impact tribal resources differently. Permit classes have an increasing level of potential effects on Native American religious concerns.

Class I permits with a “Low” tribal resource concern permit classification criterion are expected to occur in areas that have high physical resilience, have low potential for impacts to areas or resources of tribal concern, will not increase soil and site erosion, or have the potential to contaminate cultural resource deposits. The direct and indirect effects would be minimal or non-existent as the potential for damage or impacts to cultural or tribal resources would be low.

Class II and III permits with a “Moderate” tribal resource concern permit classification criteria could have activities that occur in areas with moderate cultural site potential or Native American concerns. Impacts to cultural resource deposits could include soil compaction, artifact distribution alteration, site erosion, and site contamination.

Class IV permits with a “High” tribal resource concern permit classification criterion would have activities that may occur in locations with high cultural sensitivity (fragile or sensitive cultural sites or areas of Native American concerns). These permits would not be authorized.

To protect Native American religious and tribal resources, the standard stipulations listed below in the Cumulative Effects Protective/Mitigation Measures would be added to all SRPs to reduce impacts to significant tribal resources not known to the agency:

Cumulative Effects:

Under the Proposed Action alternative, an increase in the number of SRP holders and associated numbers of clients and tours would be expected in the MCNCA. The MCNCA is visited by tens of thousands of visitors annually, but only a small fraction of these visitors are clients of SRP holders. Overall, the increased visitation to areas of tribal significance, concern or important tribal resource sites due to additional SRP holders is expected to be negligible.

A large source of impacts to important tribal resource and religious areas is unintentional, such as use of roads where sites are located. A small fraction of road and trail use within the MCNCA 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 areas on or near roads.

3.4.4 Social, Economic, Environmental Justice

Current Conditions:

Currently there are 35 SRP holders operating in the MCNCA. These operations offer public that may not normally be able to experience recreation on public lands an opportunity to realize the recreation objectives set forth in the MCNCA RMP. In addition these permits offer the permit holder an opportunity to gain financial revenue. For some SRP holders, outfitting is their primary source of income, while for many it is just a supplemental source of income. Outfitters also often employ guides. These are low paying jobs but offer a high quality of life for the individuals that are interested in holding these jobs. Based on the post use reporting required by current SRP holders, BLM estimates roughly \$400,000 are generated from commercial guiding and events authorized by SRPs. Since most SRP holders are from outside the Grand Valley, most of the revenue generated leaves the area. The BLM estimates 35% of the revenue is generated by companies and event organizers within the Grand Valley. The BLM has not conducted an economic study to determine a multiplier for SRPs that would more accurately reflect the overall economic impact associated with these SRPs. Fees generated from SRPs stay at the local office where they are collected. These fees are used to support and enhance recreation opportunities outlined in the RMP.

No Action Alternative (Direct and Indirect Effects):

Under No Action Alternative, current SRPs would continue to be authorized. New SRPs would be processed on a case by case basis under separate NEPA analysis. The BLM would take more time to process permits, which could impact applicants' ability to gain income in the short term. The BLM would likely issue less SRPs in a given time period because of increased administrative staff time needed to process an application. This could negatively impact prospective permittees' business operations. The outfitted public may be affected because their ability to enjoy public land recreation experiences may be less plentiful. It is the BLM's policy to charge cost recovery of the actual costs to the BLM if it requires more than 50 hours to issue, administer and monitor an SRP. It is also the BLM's policy to require SRP applications inside the NCA to be evaluated with an environmental assessment. Typically, completion of an EA requires more than 50 hours of staff time. Under the No Action Alternative, SRP proposals would not be evaluated using the programmatic approach outlined in the proposed action. Each proposal would be evaluated individually. The result would likely be more situations where cost recovery would apply. This would greatly increase the application cost to prospective SRP holders.

Cumulative Effects:

In combination with past, present, and reasonably foreseeable actions, the No Action Alternative would result in similar social and economic impacts described above. SRPs would be issued, though at a slower pace. Recreation would continue to occur, providing

income to service providers and guides in the local area and services to the outfitted public, though likely slightly less than under the proposed action.

Proposed Action Alternative (Direct and Indirect Effects):

Under the proposed action, current SRPs would continue to be authorized. New SRPs would be processed with quicker review through a Documentation of NEPA Adequacy (DNA) in many cases. This would allow BLM to process SRPs with less administrative time required. As a result, cost recovery requirements would be less likely to occur. The cost savings to prospective applicants could result in more proposals for SRPs. SRPs would likely be issued at a slightly faster rate than under No Action Alternative. This may allow prospective permittees and their guides to begin providing services and earning income sooner. It may also allow the outfitted public more opportunity to enjoy public land recreation experiences. Since SRPs are used by the BLM as a management tool to achieve management objectives in the RMP, the number of SRPs issued would not be solely based on the number of applications received. Rather the number of permits issued would be based on the number needed to achieve planning objectives. That said, a more efficient process of evaluating SRP proposals could result in more SRPs issued, which could result in more business opportunities.

Cumulative Effects:

In combination with past, present, and reasonably foreseeable actions, the Proposed Action would result in a slight increase over current levels of income and experiences for permittees, guides, and the outfitted public. Recreation would continue to occur and likely increase slightly in conformance with resource and recreation objectives in the RMP. This would likely providing slightly more opportunities for people to become service providers and guides in the local area and slightly more recreation opportunities for the outfitted public. If more SRPs are issued, over time, there would be more fee revenue available to support and enhance recreation opportunities inside the NCA.

3.4.5 Transportation/Access

Current Conditions:

Access to, and travel within the MCNCA is accomplished on a variety of routes. Figure 3-4 shows the primary routes of the MCNCA, in which there are eight different route categories:

- Federal interstate highways
- State highways
- Mesa County roads
- BLM maintained roads
- BLM non-maintained roads
- BLM motorized trails
- BLM non-motorized trails
- BLM non-mechanized trails

Primary access to the MCNCA from the two major metropolitan areas of Denver, Colorado, and Salt Lake City, Utah, is via Interstate (I)-70. The I-70 corridor bisects the Rabbit Valley area (exit 2), in the northern portion of the MCNCA, while State Highway 340 at Fruita, Colorado (exit 19), delineates the MCNCA's eastern boundary. Traveling south on Highway 340 and then west on Kings View Road accesses the Wilderness Front Country. Dinosaur Hill, an interpretive hiking trail system, is accessed a short distance beyond Kings View Road, just off of State Highway 340 and to the east. The backcountry portions of the Wilderness can be reached by either of two ways, with both routes beginning in Glade Park. Colorado River access, within the MCNCA, is from the Loma Boat Launch located south of the Interstate, near State Highway 139 and exit 15. This exit also leads to the trailhead for the Kokopelli Trail system.

A summary of areas within the MCNCA receiving significant user traffic is included below.

Rabbit Valley

Most trails in the Rabbit Valley area are multiple use. The trails are open to both motorized and non-motorized visitors, with mountain biking being a very popular activity. Trails in the Wild Horse Mesa and McDonald Creek areas are not open to motorized travel, and the Rabbit's Ear Mesa Trail is open to hikers only. Many equestrians also use the trail system in the area. Rabbit Valley has a designated route system in place, and cross-country travel is prohibited, except by hikers and horseback riders.

Mack Ridge

The Mack Ridge area, home to the Kokopelli Trail system, has motorized access to the Kokopelli Trailhead and country west toward Mack, Colorado (exit 11), via a frontage road running parallel to, and south of, I-70. A high-standard dirt road leads to a secondary trailhead at Rustlers Loop. All other routes are either single-track or two-track trails. These trails are open to both motorized and non-motorized visitors on designated routes only. Cross-country travel is prohibited. The vast majority of the use on these trails is by mountain bikers, and motorized use is infrequently observed on a few of the trails.

Wilderness

Backcountry

The Backcountry Wilderness is accessed from Glade Park, an area southwest of the Colorado National Monument and southeast of the MCNCA. The BS Road accesses both the Knowles and Jones Canyons Trailheads. Mee Canyon and Rattlesnake Arches may be accessed by either of two routes; the Upper Bench Road is open from April 15 to August 15 only, and the lower Black Ridge road is open from August 15 to February 15 only. All routes within the Wilderness are non-motorized/mechanized but open to horseback riders and hikers. Existing grazing rights have been recognized by the enabling legislation, allowing limited use of motor vehicles within the Wilderness for grazing permittees, in accordance with their specific grazing management plans. Additional

motorized use in the Wilderness occurs during emergency fire and search and rescue operations.

Front Country

Primary access to the Wilderness Front Country is from State Highway 340. Dinosaur Hill, included in the recently designated Dinosaur Diamond Scenic and Historic Byway, is located off of Highway 340 about 0.7 miles south of I-70, exit 19. The Front Country trailheads can be accessed from Kings View (Mesa County I.3) Road. All trails in the Wilderness Front Country are designated and open to hikers and equestrians only. The CCNCA RMP designated trails in all zones.

Foot and horse trails in Devils Canyon are braided. Designated routes are indiscernible from the multitude of user-made trails, making following the designated routes difficult. Impact from off-trail travel is substantial.

No Action Alternative (Direct and Indirect Effects):

Under the No Action Alternative BLM would not complete the comprehensive programmatic analysis for SRPs and permits would be issued and analyzed on a case by case basis. Individual SRPs would be analyzed individually, and permitting would take longer. The No Action Alternative should not affect transportation and access, if each SRP is fully analyzed and appropriate mitigation is added at the time of proposal.

Impacts to the road and trail system associated with activities authorized under current SRPs are minimized by including a stipulation in the Standard Stipulations that “Permittee shall conduct the permitted operations in a manner which prevents rutting, or soil erosion”. (XVII. Resource Protection, paragraph G)

Cumulative Effects:

Under the No Action Alternative no changes to the SRP process would occur, and no additional cumulative effects would be anticipated.

Proposed Action Alternative (Direct and Indirect Effects):

The Proposed Action sets up criteria for determining impacts of SRPs on resources including transportation and access. Impacts to transportation and access include events that would close roads and trails and damage to trails resulting from uses authorized under an SRP.

Some event SRPs could request road and trail closures to support event operations. In these cases, the public would lose access to those roads and trails during the event. The intensity of the impact would be linked to the duration of the event. Shorter duration events would have less impact and longer duration events would have greater impacts. Including a design feature to minimize route closures in permit operations plans would minimize these impacts.

Authorized activities that include the use of roads and trails could result in damage of the roads and trails are used when they are wet. Including a design feature that all event

permits include a rain contingency plan and including a stipulation on all SRPs that restrict the use of roads and trails when they are wet would minimize these impacts.

Competitive events where speed determines a winner could result in road and trail damage. Participants could be more likely to widen trails as racers pass each other and on sections of trails where too much speed results in racers leaving the trail. Including a stipulation that prohibits passing on single-track trails where participants being passed are moving and requiring course plans to include sections of two-track roads to accommodate passing would minimize these impacts. Additionally, including the stipulation (in the Event Stipulations) that requires the permittee to notify the public about the event would reduce the number of public visitors on the race course, which would reduce the incidence of race participants passing the general public that is on the course.

Cumulative Effects:

Combined with casual recreation use, livestock grazing operations, and other authorized uses, issuing SRPs could increase use of the transportation system over the long-term. Impacts from SRPs would be minimized through stipulations that do not allow permittees to restrict public access, that require permittees to conduct operations in a way that does not result in rutting of roads and trails, and that require the permittee to ensure Tread Lightly and Leave no Trace practices are known and used by participants.

3.4.6 Wastes, Hazardous or Solid

Current Conditions:

Hazardous and solid wastes are not a part of the natural environment but could be introduced to the environment as a result of the proposed action. This would be in the form of solid waste (trash, litter) for all recreational use, and hazardous waste (spilled fuel/lubricants) for certain motorized activity.

No Action Alternative (Direct and Indirect Effects):

Under the No Action alternative SRPs would continue to be issued. BLM would add stipulations to address any foreseen hazardous waste issues.

Cumulative Effects:

Cumulative impacts, relating to hazardous wastes, from recreational use are rare and with quick response can be adequately mitigated and cumulative impacts would be non-existent or negligible, particularly since hazardous waste issue from recreational use would be minor. With regular patrolling of the area and regular litter/trash removal, cumulative impacts from this would be non-existent.

Proposed Action Alternative (Direct and Indirect Effects):

The issuance of SRPs might result in increased recreational use of the area, resulting in more solid waste (trash, litter) and more hazardous waste (spilled fuel/lubricants) from motorized recreational activities.

Cumulative Effects:

With proper design features/mitigating measures, impacts from spilled fuels/lubricants from certain motorized recreation activities can be quickly remediated, resulting in negligible or no cumulative impacts. Regular patrolling of the area(s) to remove trash and litter negates cumulative impacts.

3.5 LAND RESOURCES

3.5.1 Recreation

Current Conditions:

Recreation in the MCNCA is managed in accordance with the CCNCA RMP. The RMP outlines 10 different RMZs. Each zone has specific guidance and objectives to protect a variety of specific recreational opportunities. The opportunities include activities and settings for urban interface hiking and dog walking; remote wilderness settings with opportunities for solitude; multi-day river trips; and close-to-town opportunities for bicycling and OHV riding.

The BLM estimates over 210,000 user days annually in the NCA. These user days include both private user days and user days reported by SRP holders.

SRPs are used as a management tool to support recreation program objectives. Additionally, SRPs are issued to provide business and event opportunities on BLM-administered public lands. Outfitting businesses support recreation program objectives by providing opportunities to the public for guided outings. Event organizers provide opportunities to members of the public looking for competitive or organized group settings.

Outside the NCA, most commercial SRPs and some competitive SRPs can be categorically excluded from environmental review because the permitted activities are similar to casual use enjoyed by the general public. That is, these guided and event activities have similar impacts to that of the general public recreational use. It is the BLM’s SRP policy that this categorical exclusion cannot be used inside of an NCA. As such, all SRPs must be evaluated with an EA or an EIS. The result of this policy is a longer review process for all SRP applications. Additionally, it is the BLM’s policy to charge cost recovery for any SRP when more than 50 hours are needed to process, evaluate, administer and monitor an SRP. Most EAs require more than 50 hours of staff time to complete.

Currently there are 35 active SRPs in the MCNCA.

Current SRP use in MCNCA are included in the following table:

Mack Ridge			
Activity	Year	User days	# of SRPs
Mountain Bike Tours	2014	266	6
Running Races	2014	467	2
Total		733	8

Rabbit Valley			
Activity	Year	User days	# of SRPs
Equestrian Rides	2014	62	1
4-Wheel Drive Training	2014	4	1
Paleontological Tours	2014	372	1
Mountain Bike Tours	2014	158	3
Mountain Bike Race	2014	60	1
Total		656	7
Colorado River			
Activity	Year	User days	# of SRPs
Canoeing/Rafting (day trips)	2014	1,085	1
Canoeing /Rafting (overnight trips)	2014	1,692	15
Big Game Hunting	2014	25	1
Vending	2014		2
Total		2,802	19
Black Ridge			
Activity	Year	User days	# of SRPs
Mt. Lion Hunting	2014	4	1
Hiking	2014	9	1
Big Game Hunting	2014	39	2
Backpacking	2014	30	1
Total		82	5
Front Country			
Activity	Year	User days	# of SRPs
Equestrian Rides	2014	1,017	1
Total		1,017	1

*Note: Some permittees operate in multiple zones. As such, the total number of SRPs in the table is greater than the total SRPs currently active in the NCA.

No Action Alternative (Direct and Indirect Effects):

Under the No Action Alternative, SRPs would continue to be issued. Each individual SRP would be evaluated through an individual EA. All SRPs would continue to be evaluated to ensure proposals support planning objectives in the RMP. The result would be continued opportunity for commercial outfitters and event organizers to continue to apply for SRPs. All proposals would be evaluated individually with an EA. Since most EAs require more than 50 hours of staff time, cost recovery would be charged for the evaluation and issuance of most SRPs. In addition to the cost, there would be more time needed to complete an EA, which would result in fewer SRP proposals being evaluated. The additional costs associated with an EA would result in different impacts to smaller companies. The cost of analysis would be similar for both small and large companies. That said, the percentage of a company's overall income that would be required for cost recovery would be much larger for the smaller companies.

Since SRP proposals are evaluated to ensure they are consistent with recreation objectives, issuing SRPs would generally enhance recreation opportunities in the NCA. The impacts of issuing or not issuing SRPs on recreation include: 1) impacts to SRP holders; 2) impacts to participants associated with SRPs; and 3) impacts to visitors not associated with SRPs.

Business owners and event organizers whose applications for SRPs are denied lose the opportunities associated with their proposals. These impacts include loss of business income and/or the loss of an opportunity to conduct an event. Conversely, business owners and event organizers whose applications are approved gain the opportunity to conduct business or sponsor an event on public lands. Similarly, visitors who prefer to participate in activities and events authorized under an SRP lose that opportunity if an SRP is not issued and gain that opportunity if the SRP is authorized. Visitors that lose that opportunity would likely be displaced to other nearby public lands where the types of SRPs that support their preferred recreation outing is authorized.

Visitors that are seeking outings that are supported through guide and outfitter services would have those services available. Typically, these visitors do not have the equipment or the skills to enjoy these outings. Visitors that are seeking event experiences (races and other competitions) would also benefit from issuing SRPs for these types of events.

Conversely, visitors that view outfitter services and events as commercialization of public lands could have negative experiences when they encounter groups or events authorized under SRPs. Based on the ratio of SRP authorized user days to the overall user days in the NCA, these impacts would be minimal. Overall user days in the NCA are over 210,000 and the total user days reported under SRPs is 5,290 (2.5% of overall user days).

Currently, BLM has identified commercial operators and organized groups who conduct their trip without an SRP when a one is required. Park Rangers and Law Enforcement Officers perform SRP compliance checks on SRP holders, although it is impossible to make contact with all authorized and unauthorized permit holders while they are operating on MCNCA. 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 BLM SRP management policies and potentially creating conflicts with authorized permit holders.

Cumulative Effects:

The cumulative effects would be similar to the direct and indirect effects discussed above.

Proposed Action Alternative (Direct and Indirect Effects):

Under the Proposed Action, SRPs would continue to be issued to support recreation program objectives. Under the Proposed Action, all SRP proposals would be evaluated using a resource criteria matrix and classifying the impacts of all SRP proposals based on the results of that evaluation. In most cases, the evaluation of the proposal would be

documented using a DNA rather than completing an EA. The result of using this method of evaluation would be a streamlining of the evaluation process. Resource concerns associated with a proposal would be identified through use of the matrix. Proposals would either be modified or denied as a result. This process would increase the efficiency of evaluating SRP proposals and reduce the need for additional environmental review and cost recovery.

Under the Proposed Action, there would likely be an increase in SRPs issued due to the ability to issue permits in a timelier manner. Nonetheless, overall use levels would likely remain the same. This is due to the fact that many groups that require permits are not obtaining permits. The Proposed Action alternative would allow BLM 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 SRP-visitation numbers, and is expected to increase compliance with MCNCA management plan prescriptions, i.e. conditions of use, 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 the NCA 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

Under the Proposed Action, the impacts to recreational visitors would be the same or similar to those described in the No Action Alternative. Visitors that are seeking outings that are supported through guide and outfitter services would have those services available. Typically, these visitors do not have the equipment or the skills to enjoy these outings. Visitors that are seeking event experiences (races and other competitions) would also benefit from issuing SRPs for these types of events

Conversely, visitors that view outfitter services and events as commercialization of public lands could have negative experiences when they encounter groups or events authorized under SRPs. Based on the ratio of SRP authorized user days to the overall user days in the NCA, these impacts would be minimal. Overall user days in the NCA are over 210,000 and the total user days reported under SRPs is 5,290 (2.5% of overall user days).

Cumulative Effects:

Since SRPs would be issued to support achievement of recreation planning objectives, the issuance of SRPs in the MCNCA would likely result in meeting recreation program objectives. Using the evaluation matrix to determine impacts of individual permit proposals would result in a stream-lined process that would help guide applicants in the development of proposals and ensure SRP proposals are considered in a timely fashion. On-going monitoring and annual evaluation of individual permits would ensure the activities and operations authorized under the permit are supporting the achievement of planning objectives.

3.5.2 Special Designations (ACECs, SMAs etc.)

Current Conditions:

The MCNCA and Black Ridge Canyons Wilderness were established by Congress on October 24, 2000 to conserve, protect and enhance enjoyment of present and future generations the unique and nationally important values of the NCA. These include its geological, cultural, paleontological, natural, scientific, recreational, environmental, biological, wilderness, wildlife, education, and scenic resources.

The proximity of this NCA to the communities of Grand Junction and Fruita, Colorado, make it a daily destination for local residents to hike its trails or raft the Colorado River. The area also attracts visitors from all over the world who come for its world-class mountain biking trails or learn about its important scientific resources by participating in a dinosaur dig adventure. Often, the BLM's issuance of SRPs is categorically excluded from documentation in an EA or EIS under H-1790-1 Appendix 4 H. (1); however this categorical exclusion cannot be used in "Special Areas" including National Conservation Areas, therefore an EA is required.

Proposed Action and No Action Alternative Impacts:

The effects of issuing SRPs on NCA and wilderness resources are discussed in other sections of this document. There would be no effects to the geological, scientific, educational, and scenic values. The effects to the natural, biological, and environmental values are discussed in the soil, water, fire and fuels, and biological resource sections. The effects to paleontological values are discussed in the paleontological resource section. The effects to cultural values are discussed in the cultural resource section. The effects to wildlife values are discussed in the wildlife resource section. The effects to the wilderness values are discussed in the wilderness resource section. The effects to recreation values are discussed in the recreation resource section.

There are no additional effects to the special designation beyond those analyzed in the other resource sections.

3.5.3 Wilderness and Wilderness Study Areas

Current Conditions:

The 75,550-acre Black Ridge Canyons Wilderness (BRCW) was designated as a component of the National Wilderness Preservation System on October 24, 2000, when the McInnis Canyons National Conservation Area and Black Ridge Canyons Wilderness Act of 2000 was signed into law. The BRCW makes up the core area (61 percent) of the 122,300-acre MCNCA.

The BRCW has long been recognized as one of Colorado's premier wilderness areas with its impressive canyons and sandstone arches. The area is characterized by a high east-west ridgeline, eroded by seven major canyons draining north to the Colorado River. The Wilderness landscape is predominantly natural in character with more than 60 miles of canyons and negligible human imprint. While the canyon systems remain primarily pristine, the upland mesas hold fence lines, stock reservoirs, and trails. Because of their location and screening, all of these have a minor impact on the naturalness of the area.

The expansive Wilderness area provides exceptional opportunities for primitive and unconfined recreation based on outstanding scenery, diverse landscape, geologic features, and cultural and paleontological resources. Intermittent watercourses and geologic features, such as spires, the arches in Rattlesnake Canyon, and the very large alcove in Mee Canyon enhance hiking opportunities, accentuating solitude by dispersing visitors both horizontally and vertically. Other activities in the BRCW include horseback riding, nature study, photography, arches viewing, and backpacking.

The BRCW also possesses a number of internationally renowned paleontological, archaeological, and ecological values and offers substantial potential in both education and scientific research.

SRPs are considered “commercial enterprises” under the Wilderness Act, and commercial enterprises are prohibited in wilderness. The Act further states

“Commercial services may be performed within the wilderness areas designated by this act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.”

The recreational purposes of the BRCW include both outstanding opportunities for solitude and outstanding opportunities for primitive and unconfined recreation.

In accordance with BLM policy for wilderness management, activities that are not wilderness dependent should not be authorized. Examples include: “Contests, such as physical or mental endurance of a person or animal, foot races, canoe or boat races, competitive trail rides or other forms of competition, and survival contests.”

No Action Alternative (Direct and Indirect Effects):

Impacts to wilderness would include changes to the level of manipulation of resources (trammeling), changes to the biological resources (naturalness), changes to the amount of development (undeveloped), changes to wilderness recreation opportunities (solitude or primitive and unconfined recreation), or changes to cultural resources or threatened and endangered species (supplemental values).

Under the No Action Alternative, BLM would continue to evaluate and issue recreation permits. Since SRPs are used as an implementation tool to help achieve resource objectives, only SRPs that protect wilderness resources would be issued. SRPs do not authorize manipulation of resources, so there would be no impacts to the untrammled nature of the wilderness. Recreational use could result in changes to biological resources (visitor use impacts to vegetation, soil, or water resources). The standard stipulation that requires Leave No Trace practices to be used by permittees and their clients would minimize these types of impacts. SRPs do not authorize construction of structures, so the undeveloped nature of the wilderness would not be impacted. Impacts to supplemental values would be similar to the impacts to biological resources. Visitor use could damage protected plants, animals, and cultural resources. Like naturalness, these impacts would be minimized through Leave No Trace practices required in the standard stipulations.

Impacts associated with wilderness recreation opportunities are best evaluated by looking at the trade-offs inherent in wilderness management. That is, providing opportunities for primitive recreation (hiking, horseback riding, camping, wildlife viewing, etc.) could result in more visitors. More visitors could change opportunities for solitude. Changes to opportunities for solitude could require the need for more visitor restrictions, which would change opportunities for unconfined recreation (more regulations on visitor use). Wilderness managers would evaluate each proposal to determine if enhanced primitive recreational opportunities could be mitigated to minimize impacts to solitude and/or unconfined recreation.

Under the No Action Alternative, the BLM would evaluate each SRP proposal individually to determine the nature of these trade-offs. The BLM would use a Minimum Requirements Decision Guide (MRDG) to evaluate whether the commercial activity is the minimum necessary for visitors to realize the purposes of the wilderness (wilderness recreation). The BLM would also evaluate the impacts of the SRP proposal through an EA to determine impacts to other resources, including wilderness resources. This case-by-case approach of developing both an EA and MRDG could result in BLM needing more than 50 hours of time, which could require cost recovery for the SRP applicant.

Cumulative Effects:

Under the No Action Alternative, the cumulative effects would be similar to the direct and indirect effects described above.

Proposed Action Alternative (Direct and Indirect Effects):

The proposed action sets up criteria for determining impacts of SRPs on resources including wilderness. Under the Proposed Action, impacts to wilderness would be similar or the same as those describe in the No Action Alternative.

Under the Proposed Action, wilderness resources would be considered as part of the criteria (group size in wilderness and whether permit proposals are inside the wilderness). Additionally, the design features to not permit competitive events inside the wilderness and to complete a MRDG for each SRP proposal would protect wilderness resources.

Using a programmatic approach to evaluate SRPs would reduce the amount of time needed to process permit applications and would likely result in not needing to charge cost recovery fees to SRP applicants.

Cumulative Effects:

The cumulative effects would be similar to the direct and indirect effects described above. Because group size would be stipulated as a permit condition, SRPs in combination with past, present, and reasonably foreseeable actions should not have significant impacts on wilderness character.

3.5.4 Range Management

Current Conditions:

There are 14 active grazing allotments with a total of 7,800 cattle AUMs within the McInnis NCA (AUM is an Animal Unit Month meaning the amount of forage necessary for the sustenance of one cow or its' equivalent for a period of 1 month). There are also 2 unallotted allotments and 5 allotments with portions in the NCA. Season of use occurs 11/01 to 06/15 with most of the use during the winter and early spring months from about 12/01 to 05/01.

No Action Alternative (Direct and Indirect Effects):

SRPs would be analyzed individually under the requirements of the NEPA which would require much more time and greatly increase the amount of paper work. Potential for impacts would remain the same as the Proposed Action for range management with possibilities of conflicts between recreationists and cattle when they are in the same areas.

Cumulative Effect:

Cumulative effects would be low as livestock grazing and recreation are monitored and managed under multiple-use to maintain or make progress towards meeting the Standards for Rangeland Health.

Proposed Action Alternative (Direct and Indirect Effects):

Livestock grazing would mainly occur from December 1 to May 1 creating potential for conflict during this time period especially when livestock and recreationists are in the same area. Possible conflicts would be harassing cattle at their watering areas (ponds, troughs, water hauling sites, riparian areas cattle may be using) and along trails cattle are using while recreationists may resent smelling and avoiding fresh cow pies, increase in flies and threat of injury from livestock. Issuance of SRPs under the Design Features for livestock grazing (2.2.2) should help prevent these conflicts between recreation and livestock.

Cumulative Effects:

Cumulative effects would remain the same as the No Action alternative with impacts from both livestock and recreation activities. The impacts would remain low as both livestock and recreation are managed to maintain or make progress towards meeting the Standards for Rangeland Health.

CHAPTER 4 - CONSULTATION AND COORDINATION

4.1 LIST OF PREPARERS AND PARTICIPANTS

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