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Bureau of Land Management**

**Environmental Assessment
DOI-BLM-CO-S010-2013-0016-EA**

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Hardrock 100 Endurance Run

***Location:* Silverton, Ouray, Telluride area of Southwest Colorado**

***Applicant/Address:* Hardrock 100, Inc., c/o Dale Garland
PO Box 55
Silverton, CO 81433**

Tres Rios Field Office
29211 Highway 184
Dolores, CO 81323
970-882-6841



Hardrock 100
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1.0 PURPOSE & NEED

1.1 Introduction

This Environmental Assessment (EA) has been prepared to disclose and analyze the environmental effects of the Hardrock100 Endurance Run as proposed by Hardrock100, Inc. The EA is a site-specific analysis of potential effects that could result with the implementation of a proposed action or alternatives to the proposed action. The EA assists the BLM in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination as to whether any “significant” effects could result from the analyzed actions. “Significance” is defined by NEPA and is found in regulation 40 CFR 1508.27.

An EA provides an analysis for determining whether to prepare an Environmental Impact Statement (EIS) or a statement of “Finding of No Significant Impact” (FONSI). If the decision maker determines that this project has “significant” effects following the analysis in the EA, then an EIS will be prepared for the project. If not, a Decision Record (DR) may be signed for the EA describing the decision. The decision can be an alternative as described or a combination of alternatives. A DR, including a FONSI, documents the rationale for why implementation of the selected alternative would not result in “significant” environmental effects beyond those already addressed in within-cited Resource Management Plans.

This chapter presents the purpose and need of the proposed project, as well as the relevant issues, i.e., those elements of the human environment that could be affected by the implementation of the proposed project. In order to meet the purpose and need of the proposed project in a way that resolves the issues, the BLM has considered and/or developed a range of action alternatives. These alternatives are presented in Chapter 2. A description of the Affected Environment, including a description of the current management situation of impacted resources, is found in Chapter 3. The potential environmental effects or effects resulting from the implementation of each alternative considered in detail are analyzed in Chapter 4 for each of the identified issues.

1.2 Background

Hardrock100, Inc. has requested a Special Recreation Permit for a 100 mile footrace run through the San Juan Mountains in an area encompassing the Alpine Triangle between Silverton, Ouray, Telluride and Lake City. The course passes through 7 federal jurisdictions: Norwood Ranger District (approximately 14 miles and 1 aid station), Ouray R.D. (18 miles and 3 aid stations), Columbine R.D. (12 miles and 1 aid station), Divide R.D. (8 miles and 1 aid station) Gunnison R.D. (3 miles and no aid stations), Tres Rios Field Office (24 miles and 3 aid stations) and Gunnison Field Office (13 miles and 1 aid station). The course traverses a portion of the recently expanded Mt. Sneffels Wilderness; pursuant to Congressional Authorization, the run may continue to use this area if approved by the Forest Service. Approximately 7.3 miles of the course traverses existing trails (Grouse Gulch Trail to Sloan Lake to Handies Peak and Grizzly Creek Trail when run in the clockwise direction) in the Handies Peak Wilderness Study Area.

The run has been conducted annually in alternating clockwise/counterclockwise directions, utilizing existing designated trails and roads, as well as game trails, historic unused mining

access routes, sheepherder trails, and other historically used linear features. This annual event has been run 20 times in the past years with up to 140 participants. For 2014 the event is run in a clockwise direction. A map is attached of the course (See Appendix A). The proposal requests a maximum of 160 participants for the year 2014, increasing to a maximum of 225 participants in the year 2018. Approximately 7.3 miles of the course traverses existing trails in the Handies Peak Wilderness Study Area. This portion of the course was analyzed in a 2001 Environmental Assessment, which found the use and the related activities/facilities satisfied the non-impairment criteria set for Wilderness Study Areas.

There are 12 proposed aid stations along the course (13 when the race is run in the opposite direction) to supply food, drink and medical support for the participants. No permanent structures are proposed to be erected. A description of aid stations, including the hours the aid stations will be operational and the means of and limitation on access is attached as Appendix B.

Small reflective markers would be placed along the course (usually at greater than 1/8 mile intervals) the week before the race to keep runners on course. The reflective markers would be removed within three days of the conclusion of the event (which ends on Sunday following the 4th of July weekend at 6 :00 am). The aid stations are proposed to be set up on areas legally accessible by vehicles, or, if vehicles are not allowed, the supplies would be brought in by backpack.

The event would take place over 48 hours beginning on the Friday at 6:00 am following the 4th of July weekend and end at 6:00 am the following Sunday. In 2014 the event would commence on July 11, 2014. There are time limit “cutoffs” along the course, which are strictly enforced; if runners do not meet the time checkpoint they must withdraw from the course; as a result the number of runners participating declines as the race progresses. Aid station set up would begin early on Friday the 11th and the course would be swept, cleared and cleaned by Sunday at 10 am. Course markings would be removed by Wednesday, July 16, 2014.

1.3 Need for the Proposed Action

The need for the action is established by BLM’s responsibility under the Federal Land Management Policy Act to respond to a request for a Special Recreation Permit for the Hardrock100, Inc. for access to existing trails across public lands. Since a portion of the event is proposed in the Handies Peak Wilderness Study Area (WSA), the need for this action is also to ensure that the portion of the course run within the Handies Peak Wilderness Study Area (WSA) is managed according to the Manual 6330-Management of Wilderness Study Areas (7/13/2012).

There is a demand for this fast-growing user group seeking to participate in an environmentally responsible high elevation ultra trail run in a scenic alpine setting. *Running Times* magazine reports that long distance 100 mile mountain runs are one of the fastest growing recreational sports in America; this is the 21st year of the event, which in the past has been authorized for up to 140 participants. Over 1300 runners entered the lottery to participate in 2014, which, due to the immense popularity of the event, is used to determine entrants. That number has increased every year and will continue to increase in the future with the reputation of Hardrock as one of the world’s premier and most difficult runs spreading throughout the world and as the sport continues to grow. The current request is to increase the number of participants to 160 for the year 2014, up to 225 for the year 2018. The popularity of the Hardrock 100 is in large measure

due to the unique characteristics and challenges of the event: a 100 mile run taking place in some of the most remote and primitive terrain in America, with as much of it “off road” as feasible, with the most elevation gain and loss of any endurance run in America (over 33,000 feet of gain and over 33,000 feet of loss), held at the highest average elevation of any endurance event in America. The signature distinguishing feature of the course is that it traverses Handies Peak, one of Colorado’s “14ers,” the only race in America that rises to this elevation. Hardrock has a reputation throughout the world of being one of the most challenging endurance events in the world and those who complete this unique and difficult course consider it one of lifetime’s great achievements.

1.4 Purpose(s) of the Proposed Action

The purpose of the proposed action is to provide Hardrock100, Inc. the opportunity to provide a 100 mile endurance running event on existing trails across land managed by the Bureau of Land Management and the U.S. Forest Service managed lands.

1.5 Decision to be Made

The Bureau of Land Management will decide whether or not to grant the Special Recreation Permit and, if so, under what terms and conditions.

1.6 Conformance with BLM and USFS Land Use Plans

The proposed action described herein is in conformance with the following Plans:

1. San Juan/San Miguel Resource Management Plan approved 1985. Page 13 provides, “Trails and other means of public access will continue to be maintained and developed where necessary to enhance recreation opportunities and allow public use.” Page 34: “The entire Silverton portion of the planning area should also be managed as a “Special Recreation Management Area” for its wide variety of recreation values and opportunities.”
2. Gunnison Resource Area Management Plan approved 1993. Page 2-20 referencing Management Unit 1 calls for “providing a diversity of recreation opportunities ... while protecting historic, scenic and natural values.” Page 2-25 referencing Unit 4 calls for managing the area “for protection and enhancement of visual and other natural resources and existing recreation opportunities in the unit.”
3. Alpine Triangle Final Recreation Area Management Plan, 2010, specific to Handies Peak WSA, page 56: “Management Action 5: Competitive events (e.g. trail running and equestrian endurance rides) would not be permitted in Wilderness Areas. They may continue in WSAs with the understanding that if the areas are designated the courses would have to be moved. The BLM would work with race organizers to find alternative routes outside of designated Wilderness for their events.”
4. Grand Mesa, Uncompahgre and Gunnison Land and Resource Management Plan approved 1983 (encompassing Norwood, Gunnison and Ouray R.D.) provides for management of goals “providing additional recreation opportunities,” pg. 2 and III-24: “provide a broad spectrum of diverse recreation opportunities.”
5. Rio Grande National Forest Revised Land and Resource Management Plan 1996 (encompassing Divide R.D.) provides as a forest-wide objective to “offer a diverse range of outdoor recreation opportunities.” III-4.5.

6. San Juan National Forest and Proposed BLM Tres Rios Field Office Land and Resource Management Plan 2013 (encompassing Columbine R.D.) provides for “a full spectrum of outdoor recreation opportunities,” pg. 178.

1.7 Relationship to Statutes, Regulations, or Other Plans

- Federal Land Policy and Management Act of 1976 (43 USC 1701 et seq.)
- Archaeological Resource Protection Act of 1974
- American Indian Religious Freedom Act of 1978
- National Historical Preservation Act of 1966 as Amended
- National Environmental Policy Act of 1969, as amended (42 USC 4321 et seq.)
- 1973 Endangered Species Act, as amended
- Standards for Public Land Health: In January 1997, Colorado Bureau of Land Management (BLM) approved the Standards for Public Land Health. Standards describe conditions needed to sustain public land health and relate to all uses of the public lands.
- Manual 6330-Management of Wilderness Study Areas (7/13/2012).

1.8 Scoping & Identification of Issues

A detailed description of the proposed action was submitted to all listed National Forest Ranger Districts and BLM Field Offices where it was reviewed by staff specialists for internal scoping. BLM posted a scoping letter and attached map on the Tres Rios NEPA log webpage of the BLM on April 3, 2014 with request for response by May 5, 2014. The Scoping letter was mailed to wilderness mailing recipients who requested notification on April 11, 2014. As of May 8 2014 there have been no responses to the scoping letter.

1.8.1 Identification of Issues

The following resources/issues were identified through the internal scoping process:

1.8.1 Recreation

- The event offers a unique recreational opportunity in the area. However there is a potential effect to other trail users by increasing the number of interactions.
- There was a concern that the increase in vehicles on roads and in parking areas from participants and their crews and spectators using roads to access aid stations may add to congestion in the area.

1.8.2 Wilderness/ Wilderness Study Area

- The proposed route passes through Handies Peak Wilderness Study Area. There was a concern of the potential effects pursuant to Handies Peak WSA non-impairment criteria.

1.9 Issues Considered but Eliminated from Further Analysis

The following issues were considered and are either not present or would not be effected by the Proposed Action or the No-Action Alternative and do not require detailed analysis (*rationale in parenthesis*): Air Quality (*no effect*), Areas of Critical Environmental Concern (*not present*), Cultural Resources (*no effect*), Greenhouse Gas Emissions (*no effect*), Environmental Justice (*not present*), Farmlands (*not present*), Fish Habitat (*no effect*), Floodplains (*no effect*), Forest Resources (*no effect*), Fuels/Fire Management (*no effect*), Invasive Species/Noxious Weeds (*no effect*), Land Access (*no effect*), Lands with Wilderness Characteristics (*no effect*), Migratory Birds (*the foot race is on existing trails and is of short duration; no new disturbance; no vegetation removed, no effects anticipated*), Geology (*no effect*), Oil and Gas (*no effect*), Solid Minerals (*no effect*), Native American and other Religious Concerns (*not present*), Paleontology (*not present*), Rangeland Health Standards (*no effect*), Soils (*foot race on existing trails; no new impacts*), Special Status Animal Species (*no effect*), Special Status Plant Species, Threatened, Endangered or Candidate Animal Species (*not likely to adversely affect per Canada lynx screen since runners are restricted to existing trails*), Threatened, Endangered or Candidate Plant Species (*no effect*), Visual Resources (*the temporary presence of aid station facilities would impact the visual resources of the area, however impacts of short duration and scope; due to topographic features, many of the aid stations are visible only from a very limited distance*), Vegetation (*no effect*), Wastes (hazardous or solid) (*not present*). For more information see the Resource Checklist in administrative record.

2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION

2.1 Introduction: The objective of the proposal is to allow the public to participate in a high elevation, ultra trail run in a safe and environmentally responsible manner. According to *Running Times* magazine and *Ultra Running* magazine long distance 100 mile mountain runs are one of the fastest growing recreational sports in America and this is the 21st year of the event, which in the past has been authorized for up to 140 participants. Over 1300 runners entered the lottery to participate in 2014 which, due to the immense popularity of the event, is used to determine entrants. The current proposal is to increase the number of participants to 160 for the year 2014, and up to 225 for the year 2018.

The increase in popularity of the Hardrock 100 is due to the unique natural characteristics and recreational challenges of the event. The Hardrock 100 event is a competitive 100-mile run which would take place in some of the most remote and primitive terrain in the U.S., with as much of it “off road” as feasible, with the most elevation gain and loss of any endurance run in America, held at the highest average elevation of any endurance event in America. The signature characteristic of the course is that it traverses Handies Peak, one of Colorado’s “14ers,” the only race in America that rises to this elevation. Hardrock has a reputation of being one of the most challenging endurance events and those who complete this unique and difficult course consider it one of lifetime’s great achievements.

2.2 Alternative A - Proposed Action

The proposed action is to authorize a Special Recreation Permit for Hardrock100, Inc. to utilize existing trails, roads, as well as game trails, historic unused mining access routes, sheepherder trails, and other historically used linear features for a 100 mile endurance run. (A map of the

proposed course is attached as Appendix A.) The organizers have submitted a Special Recreation Permit to the BLM to allow 160 runners for the year 2014, increasing to a maximum of 225 runners by the year 2018. The staging area for the event would take place on private lands in Silverton, Colorado; there would be 12 aid stations, some on private lands (13 when the race is run in the counter-clockwise direction) along the course to supply food, drink and medical support for the participants. The course would alternate directions annually. For 2014, the course would be run in a clockwise direction. Approximately 37 miles of the course (and four aid stations) would take place on Bureau of Land Management lands; 55 miles and six aid stations on Forest Service lands. The summer of 2014 would be the twenty-first year of the event, which was initially permitted in 1992 for 110 runners. Since 1992, participant numbers have subsequently increased; the current proposal would allow 140 runners. No motorized vehicles would be used for the event, although spectators and crews are permitted access to certain of the aid stations. A list of aid stations and limitations on spectator access is attached as Appendix B.

The event would occur over 48 hours beginning on the Friday at 6:00 am following the 4th of July weekend and ending at 6:00 am the following Sunday. In 2014 the event is planned to commence on July 11, 2014. Small reflective markers would be placed along the course (usually at greater than 1/8 mile intervals) the week before the race to keep runners on course. The markers would be removed within three days of the conclusion of the event. Aid station set up is planned to begin early on Friday the 11th and the course would be swept, cleared and cleaned by Sunday at 10 am.

The aid stations would be set up on areas legally accessible by vehicles, or, if vehicles are not allowed, the supplies would be brought in by backpack. There are no permanent structures erected on public lands associated with the proposal; aid stations typically consist of fold up tables and chairs and pop-up or other tents. A description of aid stations, including the hours the aid stations will be operational and the means of and limitation on access is attached as Appendix B.

Prior to the event runners would be instructed, both via a Runner's Handbook and at the runner's pre-race briefing, that they are required to remain on course and not leave the trail, that any form of littering is grounds for disqualification, and that they are required to carry a means of disposing of their personal waste. (There would be several existing sanitary facilities along the route). Runners would also be told at the pre-race briefing that the course traverses the Handies Peak Wilderness Study Area, which is managed for primitive recreation, naturalness and solitude, and that participants must respect those attributes as they cross the WSA.

For safety reasons, runners would be allowed "pacers" over portions of the course who may accompany them. For 2014, pacers would accompany their runners commencing at Ouray; in alternate years when the course is run in a counter-clockwise direction, pacers would accompany their runners beginning at Grouse Gulch Aid Station. Because a large number of the competitors are unable to complete the course and withdraw at various prior stages of the event, and because time limit cutoffs are strictly enforced, and because a large portion of the competitors do not utilize "pacers," the number of participants - pacers and competitors - on the course will approximate the number of runners requested by the applicant, i.e., for 2014, for example, no

more than the requested 160 participants – runners and pacers – will be on the course at any one time.

The proposed course passes through 7 federal jurisdictions: Norwood Ranger District (approximately 14 miles and 1 aid station), Ouray R.D. (18 miles and 3 aid stations), Columbine R.D. (12 miles and 1 aid station), Divide R.D. (8 miles and 1 aid station) Gunnison R.D. (3 miles and no aid stations) Tres Rios Field Office (24 miles and 3 aid stations) and Gunnison Field Office (13 miles and 1 aid station). The course traverses a portion of the recently expanded Mt. Sneffels Wilderness; pursuant to Congressional Authorization, the run may continue to use this area if approved by the Forest Service. Approximately 7.3 miles of the course traverses existing trails (Grouse Gulch Trail to Sloan Lake to Handies Peak and Grizzly Creek Trail when run in the clockwise direction) in the Handies Peak Wilderness Study Area. A non-impairment analysis was completed for this project and the proposed action was found to meet the non-impairment criteria. Event monitoring by BLM staff would be conducted and annual permit renewal/reauthorization would only be granted if the use and the related activities/facilities continue to satisfy the non-impairment criteria set for Wilderness Study Areas.

The organizers of the event have proposed commencing in 2014, to address the congestion and parking issues at Cunningham Gulch Aid Station (when run in the counterclockwise direction), Grouse Gulch Aid Station (in both directions), and Chapman Gulch Aid Station (when run in the clockwise direction) the following:

1. All runners will be limited to one crew vehicle, and one crew vehicle only.
2. All runners will be issued a crew pass, which must be prominently displayed in order to park near any of the three above-referenced aid stations.
3. There will be designated areas for Hardrock crew parking.
4. There will be designated Hardrock volunteers to insure compliance.
5. There would be no crew access at Chapman Gulch when the race is run in the clockwise direction (commencing in 2014).

As the number of runners increases above the 160 requested in the 2014 permit, the race organizers will prepare for additional mitigation measures, including:

1. Restricting the time that a crew member may park at the above aid stations (no crew may park in excess of ½ prior to the anticipated expected arrival of their runner, and must leave when the runner leaves the aid station).
2. A shuttle service to transport crew members to the above aid stations.

The mitigation measures proposed for 2014 would limit the maximum number of crew vehicles present to no more than 10 at Grouse Gulch, and to 5 at either Cunningham or Chapman Aid Stations (depending on direction). It would thus reduce the congestion and parking impacts.

2.3 Alternative B - No Action

Description: The No Action Alternative would be to not grant the Special Recreation Permit/Special Use Permit. The event would then have to be cancelled or run elsewhere.

2.4 Alternative C –Wilderness Study Area Avoidance Alignment

Description – This alternative would be to reroute the current course as described in Alternative A to avoid the Handies Peak Wilderness Study Area. This alignment would involve (in the 2014 direction): From the Grouse Gulch Aid Station runners would remain on CR 2 to Minnie Gulch, head east up Minnie Gulch following CR 24 until it becomes trail, follow the trail to the Continental Divide Trail and proceed north until the intersection with the Cuba Gulch Trail (#447). The course would then follow #447 to the intersection with Middle Fork Pole Creek Trail from there head south to the Continental Divide Trail and rejoin the current course route at Pole Creek Aid Station. A map of this alternative is attached as Appendix A.

2.5 Alternatives Considered but Eliminated from Detailed Analysis

No other alternatives are needed to address resource conflicts.

3.0 AFFECTED ENVIRONMENT

3.1 Introduction

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

3.2 General Setting

The portion of the course on public land lies within the area know as the Alpine Triangle and varies in elevation from approximately 8,000 feet to 14,048 on Handies Peak, the high point of the course. The scenery offers spectacular views of the rugged mountains and river valleys of the Alpine Triangle. The vegetation types traversed include sub-alpine meadows, spruce and fir forests, alpine tundra, and rocky talus slopes. The harsh climate, thin soils, steep slopes and short growing season in these high elevation ecosystems make them vulnerable to erosion if routes for concentrated activities are not chosen carefully. Existing road and trail corridors are for the most part designed, constructed and maintained to reduce the potential for erosion. Wildlife living in the area include elk, black bear, mountain lion, bighorn sheep, coyote, yellow bellied marmot, pika, long tailed weasel, white tailed ptarmigan, water pipit, rosy finch, common raven and several dozen other bird species.

These areas are popular among recreationists and are regularly visited by hikers, four wheelers, mountain bikers and a variety of other recreationists, including heavy vehicle use along the Alpine Loop Scenic Byway. The majority of the landscape is under the management of either the United States Bureau of Land Management (BLM) (Tres Rios and Gunnison Field Offices), or the United States Forest Service (USFS)(Gunnison, Ouray, Norwood, Divide, and Columbine Ranger Districts). The region is also criss-crossed by strips of private land.

The area encompassing the Handies Wilderness Study Area is particularly popular with hikers as Handies Peak constitutes one of Colorado's "14ers" and there are other "14ers" in the region. Non-motorized trail use along the key trails to the 14ers is heavy during the summer months, while use of other non-motorized trails in the region is considerably lighter. The area is also grazed by bands of sheep in the summertime. Past mining activity was responsible for building

many of the roads as well as buildings, mineshafts and tailing piles that dot the area, and the proposed course utilizes many of these sheep trails and mining roads.

3.3 Resources/Issues Brought Forward for Analysis

3.3.1 Recreation

The Alpine Triangle Recreation Area is a popular destination for a variety of both motorized and non-motorized activities, receiving visitors from all around the world. The Alpine Triangle is roughly defined as the area between Silverton, Lake City, and Ouray Colorado. The BLM Tres Rios and Gunnison Field Offices manage the BLM portion of the area (145,000 acres) as a Special Recreation Management Area. Overall visitation is estimated at about 600,000 visitor days each year, with July being the most popular month. This number reflects visitation to BLM lands; hundreds of thousands of other visitor days occur on the course traversing Forest Service land. The area is popular among 4-wheelers and ATVs; recreationists on the roads that will be utilized by the event can expect to see approximately 10 to 20 other vehicles per hour and even more on busy summer weekends. Hikers and backpackers can also expect to see approximately 5 to 10 other hikers and backpackers per hour during July on the trails utilized by the event. Similarly, hundreds of vehicles a day during July utilize Cinnamon Pass Road, Ophir Pass Road and Shelf Road.

3.3.2 Wilderness/Wilderness Study Area

The area around Handies Peak in the Handies Peak WSA is particularly popular among recreationists since there are numerous "14ers" in the area; on any given day in July over 100 persons will be hiking Grizzly Gulch Trail ascending Handies Peak.

The following is a synopsis of the 1980 Intensive Inventory description of the unit's wilderness characteristics:

Size and Physical Characteristics:

The unit contains 16,100 acres of public land administered by the BLM. There are 170 acres of private land inholding. The unit contains unpatented mining claims and portions leased for grazing.

Naturalness:

The unit is a rugged area of high mountains and steep drainages, containing Handies Peak at 14,048 feet. The unit also contains high alpine lakes, perennial creeks, and waterfalls. Drainages support dense forests of sub-alpine fir. Aspen groves and vast meadows of alpine tundra typify the area as well. Primarily natural in character, there are only minor imprints of man. A few sheepherder camps in upper Grizzly Creek and old mining prospects and adits are found but substantially unnoticeable.

Solitude:

Large size with remote drainages descending from 13,000 foot peaks, combined with the feeling of vastness created by the surrounding mountainous terrain, provide outstanding opportunities for solitude.

Primitive and Unconfined Recreation:

The large size of the unit and varied topography provide outstanding opportunities for hiking, backpacking, mountain climbing, horseback riding, cross country skiing, and sightseeing. High scenic quality enhances these values.

Supplemental Values:

Scenic quality due to rugged mountain landscape, 13,000+ foot peaks, glacial features, and vegetative patterns.

4.0 ENVIRONMENTAL EFFECTS

4.1 Introduction

The proposed action would be analyzed as it impacts Recreation and Wilderness as further described below.

4.2 Direct and Indirect Effects

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

4.3.1 Alternative A – Proposed Action

4.3.1.1 Recreation

The event may directly affect existing trail users by increasing interactions between participants in the event and other recreational users. There will also be the presence of small reflective markers along the course. Many trails proposed for use by the Hardrock 100 are lightly used. Others, like the trails up to Handies Peak, receive thousands of visitor days each year. There are no limitations on access to the public; trail users are already accustomed to interactions with other trail users throughout the course, often in great numbers. The participants in the proposed event rapidly spread out over the course. The added foot traffic of between 160 and 225 runners (the presence of pacers will not increase the number of participants, as discussed below) dispersed over a 48 hour period will cause no noticeable increase in the number of interactions or the feeling of crowding, and will cause no notable impacts to the trail or the surrounding area. The reflective markers are small and unobtrusive in nature and will be placed on the course only shortly before the event and will be removed within three days after. The event has been ongoing for 20 years with up to 140 participants with few complaints from the public regarding increased interactions nor the presence of the reflective markers.

The event permits crew access at various points along the course and may directly affect congestion at Grouse Gulch, Cunningham and Chapman Aid Stations and on the roads leading to those aid stations (Ophir Pass Road and CR 2). Currently there are no absolute vehicle restrictions regarding access and parking at those areas, though when the race is run in a counter clockwise direction there is no vehicle access permitted at Chapman Aid Station. With the increase in the number of entrants proposed there is an increased likelihood of congestion and traffic in these areas. At present as many as 20 crew vehicles may be parked at one time at Grouse Gulch Aid Station during its peak use. Permitting 225 participants is likely to increase that amount to 30 vehicles. Cunningham Aid Station and Chapman are

later in the race (depending on direction) with runners and crews far more dispersed; still the aid stations are small and facilities for parking limited. The organizers proposed parking and vehicle access plan, referred to above, is intended to address this increased congestion.

The event would permit the fast-growing community of recreational ultra-endurance runners the opportunity to participate in a high elevation, remote and scenic one hundred mile run, conducted on one of the most unique and challenging courses in the world. The event would also provide an economic boost to the communities of Silverton, Ouray, Telluride and Lake City, and other neighboring communities.

The event is of short duration with all aid stations and course marking removed within a short period of time after the conclusion of the event. There will be no indirect effects of granting the proposed action.

4.3.1.2 Wilderness/ Wilderness Study Area

The event must comply with the non-impairment criteria of WSAs. For the year 2014, and in subsequent years when the race is run in a clockwise direction, the first runners are expected to leave Grouse Gulch Aid Station and then enter the Handies Peak WSA at approximately 5:30 pm on Friday. (No runners are permitted to leave Grouse Gulch Aid Station after Saturday at 10:50 am). Approximately 60% of the runners will still be in the event (for the year 2014 approximately 110 runners). Approximately 50% will avail themselves of pacers. Thus approximately 165 participants will be entering the WSA over the next 15 hours, or about 7 runners, some with pacers, an hour, increasing to a maximum of 10 runners (some with pacers) an hour if the full 225 runner request is granted. Almost all of these runners and pacers will be passing through the WSA at night. The runners are generally silent and utilize only a small headlamp and flashlight for illumination. Other recreationists are accustomed to the sound of other recreationists communicating. There are few other recreationists on these trails at night. The number of participants the event would have passing the WSA at night is thus approximately the same as the number of other recreationists present during the day. In addition, pursuant to the 2010 Recreation Area Management Plan for the Alpine Triangle, camping is discouraged above elevation 12,000 feet. There will be few campers affected by the runners at night. There would be no noticeable impact to solitude

When run in the counterclockwise direction (beginning in 2015) the first and fastest runners will arrive at Sherman Aid Station at noon, pass through the WSA and arrive at Grouse Gulch at 3:30 pm on Friday. The average runner will take 5 hours to pass from Sherman to Grouse. (No runners are permitted to proceed beyond Sherman Aid Station after Friday at 8:15 pm and no pacers are permitted in this direction over this leg of the course.) The last runner will arrive at Grouse Gulch Aid Station at 2:30 am Saturday. Approximately 75 percent of the runners who started will leave Sherman; thus in 2015 approximately 120 runners will pass the WSA over 15 hours, or 8 per hour, with about one-half of them at night. For the requested 225 starters the number increases to about 12 per hour, again about one-half at night. An increase of between 60 runners for the year 2015 increasing to a maximum of 90 in the WSA during daylight hours for an average of 5 hours per runner during a single day per year would have no noticeable impact on solitude.

There would be no impact to naturalness since runners utilize existing trails. The event does not utilize motorized vehicles in the WSA. There would be no placement of permanent

facilities, and no ground disturbance that would necessitate reclamation. The size of the WSA would not be affected, nor are there any indirect effects.

The proposed action would provide a unique opportunity for participants to engage in primitive and unconfined recreation, and would not impact the quality of that experience for other users of the area.

The supplemental values identified for the unit (scenery) would not be affected by the proposal.

4.3.1.3 Monitoring and/or Compliance

The organizers of the event have proposed monitoring the parking and congestion at Cunningham Gulch, Grouse Gulch, and Chapman Gulch Aid Stations. Such monitoring would be conducted by event organizers throughout the duration of the event with a view towards assessing future mitigation measures. This monitoring would be sufficient to assess the impacts on parking and congestion. The BLM would also monitor the event and make modifications as necessary through stipulations and permit amendment. Event monitoring by BLM staff would be conducted and annual permit renewal/reauthorization would only be granted if the use and the related activities/facilities continue to satisfy the non-impairment criteria set for Wilderness Study Areas.

4.3.2 Alternative B – No Action

4.3.2.1 Recreation

If the permit is not granted, there would be no direct, indirect or cumulative effects on recreation. However, there would be no opportunity for those recreationists seeking to participate in a high-altitude endurance event to participate. The event also attracts many hundreds of participants, crews, spectators and media. The towns of Silverton and other neighboring communities would not receive the economic benefits associated with the event.

4.3.2.2 Wilderness/Wilderness Study Area

If the permit is not granted, there would be no direct, indirect or cumulative effects on the WSA. However, there would be no opportunity for those recreationists seeking to participate in a high-altitude endurance event in the WSA to do so.

4.3.3 Alternative C- Wilderness Study Area Avoidance

4.3.3.1 Recreation

If the course is rerouted to avoid the WSA, participants would avoid the Wilderness Study Area. However this alternative would shorten the course by approximately 4 miles requiring further course alteration and logistical changes. Runners would also not have the opportunity of ascending Handies Peak, the signature draw of the event and the high point of the course. Runners would also spend more time on the relatively heavily trafficked CR 2, which increases the potential for interaction between participants and non-participants and may also present safety concerns.

4.3.3.2 Wilderness/Wilderness Study Area

If the course is rerouted to avoid the WSA, participants would avoid the Wilderness Study Area. Runners would also not have the opportunity of ascending Handies Peak, the signature draw of the event and the high point of the course. The Handies Peak WSA would be avoided under this alternative but approximately 20 miles of the current course would need to be rerouted and the course would be approximately 4 miles shorter than the current alignment and without additional alteration would not be 100 miles.

4.4 Cumulative Effects Analysis

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

Past Actions

The run has been conducted annually in alternating clockwise/counterclockwise directions, utilizing existing designated trails and roads, as well as game trails, historic unused mining access routes, shepherd trails, and other historically used linear features. This annual event has been run 20 times in the past years with up to 140 participants. Its first year was 1992. Dispersed recreational activities, including casual hiking, has occurred in the WSA, typically during the summer months.

Present Actions

There are no other permitted actions in the area that would affect recreation and or wilderness. Dispersed recreational activities, including casual hiking, occurs in the WSA, typically during the summer months,

Reasonably Foreseeable Future Actions

There no other future permitted actions in the area that would affect recreation. Dispersed recreational activities, including casual hiking, can reasonably be expected to occur in the WSA in the future, typically during the summer months.

4.4.1 Recreation

The event is of short duration and all traces of the event are removed within three days after the event. There are no past, present or reasonably foreseeable future actions that would cumulatively affect this resource.

4.4.2 Wilderness/Wilderness Study Area

The event is of short duration and all traces of the event are removed within three days after the event. Though the proposal requests a potential increase from the original 110 participants to a potential maximum of 225 by the year 2018, compared to the 600,000 plus visitors to the area, the impact would be minimal. Together the past, present and reasonably future actions that could cumulatively affect this resource include casual past and present hiking. The design features of the proposed action include requiring the runners stay on existing trail so impacts are anticipated to be minimal. In addition the race would occur over three days.

5.0 CONSULTATION AND COORDINATION

5.1 Introduction

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

5.2 Persons, Groups, and Agencies Consulted:

Table 5-2

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

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
BLM – Tres Rios FO, Gunnison FO	Consult with agencies as part of the ID Team Checklist	Analysis incorporated in Chapters 1, 3 and 4.
USFS – Ouray RD, Divide RD, Columbine RD, Gunnison RD, Norwood RD	Consult with agencies for expertise regarding national forest management and effects thereon.	Analysis incorporated in Chapters 1, 3 and 4.

5.3 List of Preparers

Table 5.3 List of Preparers

5.4.1 BLM

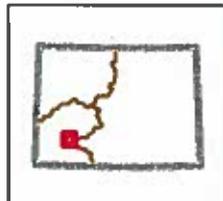
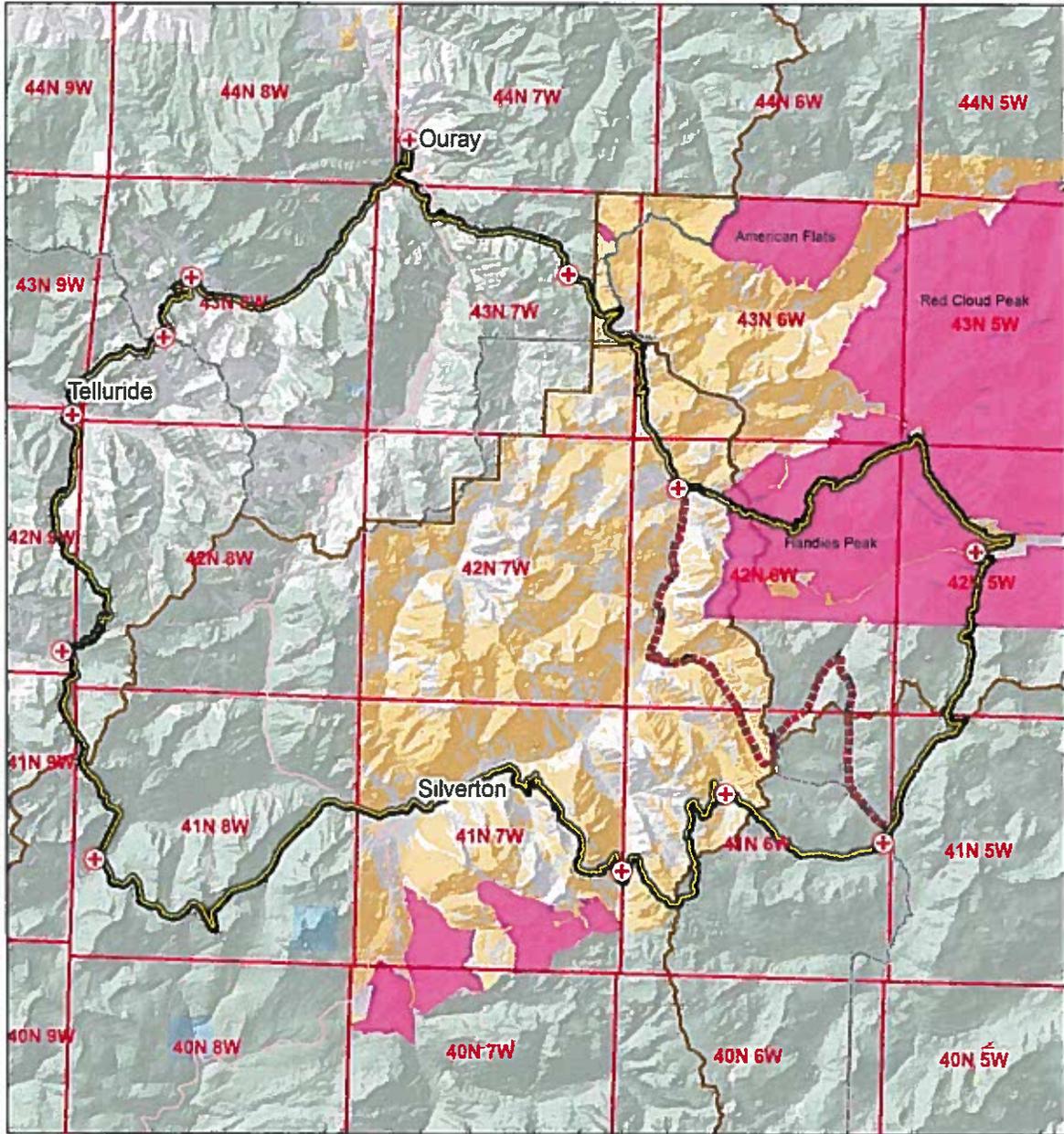
Name	Title	Responsible for the Following Section(s) of this Document
Jeff Christenson	Supervisory Outdoor Recreation Planner	Recreation and Wilderness
Gina Jones	NEPA Coordinator	NEPA compliance

5.4.2 Non-BLM Preparers

Name	Title	Responsible for the Following Section(s) of this Document
Fred Abramowitz	Attorney	Author

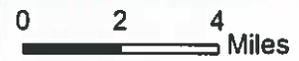
APPENDIX A

Hard Rock 100 Foot Race Route Map



Legend

- Adj. Stations
- Proposed Action
- WSA Avoidance Alternative
- Wilderness Study Areas
- BLM Field Office
- Major highways
- Major roads
- County boundaries
- Bureau of Land Management
- Private
- State
- State, County, City Areas
- US Forest Service



No Warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.

Tres Rios Field Office
 User Name: gmjones
 Date Saved: 5/21/2014

APPENDIX B

APPENDICES

Aid Station Information:

Location of the Aid Stations and Runner Cutoffs:

<u>Aid Station</u>	<u>Latitude</u>	<u>Longitude</u>	<u>Northing</u>	<u>Easting</u>	<u>Cut Off Time</u>
Silverton-Start	37°48.663'	107°39.385'	4,187,970	266,150	Fri 6:00 am
Putnam	37 46.797'	107 43.922'			
KT	37°47.528'	107°47.553'	4,186,220	254,100	Fri 12:45 pm
Chapman Gulch	37°51.351'	107°48.209'	4,193,320	253,350	Fri 4:45 pm
Telluride	37°56.109'	107°48.376'	4,202,130	253,370	Fri 8:40 pm
Kroger Canteen	37°57.706'	107°46.265'	4,204,990	256,550	
Governor Basin	37°58.910'	107°45.641'	4,207,190	257,530	
Ouray	37°01.675'	107°40.343'	4,212,080	254,435	Sat 3:25 am
Engineer	37°59.114'	107°36.230'	4,207,170	271,320	
Grouse Gulch	37°55.077'	107°33.460'	4,199,590	275,170	Sat 10:50 am
Sherman	37°54.054'	107°25.851'	4,197,400	286,270	
Pole Creek	37°48.134'	107°28.396'	4,186,550	282,250	
Maggie Gulch	37°48.812'	107°32.125'	4,187,950	276,810	
Cunningham Gulch	37°47.649'	107°34.648'	4,185,900	273,050	Sun 2:00 am
Silverton-Finish	37°48.663'	107°39.385'	4,187,970	266,150	Sun 6:00 am

Putnam Aid Station: This aid station is utilized only when the course is run in the counterclockwise direction (thus, it will not be utilized in 2014). Aid Station set up commences Saturday 2:00 am and the aid station is cleared by Sunday 9:00 am.

There is no crew or spectator access. Supplies brought in via backpack.

KT Aid Station: Aid station set-up commences Friday 5:00 am and the aid station is cleared by 2:00 pm.

There is no crew or spectator access. Access for aid station personnel and supply is via Bandora Jeep Road.

Chapman Gulch Aid Station: Aid Station set up commences Friday 7:00 am and the aid station is cleared by 7:00 pm

There is no crew or spectator access when course is run in clockwise direction. When run in the counterclockwise direction crew/spectator access limited to one vehicle per entrant (one vehicle pass is issued per runner; parking is regulated and monitored by aid station personnel. Runners are instructed that their crew members may not arrive at the aid station in advance of the runner's expected arrival and must leave when their runner departs). Access is via Ophir Pass Road. When run in the counterclockwise direction, because the runners are well dispersed (approximately 100 runners remaining in the event reaching this aid station dispersed over 24 or so hours), approximately two or three crew/spectator vehicles may be present at any one time. Under the maximum increase of participants requested in five years, it is anticipated that this may result in an additional vehicle or two present at this aid station.

Kroger Canteen Aid Station (Virginius Pass): Aid Station set up commences Friday 11:00 am and the aid station is cleared by 1:00 am Saturday.

There is no crew or spectator access. Supplies brought in via backpack.

Governor Basin Aid Station: Aid Station set up commences Friday noon and the aid station is cleared by 2:00 am Saturday.

There is no crew or spectator access. Access for aid station personnel and supplies is via Governor Basin road.

Engineer Aid Station: Aid Station set up commences Friday 3:00 pm and the aid station is cleared by Saturday 11:00 am.

There is no crew or spectator access. Supplies brought in via backpack.

Grouse Gulch Aid Station: Aid Station set up commences Friday 4:00 pm and the aid station is cleared by Saturday 1:00 pm.

Crew/spectator access limited to one vehicle per entrant (one vehicle pass is issued per runner; parking is regulated and monitored by aid station personnel). Runners are instructed that their crew members may not arrive at the aid station in advance of the runner's expected arrival and must leave when their runner departs). Access is via CR 2. Because the runners are fairly dispersed (approximately 110 runners arriving at this aid station over 12 or so hours), generally there are approximately one-half dozen crew or spectator vehicles present at any one time. Under the maximum increase of participants requested in five years, it is anticipated that this may result in an additional three or so vehicles present at this aid station at one time.

Sherman Aid Station: Aid Station set up commences Saturday 9:00 pm and the aid station is cleared by Saturday 9:00 pm. Runners are instructed that their crew members may not arrive at the aid station in advance of the runner's expected arrival and must leave when their runner departs). Crew/spectator access is via Sherman Road. Because the runners are fairly dispersed, generally there are about less than one-half dozen crew or spectator vehicles present at any one time. Under the maximum increase of participants requested in five years, it is anticipated that this may result in an additional two or three vehicle present at this aid station at one time.

Pole Creek Aid Station: Aid Station set up commences Friday 11:00 pm and the aid station is cleared by Saturday 11:00 pm.

There is no crew or spectator access. Supplies brought in via backpack.

Maggie Gulch Aid Station: Aid Station set up commences Saturday 1:00 am and the aid station is cleared by Sunday 3:00 am.

There is no crew or spectator access. Access for aid station personnel and supplies is via Maggie Gulch Road.

Cunningham Gulch Aid Station: Aid Station set up commences Saturday 2:00 am and the aid station is cleared by Sunday 4:00 am.

Crew/spectator access limited to one vehicle per entrant (one vehicle pass is issued per runner; parking is regulated and monitored by aid station personnel) when the race is run in the

clockwise direction. Runners are instructed that their crew members may not arrive at the aid station in advance of the runner's expected arrival and must leave when their runner departs). Access is via CR 4. Because the runners are well dispersed (approximately 100 runners arriving dispersed over 24 or so hours), this results in approximately one or two crew/spectator vehicles present at any one time. Under the maximum increase of participants requested in five years, it is anticipated that this may result in an additional vehicle or two present at this aid station.