

Worksheet Determination of NEPA Adequacy (DNA)

For

Hiking on North Menan Butte and the St. Anthony Sand Dunes

U.S. Department of the Interior

Bureau of Land Management (BLM)

BLM Office: Upper Snake Field Office

NEPA Number: DOI-BLM-ID-I010-2013-0009-DNA

Lease/Serial/Case File No.: ID-310-RE-13-01

Proposed Action Title/Type: Special Recreation Use Permit

Location of Proposed Action: North Menan Butte and St. Anthony Sand Dunes

Description of the Proposed Action:

Issue a Special Recreation Use Permit for commercial use on behalf of the University of Montana-Western Elderhostel. The Elderhostel group would consist of 15-30 individuals and would participate in two hikes during a one-day period at North Menan Butte and the St. Anthony Sand Dunes Special Recreation Management Area. The group would stay on designated and existing routes while hiking at North Menan Butte and would also hike on the sands in the St. Anthony Sand Dunes (outside of the Wilderness Study Area Boundary). These hikes would occur approximately twice a year at these locations.

Commercial use is defined as recreational use of the public lands and related waters for business or financial gain. An activity or service is considered commercial use if anyone collects a fee or receives compensation for services. Commercial use can also be characterized in situations where duty of care or expectation of safety is owed participants by service providers as a result of compensation.

Applicant (if any): University of Montana-Western

Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name: *Medicine Lodge Resource Management Plan*

Date Approved: April 1985

Other document: *Snake River Activity/Operation Plan*

Date Approved: July 2008

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions: Management Area 9 Snake River, Objective 7 (page 38), “To manage for the recreation values and uses of the area.”

Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

This proposed action is addressed in the following existing BLM EA/EIS:

Name/Number of NEPA Document:

Special Recreation Permits Environmental Assessment (2004) EA number ID-074-2004-0042. *The Snake River Activity/Operations Plan (2008)* also states that commercial SRUP applications would be considered on a case-by-case basis.

Other documentation relevant to the proposed action:

The post evaluations from 2010, 2011, and 2012 document that the permitted organization removes all waste and evidence that group hiking was permitted in the area. There was no disturbance to the area since participants stayed on already developed designated routes and shifting sands.

NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Yes, the proposed action to allow group hiking at North Menan Butte and the St. Anthony Sand Dunes under a Special Recreation Use Permit (SRUP) complies with the alternative selected and analyzed in *Special Recreation Permits Environmental Assessment (2004) EA number ID-074-2004-0042*.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

Yes, section 2, page 2 of the *Special Recreation Permits Environmental Assessment (2004)* describes the alternatives considered when issuing SRUP on BLM-administered lands within the USFO. The action alternative is described in detail and the alternative considered but not carried through for full analysis is presented. A description of the No Action Alternative (no change from current management) is also included as required by CEQ regulations (40 CFR 1502.14d).

Two alternatives were developed by the Interdisciplinary (ID) team on issues identified during internal scoping. A full analysis of the two alternatives is described in the EA (pages 5-11) including direct, indirect and cumulative impacts (pages 11-13).

- 3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?**

Yes, there has been no significant change in circumstances or significant new information germane to the proposed action. No new information is presented under the proposed action to warrant any further analysis. The proposed action is adequately analyzed under the existing NEPA document *Special Recreation Permits Environmental Assessment (2004) EA number ID-074-2004-0042*.

- 4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?**

Yes, the Environmental Assessment provides sufficient detailed assessments of all alternatives including the Proposed Action Alternative to sustain the action of issuing a permit for commercial group hiking at North Menan Butte and the St. Anthony Sand Dunes.

- 5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?**

Yes, the direct and indirect impacts of the small group hiking that would occur on North Menan Butte and the St. Anthony Sand Dunes are unchanged from those identified in the existing *Special Recreation Permits Environmental Assessment (2004)*. The current NEPA document specifically analyses impacts related to this activity at the identified locations.

- 6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?**

Yes, the cumulative impacts of the proposed action are essentially the same as those identified in the existing document. The direct, indirect, and cumulative impacts section of the *Special Recreation Permits Environmental Assessment (2004)* accurately describes impacts associated with group hiking and may be found within pages 11 through 13 of the NEPA document.

- 7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?**

Yes, section 5, page 13 of the *Recreation Permits Environmental Assessment (2004)* lists the individual resource specialists who participated in the preparation of the EA. Also, public involvement during the broader EA process was in accordance with NEPA timelines. The final

EA was available to the public for a thirty day comment period and no comments were received either positive or negative from any constituents or members of the public. The Shoshone-Bannock Tribes were consulted during the process and did not provide comments related to the EA.

Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

Name	Title	Resource Represented
Shannon Bassista	Outdoor Recreation Planner	Recreation
Joshua Gibbs	BLM USFO NEPA Specialist	NEPA
Marissa Guenther	Archaeologist	Cultural
Dan Kotansky	Supervisory Hydrologist	Hydrology, Hazmat
Devin Englestead	Wildlife Biologist	Wildlife
Deena Teel	Superviory Natural Resource Specialist	ACEC, Riparian
Monica Zimmerman	Outdoor Recreation Planner	Recreaiton

Mitigation Measures:

Issue a Special Recreation Permit that would require the permittee to abide by all Special Recreation Permit Stipulations. These stipulations are:

- 1) clean up all garbage associated with the event
- 2) stay on designated routes.

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM' s compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

Preparer: Shannon Bassista /s/ Shannon Bassista 1/29/13

Nepa Reviewer: Joshua Gibbs /s/ Joshua Gibbs 1/29/13

Upper Snake Field Manager: Jeremy Casterson /s/ Jeremy Casterson 1/29/13