Worksheet Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior

Bureau of Land Management (BLM)

NEPA#: DOI-BLM-ID-I010-2014-0033-DNA
BLM Office: Upper Snake Field Office

Lease/Serial/Case File No. IDI010-RE-14-06 and ID-310-RE-06-08

Proposed Action Title/Type: Special Recreation Permit

Location of Proposed Action: The Main Snake River (Gem State to the headwaters of American Falls Reservoir) and Teton River.

Description of the Proposed Action:

To issue a permit for commercial operations on the Main Snake River (Gem State to the headwaters of American Falls Reservoir) for two years to the final ruling of 43 CFR Part 2930 of BLM policy and permitting for commercial recreation on public lands. To amend a permit for commercial operations on the Teton River for two years to the final ruling of 43 CFR Part 2930 of BLM policy and permitting for commercial recreation on public lands. Commercial is defined, under subpart 2932.5, as any recreational use of the public lands and related waters for business or financial gains. Furthermore, the activity, service or use is commercial if any person, group or organization attempts to make profit, receive money, amortize equipment, or obtain goods or services, as compensation from participants in recreation activities on public lands led, sponsored, or organized by that person, group, or organization.

Outfitters and guides are governed by their state license and federal permit. The BLM will coordinate closely with the Idaho Outfitters and Guides Licensing Board to affect consistent regulations but where differences occur, the more restrictive regulation will have precedence.

Should information collected subsequent to any renewal indicate changes in management are needed to ensure that this permit is meeting or making significant progress towards goals set by permit conditions and stipulations, the permit may be modified at any time.

Applicant (if any):
Terry Bolinder (IDI010-RE-14-06)
Henry's Fork Anglers (ID-310-RE-06-08)
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

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."

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:

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:
The proposed action is addressed in the programmatic EA: *Special Recreation Permits Environmental Assessment (2004) EA number ID-074-2004-0042,* which states that commercial SRP applications would be considered on a case-by-case basis.

NEPA Adequacy Criteria

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

Yes, the proposed action to place the commercial operation on the Main Snake River under Special Recreation Permit complies with the alternative selected or analyzed in the *Special Recreation Permits Environmental Assessment (2004) EA number ID-074-2004-0042.*

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 SRP 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).

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.*

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 proposed action of commercial use by outfitter and guides.

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 commercial activity that would occur on the Main Snake River are unchanged from those identified in the existing *Special Recreation Permits Environmental Assessment (2004)*. The current NEPA document specifically analyses impacts related to commercial use on the river systems managed by BLM.

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, 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 commercial activities and may be found within pages 11 through 13 of the NEPA document.

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
Devon Englestead	Wildlife Biologist	Wildlife
Amy Forsgren	Recreation Technician	Recreation
Glen Guenther	Supervisory Natural Resource Specialist	Botany
Marissa Guenther	USFO NEPA Specialist /Archeologist	NEPA/Cultural
Monica Zimmerman	Outdoor Recreation Planner	Recreation

Mitigation Measures:

Be issued a Special Recreation Permit. Permittee will abide by all Special Recreation Permit Stipulations. These stipulations are:

- Be issued a Special Recreation Permit.
- Carry with them, at all times of commercial activity, picture identification to identify the person with their State Outfitters or Guide License.
- Carry with them, at all times of commercial activity, a copy of their Special Recreation Permit.
- Following BLM rules and regulations pertaining to the river system
- The permittee will abide by all Special Recreation Permit Stipulations

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

/s/Monica Zimmerman
Monica Zimmerman
Outdoor Recreation Planner
Date: 6/30/2014

/s/Marissa Guenther
Marissa Guenther
NEPA Reviewer
Date: 7/30/2014

/s/Jeremy Casterson
Jeremy Casterson
Upper Snake Field Manager
Date: 6/30/2014