

U.S. Department of the Interior  
Bureau of Land Management  
White River Field Office  
220 E Market St  
Meeker, CO 81641

## DETERMINATION OF NEPA ADEQUACY (DNA)

### *Sudden Impact Outfitters-Big Game Special Recreation Permit Drop Camps DOI-BLM-CO-N05-2015-0008-DNA*

#### **Identifying Information**

**Project Title:** Sudden Impact Outfitters-Big Game Special Recreation Permit Drop Camps

**Legal Description:** T3N, R94W Section 20

**Applicant:** Ryan Plumb doing business as (dba) Sudden Impact Outfitters

#### **Conformance with the Land Use Plan**

The Proposed Action is subject to and is in conformance (43 CFR 1610.5) with the following land use plan:

**Land Use Plan:** White River Record of Decision and Approved Resource Management Plan (ROD/RMP)

**Date Approved:** July 1997

**Decision Language:** "Special recreation permits (SRPs) will be issued to qualified guides and outfitters based on need and demand for services." (Page 2-43)

#### **Issues and Concerns**

Portions of proposed drop camps 2, 3, and 4 have small portions that may be potentially used that are located within the Little Snake Field Office (LSFO). A signed letter of approval from the LSFO Authorized Officer will be required in order for use of any area within the Little Snake Field Office. White River Field Office will administer and monitor the operation of all four drop camps.

#### **Proposed Action**

##### ***Project Components and General Schedule***

Ryan Plumb has applied to operate two drop camps within his big game Special Recreation Permit permitted operating area from one week prior to the opening of Colorado Parks and Wildlife (CPW) big game archery season (late August) through one week after the third rifle season (mid-November) of each year. Ryan Plumb has held a Special Recreation Permit with the BLM-White River Field Office (WRFO) for commercially guiding big game hunting for the past

four years achieving an acceptable performance rating each of those years. The rationale for this proposal is to increase and diversify the Sudden Impact Outfitters business and to provide improved big game hunting and camping experiences on BLM lands in this area.

There are four drop camp locations (see Figures 1, 2, and 3) that are proposed for use in the upper Cave Gulch and upper Goff Camp Gulch drainages in the Danforth Hills area along an unnumbered BLM road that travels along the ridge. All of these camps are located in flat pull-off type areas adjacent to the road some of which may have been mechanically constructed when the road was originally constructed. The proposal is to operate only two of these four drop camps at the same time throughout these seasons. This provides the permittee the ability to locate camps closer together or further apart depending on his and his client preferences. The multi-camp locations also provide the permittee the ability to rest camping areas and lessen any camping impacts, disperse use as needed, and provide a variety of camping locations to clients. This area of BLM land does not have general public access, but the proposed camp areas have received casual use dispersed camping over the years from those that can access these areas. Access to and from these sites will be from the adjacent unnumbered BLM road.

### ***Design Features***

The applicant has signed and agreed to the BLM Colorado-Special Recreation Permits Terms, Conditions, and Stipulations for all permitted activities. The full document can be found at: [BLM-CO SRP Stipulations, Terms, and Conditions](#). Particular stipulations in this document that pertain to this proposal include but are not limited to:

#### **VI. NON-EXCLUSIVE USE**

A. Roads, trails and trailheads, or campsites commonly in public use shall not be blocked or enclosed by the permittee.

B. Public lands will generally remain available on a first-come, first served basis to other commercial and private recreational users.

#### **XIII. CAMPSITES**

A. Camps may be set up for no longer than necessary, and no earlier than 5 days prior to the first day of use authorized and must be removed within five days after the authorized use period. No year-round, permanent camps may be established on BLM lands; only temporary facilities are permitted.

B. Camps shall be located to avoid conflict with public road and trail traffic, and stream or lake access, and to the extent possible shall be located out of sight of major trails.

C. All campsites and temporary improvements shall be as described in the approved operating plan.

D. All campsite facilities including but not limited to tents, latrines, livestock control facilities, shall be located at least 200 feet from the nearest spring, stream, lake, pond or reservoir unless specifically authorized otherwise.

E. All campsites must be approved prior to use. Clearances may be required, such as inventories for cultural resources and/or for threatened or endangered species.

#### **XIV. CAMPFIRES**

A. Unless permanent fire rings are designated, open campfires shall be built only in areas free of hazardous fuels. Fire rings or pits shall be set on bare mineral soil. After use, fire rings or pits shall be obliterated and the site rehabilitated. Open fires may be prohibited during periods of extremely high fire hazard by order of the BLM, the applicable county or the State of Colorado.

B. Campfires shall be completely extinguished when left unattended. The permittee is responsible for all fires started by him/herself, employees, or clients, and may be held responsible for fire suppression costs resulting from wildfire caused by his/her operations.

C. An axe, shovel, water bucket or extinguisher for fire control shall be available at each campfire.

#### **XVII. RESOURCE PROTECTION**

B. Rehabilitation: After camps and other temporary facilities are dismantled, insofar as practical, the area shall be left in a natural state. Reseeding with BLM approved seed mix may be required of any areas disturbed by campsites.

C. Sanitation: Self-contained or pit type toilets/privies, with or without tent coverings, shall be used at all campsites on public land. The permittee will be responsible for establishing a latrine for all permitted camps and for final rehab when the camp is removed. Waste from self-contained toilets must be disposed of at a State approved sewage disposal facility. When abandoned, toilet pits shall be covered with a minimum of 12 inches of topsoil and back filled to pre-existing grade. While in use, human waste in pits shall be covered with a layer of topsoil or lime after each individual use.

D. Trash Disposal: Camps and other permitted areas shall be regularly cleaned and no trash or litter shall be allowed to accumulate. Combustible trash may be burned when campfires are authorized. All non-combustible trash, including but not limited to tin cans, spent brass, glass bottles, foil, and wire shall be packed out. Trash shall not be buried on public land.

#### ***BLM Required Conditions of Approval to Mitigate Impacts to Cultural and Paleontological Resources***

1. The applicant is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
2. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO

Archaeologist will be notified immediately. Work may not resume at that location until approved by the AO. The applicant will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. The applicant, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.

3. Pursuant to 43 CFR 10.4(g), the applicant must notify the AO, by telephone and written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), the operator must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.

### **Review of Existing NEPA Documents**

**Name of Document:** White River Resource Area Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP/FEIS).

**Date Approved:** June 1996

**Name of Document:** Special Recreation Permits within the WRFO Involving Special Areas, More than 14 Days Consecutive Use, and/or Staging Areas Greater than Three Acres (DOI-BLM-CO-N05-2014-0057-EA).

**Date Approved:** July 31, 2014

### **NEPA Adequacy Criteria**

1. Is the new Proposed Action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document? If there are differences, can you explain why they are not substantial?

*The Proposed Action is essentially similar to what was analyzed under the selected alternative in the Environmental Assessment (EA) DOI-BLM-CO-N05-2014-0057-EA. It is within the same analysis area and this type of proposal was specifically identified and analyzed.*

2. Is the range of alternatives analyzed in the existing NEPA document appropriate with respect to the new Proposed Action, given current environmental concerns, interests, and resource values?

*Two alternatives (Proposed Action and No Action Alternative) were analyzed in DOI-BLM-CO-N05-2014-0057-EA and no reasons were identified to analyze additional alternatives. These alternatives are considered to be adequate and valid for the Proposed Action.*

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new Proposed Action?

*Additional projects have been analyzed in the area but no known changes in circumstances or information have been found, thus the original analysis is still valid. Please see the comments below regarding cultural resources, and threatened and endangered wildlife and plants species for further discussion.*

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new Proposed Action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

*The direct, indirect, and cumulative effects that could result from implementing this Proposed Action would still remain similar to DOI-BLM-CO-N05-2014-0057-EA.*

5. Is the public involvement and interagency review associated with existing NEPA documents adequate for the current Proposed Action?

This project was posted on the BLM's ePlanning online NEPA register on 11/18/2014. As of 12/19/2014, no comment were received with no issues or concerns identified. A copy of the completed DNA will also be posted to the online NEPA register.

## **Interdisciplinary Review**

The Proposed Action was presented to, and reviewed by, the White River Field Office interdisciplinary team on 11/18/2014. A complete list of resource specialists who participated in this review is available upon request from the White River Field Office. The table below lists resource specialists who provided additional review or remarks concerning cultural resources and special status species.

<b>Name</b>	<b>Title</b>	<b>Resource</b>	<b>Date</b>
Brian Yaquinto	Archaeologist	Cultural Resources, Native American Religious Concerns	12/15/2014
Lisa Belmonte	Wildlife Biologist	Special Status Wildlife Species	11/25/2014
Matthew Dupire	Ecologist	Special Status Plant Species	12/1/2014
Aaron Grimes	Outdoor Recreation Planner	Project Lead	12/15/2014
Heather Sauls	Planning and Environmental Coordinator	NEPA Compliance	12/22/2014

**Cultural Resources:** BLM archaeologist B. Yaquinto completed a cultural resource inventory of the four proposed drop-camp locations on 10/29/2014. No historic properties were found during the survey. Based on professional judgment and the absent of known historic properties in the project area and the general region, this project will have no adverse effect *36 CFR 800.5(b)* on any known cultural resource.

**Native American Religious Concerns:** No Native American religious concerns are known in the area, and none have been noted by Tribal authorities. Should recommended inventories or future consultations with Tribal authorities reveal the existence of such sensitive properties, appropriate mitigation and/or protection measures may be undertaken.

**Threatened and Endangered Wildlife Species:** There are no threatened or endangered animal species that are known to inhabit or derive important use from the project area. Impacts to terrestrial wildlife were adequately addressed in the parent document (DOI-BLM-CO-N05-2014-0057-EA). There are no additional wildlife concerns or issues associated with the Proposed Action.

**Threatened and Endangered Plant Species:** There are no threatened or endangered plant species that are known to inhabit or derive important use from the project area.

### **Mitigation Carried Forward from DOI-BLM-CO-N05-2014-0057-EA**

1. When working on lands administered by the BLM WRFO, notify Craig Interagency Dispatch (970-826-5037) in the event of any fire. The reporting party will inform the dispatch center of fire location, size, status, smoke color, aspect, fuel type, and provide their contact information. The reporting party, or a representative of, should remain nearby, in a safe location, in order to make contact with incoming fire resources to expedite actions taken towards an appropriate management response. The applicant will not engage in any fire suppression activities outside the approved project area. Accidental ignitions will be suppressed by the applicant only if safety is not endangered and if the fire can be safely contained using hand tools and portable hand pumps. If chemical fire extinguishers are used the applicant must notify incoming fire resources on extinguisher type and the location of use. Natural ignitions caused by lightning will be managed by Federal fire personnel. The use of heavy equipment for fire suppression is prohibited, unless authorized by the Field Office Manager.
2. Grazing permittees will be notified by a BLM Rangeland Specialist if commercial SRPs or filming permits are authorized or proposed in their permitted grazing allotment.
3. SRP holders should ensure all equipment and animals that may be carrying seeds are free from noxious weeds seeds and propagules before coming onto BLM lands.

### **Tribes, Individuals, Organizations, or Agencies Consulted**

None.

## Conclusion

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

Therese E. Walther

Field Manager

12/22/2014

Date

# Appendix A. Figures

Figure 1-Sudden Impact Drop Camp Locations

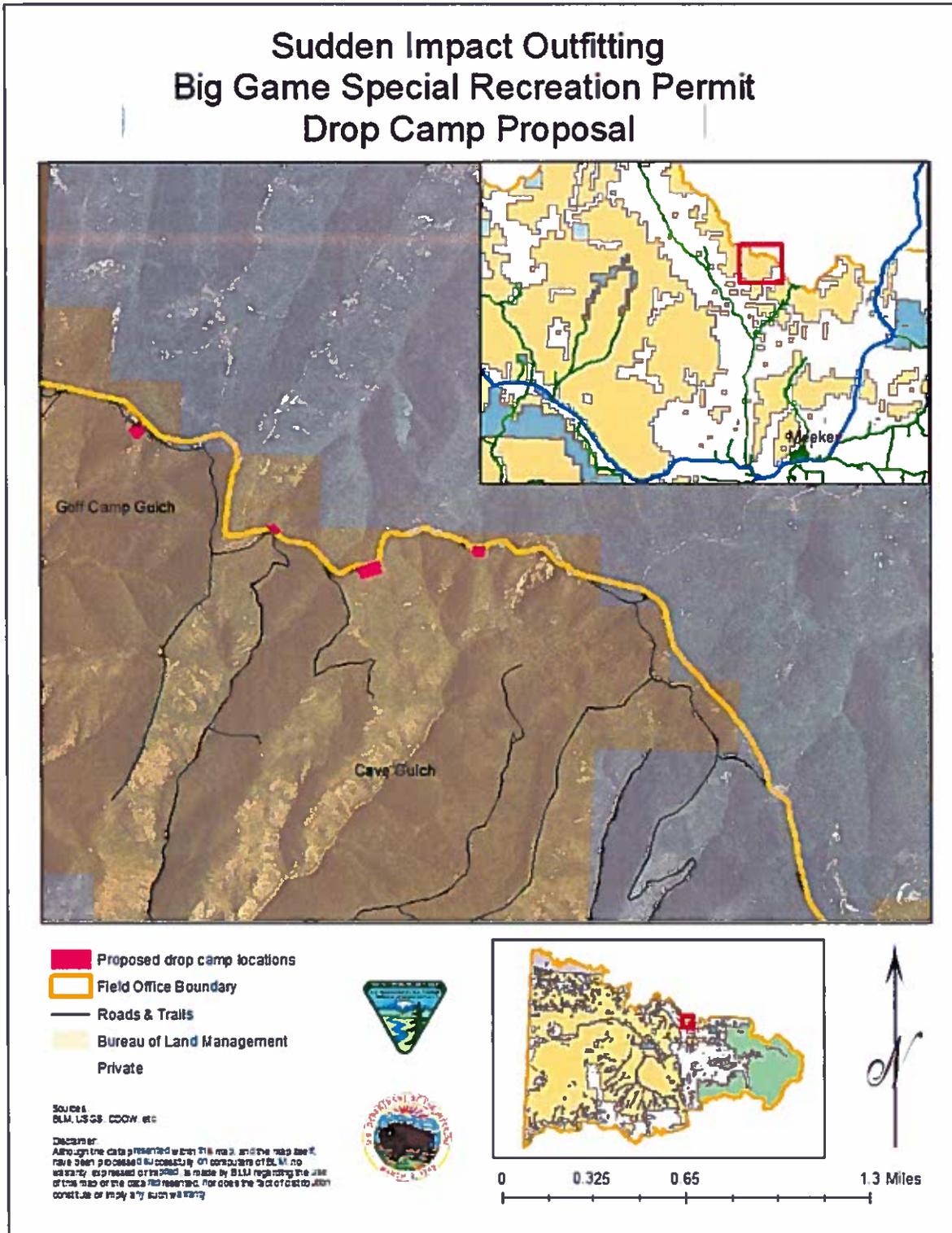


Figure 2- Detailed map of camps 1 and 2

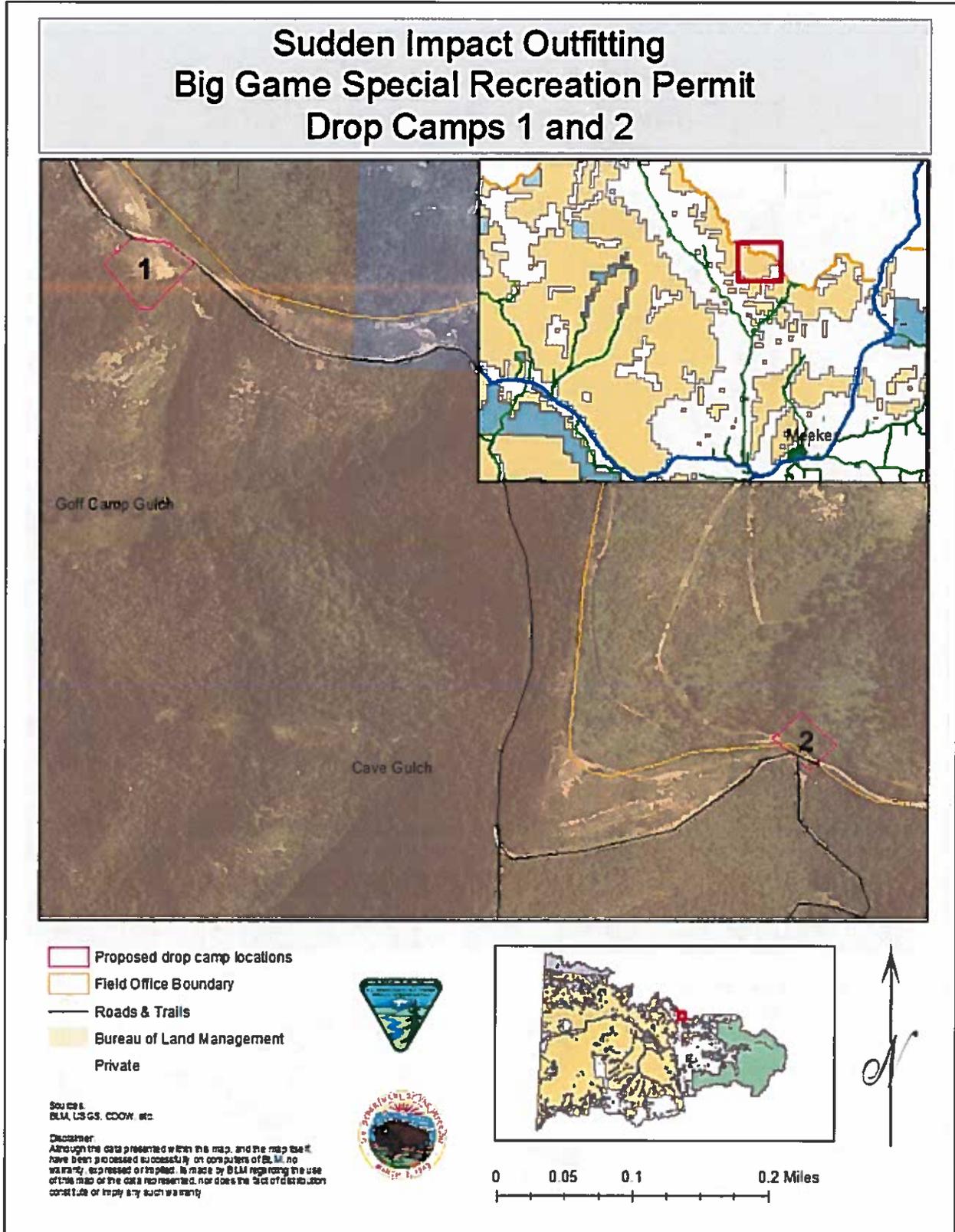
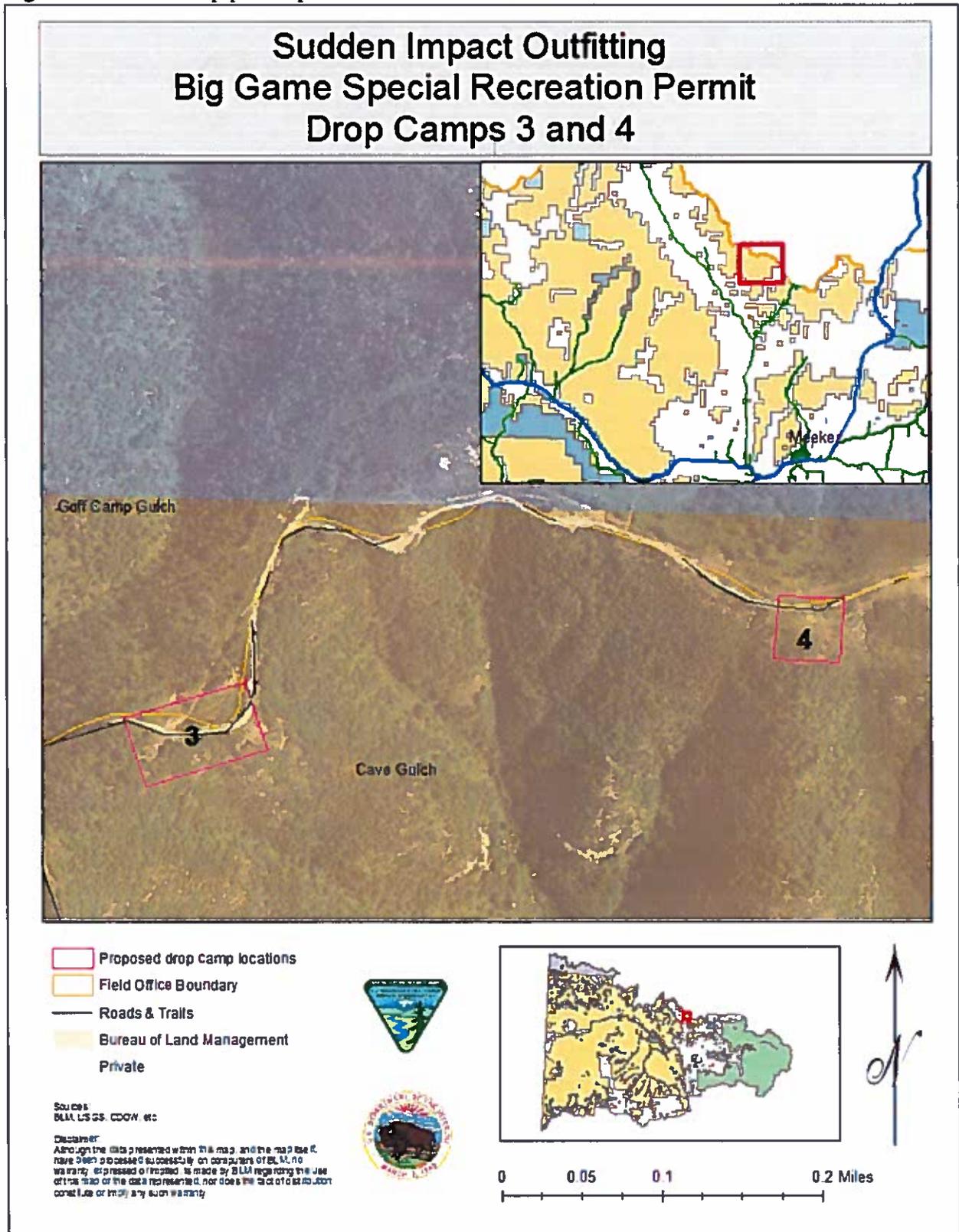


Figure 3-Detailed map of camps 3 and 4



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## DECISION RECORD

*Sudden Impact Outfitters-Big Game Special Recreation Permit Drop Camps*  
**DOI-BLM-CO-N05-2015-0008-DNA**

### Decision

It is my decision to implement the Proposed Action as described in DOI-BLM-CO-N05-2015-0008-DNA, authorizing Ryan Plumb dba Sudden Impact Outfitters the use of four drops camps for areas identified within the White River Field Office only (Figures 1, 2, and 3). All use is authorized to the south side of the adjacent unnumbered BLM road. Use of areas on the north side of the road is not authorized at this time. The areas north of the road are located within the Little Snake Field Office (LSFO). The LSFO is not issuing any new special recreation permits, including authorizing any new use of areas on joint permits, until a capacity study has been completed. No more than two of these camps are authorized to be used at the same time.

### ***Applicant Committed Design Features***

The applicant has signed and agreed to the BLM Colorado-Special Recreation Permits Terms, Conditions, and Stipulations for all permitted activities. The full document can be found at: [BLM-CO SRP Stipulations, Terms, and Conditions](#). Particular stipulations in this document that pertain to this proposal include but are not limited to:

#### **VI. NON-EXCLUSIVE USE**

A. Roads, trails and trailheads, or campsites commonly in public use shall not be blocked or enclosed by the permittee.

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### ***BLM Required Conditions of Approval to Mitigate Impacts to Cultural and Paleontological Resources***

1. The applicant is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
2. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the AO. The applicant will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. The applicant, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.
3. Pursuant to 43 CFR 10.4(g), the applicant must notify the AO, by telephone and written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), the operator must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.

### ***Mitigation Measures Carried Forward from DOI-BLM-CO-N05-2014-0057-EA***

1. When working on lands administered by the BLM WRFO, notify Craig Interagency Dispatch (970-826-5037) in the event of any fire. The reporting party will inform the dispatch center of fire location, size, status, smoke color, aspect, fuel type, and provide their contact information. The reporting party, or a representative of, should remain nearby, in a safe location, in order to make contact with incoming fire resources to expedite actions taken towards an appropriate management response. The applicant will not engage in any fire suppression activities outside the approved project area. Accidental ignitions will be suppressed by the applicant only if safety is not endangered and if the fire can be safely contained using hand tools and portable hand pumps. If chemical fire extinguishers are used the applicant must notify incoming fire resources on extinguisher type and the location of use. Natural ignitions caused by lightning will be managed by Federal fire personnel. The use of heavy equipment for fire suppression is prohibited, unless authorized by the Field Office Manager.
2. Grazing permittees will be notified by a BLM Rangeland Specialist if commercial SRPs or filming permits are authorized or proposed in their permitted grazing allotment.
3. SRP holders should ensure all equipment and animals that may be carrying seeds are free from noxious weeds seeds and propagules before coming onto BLM lands.

## **Compliance with Laws & Conformance with the Land Use Plan**

This decision is in compliance with the Endangered Species Act and the National Historic Preservation Act. It is also in conformance with the 1997 White River Record of Decision/Approved Resource Management Plan.

## **Environmental Analysis and Finding of No Significant Impact**

The Proposed Action was analyzed in DOI-BLM-N05-2014-0057-EA and it was found to have no significant impacts, thus an EIS is not required.

## **Public Involvement**

This project was posted on the BLM's ePlanning on-line National Environmental Policy Act (NEPA) register on 11/18/2014. No comments or inquiries have been received.

## **Rationale**

These camps are likely to increase and diversify the recreational opportunities that Sudden Impact Outfitters offer to the public. This decision also provides improved big game hunting and camping experiences on BLM lands in this area that were previously not available to the public. Analysis of the Proposed Action has concluded that there are no significant negative impacts and that it meets Colorado Standards for Public Land Health.

## **Monitoring and Compliance**

On-going compliance inspections and monitoring will be conducted by the BLM White River Field Office staff during the time when camps are in operation. Specific mitigation developed in this document will be followed. The applicant will be notified of compliance related issues, and depending on the nature of the issue(s), will be provided 30 days to resolve such issues.

## **Administrative Remedies**

### Process for Appeals

An appeal is an opportunity for a qualified party to obtain a review of a BLM decision by an independent board of Administrative judges within the Department of Interior's Board of Land Appeals (IBLA). The IBLA determines whether the BLM followed applicable laws and regulations, adhered to established policies and procedures, and considered relevant information in reaching a decision.

Individuals, who believe they are adversely affected by a BLM decision to deny, modify or cancel a Special Recreation Permit (SRP) may appeal the decision. Appeals are made to the IBLA under Title 43 C.F.R., Part 4, pursuant to 43 C.F.R. §4.411. A person who wishes to appeal to the IBLA must file in the office of the officer who made the decision a notice that he wishes to appeal. "Information on Taking Appeals to the Board of Land Appeals" is enclosed for your convenience.

Form 1842-1 Information on Taking Appeals to the Interior Board of Lands Appeals is attached.

**General**

Any appeal of this decision must follow the procedures set forth in 43 CFR Part 4. Within 30 days of the decision, a Notice of Appeal must be filed in the office of the Authorized Officer at White River Field Office, 220 East Market St., Meeker, CO 81641 with copies sent to the Regional Solicitor, Rocky Mountain Region, 755 Parfet St., Suite 151, Lakewood, CO 80215, and to the Department of the Interior, Board of Land Appeals, 801 North Quincy St., MS300-QC, Arlington, VA, 22203. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals at the above address within 30 days after the Notice of Appeal is filed with the Authorized Officer.

**Signature of Authorized Official**



Field Manager



Date

