

**U.S. Department of the Interior
Bureau of Land Management**

Environmental Assessment DOI-BLM-UT-Y020-2013-021

Five New Designated Routes for Monticello Travel Plan

Location: **Blanding to Bulldog,**
 Township 36S, Range 22E Sections 24, 25
 Township 36S, Range 23E Sections 7, 18, 19
Jacobs Chair,
 Township 35S, Range 15E Sections 9, 16, 22, 26, 27, 34
Nokai Dome,
 Township 39S, Range 12E Sections 20, 21, 28, 29
River House,
 Township 41S, Range 20E Section 15
Woodenshoe,
 Township 37S, Range 18E Section 3

Applicant/Address: **BLM Monticello Field Office**

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CHAPTER 1 INTRODUCTION AND NEED FOR THE PROPOSED ACTION

INTRODUCTION

This Environmental Assessment (EA) has been prepared to analyze the environmental impacts of designating sections of five routes located in various places across the field office. These routes would be designated in the Bureau of Land Management Monticello Field Office (BLM) 2008 Resource Management Plan (RMP) Travel Management Plan (Travel Plan). The routes extend existing designated routes which are known by the common names Blanding to Bulldog, Jacobs Chair, Nokai Dome, River House and Woodenshoe. Some portions of these routes would require new construction, some portions would be open to all vehicles, and other portions would be open to ATVs, UTVs and motorcycles. The EA is a site-specific analysis of potential impacts 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” impacts could result from the analyzed actions. “Significance” is defined by NEPA and is found in regulation 40 CFR 1508.27. An EA provides evidence for determining whether to prepare an Environmental Impact Statement (EIS) or a statement of “Finding of No Significant Impact” (FONSI). A Decision Record (DR), which includes a FONSI statement, is a document that briefly presents the reasons why implementation of the proposed action would not result in “significant” environmental impacts (effects) beyond those already addressed in the RMP, November 17, 2008. If the decision maker determines that this project has “significant” impacts following the analysis in the EA, then an EIS would be prepared for the project. If not, a Decision Record may be signed for the EA approving the alternative selected.

PURPOSE AND NEED FOR THE PROPOSED ACTION

The purpose of the Proposed Action is for the BLM to designate segments of motorized routes in the Travel Plan. Although located in different portions of the Monticello Field Office, these routes all have a similar purpose and need and are all proposed to enhance existing opportunities for motorized recreation. Thus there is no clear rationale to describe the purpose and need for each route separately. The proposed action is based on ensuring public safety, protecting cultural and natural resources, reducing conflicts with other uses and users, and enhancing opportunities for motorized recreation. The proposed new segments would extend popular existing designated routes.

The need for the Proposed Action is to improve opportunities for motorized recreation by:

1. Providing loops for motorized recreation to enhance out and back trails,
2. Providing spur trails and stops at popular destinations,
3. Reducing safety conflicts between recreational users and highway traffic,

4. Reducing conflicts between recreational uses and private landowner concerns,
5. Minimizing conflicts between different recreational user groups,
6. Minimizing impacts to natural and cultural resources through careful route design.

There is also a need to revise the Travel Plan to reflect the change in the designated routes per BLM's responsibility under the Federal Land Policy and Management Act and the Federal Regulations at 43 CFR 8342.1 for designating routes.

The decision to be made is whether or not to designate five route segments in the Travel Plan.

CONFORMANCE WITH BLM LAND USE PLAN(S)

LUP Name: Monticello Field Office Resource Management Plan (RMP)

The proposed action is in conformance with the Monticello Resource Management Plan and Record of Decision, November 17, 2008.

The RMP establishes a system for designating routes in the Field Office. RMP Management Action **TM-2** (RMP pg. 141) provides several categories for designated routes, such as mechanized and motorized, and it provides that "adjustments to these categories will be made based on recreational demand and potential conflict."

The Travel Plan provides for plan maintenance and changes to route designations. RMP Management Action **TM-6** (RMP pg. 141) specifies, "Appendix O outlines the processes and procedures for making modifications to the Travel Plan designated route network." RMP Appendix O.13, states: "Actual route designations can be modified without completing a plan amendment, although NEPA compliance is still required."

The proposed action is also in conformance with the RMP because it is specifically provides for the following RMP management actions:

REC-5 (RMP pg. 89)

"Existing developed recreation sites will be maintained. New sites/facilities/trails will be developed in response to user demand, amenity value, and critical resource protection needs."

CUL-13 (RMP pg. 60)

"The BLM will work with local communities and other groups to foster heritage tourism throughout the Monticello PA."

Stipulations on surface disturbing activities are applied by the RMP in both floodplains and riparian areas. Surface disturbance in active floodplains or within 100 meters of riparian areas would not be allowed except if after analysis the authorized officer determines that: (a) there are no practical alternatives, (b) impacts could be fully mitigated, or (c) the action is designed to enhance the riparian resource values (RMP Appendix B pg. 3).

Stipulations on surface disturbing activities are applied by the RMP in both the San Juan River ACEC and SRMA. Surface disturbance in the ACEC would not be allowed except if after analysis the authorized officer determines that the project would benefit the relevant and

important values of the ACEC (RMP Appendix B pg 8). Those values are scenic, cultural, fish and wildlife, natural systems and processes, and geologic features (RMP page 126). Surface disturbance in the SRMA would not be allowed except if after analysis the authorized officer determines that the disturbance is related to or can be shown to benefit recreational experiences (RMP Appendix B pg 9).

RELATIONSHIPS TO STATUTES, REGULATIONS AND OTHER PLANS

The proposed action and alternative is consistent with Federal, state and local natural resource related laws, regulations, plans, programs, and policies including the following:

- Federal Land Policy and Management Act as amended (43 U.S.C. 1701-1782)
- San Juan County Master Plan, 2008

IDENTIFICATION OF ISSUES

Public notification was initiated by entering the project information on the Environmental Notification Bulletin Board (ENBB), a BLM environmental information internet site on July 15, 2013.

As a result of this scoping to solicit issues and concerns, comments were received from numerous groups or individuals. These commenters raised the following resource issues of concern:

- Overlap with the Recapture Canyon Right-of-Way Proposal
- Multiple Designation Proposals
- NEPA process
- Minimization Criteria
- Recreation and Recreational Opportunities
- Route Proliferation/Changes in Use Patterns
- County Wide ATV Trail
- Rewarding Illegal Trail Construction
- Off Road Vehicle Monitoring
- Law Enforcement
- Cultural Resources
- Riparian Resources
- Threatened and Endangered Species
- Water Resources
- Native Fish
- Increase in Noise
- Lands with Wilderness Characteristics/Citizen Wilderness Proposal
- Cedar Mesa Cultural Resource Management Plan
- Future Legislation Compatibility
- Cryptogamic crusts in areas of new construction

The Interdisciplinary Team reviewed the above list of issues raised in the scoping comments, reviewed the proposed action and identified the following resources as present with potential for impact requiring detailed analysis in the EA:

- Lands with Wilderness Characteristics
- Recreation

All other resources were considered but eliminated from further analysis by resource specialists' determination of "not present in the area" or "present, but not affected to a degree that detailed analysis is required". Resource issues were eliminated from analysis because they were either not applicable to the lands considered in the Proposed Action or the reviewing specialists did not consider the proposed action to represent a potential impact to these issues.

All of the issues raised by the public were considered during the internal Interdisciplinary Team review. No information was received during scoping that caused the Interdisciplinary Team to change a resource determination or to add an alternative to the EA. Refer to Appendix D for a comments response table.

CHAPTER 2 DESCRIPTION OF ALTERNATIVES

This EA focuses on the Proposed Action and a No Action Alternative. BLM convened an Interdisciplinary Team to identify potential impact issues related to the proposed action. Potential impacts were identified for Lands with Wilderness Characteristics and Recreation. The No Action Alternative is considered and analyzed to provide a baseline for comparison of the impacts of the proposed action.

PROPOSED ACTION

The Proposed Action is for the designation of new travel routes that would be added to the Travel Plan and would be for specific vehicle use. New designation would be for existing undesignated disturbed areas and proposed constructed routes. All new route designations, including constructed routes, would be available for public use.

In order to better identify the locations of the new designations of existing disturbed areas and proposed construction, this Proposed Action refers to the routes by their common field names. The routes are Blanding to Bulldog, Jacobs Chair, Nokai Dome, River House and Woodenshoe (see maps in Appendix A). There would be new construction and designation on the Blanding to Bulldog route, the Woodenshoe route and Jacobs Chair route. There would be new designations of existing disturbed areas on the Jacobs Chair, Nokai Dome, and River House Routes. The new designations for Blanding to Bulldog, Woodenshoe, and most of Jacobs Chair would be limited to ATV/UTV/Motorcycle use because these proposed routes are designed to realign or to complete loops of existing designated routes specifically for recreational users of these vehicle types. The new designations for the Nokai Dome, River House, and a small part of Jacobs Chair

Routes would be open to all vehicles, because these short existing disturbed areas connect to existing designated routes that are designed to serve all vehicles.

The Jacobs Chair and Woodenshoe designations are needed to complete ATV/UTV trail loops and to reduce highway safety conflicts. The portion of the Jacobs Chair Route for all vehicles is needed to provide an alternate route around a washout. The old washed out route would be designated as closed as part of this proposal. The Blanding to Bulldog designation is needed to complete a new public land route for an ATV/UTV/Motorcycle trail which formerly crossed private land. This route would avoid private lands and areas of Recapture Canyon included in a 2007 emergency closure to protect cultural resources. The River House and Nokai Dome designations are needed to provide access to existing disturbed areas used for parking at popular cultural sites. These parking areas/trailheads would be designated as part of the Travel Plan. The River House Route accesses San Juan Hill on the Hole-in-the-Rock Trail which has previously been assigned to a public use category. All of the routes have been designed with safety in mind, and they have been designed to minimize resource conflicts. Certain segments of new construction were proposed specifically with safety and erosion problems. Otherwise, existing disturbed areas, although undesignated, were used wherever possible to minimize potential impacts.

All new construction and designation of existing linear disturbed areas for ATV, UTV, and motorcycle use would be constructed and maintained at 65 inches wide with a designation of 12 feet to allow for passing. New designations for "All Vehicles" (ATV, UTV, and motorcycle plus full size, typically high clearance vehicles) would be designated 20 feet wide for passing with no construction beyond their existing width. All routes designated would be maintained as needed into the future. This may include, for example, infrequent use of a trail cat to repair damaged waterbars, eroded areas, rutting, or other damage.

New sections of route construction totaling 2.36 miles in length would result in new surface disturbance of 3.2 acres. New routes would be constructed by the San Juan County road crew using a trail cat, chainsaws and hand tools. New construction would be limited to a period between September 1 and October 14, inclusive, to be outside breeding, nesting, and young rearing times for various wildlife and migratory bird species, except that construction may begin as early as August 1 if wildlife surveys show a lack of conflicts. Waterbars would be constructed if needed to control erosion as part of routine maintenance. The ends of waterbars may have wing ditches if necessary to prevent stormwater from returning to the route; these may extend a short distance outside the above designation widths. New construction across slopes and at the approaches to drainages would also exceed the designation widths in a few locations. Any such disturbance would be rehabilitated. Vehicle camping along these new designated routes is not authorized. Vehicle camping would be limited to existing designated campsites, and no additional camping sites would be designated as part of this action.

The proposed Blanding to Bulldog route is realigned from the original proposal and would avoid areas of Recapture Canyon included in a 2007 emergency closure. The route follows the Pacheco Trail east from Blanding, then heads northwest past Lems Draw towards Recapture Dam following an old, unused drainage canal. There are three design features that need to be addressed in detail. First, there is a need to provide for construction access from the highway to the trail on the west rim of Recapture Canyon just southwest of Recapture Dam. This is a distance of less than 440 feet. An existing canal/power pole access route would be used for this

purpose. Second, there is an existing 6” drain pipe on the outside of an existing canal bank on the west side of Recapture Canyon which the proposed route would pass below. An eight to ten foot long culvert would be used to transmit flow from the drain pipe to the other side of the trail. Third, the proposed route would require a stream crossing at Recapture Creek. The portion of the proposed route near the base of Recapture Dam is along an abandoned haul road which once crossed the creek with a culvert. The culvert has been removed long ago leaving a narrow deep channel. This channel is proposed to be bridged with a set of two or three salvaged power poles or other large timbers, across which heavy planks would be attached.

New Designations for All Vehicles

All of the existing linear disturbed areas except for the short All Vehicles portion of the proposed Jacobs Chair route have been existing since prior to the 2008 RMP, based primarily on analysis of 2006 aerial photography. The short All Vehicles portion of the proposed Jacobs Chair route appears to have been established in 2012 as a bypass around a washout on the existing designated route.

The following designations and mileage of existing linear disturbed areas would be for All Vehicle use: the new designation of the existing linear disturbed areas on Jacobs Chair would be 0.20 miles long, and the new designation of existing linear disturbed areas on Nokai Dome 0.18 miles and on River House 0.19 miles. The total length which would be designated for All Vehicles would be 0.57 miles, all of which is existing linear disturbed area. There would be no new constructed needed for designation of route proposed for All Vehicle use.

New Designations for ATVs, UTVs, and Motorcycles

The following designation and mileage of existing linear disturbed areas would be for ATVs, UTVs, and motorcycles only: the new designation on Blanding to Bulldog would be 4.44 miles long and on Jacobs Chair would be 2.69 miles long. The total length of existing linear disturbed areas to be designated for ATVs, UTVs, and motorcycles would be 7.13 miles.

New Construction and Designations for ATVs, UTVs, and Motorcycles

The following designation and mileage of trail proposed for new construction would be for ATVs, UTVs, and motorcycles only: the new construction on the Blanding to Bulldog route would be 1.07 miles long, on Woodenshoe 0.37 miles long, and on Jacobs Chair 0.92 miles long. The total length of trail proposed for new construction which would be designated for ATVs, UTVs, and motorcycles would be 2.36 miles.

Other Features for New Designations

Four ATV/UTV cattleguards and horse gates would need to be installed on the Blanding to Bulldog new designated route. On this route and the proposed Jacobs Chair route, all users would be required to come to a full stop at crossings of state highways, which would be appropriately signed.

The following "Standard Operating Procedures" as outlined in the RMP (RMP Appendix G pg.2) would be observed. The construction site would be maintained in a sanitary condition at all times; waste materials at this site would be disposed of promptly at an approved waste disposal site. "Waste" means all discarded matter, including trash, garbage, refuse and equipment. Only the minimum amount of vegetation necessary would be removed and topsoil would be conserved

during excavation and reused as cover on disturbed areas. Drainages shall be restored, to the greatest extent possible, to the original bank configuration, stream bottom width, and channel gradient. Loose soil and fill shall be removed from drainage channels.

See Table 2.1 below for the breakdown of length and acreage on all new construction and new designations.

Table 2.1. Route Designation and Construction Length and Area

Route Name	New Designations for All Vehicles 20 feet in width	New Designations for Motorcycles, ATVs, UTVs 12 feet in width	New Construction and Designations for Motorcycles, ATVs, UTVs 12 feet in width	Totals
Blanding to Bulldog	---	4.44 miles 23,318' by 12' 6.5 acres	1.07 miles 5,581' by 12' 1.4 acres	5.51 miles 29,099' 7.9 acres
Jacobs Chair	0.20 miles* 1,029' by 20' 0.5 acres	2.69 miles 14,180' by 12' 3.9 acres	0.92 miles 4,813' by 12' 1.3 acres	3.81 miles 20,022' 5.7 acres
Nokai Dome	0.18 miles 935' by 20' 0.4 acres	---	---	0.18 miles 935' 0.4 acres
River House	0.19 miles 946' by 20' 0.4 acres	---	---	0.19 miles 946' 0.4 acres
Woodenshoe	---	---	0.37 miles 1,973' by 12' 0.5 acres	0.37 miles 1,973' 0.5 acres
Totals	0.57 miles 2,910' by 20' 1.3 acres	7.13 miles 37,698' by 12' 10.4 acres	2.36 miles 12,367' by 12' 3.2 acres	10.06 miles 52,975' 14.9 acres

* Includes mileage for a small amount (approximately 473 feet) of State Institutional and Trust Lands Administration (SITLA) land on the All Vehicles portion of the Jacobs Chair Route.

NO ACTION

The No Action Alternative would be to implement the RMP as it exists today. Some of the areas proposed for designation appear to have been used by vehicles prior the signing of the RMP (based on review of pre-RMP aerial photography) but were not included in the TMP. For some areas it is apparent that that use has continued. There would be no designation or construction of any of the routes. The existing on-the-ground disturbed areas would be signed as closed and rehabilitated as appropriate. Under this alternative safety issues and conflicts with landowner concerns would continue, and enhancements to motorized recreation opportunities would not be realized. The existing linear disturbances involved with all of the proposed Nokai Dome and River House routes, about 81 percent of the proposed Blanding to Bulldog route, and about 76 percent of the proposed Jacobs Chair route would be closed. The short washed out portion of the Jacobs Chair route would not be designated as closed and would be reopened through the washed out area.

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER ANALYSIS

An alternate location was considered for the proposed Blanding to Bulldog Route. This route was proposed to drop into Recapture Canyon east of Lems Draw and proceed north to Recapture Reservoir. Concerns were raised during scoping about the confusion with the nearby Recapture Canyon Right-of-Way (Recapture ROW) proposal (EA UT-090-06-25: see also the Cumulative Impacts analysis in Chapter 4). This alternative may have had a potential impact to riparian dependent wildlife. It was not carried forward because an alternate route was available which mostly followed areas of existing disturbance and minimized potential impacts to a level of No Impact (see ID Team Checklist: Appendix C).

Another alternative was considered for the Blanding to Bulldog route which would have involved passing around the shore of Recapture Reservoir and crossing its multiple inlets. This alternative would have been significantly shorter than the Proposed Action and it would have avoided overlapping with the Recapture ROW proposal. Its location on the shore of a popular reservoir may have resulted in conflicts with water-based user groups. It would also have been largely on private land and would have crossed large areas of riparian vegetation. One landowner was also concerned about potential impacts to cultural resources. This alternative was not considered for analysis because of impacts to riparian and wildlife resources far greater than any potential impacts of the Proposed Action, because it would have faced conflicts with water-based user groups and because it was not clear whether cultural concerns could be resolved.

An alternative was considered for the Jacobs Chair route which would have passed below the ledges along the highway. This alternative would have avoided more of an area proposed for wilderness designation by the Utah Wilderness Coalition as the Red Rocks Heritage Proposal (Red Rocks Wilderness Proposal) than the Proposed Action. This alternative would have involved significant engineering challenges dealing with topography and would regularly have had to follow the highway. It would have also been highly visible from the highway in areas where it crossed steep slopes, and would have resulted in changes to the characteristic landscape. The Visual Resource Management (VRM) classification for much of this area is VRM II, and this alternative would not have met management objectives for this VRM class. This alternative was not considered for analysis because it would have involved far greater safety conflicts and greater impacts to visual resources than the Proposed Action and would therefore not have met the purpose and need for the Proposed Action.

An alternative was considered which would have included designation of a 0.08 mile segment of route in Arch Canyon for all vehicles. This designation would have authorized an existing disturbed area used for parking. It may have involved potential impacts to wildlife and wildlife habitat which would not have met the purpose and need for the proposed action. For this reason, it was not carried forward for detailed analysis.

CHAPTER 3 AFFECTED ENVIRONMENT

INTRODUCTION AND GENERAL SETTING

The affected environment was considered and analyzed by an interdisciplinary team as documented in the Interdisciplinary Team Checklist. The checklist indicates which resources of concern are either not present in the project area or would not be impacted to a degree that requires detailed analysis. Potential impacts were identified to Lands with Wilderness Characteristics and to Recreation. Accordingly, the affected environment relating to these resources is described here in detail.

The Blanding to Bulldog route proposal is located northeast of the town of Blanding, in an area of canyons and hilly mesas eroded into sandstones and shales of the Jurassic Morrison Formation, the Cretaceous Dakota and Burro Canyon Formations, and colluvial deposits produced from these formations. This route would reduce conflicts between motorized recreation and private landowner concerns.

The Jacobs Chair route proposal is located in the area of White Canyon and on high benches to the southwest of the canyon. This is an area of ledges and benches eroded into shales and sandstones of the Triassic Moenkopi and Chinle Formations, sandstones of the Permian Cutler Group, and colluvial deposits produced from these formations. This route would reduce safety conflicts with highway traffic and it would provide a loop for motorized recreation.

The Nokai Dome route proposal is located on the rim of shallow Lake Canyon which is eroded from sandstone of the Jurassic Glen Canyon Group. This route would provide a spur route to, and parking for stops at a popular and well known archeological site.

The River House route proposal is located on a sandstone bench above the San Juan River eroded from sandstone of the Jurassic Glen Canyon Group and mantled with gravels of probable Pleistocene age. This route would provide a spur route to, and parking for stops at a popular and well known historic site: San Juan Hill.

The Woodenshoe route proposal is located on the extreme northern edge of Cedar Mesa just below the Bears Ears in shales eroded from the Triassic Moenkopi Formation. This route would reduce safety conflicts with highway traffic and it would provide a loop for motorized recreation.

POTENTIALLY IMPACTED RESOURCES

Lands with Wilderness Characteristics

The Proposed Action occurs partially in two areas determined to have wilderness characteristics, both of which were identified in a BLM 1999 inventory as documented in the 2008 RMP. The RMP did not include the areas as among those to be managed for wilderness characteristics and, therefore, they are not BLM Natural Areas (RMP Map 8). The Jacobs Chair Route would cross the edge of an approximately 22,693 acre area identified as having wilderness characteristics. The Nokai Dome route would cross the edge of an approximately 44,317 acre area identified as having wilderness characteristics. Both of these areas are large and greatly exceed minimum size requirements.

All other portions of the proposed Jacobs Chair route were determined to be on inventoried lands with no wilderness characteristics as documented in the RMP (RMP Map 8).

The Nokai Dome route and the ATV/UTV/Motorcycle portion of the Jacobs Chair Route occur within multiple areas of Red Rocks Wilderness Proposal. The Blanding to Bulldog and River House routes and the remaining small portion of the Jacobs Chair route do not occur within any areas of the Red Rocks Wilderness Proposal.

Recreation

The Proposed Action occupies areas of the Monticello Field Office generally popular for motorized recreation. This includes all five of the proposed designated routes. Non-motorized recreation is high in some areas, particularly including the area of the proposed Blanding to Bulldog route and the area of the proposed River House route.

Routes in the vicinity of the proposed Blanding to Bulldog route are popular with motorized users. Portions of Recapture Canyon adjacent to but not overlapping with this proposed route are becoming somewhat popular for non-motorized recreation. Existing disturbed areas in this vicinity are also popular for non-motorized use by residents of Blanding, including groups such as school cross-country teams. The adjacent Recapture Reservoir is popular for boating and for boat and shore based fishing activities.

The location of the proposed Jacobs Chair route additions is more remote, but the existing Jacobs Chair ATV route is well known. Non-motorized recreation is high in some nearby canyon areas such as White Canyon, but is otherwise light. Non-motorized recreation is probably minor in the immediate vicinity of the proposed route, in part due to pervasive evidence of old uranium mining and prospecting.

The proposed Nokai Dome route is located at a popular stop on a motorized route into Lake Canyon, and would facilitate use of that stop for all users. Lake Canyon and its tributaries have several well-known motorized routes, and parts of the canyon system may have high light interest in non-motorized recreation.

The proposed River House route is located at a popular stop on an existing designated motorized route into the canyon of the San Juan River, and would facilitate use of that stop for all users. The focus of the stop, San Juan Hill, is an important historic site popular particularly with heritage tourism groups, including church groups and descendants of the pioneers who established the trail. These uses at San Juan Hill are non-motorized, but many users arrive at the destination using motorized vehicles. There have been a few mechanized tours along the existing designated route leading to the site, and the proposal would facilitate that use. Non-motorized users also hike to the site from float trips on the river below. River House is another nearby and very popular attraction which attracts use from both river-based groups and motorized users, and some visitors also tour a nearby Ancestral Puebloan site with a great kiva, and a historic trading post with a water wheel as well.

The proposed River House route is within the San Juan River SRMA. Stipulations on surface disturbing activities are applied by the RMP in the SRMA. Surface disturbance would not be

allowed except if after analysis the authorized officer determines that the disturbance is related to or can be shown to benefit recreational experiences (RMP Appendix B pg 9).

The proposed Woodenshoe route additions is adjacent to the existing designated Woodenshoe ATV route which is well known. Natural Bridges Natural Monument is located several miles to the west, but there is very little non-motorized recreation in the immediate area of the proposed route.

CHAPTER 4 ENVIRONMENTAL IMPACTS

DIRECT AND INDIRECT IMPACTS

This section analyzes the impacts of the Proposed Action and the No Action alternatives to those resources described in the Affected Environment Section 3, above. Potential impacts were considered and analyzed by the Interdisciplinary Team, as documented in the Interdisciplinary Team Checklist (Appendix C). Potential impacts were identified to Lands with Wilderness Characteristics and to Recreation. Accordingly, these resources are analyzed in detail here.

PROPOSED ACTION

This section analyzes the impacts of the proposed action to those potentially impacted resources described in the affected environment Chapter 3, above.

Lands with Wilderness Characteristics

Portions of the Proposed Action occurs in two areas determined to have wilderness characteristics. The Jacobs Chair route occurs partially within an area of Lands with Wilderness Characteristics. Designation of a route here would isolate a nine acre section from the larger block of Lands with Wilderness Characteristics, including the area of the project footprint (see map in Appendix B). This would make the isolated acreage too small to meet the size criteria for Wilderness Characteristics. The remaining 22,684 acre section (from the original 22,693 acre area) retains its Wilderness Characteristics.

The Nokai Dome route also occurs partially within an area of Lands with Wilderness Characteristics. This route of the Proposed Action has a footprint that would isolate two small areas totaling about one-half an acre from the larger area with Wilderness Characteristics. No trail work or site development would be done outside of the Proposed Action footprint. Again these sections are too small to meet the size criteria for Wilderness Characteristics (see map in Appendix B). The remaining block retains its Wilderness Characteristics due to its approximately 44,317 acre size.

Approval of the Proposed Action would result in these two areas (nine acres and one-half acre) not meeting at least one of the size criteria for Wilderness Characteristics. Therefore, the area of

the Proposed Action and the isolated sections should be removed from the Wilderness Characteristics inventory, resulting in ten acres removed. Given that there are 493,489 acres of Lands with Wilderness Characteristics Field Office wide, and that these ten acres amount to only 0.002 percent of the total, this proposal would not result in a significant impact to Lands with Wilderness Characteristics.

The Nokai Dome route and the ATV/UTV/Motorcycle portion of the Jacobs Chair Route occur within multiple areas of Red Rocks Wilderness Proposal. The Blanding to Bulldog and River House routes and the remaining small portion of the Jacobs Chair route do not occur within any areas of the Red Rocks Wilderness Proposal.

Recreation

Recreational impacts of the Proposed Action would be positive for motorized users. Designation of these routes would result in a variety of benefits ranging from safety improvements to connecting of loops and providing access to parking areas/trailheads. Recreation impacts may be negative for non-motorized users, but this is expected to be minimal.

The proposed Blanding to Bulldog route would provide designation of a bypass around private property and around the Recapture Reservoir for motorized users. This would allow continued motorized access for ATVs, UTVs, and motorcycles through the area from the town of Blanding up to the National Forest. It would create a connection for these users to an existing designated route accessing Mustang Mesa. The proposed designation would allow recreational use of areas through which the proposed route passes and other areas served by connecting existing designated routes for motorized users. This would positively impact these users, and would positively impact the landowner. It also has the potential for a safety benefit since it would reduce the potential for motorized users to ride the state highway in an attempt to get around the private land and reservoir.

Other users of the proposed Blanding to Bulldog route would be variously impacted by designation. Non-motorized users of Recapture Canyon typically use lower parts of the canyon and would not likely be impacted by the designation. Non-motorized users such as residents of nearby Blanding City and groups such as school cross-country teams may experience some negative impact. However, such impact would be expected to be minor, since conditions on-the-ground would change little in the areas which these users occupy most frequently. Motorized and non-motorized users of Recapture Reservoir would probably not be impacted.

Designation of the proposed Jacobs Chair route would complete a loop trail for motorized users, and it would eliminate the temptation for users to illegally ride down the state highway. Completion of the loop would improve visitor experiences for these users, providing a positive impact. By eliminating a temptation for users to ride the highway, it would improve safety for both these users and for highway traffic. Non-motorized users would likely be impacted minimally by this alternative. Users of the White Canyon area are isolated from the proposed route by cliffs, and other parts of the proposed route probably see very little non-motorized use.

Designation of the proposed Nokai Dome route would not be likely to cause changes to existing use patterns on-the-ground. Motorized users would be positively impacted by designation of the stop at the ruin here. Non-motorized users would not likely be impacted by this alternative.

Designation of the proposed River House route would not be likely to cause changes to existing use patterns on-the-ground. Motorized users would be positively impacted by designation of the stop at San Juan Hill. Church groups and descendants of pioneers would generally benefit by having an area to park when using the site, as would mechanized tours. Designation is not likely to negatively impact the experience of those hiking San Juan Hill. Although they would be able to see the parking area from the hill, they could also see the existing designated route which would otherwise be the default parking area. River-based groups using San Juan Hill probably would not be differentially impacted. Designation would not impact users of other nearby destinations, partly because parking at the base of the hill would be minimally visually intrusive from their vantage point.

The proposed River House route is within the San Juan River SRMA. Stipulations on surface disturbing activities are applied by the RMP in the SRMA. This alternative is designed to benefit recreational experience in the SRMA, which satisfies the criteria for an exception to the No Surface Occupancy stipulation. The Proposed Action would involve surface disturbance only in the form of future maintenance as needed.

Designation of the proposed Woodenshoe route would complete a loop trail for motorized users, and it would eliminate the temptation for users to illegally ride down the state highway. Completion of the loop would improve visitor experiences for these users, providing a positive impact. By eliminating a temptation for users to ride the highway, it would improve safety for both these users and for highway traffic. Non-motorized users would not likely be impacted by this alternative.

NO ACTION

The No Action Alternative would continue with implementation of the RMP as it exists with no designations or construction of any of the other routes and no additions to the TMP. Areas where use is occurring in locations not designated in the TMP, most of which have existed prior to the adoption of the 2008 Travel Plan, would be closed and rehabilitated as appropriate. The short washed out portion of the Jacobs Chair route would not be designated as closed and would be reopened through the washed out area. Under this alternative safety issues and conflicts with landowner concerns would continue, and enhancements to motorized recreation opportunities would not be realized. This alternative would not meet the purpose and need for the Proposed Action.

Lands with Wilderness Characteristics

Under the No Action Alternative, there would be no loss of Lands with Wilderness Characteristics and no intrusion into areas included in the Red Rocks Wilderness Proposal.

Recreation

Recreational impacts of the No Action Alternative would be expected to be negative for motorized users. Potential conflicts of designation with non-motorized users in some cases may not occur and in some cases may be worsened by failure to manage existing motorized use. Potential benefits to safety and enhancement of motorized opportunities would not be realized.

Not designating the Blanding to Bulldog route would negatively impact users of ATVs, UTVs and motorcycles. With the closure of the existing private land route, they would be deprived of an access route between Blanding and the National Forest. They would also be deprived of opportunities for motorized recreation on the proposed routes and on connecting portions of existing designated routes. The private landowner may experience negative impacts from motorized users attempting to use the private land route which was formerly open. Some users may illegally ride the state highway creating safety issues for both themselves and for highway traffic.

Closure of existing linear disturbed areas and not designating the Blanding to Bulldog route would variously impact other users. Non-motorized users of Recapture Canyon typically use lower parts of the canyon and would not likely be impacted. Non-motorized users such as residents of nearby Blanding City and groups such as school cross-country teams may experience some positive impact since they would not share trails with motorized users. However, such impact would be mixed, since existing disturbed areas would be closed, maintenance would not occur, and opportunities for non-motorized recreation would likely degrade over time.

Not designating the proposed Jacobs Chair route would negatively impact motorized users since the trail loop would not be realized. Due to the relatively close proximity of the two legs of the existing designated out-and-back route, there would remain a significant potential for users to illegally ride the highway, creating safety issues for both themselves and for highway traffic. Non-motorized users would not likely be impacted by this alternative.

Not designating the proposed Nokai Dome route would negatively impact motorized users since the existing disturbed area would be closed. Users would probably park along the edge of the existing designated route when stopping at the ruin here. Non-motorized users would not likely be significantly impacted by this alternative. The walk from the existing designated route is not long, and all users would be expected to continue to visit the ruin. Excluding vehicles from the picnic area would provide slight enhancement of visitor experience.

Not designating the proposed River House route would negatively impact motorized users since the areas next to the existing designated route would be closed. Users would probably park along the edge of the existing designated route when stopping at San Juan Hill. This would result in congestion which would negatively impact motorized users who stop at the historic site, including church groups, descendants of pioneers, and mechanized tours. Motorized users of other nearby sites such as River House, the great kiva, and the trading post would also be negatively impacted by the parking congestion. The roadside parking would also cause additional ground disturbance. There may be a slight positive impact to the experience of those hiking San Juan Hill, since the parking area would not be as visible, but these users would still be able to see the parking along the existing designated route a little farther away. Non-motorized

river-based groups who tour either San Juan Hill or any of the other nearby destinations would probably not be impacted by the No Action Alternative, except that the parking along the road would be visually intrusive.

The proposed River House route is within the San Juan River SRMA. Stipulations on surface disturbing activities are applied by the RMP in the SRMA. The No Action Alternative would not involve any surface disturbance.

Not designating the proposed Woodenshoe route would negatively impact motorized users since the trail loop would not be realized. Due to the relatively close proximity of the two legs of the existing designated out-and-back route, there would remain a significant temptation for users to illegally ride the highway, creating safety issues for both themselves and for highway traffic. Non-motorized users would not likely be impacted by this alternative.

CUMULATIVE IMPACTS

“Cumulative impacts” are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions. Potential impacts were identified to Areas with Wilderness Characteristics and to Recreation. Accordingly, potential cumulative impacts to these resources are analyzed in detail here.

Lands with Wilderness Characteristics

Typically the Cumulative Impact Area (CIA) for Lands with Wilderness Characteristics has been determined to be the unit of Lands with Wilderness Characteristics that is directly influenced by the proposed action. In this case public comment has also identified potential cumulative effects from other similar, but physically unassociated, actions. Therefore, the CIA for this proposal would include all units of Lands with Wilderness Characteristics Field Office wide. The actions and proposals which are analyzed for potential cumulative impacts to Lands with Wilderness Characteristics would be past, present, or reasonably foreseeable future actions which involved changes to motorized routes in the Travel Plan implemented or proposed since the 2008 signing of the RMP/ROD.

The Five New Designated Routes proposal is the only present proposal in the CIA. Areas of the CIA that would be crossed by the Proposed Action include portions of the proposed Jacobs Chair route and the proposed Nokai Dome route. The Proposed Action would potentially remove nine acres out of 22,693 and one-half acre out of the 44,317 acres of these units. Other than the Proposed Action, there are no past or present actions within this portion of the CIA which had the potential to impact Lands with Wilderness Characteristics. Similarly, there are also no reasonably foreseeable action scenarios which have the potential to impact these Lands with Wilderness Characteristics.

Other similar, yet physically unassociated past, present, or reasonably foreseeable future actions involving changes to the Travel Plan which potentially impact Lands with Wilderness Characteristics are: the past Cedar Mesa ATV Connector Trail for which a decision was signed

in June of 2013, the reasonably foreseeable future Indian Creek ATV ROW proposal and the reasonably foreseeable future New Route Designations near Red Canyon Comb Wash and Peters Point Ridge proposal which involves potential impacts to Lands with Wilderness Characteristics only on the proposed Access to Red Canyon route. These last two are posted on BLM's Electronic Notification Bulletin Board (ENBB), which may be accessed at <https://www.blm.gov/ut/enbb/index.php>.

The past Cedar Mesa ATV Connector Trail removed 173 acres out of 9,534 acres in the two units of Lands with Wilderness Characteristics which it impacted.

The Indian Creek ATV ROW proposal would remove 859 acres out of 6,350 acres in the unit which it would impact. The proposed Access to Red Canyon route of the Red Canyon Comb Wash and Peters Point Ridge proposal would remove 12 acres out of 28,545 acres in the unit which it would impact.

If all actions that are under consideration by the Monticello Field Office were ultimately approved, the potential total impact to Lands with Wilderness Characteristics within the CIA would be to remove 1,054 acres from the total of 493,489 acres in the CIA. There are no cumulative impacts of the Proposed Action to Lands with Wilderness Characteristics beyond the removed acreage discussed above. This amounts to a reduction of 0.21 percent of Lands with Wilderness Characteristics in the total area of the CIA. While there would be impacts to solitude and naturalness in the acreage removed, visitors would still have these opportunities on the vast majority of the CIA which remains. This percentage would be negligible and therefore neither the Proposed Action nor the No Action Alternative would have any cumulative impacts to Lands with Wilderness Characteristics.

Recreation

Typically the CIA for Recreation has been determined to be the area of the proposed action. In this case public comment has also identified potential cumulative effects from other similar, but physically unassociated, actions. Therefore, the CIA for this proposal would include the area of all past, present, or reasonably foreseeable future actions Field Office wide which involved changes to motorized routes in the Travel Plan implemented or proposed since the 2008 adoption of the RMP and the establishment of the Travel Plan.

Agencies are not required to list or analyze the effects of individual past actions unless such information is necessary to describe the cumulative effect of all past actions combined. Generally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions. In this case, it appears that identification of past actions may be beneficial to illustrate the overall changes to designated motorized routes that have occurred since signing of the 2008 RMP. Past actions are listed in the following Table 4.1 and present and future actions are listed in Table 4.2:

Table 4.1. Past Changes to Motorized Routes in the Travel Plan

Name	Number	Miles Added*	Miles Deleted*
Cedar Mesa ATV Connector Trail ROW	UT-090-06-06	2.71	0.28
Fable Valley Hiking Trail and Trailhead Parking	UT-090-09-09	0.03	0.78
Indian Creek Falls Group Campsite	DOI-BLM-UT-Y020-2010-0031	0.02	0.51
San Juan Trading Post Stabilization	DOI-BLM-UT-Y020-2010-021	0.08	0.31
Monticello Field Office Travel Plan Maintenance	DOI-BLM-UT-Y020-2011-001	0	0.82
Chocolate Drop Road	DOI-BLM-UT-Y020-2011-041	1.62	0
Hole-in-the-Rock Trail Segment Interpretive Trail	DOI-BLM-UT-Y020-2012-006	0	2.09
Route Designations for San Juan ATV Safari 2012	DOI-BLM-UT-Y020-2012-0037	2.34	0
Arch Canyon Road Realignment	DOI-BLM-UT-Y020-2013-007	0.30	0.25
Totals	---	7.10 miles	5.04 miles

* Documentation of past actions is cited in Chapter 6, References. Mileages were recalculated using GIS Travel Plan data which corrects any length discrepancies between maps and other documents.

Table 4.1 shows that since the establishment of the Travel Plan, 7.1 miles of designated routes have been added and 5.04 miles have been deleted through nine separate NEPA actions. This increased the size of the Travel Plan from 2,820 miles to 2,822 miles. The Field Office has undertaken a road and trail use monitoring program to try to establish use trends over time. Results are not substantive enough to date, but input from BLM’s field personnel don’t indicate that individually, any of the past actions identified in Table 4.1, have appreciably increased OHV use in the immediate area of development.

Table 4.2. Present and Future Changes to Motorized Routes in the Travel Plan

Name	Number	Miles Added*	Miles Deleted*
Five New Designated Routes	DOI-BLM-UT-Y020-2013-021	10.06	0
Indian Creek ROW	UT-090-06-05	5.45	0
Recapture Canyon ROW	UT-090-06-25	14.32	0
Routes Southwest of Blanding	DOI-BLM-UT-Y020-2011-034	2	0
Red Canyon Comb Wash and Peters Point Ridge	DOI-BLM-UT-Y020-2013-026	4.02	0.06
Totals	---	35.85 miles	0.06 miles

* Summaries of future actions are posted on the ENBB which may be accessed at <https://www.blm.gov/ut/enbb/index.php>. Mileages are subject to change as these proposals are still under analysis.

Table 4.2 shows that five present and reasonably foreseeable future proposals would add 35.85 miles to the Travel Plan and delete 0.06 miles. This would increase the size of the Travel Plan from 2,822 miles to 2,858 miles, an increase of 1.27 percent. In the aggregate, these proposals have the potential to positively impact motorized recreational users. Potential impacts to non-motorized recreational users are expected to be minor.

According to the RMP, the San Juan Public Entry and Access Rights organization (SPEAR) submitted a proposal during the scoping period for the RMP for a loop system of roads and trails throughout San Juan County. The submission by SPEAR predates the RMP, but comments presented during scoping of this current action (the Five New Designated Routes proposal) prompt a discussion of this submission here. While there is not an actual map of the original proposal submitted during RMP scoping, Monticello Field Office does have a later map (dated 2008) which would appear to contain similar information. This map is titled “San Juan County ATV Trail System” with indication that it was produced by SPEAR. A single loop trail system is hand drawn on this map that loops around much of the Monticello Field Office and a portion of the Moab Field Office. SPEAR’s submitted proposal seems to have included both existing routes and recommendations for new construction (RMP Appendix O.8.2.3). This section of the RMP indicates that the proposal would not be considered as a whole at that time but would be compared with the Travel Plan then under development. For portions not coincident with the Travel Plan BLM would “consider on a site-specific basis NEPA process which routes, connectors, and staging areas are consistent with the goals and objectives of the [RMP].”

This 2008 map indicates use of existing routes and displays recommendations of new construction to make what would amount to an approximate 400 mile motorized loop around San Juan County. Portions of the Five New Designated Routes Proposed Action are generally consistent with some portions of this loop including a small portion of the proposed Jacobs Chair

route and the now-closed private land route adjacent to the proposed Blanding to Bulldog route. Other routes which are coincident with the map include the Cedar Mesa ATV Connector Trail, portions of the Chocolate Drop Road, the Route Designations for San Juan ATV Safari 2012, the Indian Creek ROW, portions of the Red Canyon Comb Wash and Peters Point Ridge, and probably a portion of the Routes Southwest of Blanding.

Cumulatively, all these actions would increase the motorized recreation opportunities, enhance the rider's experience, and would serve to make it possible to travel on safer routes between various trail networks as they currently exist across the Field Office. These past, present and potential future designations could be considered to implement major portions of the SPEAR proposal. This could be seen as a positive impact to ATV recreational users. Assuming that all proposals were approved, is likely that much of San Juan County could be ridden in a loop fashion on a multi-day, sag-supported trip. However, discussions with users indicate their preference for completing day or weekend trips focused in individual areas throughout the Field Office. Because of this, it is unlikely that designation and subsequent use of any one route individually, or all routes cumulatively, will increase overall use on the Monticello Field Office very much.

The No Action Alternative would not result in an accumulation of Recreation impacts, other than the connecting of ATV trail networks would not be realized.

CHAPTER 5 PERSONS, GROUPS, AND AGENCIES CONSULTED, and LIST OF PREPARERS

This EA was listed on the ENBB on May 29, 2013. A scoping period was offered from June 6 to July 19, 2013. Scoping comments were received from the Southern Utah Wilderness Alliance (SUWA), the Friends of Cedar Mesa (FCM), the Great Old Broads for Wilderness (GOB), local landowner Gary Guymon, and various members of the public. SUWA, FCM and GOB provided general comments related to various resources and the NEPA process. The GOB in particular was concerned about the Proposed Action overlapping with the Recapture ROW proposal in the area of the proposed Blanding to Bulldog route. Gary Guymon indicated he appreciated the Proposed Action as an alternative to the route which is now closed across his family's private land. See Appendix D for comments and responses. Letters were received from the Hopi Tribe as a result of Native American Consultation. BLM tried to address their concerns about indirect and cumulative effects. No other scoping comments were received from Native American Tribes.

BLM convened an interdisciplinary team to identify potential impact issues related to the proposed action. Potential impacts were identified to Lands with Wilderness Characteristics and to Recreation. BLM consulted with the State Historic Preservation Officer (SHPO) regarding National Historic Preservation Act (NHPA) compliance. SHPO requested additional information regarding whether the Hole-in-the-Rock Foundation and the Church of Jesus Christ of Latter-day Saints had been invited to consult on the project. BLM contacted both of these organizations, and both declined to participate as consulting parties. SHPO then concurred with BLM's proposed finding of No Adverse Effect. Following a change in the Proposed Action on the proposed

Blanding to Bulldog route, BLM again consulted with SHPO who concurred with a finding of No Adverse Effect on March 19, 2014. BLM conducted Endangered Species Act (ESA) consultation with the US Fish and Wildlife Service, which concurred with a determination of May Affect, Not Likely to Adversely Effect. See Appendix E for consultation documents.

BLM consulted with the State Institutional and Trust Land Administration (SITLA) and the Utah Department of Transportation (UDOT) regarding whether permits would be required to designate routes which cross SITLA lands or UDOT ROW over BLM lands. Both agencies replied that permits were unnecessary. BLM consulted with the San Juan County Water Conservancy District regarding routing around Recapture Dam; they concurred with a route and indicated that state approval of that route was unnecessary. BLM consulted with the Blanding Irrigation Company regarding route designation along an old canal; they indicated that such use would be compatible with their future plans for the canal.

See Table 5.1 and Table 5.2 below for the lists of agencies and tribes consulted and the list of preparers of this document.

Table 5.1. List of Agencies and Tribes Consulted

Title/Agency	Responsible for Fulfilling Specific Consultation, Coordination or Permitting Roles
Native American Consultation	Letters were mailed to 11 tribes on July 10, 2013. The only concern raised was from the Hopi Tribe, who responded by letter on July 17, 2013 and August 1, 2014. BLM reviewed the tribe’s concerns and determined that the proposed action was adequate to address their concerns.
State Historic Preservation Officer	BLM proposed a finding of No Adverse Effect. SHPO concurred on November 13, 2013. Following a change in the Proposed Action on the proposed Blanding to Bulldog route, BLM again consulted with SHPO who concurred with a finding of No Adverse Effect on March 19, 2014.
US Fish and Wildlife Service	BLM conducted informal ESA Section 7 consultation by letter, with concurrence on March 20, 2014.
Hole-in-the-Rock Foundation	Declined consulting party status under NHPA Section 106.
Church of Jesus Christ of Latter-day Saints	Declined consulting party status under NHPA Section 106.
State Institutional and Trust Land Administration	Indicated that a permit was not necessary.
Utah Department of Transportation	Indicated that a permit was not necessary.
San Juan County Water Conservancy District	Concurred on route selection around Recapture Dam, and indicated that state approval of that route was unnecessary.
Blanding Irrigation Company	Indicated route is compatible with future plans for old canal.

Table 5.2. List of Preparers

Name	Title	Responsible for the Following Section(s) of this Document
Laird Naylor	BLM Archeologist and Project Lead	Cultural Resources
Robert Leaver	Recreation Specialist and Project Lead	Lands with Wilderness Characteristics
Amanda Scott	Wildlife Biologist	Wildlife

CHAPTER 6 REFERENCES

Addition of Route to Monticello RMP Travel Plan: Chocolate Drop Road. Prepared by the Bureau of Land Management, Monticello Field Office. March 2012. EA DOI-BLM-UT-Y020-2011-041.

Arch Canyon Road Realignment. Prepared by the Bureau of Land Management, Monticello Field Office. November 2013. DOI-BLM-UT-Y020-2013-007.

BLM National Environmental Policy Handbook H-1790-1. January 2008.

Bureau of Land Management, Monticello Field Office, Record of Decision and Approved Resource Management Plan. Prepared by the Bureau of Land Management, Monticello Field Office, November 2008. BLM-UT-090-004-1610, UT-090-2007-40.

Cedar Mesa ATV Connector Trail. Prepared by the Bureau of Land Management, Monticello Field Office. June 2013. EA UT-090-06-06.

Hole-in-the-Rock Trail Segment Interpretive Trail. Prepared by the Bureau of Land Management, Monticello Field Office. November 2012. DOI-BLM-UT-Y020-2012-006

Indian Creek Falls Group Campsite. Prepared by the Bureau of Land Management, Monticello Field Office. November 2010. EA DOI-BLM-UT-Y020-2010-0031.

Monticello Field Office Travel Plan Maintenance. Prepared by the Bureau of Land Management, Monticello Field Office. December 2010. DOI-BLM-UT-Y020-2011-001.

Proposal to move Fable Valley Hiking Trail and Trailhead Parking. Prepared by the Bureau of Land Management, Monticello Field Office. July 2009. CX UT-090-09.

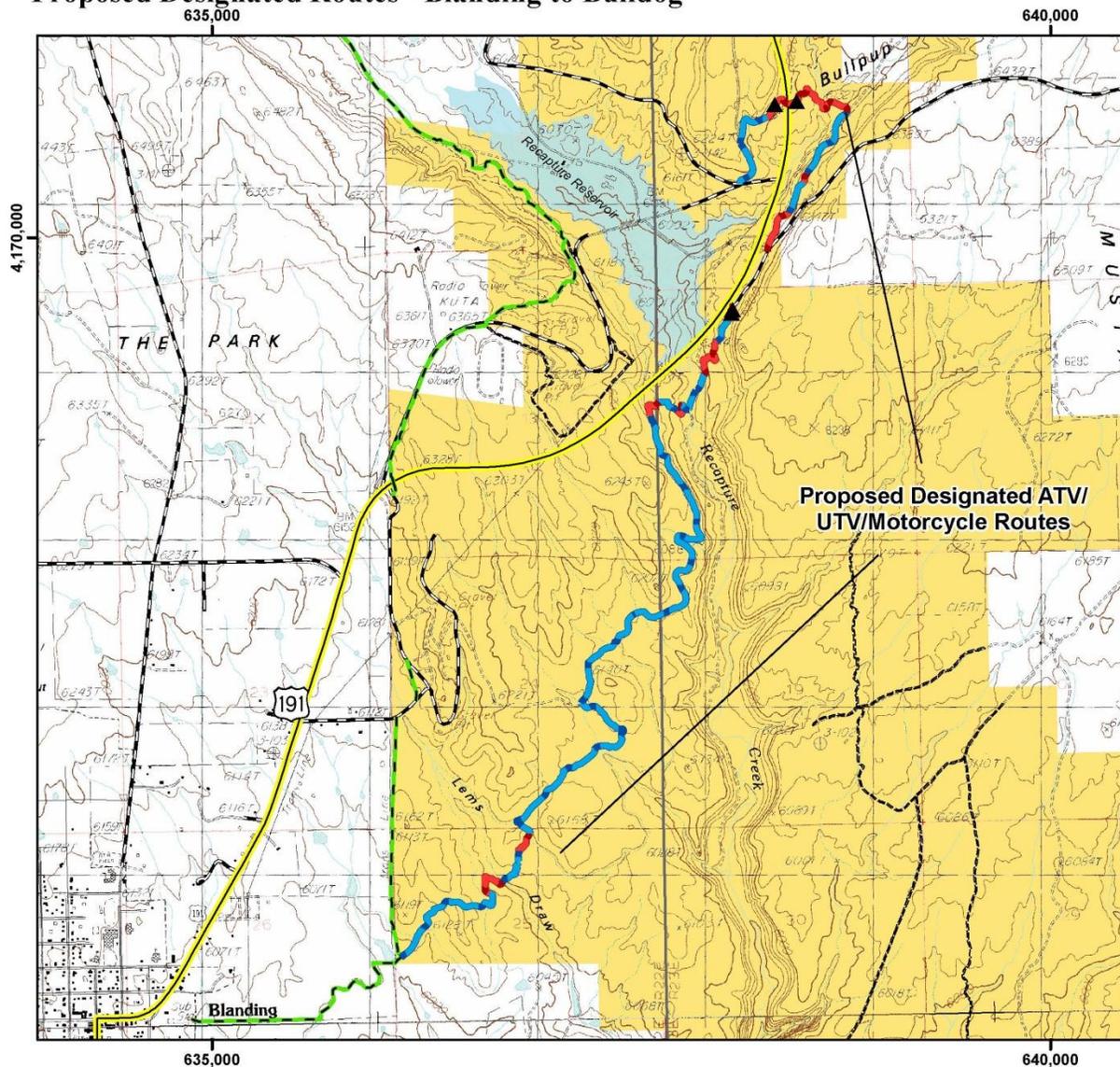
San Juan ATV Safari 2012. Prepared by the Bureau of Land Management, Monticello Field Office. September 2012. DOI_BLM_UT_Y020-2012-00037.

San Juan Trading Post Stabilization. Prepared by the Bureau of Land Management, Monticello Field Office. October 2010. EA UT-Y020-2010-021.

APPENDICES

Appendix A – PROJECT MAPS

Proposed Designated Routes - Blanding to Bulldog

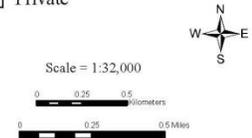


DOI-BLM-Y020-2013-0021 EA
 Bureau of Land Management
 Monticello Field Office



- ▲ ATV/Cattleguard/Horse Gate
- Proposed Designated Existing ATV/UTV/Motorcycle Route
- Proposed Designated New UTV/Motorcycle Route
- ATV/Motorcycle Route
- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)

- Land Status**
- Bureau of Land Management
 - Private



Location Map
 Utah BLM Field Office Boundaries



Date: 2/4/2014

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Grid: UTM Zone 12 NAD 83

Proposed Designated Routes - Jacobs Chair



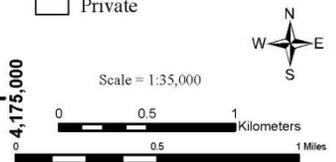
DOI-BLM-Y020-2013-0021 EA
 Bureau of Land Management
 Monticello Field Office



- Proposed Designated Existing Route Open To All Vehicles
- Proposed Designated Existing ATV/UTV/Motorcycle Route
- Proposed Designated New ATV/UTV/Motorcycle Route
- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)

Land Status

- Bureau of Land Management
- State
- Private



Location Map
 Utah BLM Field Office Boundaries



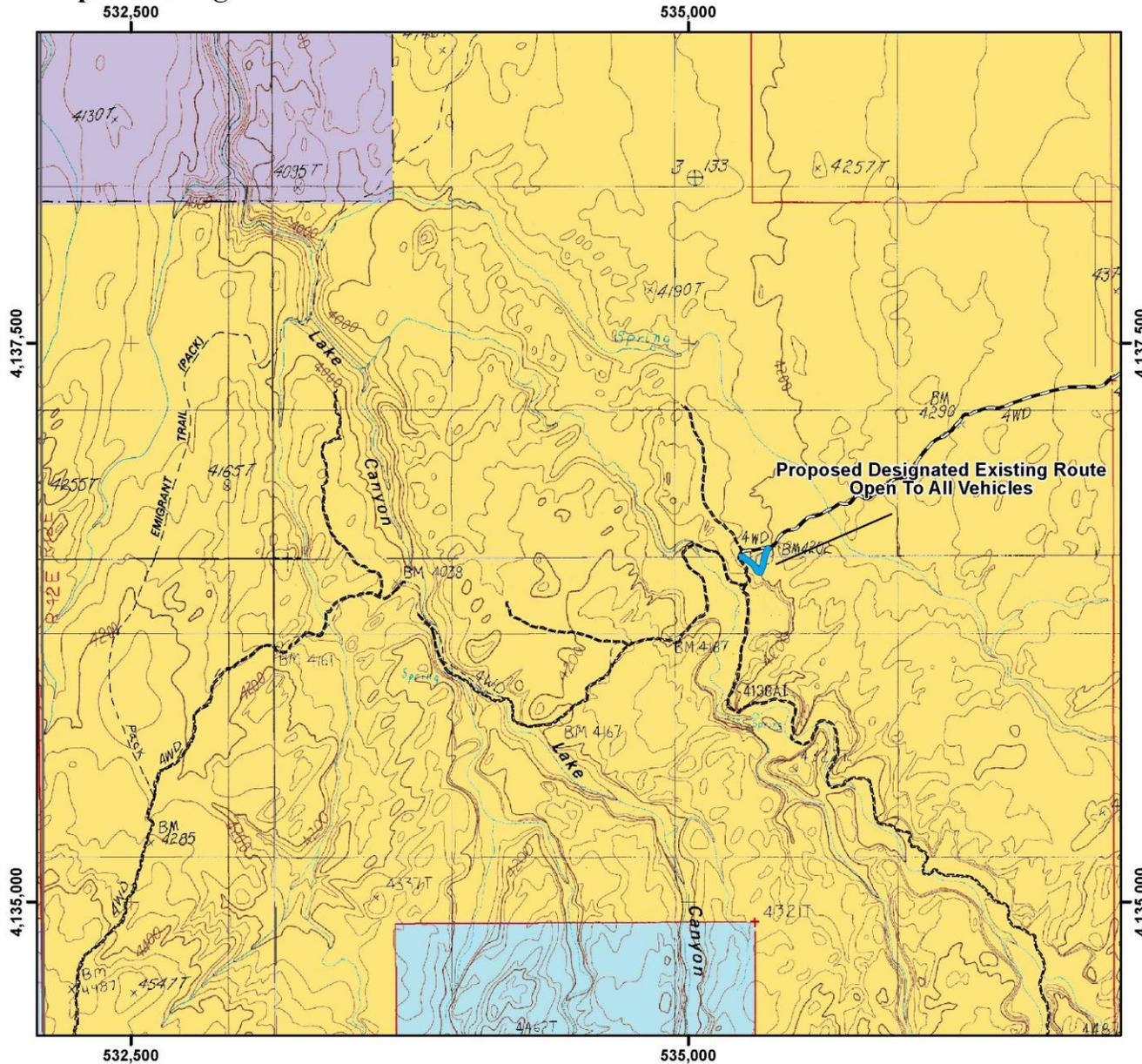
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Grid: UTM Zone 12 NAD 83

Proposed Designated Route - Nokai Dome

DOI-BLM-Y020-2013-0021 EA
 Bureau of Land Management
 Monticello Field Office



Proposed Designated Existing Route Open To All Vehicles

B Roads (Maintained)

D Roads (Unmaintained)

Land Status

Bureau of Land Management

State

National Park Service



Scale = 1:24,000



Location Map
 Utah BLM Field Office Boundaries



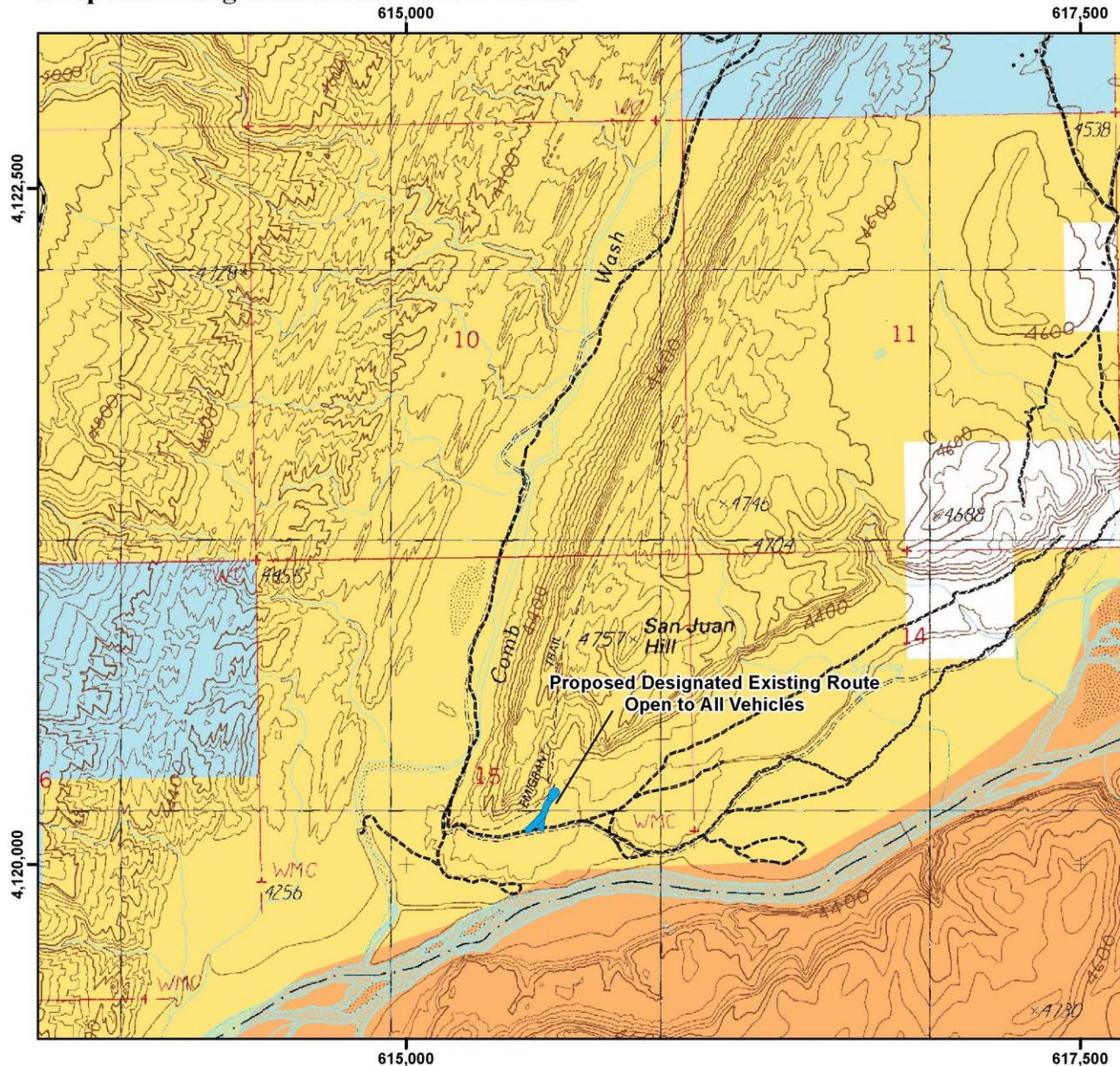
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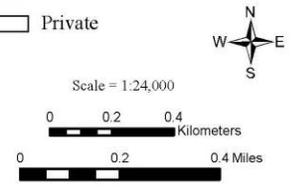
Proposed Designated Route - River House

DOI-BLM-Y020-2013-0021 EA
 Bureau of Land Management
 Monticello Field Office



- Proposed Designated Existing Route Open to All Vehicles
- B Roads (Maintained)
- D Roads (Unmaintained)

- Land Status**
- Bureau of Land Management
 - Indian Reservation
 - State
 - Private



Location Map
 Utah BLM Field Office Boundaries



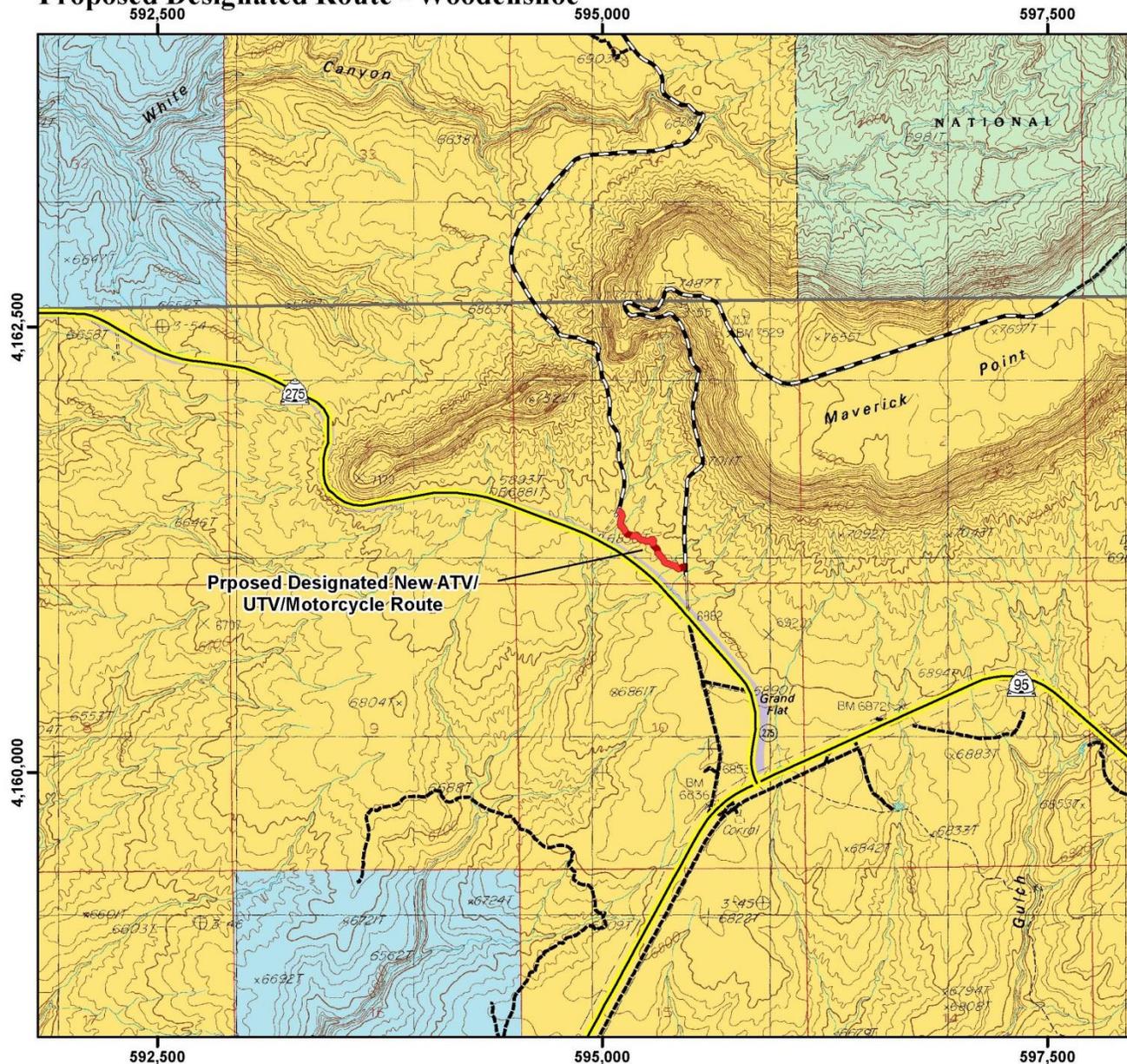
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Grid: UTM Zone 12 NAD 83

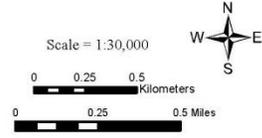
Proposed Designated Route - Woodenshoe

DOI-BLM-Y020-2013-0021 EA
Bureau of Land Management
Monticello Field Office



- Proposed Designated New ATV/UTV/Motorcycle Route
- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)

- Land Status**
- Bureau of Land Management
 - National Park Service
 - US Forest Service
 - State



Location Map
Utah BLM Field Office Boundaries



Date: 11/15/2013

This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

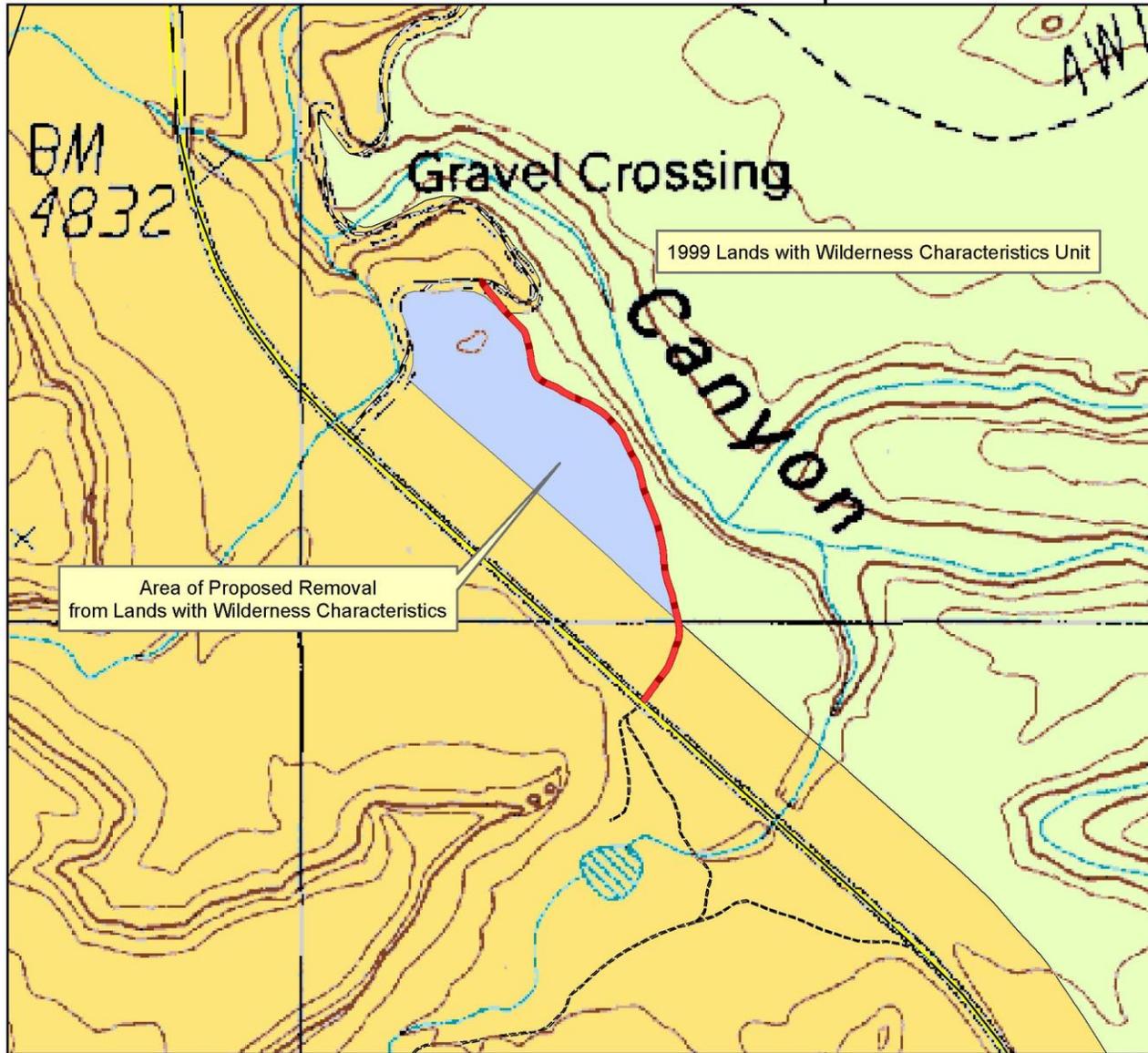
Grid: UTM Zone 12 NAD 83

Appendix B – MAPS OF LANDS WITH WILDERNESS CHARACTERISTICS

Proposed Removal from Lands with Wilderness Characteristics - Jacobs Chair

567,500

DOI-BLM-Y020-2013-0021 EA
Bureau of Land Management
Monticello Field Office



- Proposed Designated Existing Route Open To All Vehicles
- Proposed Designated Existing ATV/UTV/Motorcycle Route
- Proposed Designated New ATV/UTV/Motorcycle Route
- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)

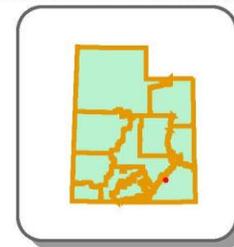
Land Status

- Bureau of Land Management
- State
- Private



Scale = 1:6,000

Location Map
Utah BLM Field Office Boundaries



Date: 11/25/2013

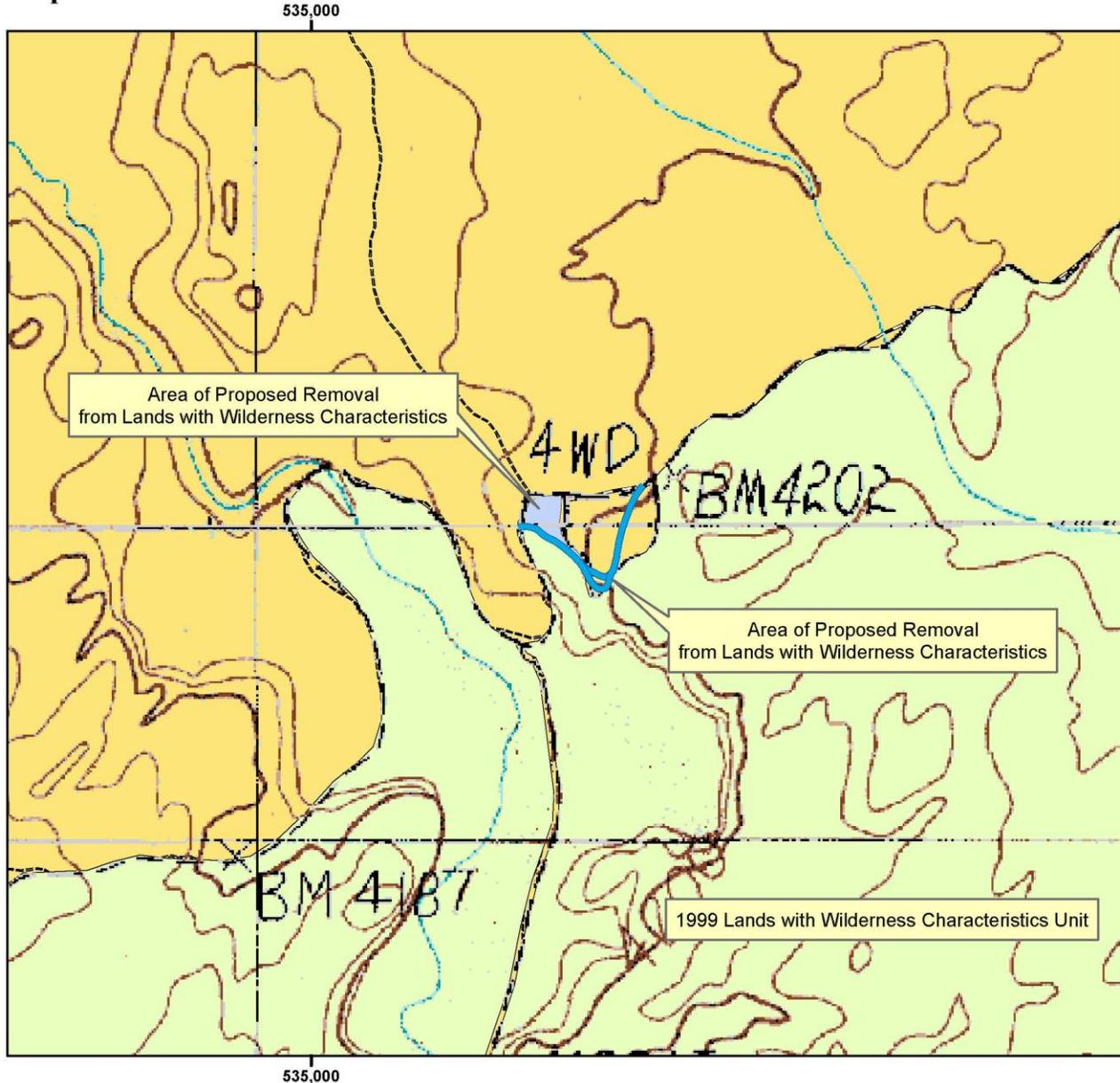
This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

Grid: UTM Zone 12 NAD 83

567,500

Proposed Removal from Lands with Wilderness Characteristics - Nokai Dome

DOI-BLM-Y020-2013-0021 EA
 Bureau of Land Management
 Monticello Field Office



- Proposed Designated Existing Route Open To All Vehicles
- Proposed Designated Existing ATV/UTV/Motorcycle Route
- Proposed Designated New ATV/UTV/Motorcycle Route
- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)

- Land Status**
- Bureau of Land Management
 - State
 - Private



Scale = 1:6,000

Location Map
 Utah BLM Field Office Boundaries



Date: 11/25/2013

This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

Grid: UTM Zone 12 NAD 83

Appendix C - INTERDISCIPLINARY TEAM ANALYSIS RECORD CHECKLIST

Five New Travel Routes for Monticello Travel Plan DOI-BLM-UT-Y020-2013-021-EA

Interdisciplinary Team Checklist

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

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that needs to be analyzed in detail in the EA

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale column may include NI and NP discussions.

Determination	Resource	Rationale for Determination*	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)				
NI	Air Quality	<p>The proposed action will result in emissions of dust from construction operations and the operation of vehicles on unpaved road surfaces; and exhaust emissions from internal combustion engines. These emissions will be minor, temporary, and will rapidly disperse. San Juan County is currently considered to be in compliance with the NAAQS criteria pollutants (Utah Division of Air Quality 2012 Annual Report). The proposed action is not likely to cause or contribute to a violation of the NAAQS.</p> <p>The proposed action is consistent with the recreation management decisions in the MFO ROD/RMP. The MFO PRMP/FEIS concluded that impacts from recreation management decisions to air quality would be negligible in the short term and negligible to minor beneficial in the long term (MFO PRMP/FEIS chapter 4.3.1.3.7.2, pg. 4-30).</p> <p>Air quality need not be further analyzed.</p>	CGiffen	2/27/14
NI	Areas of Critical Environmental Concern	<p>The 2008 Monticello RMP designated seven areas as Areas of Critical Environmental Concern (ACECs) where special management attention is required (RMP Map 11). The Proposed Action is within the San Juan River ACEC. Stipulations on surface disturbing activities are applied by the RMP in the ACEC. Surface disturbance would not be allowed except if after analysis the authorized officer determines that the project would benefit the relevant and important values of the ACEC (RMP Appendix B pg 8). Those values are scenic, cultural, fish and wildlife, natural systems and processes, and geologic features (RMP page 126). The project is designed to benefit the relevant and important cultural values of the ACEC, which satisfies the criteria for an exception to the No Surface Occupancy stipulation. The Proposed Action is not within any of the other six ACECs. The Proposed Action would utilize existing and newly designated routes that would be added to the Monticello Field Office Travel Management Plan. There would be no impact to ACECs with the approval of the Proposed Action.</p>	Laird Naylor	2/26/14
NP	BLM Natural Areas	<p>Five areas of non-WSA lands with Wilderness Characteristics were carried forward in the Approved RMP for the protection of their Wilderness Characteristics. These lands total 88,871</p>	Robert A. Leaver	02/06/14

Determination	Resource	Rationale for Determination*	Signature	Date
		acres and are referred to in the RMP as “BLM Natural Areas” (Map 8 RMP). The Proposed Action would designate routes that would be added to the Monticello Field Office Travel Management Plan. There would be no impact to BLM Natural Areas with the approval of the Proposed Action as the designation of the new routes would not be within BLM Natural Areas. The dropping of the Arch Canyon route and the changes to the Blanding to Bulldog route will not affect BLM Natural Areas.		
NI	Cultural Resources	BLM has determined the Area of Potential Effects (APE) for this undertaking to be an area 30m wide centered on each of the ten route segments to be designated. A record search revealed that four recent previous Class III inventories had covered portions of the APE, and the remaining portions of the APE were subjected to a new Class III inventory (Project U13BL0478). BLM determined the identification efforts to be adequate and conducted in good faith. BLM proposed a finding of No Adverse Effect (NAE), based on the results of the identification efforts, as effects to all sites were either avoided or minimized and as all impacts were avoided. The State Historic Preservation Officer (SHPO) inquired whether the Hole in the Rock Foundation and the Church of Jesus Christ of Latter-day Saints had been invited to be consulting parties; both organizations were asked and both declined. SHPO concurred the undertaking would result in NAE on November 13, 2013. Following a change in the Proposed Action on the proposed Blanding to Bulldog route, BLM again consulted with SHPO on March 14, 2014 with a proposed finding of NAE. SHPO concurred on March 19, 2014.	Laird Naylor	3/25/14
NP	Environmental Justice	There would be no impact to Environmental Justice with the approval of the Proposed Action.	Robert A. Leaver	2/26/14
NP	Farmlands (Prime or Unique)	The Monticello Field Office does not include any designated prime and unique farmlands administered by the BLM (MFO FRMP/FEIS, pg 4-7).	Jed Carling	06/20/13
NI	Fish and Wildlife Excluding USFW Designated Species	<p>The proposed action is located in various ecological sites, pinyon and juniper woodlands with some shrubs (e.g. sagebrush, cliffrose, and bitterbrush) and grasses (e.g. Indian ricegrass and galleta grass).</p> <p>The proposal includes authorizing travel on approximately 8.2 miles (12.5 acres) of existing roads, yet undesignated, and 2.4 miles (3.5 acres) of newly constructed routes. There would be no discernible impacts to authorizing use and maintenance on the existing 8.2 miles of existing disturbed routes, as vegetation has been previously removed. The newly constructed 2.3 miles of routes would disturb approximately 3.5 acres of habitat, which is dispersed across the southern portion of the field office.</p> <p>No construction of the 2.3 miles would occur during critical breeding and young rearing times: Desert Bighorn: April 1-June 15 and October 15-December 15 Mule Deer: November 15-April 15 Elk: November 15-April 15</p>	M. Scott	3/13/14

Determination	Resource	Rationale for Determination*	Signature	Date
		This action would not impact wildlife to a degree that detailed analysis is required because these routes already exist and are being used by the user groups identified in the EA.		
NI	Floodplains	<p>The proposed Blanding to Bulldog route crosses active floodplains in Recapture Canyon immediately below the dam and in Lems Draw. Recapture Dam restricts flooding in Recapture Canyon at the proposed route. The other four proposed routes are located in the uplands and do not cross any immediate active floodplains.</p> <p>As outlined in the MFO RMP, floodplain stipulations include no surface-disturbing activities allowed in active floodplains, with the exceptions if: (a) there are no practical alternatives, (b) impacts could be fully mitigated, or (c) the action is designed to enhance riparian resource values (RMP Appendix B, pg. 3).</p> <p>The proposed action does not result in any permanent fills or diversions, or placement of permanent facilities in floodplains or special flood hazard areas. The proposed limited scope of routes in the floodplain (~140' x 5.5', or 0.02 acres) would not negatively influence the site's ability to provide for the physical aspects of a functional floodplain system. Active floodplains would continue to provide the ability to dissipate energies during high flow events. Thereby, the proposal would meet the exception requirements for NSO of floodplains, as impacts are mitigated through negligible impacts, design features (e.g. perpendicular crossings), and allowing for proper functioning conditions of the floodplains to be maintained. For reasons listed above, floodplains are not affected to a degree that detailed analysis is required.</p>	Jed Carling	02/19/14
NI	Fuels/Fire Management	Proposed activities will not affect wildland fire response. Camping is not authorized and campfire, outdoor cooking, or warming fires are not usually associated with this type of activity. In the proposed action vehicles are restricted from off road travel limiting the possibilities of accidental vehicle related fire ignitions. One of the designated routes falls within a planned hazardous fuels treatment project. Coordination and proper planning will alleviate any possible conflicts with this project. Fire and Fuels will not be analyzed further in the E.A.	P.Plemons	2/27/14
NI	Mineral Resources/Energy Production	According to the 2008 Monticello Field Office RMP (Maps 18 and 19), the proposed action would occur within areas which are available for leasable and saleable mineral resource development. There are currently no active mineral operations near the proposed route designations. The proposed action would not interfere with future mineral resource development because legal access to public lands for purposes of mineral exploration and development would be maintained.	T.McDougall	2/12/14
NI	Invasive Species/ Noxious Weeds	<p>There are no known infestations of State of Utah listed noxious weeds in the immediate vicinity of the proposed action's travel routes. The MFO does not anticipate any changes in the proportion of controllable spreading agents to contribute in the establishment and spread of invasive plants and/or noxious weeds as a result of the proposed action.</p> <p>The limited scope of proposed new surface disturbance associated with route construction along approximately 2.36</p>	Jed Carling	02/18/14

Determination	Resource	Rationale for Determination*	Signature	Date
		<p>miles (3.2 acres) should curtail the opportunity for the establishment and propagation of invasive and noxious weed species. Also, travel along about 7.7 miles (11.7 acres) of existing, yet undesignated, routes would not cause new surface disturbance that allows weed establishment, and is insignificant in the overall mileage of routes in the current travel management plan.</p> <p>The BLM implements integrated weed management strategies that actively controls known infestations of noxious weeds, which will include these routes, in the unlikely event that weeds establish.</p> <p>The proposed alternative does not pose an appreciable threat to the further establishment and spread of noxious weeds and invasive species. Thereby, invasive species and noxious weeds are not impacted to a degree that detailed analysis is required.</p>		
NI	Lands/Access	The proposed new travel routes will increase motorized access in several locations throughout the field office. The proposal will not impact other activities of the Lands and Realty program.	Brian Quigley	3/13/14
NI	Livestock Grazing	The proposed new travel routes are located in allotments authorized for livestock grazing. The proposed action and associated work will not measurably influence livestock grazing management, cattle distribution, and/or available forage. This is due to the limited amount of new disturbance (~3.2 acres) that would remove vegetation (i.e. forage), proposed installation of ATV cattleguards across fencelines, and the allotments are currently used by motorized travel with associated minor influences to livestock grazing. Thereby, there are no impacts to a degree that detailed analysis is required.	Jed Carling	2/18/14
NI	Migratory Birds	<p>The proposed action is located in various ecological sites, pinyon and juniper woodlands with some shrubs (e.g. sagebrush, cliffrose, and bitterbrush) and grasses (e.g. Indian ricegrass and galleta grass).</p> <p>The proposal includes authorizing travel on approximately 8.2 miles (12.5 acres) of existing roads, yet undesignated, and 2.4 miles (3.5 acres) of newly constructed routes. There would be no discernible impacts to authorizing use and maintenance on the existing 8.2 miles of existing disturbed routes, as vegetation has been previously removed. The newly constructed 2.3 miles of routes would disturb approximately 3.5 acres of habitat, which is dispersed across the southern portion of the field office.</p> <p>The new construction of 2.3 miles would occur outside of breeding and nesting season May1-August 31st. If ground disturbing activities do occur within that timeframe a survey would be required.</p> <p>This action would not impact migratory birds to a degree that detailed analysis is required because these routes already exist and are being used by the user groups identified in the EA.</p>	M. Scott	3/13/14

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Native American Religious Concerns	<p>A letter describing the proposed action with maps and describing archeological sites encountered by Class III inventory of the APE was sent 7/10/13 to 11 tribal groups. Responses were received from the Hopi Tribe on 7/17/201 and 8/01/13. The Tribe was concerned about indirect and cumulative effects. They requested a copy of BLM's response to comments from the Great Old Broads for Wilderness on a different project and any additional information. These were provided on 7/22/13 and 8/21/2013.</p> <p>Regarding the Tribe's concern for possible indirect and cumulative effects, BLM considers there will be no indirect effects because the trail does not pass any highly visible sites except for two which are already highly visited: San Juan Hill which BLM has previously assigned to a public use category and a ruin on the rim of Lake Canyon.</p> <p>On 3/13/14, BLM sent a letter to eleven tribal groups concerning a proposed reroute for the Blanding to Bulldog route. No response was received through 3/25/14.</p> <p>BLM considers there will be no cumulative effects because no past or present actions analyzed a potential impact to either cultural resources or Native American concerns, and no reasonably foreseeable future actions would be expected to result in a potential impact to either.</p>	Don Simonis	03/25/14
NI	Paleontology	Paleontological resources are present in the areas described, but should not be impacted by the proposed action.	ReBecca Hunt-Foster	06/04/13
NI	Rangeland Health Standards	Utah Standards for Rangeland Health are individually addressed as separate resources for determination of impacts in this checklist (Standard #1-Soils, #2-Riparian, #3-Biotic (vegetation/wildlife), and #4-Water Quality). Thereby, there are no impacts that require detailed analysis to Rangeland Health Standards and Guidelines that are not already being considered by the individual resource.	Jed Carling	06/20/13
PI	Recreation	Recreational impacts will be positive for motorized users with the Proposed Action. The new designations are relatively small in size, would be added to the MFO Travel Plan, and would be utilized by motorized recreational users of the general public. Existing networks of designated routes would be enhanced through the establishment of safer routes, the elimination of potential conflicts with highway traffic, the elimination of an existing trail conflict with private land values, the completion of trail loops, and the designation of pullouts and stops for recreational use. The Proposed Action is within the San Juan River Special Recreation Management Area (SRMA). Stipulations on surface disturbing activities are applied by the RMP in the SRMA. Surface disturbance would not be allowed except if after analysis the authorized officer determines that the disturbance is related to or can be shown to benefit recreational experiences (RMP Appendix B pg 9). The Proposed Action is designed to benefit recreational experience in the SRMA, which satisfies the criteria for an exception to the No Surface Occupancy stipulation. The Proposed Action is not within any other SRMA. Potential impacts to recreational users would be analyzed in detail in the EA.	Todd Parker	3/13/14

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Socio-Economics	There would be no impact to Socio-Economics with the approval of the Proposed Action. The dropping of the Arch Canyon route and the changes to the Blanding to Bulldog route will not affect Socio-Economics.	Robert A. Leaver	02/06/14
NI	Soils	<p>The proposed action is located in miscellaneous soil mapping units.</p> <p>The proposal includes authorizing travel on approximately 11.7 acres of existing and as yet undesignated roads, and will result in no new surface disturbance and no new impacts to the soil resource. There would be no new impacts from authorizing use and maintenance, as vegetation has been previously removed and the soil surface has been disturbed by vehicle travel.</p> <p>The construction of 3.2 acres of new trail by a trail cat would cause removal of vegetation and mixing of soil horizons.</p> <p>This action would not significantly impact soils because the scale of disturbance is nominal in relation to overall area of the soil mapping units. The overall productivity and stability of the soil resource will not be affected to the degree that would require detailed analysis in the EA.</p>	CGiffen	3/24/14
NP	Threatened, Endangered or Candidate Plant Species	There are no known Threatened, Endangered or Candidate Plant Species within or within 0.5 miles of the proposed routes.	M. Scott	12/17/13
NI	Threatened, Endangered or Candidate Animal Species	Several of the proposed routes are near or cross potential southwestern willow flycatcher habitat, yellow-billed cuckoo habitat and Mexican spotted owl habitat. Many of these routes currently exist on the ground and are being used. Surveys for these species and habitat evaluations have been done at or near these locations. Section 7 Consultation was initiated with the USFWS on February 13, 2014, the FWS concurred with the finding of “may affect, is not likely to adversely affect” on 3/21/14.	M. Scott	3/21/14
NI	Wastes (hazardous or solid)	The Proposed Action incorporates Standard Operating procedures for construction activities which contain adequate mitigation to prevent impacts from wastes, hazardous or solid.	J. Brown	2/27/14
NI	Water Resources/ Quality (drinking/surface/ ground)	<p>The proposed routes cross intermittent channels that may contain water during heavy precipitation events. There are no perennial water sources that are crossed by these routes. The proposed action contains mitigation measures, such as bridging and perpendicular crossings, which would reduce erosion and sedimentation if water were present.</p> <p>The proposed action is within accordance with the Monticello FO RMP, Executive Orders 11988 and 11990, and Sections 303 and 404 of the Clean Water Act.</p>	M. Scott	3/5/14
NI	Wetlands/ Riparian Zones	<p>The proposed Blanding to Bulldog route contains several small isolated stretches of riparian in Recapture Canyon and Lems Draw. The other four proposed routes are located in the uplands and do not contain known wetlands / riparian zones.</p> <p>Within the RMP, riparian zones are stipulated as No Surface Occupancy (NSO). Thereby, no surface-disturbing activities are allowed within 100 meters of riparian areas along perennial streams and springs, with the exceptions if: (a) there</p>	Jed Carling	02/19/14

Determination	Resource	Rationale for Determination*	Signature	Date
		<p>are no practical alternatives, (b) impacts could be fully mitigated, or (c) the action is designed to enhance riparian resource values (RMP Appendix B, pg. 3).</p> <p>The Recapture Canyon section of the Blanding to Bulldog route would cross approximately 23 feet of riparian (0.003 acres) at an abandoned haul road. This route would be bridged to avoid direct travel in the stream and to reduce riparian vegetation impacts. The existing on-the-ground Lems Draw route intersects approximately 41 feet (0.005 acres) of riparian zone. This is a total surface disturbance of 0.008 acres of riparian vegetation that would be removed as a result of the proposal. The Lems Draw route and associated impacts currently exist. The primary riparian plants at these crossings consist of willows, cattails, scattered cottonwoods, and wire grass.</p> <p>The proposed limited scope of surface disturbing activities in the riparian zone (0.008 acres) is negligible in comparison to the 1251 acres of riparian zones in the Recapture Drainage (RMP Table 3.24, pg. 3-107). The action would not cause considerable channelization or bank deterioration, would not affect the drainage's ability to withstand high flow events, would not negatively influence the overall riparian communities to achieve Proper Functioning Conditions (PFC) status, and Utah Standard #2 (riparian) for Rangeland Health would be maintained under the proposal.</p> <p>Thereby, the routes would meet the exception requirements for NSO of riparian zones, as impacts are negligible and mitigated through design features (e.g. bridging, perpendicular crossings, etc.) and maintenance of proper functioning conditions in the riparian zone. For reasons listed above, wetlands / riparian zones are not affected to a degree that detailed analysis is required.</p>		
NP	Wild and Scenic Rivers	There are no Wild and Scenic Rivers segments in the area of the Proposed Action. The dropping of the Arch Canyon route and the changes to the Blanding to Bulldog route will not affect Wild and Scenic Rivers.	Robert A. Leaver	02/06/14
NP	Wilderness/WSA	There are no WSAs or Wilderness areas within the Proposed Action area as all proposed new designations are outside WSAs boundaries. The dropping of the Arch Canyon route and the changes to the Blanding to Bulldog route will not affect Wilderness/WSA Areas	Robert A. Leaver	02/06/14
NI	Woodland / Forestry	The proposed Woodenshoe route would require the removal of pinyon/juniper tree for the 0.37 miles resulting in approximately 0.5 acres of disturbance. The area has over 33% tree cover, ≤2% shrubs, ≤2% perennial grasses and 59% bare ground. The proposed construction would have minimal impacts on the woodland as a whole. The removed trees would be available for fuel wood for the public. The Blanding to Bulldog route may require the removal of trees, but it would be minimal and would not impact the woodland as a whole.	M. Scott	3/5/14
NI	Vegetation Excluding USFW Designated Species	The proposed action is located in miscellaneous ecological sites primarily composed of pinyon and juniper woodlands with dispersed shrubs (e.g. sagebrush, cliffrose, and bitterbrush) and grasses (e.g. Indian ricegrass and galleta	Jed Carling	02/18/14

Determination	Resource	Rationale for Determination*	Signature	Date
		<p>grass).</p> <p>There would be no discernible impacts to vegetation with authorizing motorized use and maintenance on the existing 7.7 miles of existing disturbed routes, yet not designated, as vegetation has been previously removed. The newly constructed 2.4 miles of routes would disturb approximately 3.2 acres of vegetation, which is dispersed across the southern portion of the field office.</p> <p>This action would not impact vegetation to a degree that detailed analysis is required, because the scale of disturbance is nominal in relation to available woodlands and other vegetation in the immediate area, biotic integrity would continue and be maintained at a level appropriate for the site and species involved, and it would have no negative influence on the landscape's ability to achieve the Standards for Rangeland Health.</p>		
NI	Visual Resources	The proposed action and level of landscape change will comply with all VRM management class objectives in the 2008 Monticello Resource Management Plan.	Brian Quigley	3/12/14
PI	Lands with Wilderness Characteristics	The BLM inventoried and evaluated areas for wilderness characteristics as part of the RMP process. That evaluation process is documented in Appendix O of the RMP/FEIS, dated August 2008. In the November 17, 2008 Monticello Field Office Resource Management Plan (RMP) these lands were not selected for management of wilderness characteristics. Parts of the proposed project area are within the area of a citizen proposal for wilderness (Red Rock Wilderness bill H.R. 1916/S.979). The Proposed Project is in an area determined to have Wilderness Character in the 1999 inventory. The 2008 RMP did not include the area as one to be managed for Wilderness Character and, therefore, it is not a BLM Natural Area. The Proposed Project would result in the removal of 9.44 acres of wilderness character on the Jacobs Chair route and a total of 0.54 acres of wilderness character from the Nokai Dome route. Approval of the Proposed Project would be an impairment to Wilderness Character and therefore 9.98 acres of the area of the Proposed Project should be removed from the Wilderness Character inventory. The dropping of the Arch Canyon route and the changes to the Blanding to Bulldog route will not affect Land with Wilderness Characteristics.	Robert A. Leaver	02/06/14

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	S/Brian Quigley	3/26/14	
Authorized Officer	S/Donald K. Hoffheins	3/26/14	

Appendix D – PUBLIC SCOPING COMMENTS AND RESPONSES

Five New Travel Routes for Monticello Travel Plan
DOI-BLM-UT-Y020-2013-021-EA

Scoping Comments and Responses

Hopi 1 (letter 7/17/13)	“The BLM does not seem to be considering indirect ... adverse effects of this proposal.”	BLM considers there would be no indirect effects because the proposed trails do not pass any highly visible sites except for two which are already highly visited and at which on-the-ground conditions would not change as a result of this proposal: San Juan Hill which BLM has previously assigned to a public use category and a ruin on the rim of Lake Canyon.
Hopi 2	“The BLM does not seem to be considering ... cumulative adverse effects of this proposal.”	BLM considers there would be no cumulative effects because no past or present actions analyzed a potential impact to either cultural resources or Native American concerns, and no reasonably foreseeable future actions would be expected to result in a potential impact to either.
Guymon 1 (email 6/11/13)	This proposal “offers a viable alternative” “as a way to travel on an ATV from Blanding up to the forest ATV trails in upper Bulldog/Recapture” around the “old route across the private land to the west and north of Recapture Reservoir” which “will shortly be closed.”	BLM developed the proposed Blanding to Bulldog route, in part, to reduce conflicts with the Guymons’ private land values and concerns and to provide an alternate route for continued recreational access.
Guymon 2	“It is important to put horse gates by each ATV cattle guard” which “should be wide enough to lead a horse thru but not wide enough for a jeep or pickup.”	BLM modified the Proposed Action in response to this comment to include a provision for horse gates through each fence.
SUWA 1 (email 7/9/13)	The proposed Arch Canyon project’s purpose and need statement must adequately inform the public as to BLM’s purpose and need for the proposed action and must sufficiently analyze a wide range of reasonable alternatives. In doing so, BLM must not narrowly define the purpose/need of the proposal in such a way as to make the proposed routes the only alternative that meets BLM’s purpose and need.	The purpose and need for the action is to consider designating segments of routes which would connect to existing disturbed areas previously listed in the Travel Plan, while reducing safety issues and conflicts with private land, and enhancing opportunities for motorized recreation. The BLM did consider the Proposed Action Alternative, a No Action Alternative and considered other alternatives that were not carried forward for further analysis. See Chapter 2 of the

		EA for details on alternatives.
SUWA 2	BLM’s Environmental Notification Bulletin Board (ENBB) for this proposal fails to state a purpose and need for the additional routes. The ENBB merely states that the proposed action is to designate new travel routes and to add these new routes to the Monticello Travel Management Plan.	The ENBB contains only an introduction to a proposal. The purpose and need for each route is to enhance existing opportunities for motorized recreation in the Monticello Field Office while addressing public safety, and protecting cultural and natural resources, reducing conflicts with other uses and users. At this stage, maps and other condensed data are used to convey information about a project and to solicit comments that may inform preparation of the EA. Additional data may be added to the ENBB as it becomes available.
SUWA 3	The EA must describe why these routes are needed and the purpose of the routes.	The EA provides this information.
SUWA 4	The EA must describe how these routes minimize impacts to natural and cultural resources and minimize conflicts with other users as opposed to other alternatives, including the “no action” alternative.	The routes were designed to avoid cultural resources, minimize impacts to riparian and other resources, to enhance safety, and to minimize conflicts with private land and other users. The EA describes how the proposed action minimizes impacts and conflicts compared to other alternatives.
SUWA 5	To comply with NEPA’s mandate, BLM must consider and fully analyze a range of reasonable alternatives, which must include the no action alternative; an alternative that would avoid lands identified by the BLM as having wilderness character.	The EA considers and fully analyzes a No Action Alternative. The Proposed Action minimizes impacts to Lands with Wilderness Characteristics by avoiding these areas where possible and remaining close to the edges of these areas to minimize the number of acres of these lands isolated where full avoidance is not practical
SUWA 6	The range of alternatives must include an alternative that would avoid other lands included in America’s Red Rock Wilderness Act – Arch Canyon, Jacobs Chair, Nokai Dome, Woodenshoe.	BLM is not required to manage other lands included in America’s Red Rock Wilderness Act for wilderness values; however, potential impacts to these lands were considered and analyzed in response to scoping comments. Impacts to these lands were minimized in the same way as with Lands with Wilderness Characteristics. Impacts were found to be minimal on the proposed Nokai Dome route and nonexistent on the proposed

		Woodenshoe route. Impacts of the proposed Jacobs Chair route were found to be greater. An alternative was considered which would have further minimized the impact, but it was not analyzed due to obvious and unacceptable safety issues. This alternative was shown to be not reasonable and the Proposed Action was shown to be the alternative which minimized the potential impact.
SUWA 7	The range of alternatives must include an alternative that would avoid riparian areas – Arch Canyon, Blanding to Bulldog, River House.	The Proposed Action avoids impacts to riparian areas on the proposed River House route. On the proposed Blanding to Bulldog route potential impacts are so minimal that they were judged by the ID Team to be negligible. The Arch Canyon proposal was not carried forward. An alternative was considered but was not forwarded for analysis because it would have resulted in considerable potential impacts to riparian areas. The Proposed Action was shown to be the alternative which minimized the potential impact.
SUWA 8	The range of alternatives must include an alternative that would fully protect cultural resources.	The Proposed Action fully avoids direct effects to cultural resources. Indirect and cumulative impacts are also avoided as discussed above (see Hopi 1 and 2). The Proposed Action was determined to result in No Adverse Effect, with SHPO concurrence.
SUWA 9	BLM must disclose its full analyses of potential effects of all of the reasonable alternatives in the EA.	The EA discloses full analyses of the Proposed Action and the No Action Alternatives. Other alternatives were considered but not forwarded for analysis because they were found to be not reasonable. These are briefly described in the EA.
SUWA 10	According to BLM’s Draft Resource Management Plan (DRMP), none of these routes were “existing” as of 2008. Specifically, none of these proposed new routes appeared on the Monticello field office’s DRMP map of Alternative A (the no action alternative) – even though the RMP’s	Most of the routes which are existing today were existing at the time of the 2008 RMP’s adoption. This has primarily been determined through analysis of aerial photos from 2006 in concert with field inspection. Existing disturbed areas on the proposed Blanding to Bulldog, Nokai Dome and River House routes

	<p>Appendix O states that San Juan County’s route inventory served as the “baseline . . . since it was the most complete inventory for the field office area.” This baseline inventory of all of the known routes served as BLM’s Alternative A in the DRMP analysis. See Monticello RMP, App. O at 13. Thus, ENBB’s description of the “Proposed Action” for the additional route designations, which states that the new designation “would be for existing undesignated routes” is incorrect and deceptive. If, indeed, portions of these proposed route additions exist on the ground today, it would appear that the routes have been illegally created since 2008, when the Monticello RMP/TP prohibited cross-country travel. BLM must correct this gross misstatement in the EA.</p>	<p>clearly predate the RMP. The existing route on the proposed Arch Canyon route was determined to predate the RMP on the basis of observations and recollections of BLM staff but was not carried forward for analysis at this time. Most of the existing segments of the proposed Jacobs Chair route clearly predate the RMP on the basis of 2006 aerial photos in concert with field inspection. A very small segment of existing route on the proposed Jacobs Chair route does not predate the RMP. This segment was formed as a result of vehicles driving around a washout, and as it is not visible on aerial photos from 2011 but was observed on the ground in late 2012, it would have formed during this period. This situation has been clarified in the EA.</p>
SUWA 11	<p>BLM must take a hard look at the proposed impacts of these routes on the natural and cultural resources, and other users in the area.</p>	<p>The EA takes a hard look at the proposed impacts of these routes on the natural and cultural resources, and other users in the area.</p>
SUWA 12	<p>The EA must address the foreseeable impact of rewarding illegal route creation by subsequently designating the illegal routes, rather than physically closing and rehabilitating the illegal route.</p>	<p>This is an issue only on a small portion of one route: the proposed Jacobs Chair route (see SUWA 10). BLM considers that there are no foreseeable impacts of rewarding illegal route creation here, since the creation of this route does not appear to have been a premeditated act. The new route appears instead to have been formed through an illegal act expedient and opportunistic in nature, formed as a result of driving around a washout. The perpetrators may not even remember the act. The reroute is needed and the risk of additional illegal acts as a result of rewarding the illegal act is minimal, particularly as compared to the risk of further illegal acts if No Action is taken.</p>
SUWA 13	<p>Pursuant to NEPA, the new route designations EA must assess the</p>	<p>Potential direct impacts of off-road vehicles being distributed into new areas</p>

	potential direct effects of these new routes on the natural and cultural resources in and near the routes, and the potential conflicts with other users in these areas.	were considered; potential impacts to specific resources of these areas are discussed in the Interdisciplinary Team Checklist, and where Potential Impacts were identified these were analyzed in detail in the EA.
SUWA 14	The EA must analyze the indirect impacts from additional off-road vehicle use on and near these new routes, and the growth inducing effects and potential changes in patterns of land use as a result of adding these new routes to the travel plan.	BLM considers that designating these proposed routes would not increase use significantly, but would better manage the use which is already occurring. Potential indirect impacts of off-road vehicles being distributed into new areas were considered; potential impacts to specific resources of these areas are discussed in the Interdisciplinary Team Checklist, and where Potential Impacts were identified these were analyzed in detail in the EA.
SUWA 15	The EA must assess the cumulative impacts of these new routes when added to the existing designated route network and other activities on surrounding public lands, including: domestic livestock grazing; seismic exploration, oil and gas drilling, and mining activities; commercial, organized and private motorized and non-motorized uses of these areas; and other foreseeable actions, uses and impacts to the public lands managed by the Monticello Field Office.	BLM considered potential cumulative effects to all resources which were considered by the Interdisciplinary Team to be subject to a Potential Impact as a result of the Proposed Action. These Potential Impacts were considered cumulatively with Potential Impacts to the same resources analyzed by past and present action EAs, and which may be analyzed by reasonably foreseeable action scenarios. BLM is not required to analyze cumulative effects to resources which are or were not found to be subject to Potential Impacts (see BLM NEPA Handbook H-1790-1).
SUWA 16	The new route designations must comply with the minimization criteria of the federal regulations governing off-road vehicle route designation and the BLM's Manual 1626 documentation requirement.	The Proposed Action does comply with the minimization criteria (43 CFR § 8342.1(a)-(c)), as documented in the EA.
SUWA 17	Has the Monticello field office developed an off-road vehicle Monitoring Plan, pursuant to the RMP's directive (Appendix O.15.3.3)? If yes, SUWA requests that the Monitoring Plan and collected data be included as an appendix to the EA. If	The EA is in compliance with procedures for modifying the Travel Plan in the RMP (RMP Appendix O.13.). BLM conducts regular monitoring of off-road vehicle use. BLM conducts extensive monitoring of permitted events on these routes, and is aware of resource

	<p>the Monticello field office has not developed and implemented an off-road vehicle monitoring plan and has not collected monitoring data regarding resource impacts and user conflicts on the existing 8 designated routes, <u>SUWA urges BLM to do so to become informed as to the current impacts, before adding more routes to the travel plan.</u></p>	<p>conditions and user conflicts on the existing designated routes. The proposed new designations are designed to minimize conflicts identified as a result of this monitoring and awareness. BLM plans to prepare the monitoring plan specified in the RMP, but has not yet done so. There is nothing in the RMP which restricts BLM from taking other actions pending preparation of the monitoring plan.</p>
SUWA 18	<p>Has the Monticello field office increased its law enforcement to be a more visible and effective tool for managing off road vehicle use in the field office area? If yes, please include a discussion in the EA regarding the law enforcement efforts the Monticello field office has put into effect to better manage off-road vehicle use.</p>	<p>BLM has taken steps to make law enforcement “a more visible and effective tool for motorized OHV management.” Additional staff has been hired since the RMP was adopted, and regular patrols are conducted. BLM would ensure that any newly designated routes are properly signed. BLM did not include a discussion of law enforcement in the EA.</p>
SUWA 19	<p>Several of the proposed new routes are located within or near riparian areas: Arch Canyon, Blanding to Bulldog (Recapture Wash), and River House (San Juan River). SUWA urges the Monticello field office to comply with the management decisions in the Monticello RMP in order to protect the very scarce and valuable riparian resources in the planning areas. These resources are considerably more valuable than the increased recreation benefits that could be derived from designating these routes. The EA must explain how designating new off-road vehicle trails in riparian areas is consistent with the RMP decisions.</p>	<p>The Proposed Action avoids impacts to riparian areas (see SUWA 7).</p>
SUWA 20	<p>BLM’s analysis of the proposed route designation in Arch Canyon must include an analysis of the potential impacts of the route on the water quality of Arch Canyon and the larger Comb Wash watershed. BLM must ensure that the proposed route, and the associated use by off-road vehicles, do</p>	<p>The Arch Canyon proposal was not carried forward for analysis at this time.</p>

	not violate the Clean Water Act by further degrading the water quality of the 303(d) listed Comb Wash Watershed.	
SUWA 21	Designating the proposed routes would be an “undertaking” pursuant to the NHPA, and BLM must comply with Section 106 of the NHPA before designating any of the routes. BLM must initiate consultation with the State Historic Preservation Officer, relevant and affected Tribes, and other interested parties, and determine the area of potential effects. BLM must make a reasonable and good faith effort to identify cultural resources in the area of potential effects, including conducting a Class III cultural resource inventory of the area of potential effects for each of the routes proposed for inclusion in the Travel Plan.	BLM agrees that the proposed designation is an undertaking and has complied with Section 106 of the NHPA. BLM has consulted with SHPO and appropriate Tribes, and two potential consulting parties. The Area of Potential Effects (APE) has been determined and a reasonable, good faith, and appropriate Class III intensive inventory of the entire APE has been conducted. The Proposed Action was determined to result in No Adverse Effect, with SHPO concurrence (see SUWA 8). The only concern raised was from the Hopi Tribe. BLM reviewed the tribe’s concerns and determined that the proposed action was adequate to address their concerns (see Hopi 1 and 2).
SUWA 22	BLM’s EA must analyze and disclose the impacts of the Arch Canyon proposed route designation as well as the no action alternative with respect to the Mexican spotted owl habitat in Arch Canyon. In addition, the EA must disclose how the proposed action complies with the Mexican spotted owl Recovery Plan (Nov 2012).	BLM modified the Proposed Action in response to this and other similar comments and has removed the proposed Arch Canyon route from the Proposed Action. See Chapter 2 of the EA for details on alternatives which were not considered for detailed analysis.
SUWA 23	Vehicle routes and their associated use in riparian areas has been documented to cause significant adverse impacts including rutting, channeling, bank deterioration, increased sedimentation, and water pollution from petroleum products. Permitting the use of motor vehicles in a riparian area (i.e., driving in the stream and/or crossing the stream) is not consistent with the objectives and mandates of the Policy. The EA must include a discussion of how the proposed routes in Arch Canyon, Recapture Wash and along the San Juan River comply with the Utah	The Proposed Action avoids impacts to riparian areas (see SUWA 7).

	Riparian Management Policy.	
FCM 1	Finding information on the BLM website is difficult and almost impossible without assistance.	BLM has provided assistance to FCM and education on the features of the ENBB.
FCM 2	The comment period of scoping is not specified on ENBB.	This was corrected. A comment period was specified which was set to close a month after the correction was made.
FCM 3	Previous comments by Friends of Cedar Mesa on related Environmental Assessments have not been answered in a written format.	BLM provides direct answers to comments that are determined to be substantive. The BLM is not required to respond to non-substantive comments. Non-substantive comments may be acknowledged in the consultations and coordination section and/or reference in the ID Team Checklist, with a brief description of why they are not carried forward in the analysis (see BLM NEPA Handbook H-1790-1). In the future, all commenters would be notified that BLM has received their comments. Substantive comments would continue to be answered in detail.
FCM 4	No changes in the Travel Plan alterations on Cedar Mesa should be accomplished until the Cedar Mesa Special Resource Plan has been written and approved.	The RMP directs BLM to prepare Cultural Resource Management Plans (CRMPs) for certain specific areas and for other areas where a need becomes apparent. The proposed Arch Canyon and River House routes occur in such areas. The Arch Canyon proposal was not carried forward for analysis at this time BLM plans to prepare CRMPs for appropriate areas in the future, but has not yet done so. There is nothing in the RMP which restricts BLM from taking other actions pending preparation of these plans.
FCM 5	This proposal acts to legitimize the practice of illegally pioneering ATV routes and then making them legal after the fact.	See SUWA 12.
FCM 6	Major decisions that affect use patterns on Cedar Mesa should be postponed until after the “Bishop Process” runs its course. New congressional designation may run contrary to the current decisions regarding ATV use.	BLM’s management is directed by law as planned in detail in the RMP. BLM is not allowed to wait for laws that have not yet been passed. The RMP establishes that the area of the Proposed Action is open to designated routes, establishes a Travel

		Plan, and prescribes a process for amending the Travel Plan. BLM must act as directed by the RMP.
FCM 7	The BLM needs to adequately monitor the existing ATV/motorized use before extending the use with new proposals such as this. Greater law enforcement and education initiatives must be put in place prior to the encouragement of greater use. The BLM has no adequate proposal for management of increased motorized use.	See SUWA 17 and 18.
FCM 8	The “road” into River House runs across important ruins and the new travel route proposed by this EA will guarantee more damage to those ruins.	The proposed River House route would result in No Adverse Effect to cultural resources (see SUWA 21). BLM considers that designating these proposed routes would not increase use significantly (see SUWA 14). Any “important ruins” crossed by existing designated routes would not experience any increase in traffic or any increase in damage.
FCM 9	Arch Canyon contains a stream that supports the largest “live water” riparian area on Cedar Mesa. Vehicles degrade and destroy those important water resources. The parking/picnic area and turnaround proposed for the end of the Arch Canyon "road" only increases the use and damage to that fragile stream.	The Arch Canyon proposal was not carried forward for analysis at this time.
GOB 1	Much of the proposed Blanding to Bulldog route is identical to that proposed by San Juan County as part of their desired ATV Trail ROW as presented to the Section 106 Consulting party group in April of 2010.	The current proposal of the Blanding to Bulldog route in the Proposed Action does overlap with a few of the segments the Recapture Canyon ROW application on the mesa top and near Recapture dam east of Blanding but it avoids the core area of the Recapture ROW proposal and it stays out of the area covered by the 2007 emergency closure.
GOB 2	The BLM’s new route designation EA must clearly describe a real (not perceived) purpose and need for each new route and must analyze a clear range of alternatives. The EA should not be written in such a way that the	See SUWA 1.

	purpose and need is so narrowly defined that the proposed routes are the only alternative that would meet the stated purpose and need.	
GOB 3	There is no stated purpose and need on the BLM’s ENBB so there is no clear reason to consider adding these new route designations to the Travel Plan. Why are new route designations needed; especially unauthorized user-created routes as this simply rewards scofflaws. How do these routes minimize impacts to cultural and natural resources and minimize conflicts with other users as compared with other alternatives, including a “no action” alternative.	See SUWA 2, 3, 4, 12.
GOB 4	BLM must consider and fully analyze a range of reasonable alternatives such as a no action alternative, alternatives that would avoid lands identified by the BLM as having wilderness character and the lands that are included in America’s Redrock Wilderness Act (Arch Canyon, Jacobs Chair, Nokai Dome, Woodenshoe), alternatives that would avoid entirely riparian areas such as Arch Canyon, Blanding to Bulldog, River House) and alternatives that would fully protect the unique cultural resources of the area. BLM cannot unilaterally decide to not consider this full range of alternatives but must disclose its analysis of the potential effects of all of the reasonable alternatives in the EA so the public and the decision-maker has adequate information to compare and contrast the impacts and benefits.	See SUWA 5, 6, 7, 8, 9.
GOB 5	It is especially important to Broads that the BLM finally undertake an effort to fully describe and disclose to the public exactly what is contemplated and intended by the “ <i>SPEAR county-wide ATV route system proposal</i> ” that was referenced in the Draft (and final) RMP	The RMP provides information on input from the public on desired outcomes for the then-proposed Travel Plan. It includes a section for “Data Provided by San Juan Public Entry and Access Rights, Inc (SPEAR), which references loop systems of roads throughout San

	<p>and Travel Plan. At that time, in spite of numerous inquiries by phone/email/mail and personal visits to the Monticello BLM office, no map or plan for this “countywide ATV route system” was ever produced.</p>	<p>Juan and Grand Counties including existing disturbed areas and new construction (RMP Appendix O.8.2.3). This section of the RMP indicates that the proposal would not be considered as a whole but would be compared with the Travel Plan. For portions not coincident with the Travel Plan BLM would “consider on a site-specific basis NEPA process which routes, connectors, and staging areas are consistent with the goals and objectives of the [RMP].” While BLM cannot present the original map submitted during RMP scoping, it does have a later map (dated 2008) which would appear to contain similar data. This map is titled “San Juan County ATV Trail System” with indication that it was produced by SPEAR. A single loop trail system is hand drawn on this map that crosses much of the Monticello Field Office and a portion of the Moab Field Office. Portions of the Proposed Action are generally consistent with some portions of this loop which are not coincident with the Travel Plan, including a small portion of the proposed Jacobs Chair route and the now-closed private land route adjacent to the proposed Blanding to Bulldog route. The majority of the Proposed Action would seem to have very little in common with this loop proposal.</p>
<p>GOB 6</p>	<p>Since no analysis or disclosure of the “county-wide ATV route system” was done [at the time of RMP preparation], it is imperative that the BLM cease considering individual route additions that “connect” existing routes, without completing a plan for an ATV trail system for the entire field office/county based on extensive public scoping and comment.</p>	<p>The RMP considered and fully analyzed the potential impacts of designating all of the routes in the Travel Plan. It is not necessary for BLM to revisit these designations when considering a proposal for connector trails or spurs.</p>
<p>GOB 7</p>	<p>With various protective designations being proposed both administratively and legislatively for landscapes such as</p>	<p>See FCM 6 and SUWA 10.</p>

	Cedar Mesa, why is the BLM rushing forward to designate illegal user created routes or new routes that may contradict recommendations of an appropriate planning process?	
GOB 8	To satisfy NEPA’s hard look requirement for cumulative impacts, the BLM must do two things. First, the BLM must catalogue the past, present, and <i>reasonably foreseeable uses and management actions in the area that might impact the environment</i> . A failure to include a cumulative impact analysis of similar actions within a larger region will render the NEPA analysis insufficient. This is what BLM has done to date in spite of recognizing the foreseeable future effects and actions.	BLM has considered and analyzed potential cumulative impacts of the Proposed Action relative to past, present and reasonably foreseeable future action scenarios (see SUWA 15 and Hopi 2).
GOB 9	According to BLM’s Draft Resource Management Plan (DRMP), none of these routes were “existing” as of 2008. The BLM’s description of the “Proposed Action” for the additional route designations, included on the ENBB, which states that the new designation “would be for existing undesignated routes” is both incorrect and a deceptive way to describe authorizing illegally created routes if indeed portions of them exist on the ground today since they did not exist on the ground in 2008 when the Monticello RMP/TP prohibited cross-country travel. This mis-representation must be corrected in the EA when the BLM takes a hard look at the “proposed impacts” (or is this sanctioning BLM’s lack of adequate enforcement of your RMP/TP and illegal use?). The BLM must complete an analysis of the foreseeable outcomes of rewarding illegal route creation by subsequent designation of those illegal routes rather than appropriately managing the areas in question.	See SUWA 10 and 12.

	Physical closure of the routes in question and rehabilitation of the footprint of the route is what should be happening.	
GOB 10	Under NEPA, the new route designation EA must assess the direct effects of these new routes on the natural and cultural resources in and near the routes and the conflicts with other users in these areas. It must analyze the indirect impacts from additional ORV use on and near these new routes (such as more illegal route creation as has happened since the RMP was completed). It must analyze the growth inducing effects and potential changes in land use patterns as a result of adding these new routes to the travel plan and bringing the “countywide ATV trail system” that much closer to fruition thus creating a new way of marketing ORV use in the region. The EA must assess the cumulative impacts of adding these proposed new routes to the existing designated route network in the Monticello Field Office resulting from grazing, seismic exploration, oil/gas/mining activities, and commercial organized and private motorized and non-motorized uses of these areas and other foreseeable uses to the public lands.	See SUWA 13, 14, 15. BLM does not believe that there have been significant amounts of new route creation since the RMP was signed, based on analysis of aerial photographs through time. BLM considers that designating these proposed routes would not increase use significantly, but would better manage the use which is already occurring (see SUWA 14).
GOB 11	Has the Monticello field office developed an off-road vehicle Monitoring Plan, pursuant to the RMP’s directive? If yes, please provide Broads with a copy of this Monitoring Plan. We believe this plan should be in place prior to consideration of additional ORV routes in the field office and it should be included as an appendix to the EA. If the Monticello field office has not developed and implemented an off-road vehicle monitoring plan and has not collected	See SUWA 17 and 18.

	<p>monitoring data regarding resource impacts and user conflicts on the already designated routes, Broads urges the BLM to do this before adding more routes to the travel plan. Becoming informed in a systematic way of current impacts off ORV use and conflicts must be the starting point for a true analysis. While the Monticello field office has increased its law enforcement staff by one position there needs to be a discussion in the EA as to what law enforcement efforts have been put in place and the outcomes to better manage off-road vehicle use.</p>	
GOB 12	<p>Several of the proposed new routes are located within or near riparian areas (Arch Canyon, Blanding to Bulldog (Recapture Wash), River House (San Juan River). Broads again urges the BLM to comply with the management decisions in the Monticello RMP in order to protect the very rare and precious riparian resources in the planning areas. We believe these resources are considerably more valuable than the increased recreation benefits that could be derived from designating these additional routes. The EA must explain how designating new off-road vehicle trails in riparian areas is consistent with the RMP decisions.</p>	<p>The Proposed Action avoids impacts to riparian areas (see SUWA 7).</p>
GOB 13	<p>Both Arch Canyon and entire Comb Wash watershed are on the State of Utah's 303(d) list but this was not analyzed or considered in the Monticello RMP, finalized in 2008, and the Utah Division of Water has not yet prepared a TMDL for the Comb Wash watershed. Any proposed route designation in Arch Canyon must include an analysis of the potential impacts of the route on the water quality of Arch Canyon and the Comb Wash watershed. The proposed routes and any associated use by ORVs</p>	<p>See SUWA 20.</p>

	should not contribute to degradation of the water quality of the 303(d) listed Comb Wash Watershed.	
GOB 14	The designation of new routes in the field office would constitute an <i>undertaking</i> requiring the agency to take into account the effects on historic properties and allow for reasonable opportunities for the Advisory Council, SHPO and Native American tribes to consult on the proposed undertaking. A determination of and documentation of the area of potential effects (APE) must occur and the BLM must then do a data review of existing information and take steps necessary to identify historic properties with the APE. A Class III cultural resource inventory of the APE for each route must be done. Each of these steps must be done before designation of any routes can occur.	See SUWA 21.
GOB 15	The Arch Canyon route is in or near a Mexican spotted owl Protected Activity Center and the Monticello RMP acknowledges the existence of Mexican spotted owl habitat in Arch Canyon near the boundary between the BLM and U.S. Forest Service, and limits organized and commercial group access within 0.5 miles of the Forest Service boundary March 1 through August 31, to protect the species and its habitat. Why then would the BLM propose new routes in this area? The EA must analyze and disclose the impacts of the proposed route designation and all other alternatives including the no action alternative on Mexican spotted owl habitat in Arch Canyon and explain how the proposed action complies with the Mexican Spotted Owl Recovery Plan.	See SUWA 22.
GOB 16	The Southwest Willow Flycatcher, while not yet identified as a resident present in Recapture Wash, very likely migrates through this lush well watered	The proposed Blanding to Bulldog route was realigned in a manner which would minimize any potential impact to riparian dependent wildlife. The original

	<p>riparian habitat and deserves similar attention, analysis and consideration of impacts of the proposed route designation of the Blanding to Bulldog route addition. The EA must address what consideration has BLM given to the potential for this endangered species to be present in the riparian habitats of Arch Canyon, Recapture Wash and along the San Juan River where new ORV routes are being proposed.</p>	<p>alignment would be anticipated to be analyzed in the future as part of the Recapture ROW proposal. The proposed River House route does not occur in or near riparian habitats. The Arch Canyon proposal was not carried forward.</p>
<p>GOB 17</p>	<p>Vehicle routes and their use in riparian areas has been documented to cause significant adverse impacts including rutting, channeling, bank deterioration, increased sedimentation and water pollution from petroleum products. Broads has shared photo documentation of some of these adverse impacts of ORV use in Arch Canyon and the BLM is working to correct the situation. Why then is the BLM considering NEW routes in riparian areas where similar impacts could also occur? Permitting of new routes for motor vehicles in a riparian area where they may be driving in a stream, in the floodplain or crossing the stream is not consistent with the Utah Riparian Management Policy. The EA must explain how any proposed new routes in Arch Canyon, Recapture Wash and along the San Juan River comply with the Policy.</p>	<p>See SUWA 7 and 23.</p>
<p>GOB 18</p>	<p>We are very concerned by the multiple projects and proposals being posted to the Utah BLM ENBB in recent months regarding a variety of ORV routes under a confusing variety of titles, in a very piece-meal manner, and not in order of most recent updates or actions. We would suggest the BLM take a step back and consider how it could consolidate these multiple and sometimes conflicting proposals in a</p>	<p>BLM cannot hold up new proposals while we wait for more proposals that could be consolidated. Similarly, when new proposals are initiated if they were added to existing proposals farther along in the process this may either hold up the existing proposal or result in the new proposal riding in on the coat tails of the other and possibly escaping public scrutiny. BLM does not intend to make the process difficult to use. Rather, we</p>

	truly comprehensive manner rather than continuing with this fragmented approach.	see the stop-and-start progress of certain proposals as having caused this issue. BLM will work in the future to keep proposals moving as consistently as possible, and we welcome suggestions for improving communication.
Hayden 1	Several of these routes are located in proposed wilderness areas, while others are located in sensitive riparian habitat or in areas known to have dense archaeological sites.	See SUWA 5, 6, 7, 8, 19, 21
Hayden 2	The BLM should monitor existing ORV routes in order to document ongoing resource damages and user compliance before considering the addition of more routes!	See SUWA 17.
Hayden 3	Adding these illegally pioneered ORV trails to the BLM's official travel plan legitimizes unauthorized ORV use and sends the message that BLM will reward the creation of illegal trails by eventually adding the trails to its travel plan.	See SUWA 10 and 12.
Buick road 1	There is the potential for secondary negative impacts from increased vandalism/looting, decreased water quality, an increase in invasive weed transport, etc	See SUWA 20, and 21 There are no known infestations of State of Utah listed noxious weeds in the immediate vicinity of the proposed action's travel routes. The MFO does not anticipate any changes in the proportion of controllable spreading agents to contribute in the establishment and spread of invasive plants and/or noxious weeds as a result of the proposed action. The BLM implements integrated weed management strategies that actively controls known infestations of noxious weeds, which will include these routes, in the unlikely event that weeds establish. The proposed alternative does not pose an appreciable threat to the further establishment and spread of noxious weeds and invasive species. Thereby, invasive species and noxious weeds are not impacted to a degree that detailed analysis is required.
Porcher 1	There is a risk for the creation of	The proposed action has been revised to

	random firepits, and accumulation of trash.	limit dispersed vehicle camping to designated campsites only, and BLM routinely patrols its OHV routes and removes trash, in addition to conducting education and soliciting public service.
Fitzgerald 1	I am very dismayed that the BLM would add more ORV travel routes without first monitoring for resource impact the ones that have been already designated.	See SUWA 17.
Michl 1	Concerned that OHV use would increase erosion and air pollution.	The proposed action contains provisions which would adequately control soil erosion. Emissions of dust and exhaust would be minor, temporary, and would rapidly disperse.
Hunt 1	One ecosystem which is endangered by these user-created trails is what is left of "old growth" sagebrush areas, which the sage grouse needs for its survival.	The proposed action is not located within any areas which have been identified as sage grouse habitat.
Stantejsky 1	In Arch Canyon there is a potential for impacts to water and fish, widening of trails, motorized use near and within archeological sites, and an increase in noise.	The proposed Arch Canyon route has been dropped from the Proposed Action.
Cimon 1	Concerned about the progressive loss of the cryptogamic crusts, as a cause for increase in soil erosion.	The construction of approximately 2.4 miles (approximately 3.5 acres) of new trail by a trail cat would cause removal of vegetation, but very little of this area contains cryptogamic crust. This action would not significantly impact soils because the scale of disturbance is nominal in relation to overall area of the soil mapping units. The overall productivity and stability of the soil resource will not be affected to the degree that would require detailed analysis in the EA.
Davis 1	Concerned about increase in noise in areas with wilderness characteristics.	Those Lands with Wilderness Characteristics which are crossed by the proposed action were identified in the 2008 RMP as areas not to be managed for wilderness values.
Smith 1	Concerned about potential for impacts to riparian resources in Arch Canyon.	The proposed Arch Canyon route has been dropped from the Proposed Action.
Stevens 1	Concerned about potential for impacts to riparian, wildlife, and water	The proposed Arch Canyon route has been dropped from the Proposed Action.

	resources in Arch Canyon.	
Stevens 2	Concerned about potential for impacts caused by increased access to archeological sites in Recapture Canyon on the proposed Blanding to Bulldog route.	There are no highly visible archeological sites along the proposed Blanding to Bulldog route. The proposal would not be expected to increase access to archeological sites in Recapture Canyon. The proposed Blanding to Bulldog route was also realigned in a manner which shortens the distance the route would occur within Recapture Canyon. The original alignment would be anticipated to be analyzed in the future as part of the Recapture ROW proposal.
Stevens 3	Concerned about potential for impacts to riparian resources east of Comb Ridge on the proposed River House route.	The proposed River House route is not in any riparian areas.
Numerous 1	This current proposal should be shelved until adequate monitoring of the existing route network has been completed. Your office was instructed to complete a monitoring plan for the designated route system; yet five years after the Travel Plan decision, there is no evidence that this monitoring plan has been completed or that comprehensive, on-the-ground monitoring has been conducted. Thus, the BLM and the public are not informed as to the damages that are occurring to natural and cultural resources from the existing travel plan routes. This monitoring information should provide the basis for any decision to add more ORV routes to the travel plan. Please conduct on-the-ground monitoring and analysis of resource impacts and user conflicts stemming from the existing designated ORV routes before adding more routes to the system.	See SUWA 17.
Numerous 2	If the BLM designates these user-created trails, it sends the message that driving off-trail and creating new trails is the way to get the BLM to designate more ORV trails. This is reckless	See SUWA 10 and 12.

	management that encourages more illegal, user-created trails on public lands.	
Numerous 3	New ORV routes should not be located in wilderness caliber lands, streams and riparian areas, and in the midst of archaeological sites.	See SUWA 5, 6, 7, 8, 19, 21

Appendix E – CONSULTATION DOCUMENTS



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Monticello Field Office



~~Center No Office~~ Box 7
Monticello, Utah 84535
~~U.S. Fish and Wildlife Service~~ Monticello

~~No Comment~~

[Signature]
U.S.F.W.S. - Utah Field Supervisor
3-20-14



IN REPLY REFER TO:

6840
(UTY-020)

Memorandum

To: Field Supervisor, U.S. Fish and Wildlife Service, 2369 West Orton Circle, West Valley, Utah 84119

From: Donald Hoffheins, Field Manager, Monticello Field Office, Bureau of Land Management, Monticello, Utah

Subject: Informal Section 7 Consultation for Five Routes Designation for the Monticello Field Office Travel Management Plan

Introduction and Background

The Monticello Bureau of Land Management (BLM) Monticello Field Office is currently working on an Environmental Assessment (DOI-BLM-UT-Y020-2013-021-EA) to designate five routes that would be added to the Monticello Field Office Travel Management Plan (2008) as plan maintenance. Actual route designations can be modified without completing a plan amendment, although NEPA compliance is still required. 42 CFR 8342.3 states:

The authorized officer shall monitor effect of the use of off-road vehicles. On the basis of information so obtained, and whenever the authorized officer deems it necessary to carry out the objectives of this part, designations may be amended, revised, revoked, or other action taken pursuant to the regulation in this part.

Plan maintenance can be accomplished through analysis and land use planning. BLM collaborates with affected and interested parties in evaluating the designated road and trail network system for suitability for active OHV management and envisioning potential changes in the existing system or adding new trails that would help meet current and future demands.

Proposed Action

The Bureau of Land Management, Monticello Field Office is proposing the designation of five travel routes that would be added to the Monticello Field Office Travel Management Plan (2008) (Please see included maps). BLM has identified these routes because of the need to provide access for motorized recreation, complete existing trail loops and to reduce highway safety conflicts. Designation would be for existing and newly constructed routes. ATV/UTV and



GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

Julie Fisher
Executive Director
Department of
Heritage & Arts



Brad Westwood
Director

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DEPT. OF THE INTERIOR
BUREAU OF LAND MGMT

August 7, 2013

Laird Naylor II
Field Office Archaeologist
Bureau of Land Management
Monticello Field Office
P.O. Box 7
Monticello, Utah 84535

RE: Designation of Ten Segments of ATV Trail and Class I Route in the Monticello Bureau of Land Management Travel Plan U-13-BL-0478

For future correspondence, please reference Case No. 13-0876

Dear Mr. Naylor:

The Utah State Historic Preservation Office received your request for our comment on the above-referenced undertaking on August 6, 2013. **We concur with your determinations of eligibility for this undertaking, but we need additional information for effects.** Some of the historic properties associated in this undertaking have a high potential for other consulting party input, particularly the Hole-in-the-Rock Trail and the Church of Jesus Christ of Latter-day Saints. Has the BLM involved or solicited involvement from other parties in regards to this undertaking and its potential to effect?

This letter serves as our comment on the determinations you have made, within the consultation process specified in §36CFR800.4. If you have questions, please contact me at 801-245-7263 or Lori Hunsaker at 801-245-7241 lhunsaker@utah.gov.

Sincerely,

Chris Merritt, Ph.D.
Senior Preservation Specialist
cmerritt@utah.gov



300 S. Rio Grande Street • Salt Lake City, Utah 84101 • (801) 245-7225 • facsimile (801) 533-3503 • history.utah.gov

13-0876



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Monticello Field Office
P.O. Box 7
Monticello, UT 84535
<http://www.blm.gov/utah/monticello>



IN REPLY REFER TO:
8100
(UTY-020)

State Historic Preservation Officer
Utah State Historical Society
300 Rio Grande
Salt Lake City, Utah 84101-1182

AUG 2 - 2013

PART I. Project Description

County: San Juan
Project Number: U13BL0478

This undertaking proposes to designate ten segments of ATV trail and Class D route in the Monticello Bureau of Land Management (BLM) Travel Plan. These segments are grouped into six routes. Portions of this undertaking have been inventoried under four previous inventory projects, however, the information is summarized in this report. The report also documents additional inventory of remaining portions.

BLM has determined the Area of Potential Effects (APE) for this project to be an area 30m-wide along each of the route segments proposed to be designated. BLM determines the inventory effort to be adequate and conducted in good faith. The finding of effect for this undertaking is No Adverse Effect.

BLM requests concurrence with the above determinations of APE, adequacy of effort and effect for the undertaking.

This undertaking:

	(1) is a non-routine interstate and/or interagency project or program
	(2) directly affects a National Register eligible or listed property
	(3) has been determined by BLM, the SHPO or the Council to be highly controversial
	(4) is one of the following: a land exchange, land sale, Recreation and Public Purpose lease, or transfer
X	(5) is one which we wish to bring to your attention

Received
Monticello Field Office
NOV 15 2013
Bureau of Land Management
Dept of Interior

Received
U.S.HPO

Please review the enclosed documentation, then sign and return this letter with your comments within ten working days.

BUREAU OF LAND MANAGEMENT, MONTICELLO FIELD OFFICE


BY FIELD OFFICE ARCHAEOLOGIST July 30, 2013
DATE


BY FIELD OFFICE MANAGER Aug. 1, 2013
DATE

UTAH STATE HISTORIC PRESERVATION OFFICER

Concur Do Not Concur


BY Chris Merritt, Ph.D.
Senior Preservation Planner
USHPO
for Lori Hunsaker 11/13/13
DATE

COMMENTS:

CC: Kenny Wintch, State Institutional and Trust Lands Administration
CC: Pam Higgins, Utah Department of Transportation, Region 4

Enclosures

1. Site forms and statement of site significance /or reason for site noneligibility.
2. Cultural Resources Inventory Report

13-0876



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Monticello Field Office
P.O. Box 7
Monticello, UT 84535
<http://www.blm.gov/utah/monticello>



IN REPLY REFER TO:
8100
(UTY-020)

MAR 17 2014

State Historic Preservation Officer
Utah State Historical Society
300 Rio Grande
Salt Lake City, Utah 84101-1182

PART I. Project Description

County: San Juan
Case Number: 13-0876
Project Number: U14BL0160

This modification of the Case 13-0876 undertaking proposes to realign a segment of ATV/UTV trail designation. The original undertaking proposed to designate six segments of routes in the Monticello Travel Plan resulting in concurrence on a determination of No Adverse Effect. This modification concerns one of those six proposed routes, the Blanding to Bulldog route. A portion of this route would be located to follow a canal on the rim of Recapture Canyon as shown on a map in the report.

Three archeological sites were recorded during the survey of this alignment, as shown in the table on page 2 of this letter. These are a historic canal which would be followed by the trail, and two sites which are adjacent to the trail. There is already an ATV trail following the historic canal, and designation of that trail would not further affect the canal. Neither of the two adjacent sites are crossed by the proposed designation. Both of these are located in areas where the canal is entrenched with the route on the opposite canal embankment, which should reduce access and help to prevent indirect effects. This proposed trail alignment is recommended in the report to result in No Adverse Effect.

BLM has determined the Area of Potential Effects (APE) for this project to be an area 30m-wide along each of the route segments proposed to be designated. The APE is being modified to follow the newly aligned Blanding to Bulldog route. BLM determines the inventory effort to be adequate and conducted in good faith. The finding of effect for this undertaking is No Adverse Effect.

BLM requests concurrence with the above determinations of APE, adequacy of effort and effect for the undertaking.



This undertaking:

	(1) is a non-routine interstate and/or interagency project or program
	(2) directly affects a National Register eligible or listed property
	(3) has been determined by BLM, the SHPO or the Council to be highly controversial
	(4) is one of the following: a land exchange, land sale, Recreation and Public Purpose lease, or transfer
X	(5) is one which we wish to bring to your attention

PART II. Determination of Eligibility to the National Register of Historic Places.

BLM requests your concurrence on the following determinations of eligibility and effect:

DETERMINATION OF ELIGIBILITY					DETERMINATION OF EFFECT ON HISTORIC PROPERTIES		
SITE NUMBER	NOT ELIGIBLE	NEED DATA	ELIGIBLE	ELIGIBILITY CRITERIA	NO EFFECT	NO ADVERSE EFFECT	ADVERSE EFFECT
42SA13894			E	D		X	
42SA21220			E	D		X	
42SA29896			E	A,C		X	

A narrative discussing not eligible, need data, and eligible cultural resources is attached.

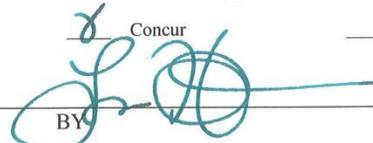
Please review the enclosed documentation, then sign and return this letter with your comments within ten working days.

BUREAU OF LAND MANAGEMENT, MONTICELLO FIELD OFFICE


 BY FIELD OFFICE ARCHAEOLOGIST Mar 14, 2014
 DATE

 BY FIELD OFFICE MANAGER 3/14/2014
 DATE

UTAH STATE HISTORIC PRESERVATION OFFICER

Concur Do Not Concur

 BY 3.19.14
 DATE

COMMENTS:

Very Clear! Thanks

Enclosures

1. Site forms and statement of site significance /or reason for site noneligibility.
2. Cultural Resources Inventory Report



RECEIVED
MONTICELLO FIELD OFFICE
13 JUL 25 PM 12:18
LeRoy N. Shingoitewa
CHAIRMAN
Herman Honanie
VICE-CHAIRMAN
DEPT. OF THE INTERIOR
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July 17, 2013

Brian Quigley, Acting Field Office Manager
Attention: Don Simonis, Archaeologist
Bureau of Land Management, Monticello Field Office
P.O. Box 7
Monticello, Utah 84535

Dear Mr. Quigley,

This letter is in response to your correspondence dated July 10, 2013, regarding the Bureau of Land Management (BLM) Monticello Field Office proposing to designate 10.5 miles of motorized vehicle routes and add them to the Transportation Management Plan.

The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Utah. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the BLM, Monticello Field Office's continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office understands this proposal involves six different route areas. We also understand cultural resource surveys have been conducted on the six routes and 15 prehistoric archaeological sites were documented within three of the route areas. Your letter states, "Most of these sites are located along one of the routes and none would be adversely affected by the proposed undertaking." The BLM does not seem to be considering indirect or cumulative adverse effects of the proposal.

Therefore, we have concerns with this proposal and we agree with the questions in the Great Old Broads for Wilderness June 28, 2013 e-mail to you and its conclusion that states:

The continued proliferation of ATV routes and "connector" routes without any evaluation of the cumulative impacts of these proposals is unacceptable. Conservation of natural and cultural resources is part of the multiple use management of BLM lands, yet it seems to have little influence in BLM decisions.

Please provide us with a copy of your response to the Great Old Broads for Wilderness.

P.O. Box 123

Kykotsmovi, AZ 86039

Telephone: (928) 734-3612

Fax: (928) 734-3629

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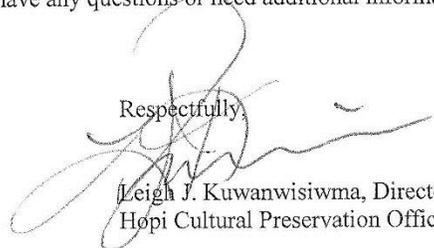
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Brian Quigley
July 17, 2013
Page 2

We also look forward to being provided with copies of any other compliance documents related to this proposal for review and comment. Please contact Terry Morgart at 928-734-3619 or tmorgart@hopi.nsn.us if you have any questions or need additional information. Thank you for your consideration.

Respectfully,



Leigh J. Kuwanwisiwma, Director
Hopi Cultural Preservation Office

xc: Rose Chilcoat, Great Old Broads for Wilderness, P.O. Box 2924, Durango, CO 81302
Utah State Historic Preservation Office



RECEIVED LeRoy N. Shingoitewa
MONTICELLO FIELD OFFICE CHAIRMAN
13 AUG -9 PM 12:15 Herman Honanie
VICE-CHAIRMAN
DEPT. OF THE INTERIOR
BUREAU OF LAND MGMT

August 1, 2013

Donald K. Hoffheins, Field Office Manager
Attention: Don Simonis, Archaeologist
Bureau of Land Management, Monticello Field Office
P.O. Box 7
Monticello, Utah 84535

Dear Mr. Hoffheins,

This letter is in response to your correspondence dated July 22, 2013, regarding the Bureau of Land Management (BLM) Monticello Field Office proposing changes to the Blanding to Bulldog route as part of a proposal to designate 10.5 miles of motorized vehicle routes and add them to the Transportation Management Plan. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Utah. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the prehistoric archaeological sites of our ancestors to be "fragile" and Traditional Cultural Properties. Therefore, we appreciate the BLM, Monticello Field Office's continuing solicitation of our input and your efforts to address our concerns.

In the enclosed letter dated July 17, 2013, in response to a July 10, 2013, correspondence from the Monticello Field Office, the Hopi Cultural Preservation Office stated we understood this proposal involves six different route areas, cultural resource surveys have been conducted on the six routes, and 15 prehistoric archaeological sites were documented within three of the route areas. The July 10th letter states, "Most of these sites are located along one of the routes and none would be adversely affected by the proposed undertaking."

We stated that the BLM does not seem to be considering indirect or cumulative adverse effects of the proposal, that we have concerns with this proposal, and that we agree with the questions in the Great Old Broads for Wilderness June 28, 2013 e-mail to the Monticello Field Office and its conclusion that states:

The continued proliferation of ATV routes and "connector" routes without any evaluation of the cumulative impacts of these proposals is unacceptable. Conservation of natural and cultural resources is part of the multiple use management of BLM lands, yet it seems to have little influence in BLM decisions.

P.O. Box 232

Kykotsmovi, AZ 86039

Telephone: (928) 734-3612

Fax: (928) 734-3629

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Donald K. Hoffheins
August 1, 2013
Page 2

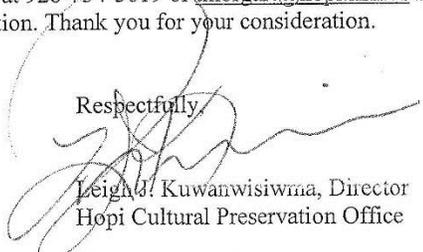
We requested and reiterate our request to be provided with a copy of your response to the Great Old Broads for Wilderness.

Regarding your July 22, 2013 correspondence, we understand minor changes are proposed to the Blanding to Bulldog route that will avoid two identified prehistoric sites.

Also enclosed are our letters dated July 17 and July 29, 2013, regarding the proposed Indian Creek ATV Trail and City of Monticello proposed ATV Safari scheduled for September. We look forward to your responses to these letters as well as being provided with copies of any other compliance documents related to these proposals for review and comment.

Please contact Terry Morgart at 928-734-3619 or tmorgart@hopi.nsn.us if you have any questions or need additional information. Thank you for your consideration.

Respectfully,



Leigh A. Kuwanwisiwma, Director
Hopi Cultural Preservation Office

Enclosures: August 6, 2012, January 3, 2013, July 17, 2013 (2), and July 29, 2013, letters

xc: Juan Palma, BLM State Director
Rose Chilcoat, Great Old Broads for Wilderness, P.O. Box 2924, Durango, CO 81302
Utah State Historic Preservation Office
Liz Thomas, Southern Utah Wilderness Alliance