

United States Department of the Interior  
Bureau of Land Management

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Determination of NEPA Adequacy  
DOI-BLM-UT-G021-2015-0052-DNA

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June 2015

**Tim Kemple, INC Film Permit**

**Location:** *Eardley and Zero Gravity Trailheads and the  
Wedge Overlook in Emery County, Utah*

*T. 23 S., R. 13 E., Salt Lake Meridian, Emery County, Utah  
Section 27, 28, and 34.*

*T. 19 S., R. 10 E., Salt Lake Meridian, Emery County, Utah  
Section 11.*

**Applicant/Address:** *Tim Kemple, INC  
1905 West 4700 South  
Salt Lake City, UT 84129*

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U.S. Department of the Interior  
Bureau of Land Management  
Green River District, Price Field Office  
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**Worksheet**  
**Determination of NEPA Adequacy**  
U.S. Department of the Interior  
Utah Bureau of Land Management

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The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

OFFICE: Price Field Office

TRACKING NUMBER: DOI-BLM-UT-G021-2015-0052-DNA

FILE/SERIAL NUMBER: UTU-91231

PROPOSED ACTION TITLE/TYPE: Tim Kemple, INC. / Filming Permit

LOCATION/LEGAL DESCRIPTION:

Eardley and Zero Gravity Canyon's  
Wedge Overlook

T. 23 S., R. 13 E., Salt Lake Meridian, Emery County, Utah  
Section 27, 28, and 34.

T. 19 S., R. 10 E., Salt Lake Meridian, Emery County, Utah  
Section 11.

APPLICANT: Tim Kemple, INC.

**A. Description of the Proposed Action and Any Applicable Mitigation Measures**

On June 18, 2015, Tim Kemple, INC. filed a film permit application for four days of filming from June 23-26, 2015. The company proposes to take still photographs of three athletes hiking the Eardley and Zero Gravity Canyon trails and camping at the Wedge Overlook. The film crew would consist of 8 people, with hand held cameras and a tripod. Access would be via established routes and trails. No vehicles would be driven off-road and the crew would walk to the site. The trails would not be blocked and the flow of recreational activity would not be disrupted.

The proposed filming locations are within a Wilderness Study Area. In 2006 an Environmental Assessment for *No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument* (UT-USO-06-004) was written. This proposal conforms to the criteria for No-Impact Commercial Filming in that document. It also meets the non-impairment standard defined in BLM Handbook H-8550-1. BLM Manual 6330 - Management of BLM Wilderness Study Areas, states: All offices should notify interested parties of proposed actions on WSAs in their jurisdiction. The proposed project was posted on the EPlanning public notification website on June 19, 2015.

## **B. Land Use Plan (LUP) Conformance**

**LUP Name:** Price Field Office Record of Decision  
& Approved Resource Management Plan

**Date Approved:** October 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):

Page 115 of the Price Field Office RMP reads as follows: *“Maintain availability of public lands to meet the habitation, cultivation, trade, mineral development, recreation, and manufacturing needs of external customers and the general public”* and decision LAR-5, which states *“Permit commercial filming on a case-by-case basis subject to a NEPA process.”*

## **C. Identify the applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

List by name and date all applicable NEPA documents that cover the proposed action:

- No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (UT-USO-06-004 - EA).
- The Federal Land Policy and Management Act of 1976 (Public Law 94-579, as amended) (FLPMA) augmented by Public Law 106-206, authorizes the BLM to regulate commercial filming activities on Federal lands.
- Existing WSAs are managed under the BLM’s Manual 6330, and guidelines for Lands Under Wilderness Review (BLM Handbook H-8550-1). The major objective of the policy is to manage lands under wilderness review in a manner that does not impair their suitability for designation as wilderness. In general, the only activities permissible under the policy are temporary uses that do not create surface disturbance or involve permanent placement of structures. Manual 6330 states that *Any permit or lease issued under 43 CFR 2920 must contain a stipulation that if the WSA is designated as a wilderness area, the lease or permit may be terminated, and Commercial filming may be permitted under 43 CFR 2920 if it is determined to meet the non-impairment standard or one of the exceptions.*
- As defined by the National Historic Preservation Act (NHPA), the proposed action is an undertaking. However, in accordance with the implementing regulations set forth at 36 CFR 800.3(a)(1), the proposed action has no potential to cause effects to historic properties, even assuming that historic properties might be present. Therefore, beyond documenting a finding of *no potential to cause effects*, no additional efforts are required in order to comply with Section 106 of NHPA. Additionally, in accordance with the Utah Protocol which may be followed by the Price Field Office, Section VII.C.1 provides additional exemption from further compliance efforts. This action is in conformance with the NHPA and no further compliance efforts are required.

## **D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? 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(s)? If there are differences, can you explain why they are not substantial?**

Yes

No

Documentation of answer and explanation:

The UT-USO-06-004 - EA analyzed and described the resource values that could be affected by proposed filming within the Wilderness Study Areas and the Grand Staircase-Escalante National Monument. The criteria for No-Impact Commercial Filming in this EA are as follows:

Filming would be by use of hand-held cameras or cameras with tripods. Walking, hiking, and horseback riding on existing trails and cross country would occur. All vehicle use would occur only on boundary roads and vehicle ways designated in the respective land use plan as open to vehicular use. Duration of filming in any one location would be less than 10 days, with the typical time being an average of 1-3 days. The total number of personnel associated with this type of filming would typically be 5 or fewer people. While the filming proposal by Tim Kemple, INC. does involve 8 people, it is not anticipated that there would be more impact from 8 people for four days than 5 people for 10 days.

There would be no removal of vegetation or soils; no use of dollies, tracks, cranes, high lines or other major camera support devices or platforms; no construction of movie sets; no use of props or artificial lighting; no use of explosives, pyrotechnics, or fires; no climbing (or the appearance of climbing) on natural bridges or arches, in archaeological sites, or within breeding habitats of threatened or endangered species. There would be no use of exotic species. No vehicular cross country travel (except as previously discussed) would be allowed. No use of heavy equipment would be allowed. No taking off or landing, or flying of aircraft less than 2,000 feet above the ground surface would be permitted. Public access would not be restricted as a result of no-impact commercial filming activities.

The proposal will be screened by local staff to ensure it meets the non-impairment standard.

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

Yes

No

Documentation of answer and explanation:

The alternatives considered in the UT-USO-06-004 - EA, dated September 6, 2006, are appropriate given the detailed response to identified issues and the analysis targeted to protection of resource values that may be affected by the proponent's filming. Within the UT-USO-06-004 - EA, the BLM analyzed two alternatives, the Proposed Action and the No Action. Within the range of alternatives considered in the UT-USO-06-004 - EA the BLM included mitigation measures to minimize impacts to resources of interest/concern. The UT-USO-06-004 - EA effectively analyzed and disclosed any known potential impacts to resources of interest/concern. No significant new information or circumstances have been identified for any of these resources which would render the existing analysis inadequate for approving the filming application.

**3. Is existing analysis adequate in light of any new information or circumstances (such as, rangeland health standards assessment; recent endangered species listings, updated list 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?**

- Yes
- No

Documentation of answer and explanation:

The UT-USO-06-004 - EA effectively analyzed and disclosed any known potential impacts to the resources of interest/concern. No significant new information or circumstances have been identified for any of these resources which would render the existing analysis inadequate for approving the filming project.

**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?**

- Yes
- No

Documentation of answer and explanation:

The UT-USO-06-004 - EA included a comprehensive environmental analysis of the direct, indirect, and cumulative impacts of filming in WSAs. The UT-USO-06-004 - EA analyzed up to 50 applications per year for no-impact filming in WSAs. The one filming proposal addressed in this DNA is part of the 50 proposals addressed and conceptually analyzed in the UT-USO-06-004 - EA. No significant new information or circumstances have been identified which would render the existing analysis inadequate for approving the filming permit.

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

- Yes
- No

Documentation of answer and explanation:

During the development of the UT-USO-06-004 - EA the BLM made diligent efforts to invite and solicit comments from the affected and interested public. Copies of the EA were mailed to the Southern Utah Wilderness Alliance, the Utah Chapter of the Sierra Club and the Wilderness Society. Notice of the proposed action was posted on the Utah ENBB on May 8, 2006. The comment period was open from May 8, 2006 through June 7, 2006. No comments were received.

**E. Persons/Agencies/BLM Staff Consulted:**

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Amanda Harrington	Realty Specialist / Project Lead	Lands / Access
Michael Wolfe	Archeologist	Native American Consultation, Cultural Resources
Matt Blocker	Outdoor Recreation Planner	BLM Natural Areas, National Trails and Backways, Wild and Scenic Rivers, Wilderness, Recreation
Josh Winkler	Outdoor Recreation Planner	ACEC, Visuals, Recreation
Kelly Buckner	Environmental Coordinator	NEPA, Environmental Justice, Socio-Economics
Stephanie Bauer	Rangeland Management Specialist	Vegetation, Livestock, Rangeland Health
Stephanie Bauer	Rangeland Management Specialist	Invasive Species / Noxious Weeds, Woodlands / Forestry
Mike Leschin	Geologist/Paleontology	Paleontology
Kelly Buckner	Planning and Environmental Coordinator	Fuels / Fire Management
Stephanie Bauer	Range Management Specialist	Wild Horses & Burros
Jared Reese	Wildlife Biologist	T & E, BLM Sensitive, Migratory Birds, Non-USFWS Designated, Wildlife
Chris Conrad	Geologist	Geology / Minerals / Energy Production
Kelly Buckner/Chris Conrad	Planning and Environmental Coordinator Geologist	Air Quality, Farmlands, Floodplains, Water Quality, Wetland / Riparian, Soils, Wastes,

**CONCLUSION**

Plan Conformance:

- This proposal conforms to the applicable land use plan.
- This proposal does not conform to the applicable land use plan.

Determination of NEPA Adequacy

- Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes the BLM's compliance with the requirements of the NEPA.
- The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.

Amanda Harrington  
Signature of Project Lead

4-22-15  
Date

Don Janssen  
Signature of the Responsible Official

6-22-15  
Date

**Note:** The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

**ATTACHMENTS:**

- ID Team Checklist
- Maps

## INTERDISCIPLINARY TEAM CHECKLIST

**Project Title:** Tim Kemple, INC

**NEPA Log Number:** DOI-BLM-UT-G021-2015-0052-DNA

**File/Serial Number:** UTU-91231

**Project Leader:** Amanda Harrington

**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 need 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 for Determination column may include NI and NP discussions.

Determination	Resource/Issue	Rationale for Determination	Signature	Date
<b>RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)</b>				
NI	Air Quality & Greenhouse Gas Emissions	Overall, air quality in the project area is considered to be in attainment of the NAAQS. There are no regulatory monitoring data for the project area. Dust emissions currently occur from vehicles utilizing the subject roads. It is anticipated that the incremental change from this project's alternatives would be so small as to be undetectable by both models and monitors.	Kelly Buckner	6/22/2015
NC	BLM natural areas	There are BLM natural areas within the proposed project area. The proposed action satisfies the non-impairment criteria and will not adversely affect the wilderness characteristics in the area.	Matt Blocker	6/22/2015
NI	Cultural Resources	The Area of Potential Effect for the proposed Tim Kemple, INC Film Permit meets the definition for a small routine undertaking under the Programmatic Agreement Between the ACHP, the BLM-Utah and the USHPO per 36CFR800.3(a)(1). The nature of the proposed action is such that no impact can be expected on significant cultural resources. Temporary/day use will not include any ground disturbance activities.	Michael Wolfe	6/22/2015
NC	Cultural: Native American Religious Concerns	No Native American concerns are known in the project area, and none have been noted by Ute tribal authorities. Recent consultations with tribal authorities have indicated that consultation is not desired for projects that have no potential to affect known cultural sites.	Michael Wolfe	6/22/2015
NI	Designated Areas: Areas of Critical Environmental Concern	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas (EA UT-USO-06-004)" was adequate, no further analysis or decision is required. This type of filming will have no impacts to the ACEC's located in our area.	Josh Winkler	6/22/2015
NP	Designated Areas: National Trails and Backways	There are no National Trails or Backways within the proposed project area as per review of RMP/GIS maps.	Matt Blocker	6/22/2015

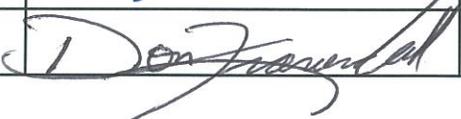
Determination	Resource/Issue	Rationale for Determination	Signature	Date
NP	Designated Areas: Wild and Scenic Rivers	There are no Wild and Scenic Rivers within the project area as per review of RMP/GIS maps.	Matt Blocker	6/22/2015
NC	Designated Areas: Wilderness Study Areas	The proposed action lies within San Rafael Reef WSA but the use in accordance to the RMP and will have little impact because of the small group size and the mode of transportation being hiking.	Matt Blocker	6/22/2015
NC	Environmental Justice	No minority or economically disadvantaged communities or populations would be disproportionately adversely affected by the proposed action or alternatives.	Kelly Buckner	6/22/2015
NP	Farmlands (prime/unique)	According to the NRCS soils surveys and knowledge of the soils, there are no prime and unique soils mapped within the project area.	Kelly Buckner	6/22/2015
NC	Fuels/Fire Management	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate, no further analysis or decision is required.	Kelly Buckner	6/22/2015
NI	Geology / Minerals / Energy Production	The proposal will not negatively affect mineral resources. The project is short-term, non-destructive, and no impacts will occur. Mineral exploration and or extraction could be accomplished at other times if appropriate and authorized by the RMP and NEPA analysis.	Chris Conrad	6/22/2015
NC	Lands/Access	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate, no further analysis or decision is required.	Amanda Harrington	6/22/2015
NC	Lands with wilderness Characteristics	The proposed action is located within lands with wilderness characteristics but will not have an impact to those wilderness characteristics	Matt Blocker	6/22/2015
NC	Livestock Grazing	The limited amount of proposed use during filming is not expected to disturb livestock grazing on BLM lands. The landscape associated with Utah's WSAs result in scattered livestock, use that would not be affected by the proposed action. When compared to the normal public activity on BLM lands the proposal is not expected to affect livestock grazing activities on BLM lands	Stephanie Bauer	6/22/2015
NC	Paleontology	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate, no further analysis or decision is required.	Michael Leschin	6/22/2015

Determination	Resource/Issue	Rationale for Determination	Signature	Date
NC	Vegetation: BLM Sensitive	Because no surface disturbance would occur as a result of implementation of the proposed action, no adverse impacts to non-listed special status plant species is anticipated.	Stephanie Bauer	6/22/2015
NI	Vegetation: Invasive Species / Noxious Weeds	According to the proposal, no surface disturbing activities will take place. Following stipulations attached to permit, such as making sure equipment and clothing are free of mud and debris would help to eliminate accidental introduction/spread of invasive species/noxious weeds. By following stipulations, impacts to invasive species/noxious weeds would be negligible.	Stephanie Bauer	6/22/2015
NC	Vegetation: Threatened, Endangered, Proposed, or Candidate	Because no surface disturbance would result from the implementation of the proposed action, BLM has determined that there would be "No Effect" to listed threatened or endangered plant species. No adverse impact would occur to candidate plant species.	Stephanie Bauer	6/22/2015
NC	Vegetation: Vegetation Excluding USFW Designated Species and BLM Sensitive Species	Because no surface disturbance would occur as a result of implementation of the proposed action, no adverse impacts to non-listed special status plant species is anticipated.	Stephanie Bauer	6/22/2015
NC	Vegetation: Wetland/Riparian	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate, no further analysis or decision is required.	Stephanie Bauer	6/22/2015
NP	Vegetation: Woodlands/ Forestry	There are no merchantable woodlands/forestry products within the project area.	Stephanie Bauer	6/22/2015
NC	Rangeland Health Standards	The scattered and limited nature of the proposed use will not affect Rangeland Health Standards (RHS). The level of proposed use on these vast acres would not affect these lands ability to meet RHS. The proposed use would not prevent the BLM from implementing the Guidelines for Livestock management if this would be necessary due to rangelands not meeting standards for other reasons.	Stephanie Bauer	6/22/2015
NC	Recreation	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate, no further analysis or decision is required.	Josh Winkler	6/22/2015
NC	Socio-Economics	No impact to the social or economic status of the county or nearby communities would occur from this project due to its small size in relation to ongoing development throughout the PFO.	Kelly Buckner	6/22/2015

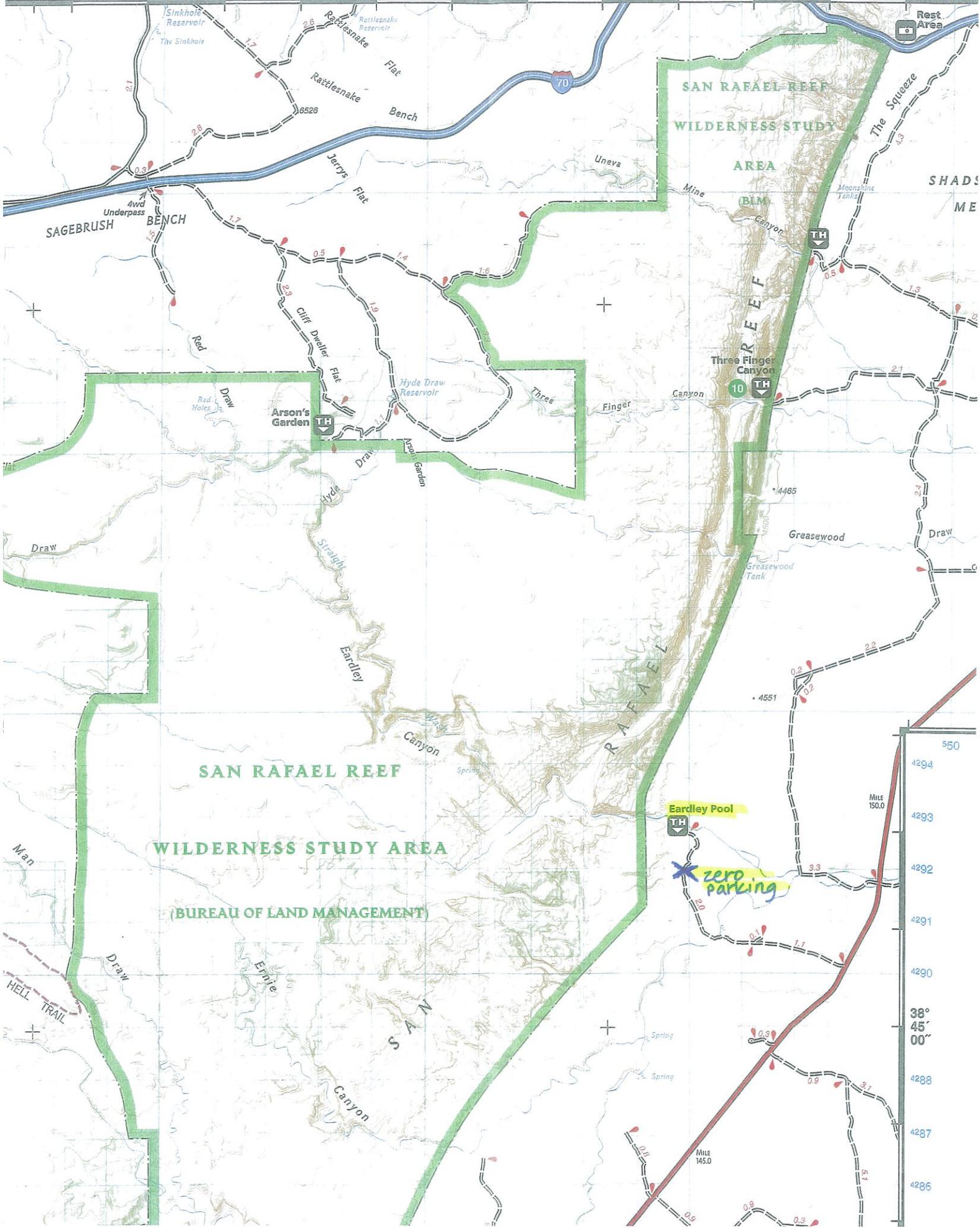
Determination	Resource/Issue	Rationale for Determination	Signature	Date
NC	Soils	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate. No further analysis or decision is required.	Chris Conrad	6/22/2015
NC	Visual Resources	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate. no further analysis or decision is required.	Josh Winkler	6/22/2015
NI	Wastes (hazardous/solid)	No chemicals subject to reporting under SARA Title III will be used, produced, stored, transported, or disposed of annually in association with the project. Furthermore, no extremely hazardous substances, as defined in 40 CFR 355, in threshold planning quantities, will be used, produced, stored, transported, or disposed of in association with the project.  Trash would be confined in a covered container and disposed of in an approved landfill. No burning of any waste will occur due to this project. Human waste will be disposed of in an appropriate manner in an approved sewage treatment center.	Kelly Buckner	6/22/2015
NC	Water: Floodplains	After an inspection of USGS 7.5 minute maps of the area, it is determined no floodplains as defined by EO 11988, FEMA, or Corps of Engineers is found on or near the project area	Chris Conrad	6/22/2015
NC	Water: Groundwater Quality	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate. no further analysis or decision is required.	Chris Conrad	6/22/2015
NC	Water: Hydrologic Conditions (stormwater)	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate. no further analysis or decision is required.	Chris Conrad	6/22/2015
NC	Water: Surface Water Quality	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate. no further analysis or decision is required.	Chris Conrad	6/22/2015

Determination	Resource/Issue	Rationale for Determination	Signature	Date
NC	Wildlife: BLM Sensitive	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate, no further analysis or decision is required.	Jared Reese	6/22/2015
NC	Wildlife: Migratory Birds (including raptors)	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate, no further analysis or decision is required.	Jared Reese	6/22/2015
NC	Wildlife: Non-USFWS Designated	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate, no further analysis or decision is required.	Jared Reese	6/22/2015
NC	Wildlife: Threatened, Endangered, Proposed or Candidate	The NEPA analysis in the "No-Impact Commercial Filming on BLM-Managed Lands in Utah within Wilderness Study Areas and the Grand Staircase-Escalante National Monument - Environmental Assessment (EA UT-USO-06-004)" was adequate, no further analysis or decision is required.  Is the proposed project in sage grouse PPH or PGH? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If the answer is 'Yes,' the project must conform with WO IM 2012-043.	Jared Reese	6/22/2015

**FINAL REVIEW:**

Reviewer Title	Signature	Date	Comments
Environmental Coordinator		6-22-2015	
Authorized Officer		6-22-2015	

10°37'30" 534 535 536 537 538 539 540 541 542 110°30'00" 545 546 547 548 549 55000m



**SAN RAFAEL REEF**  
**WILDERNESS STUDY AREA**  
(BUREAU OF LAND MANAGEMENT)

**SAN RAFAEL REEF**  
**WILDERNESS STUDY**  
**AREA**

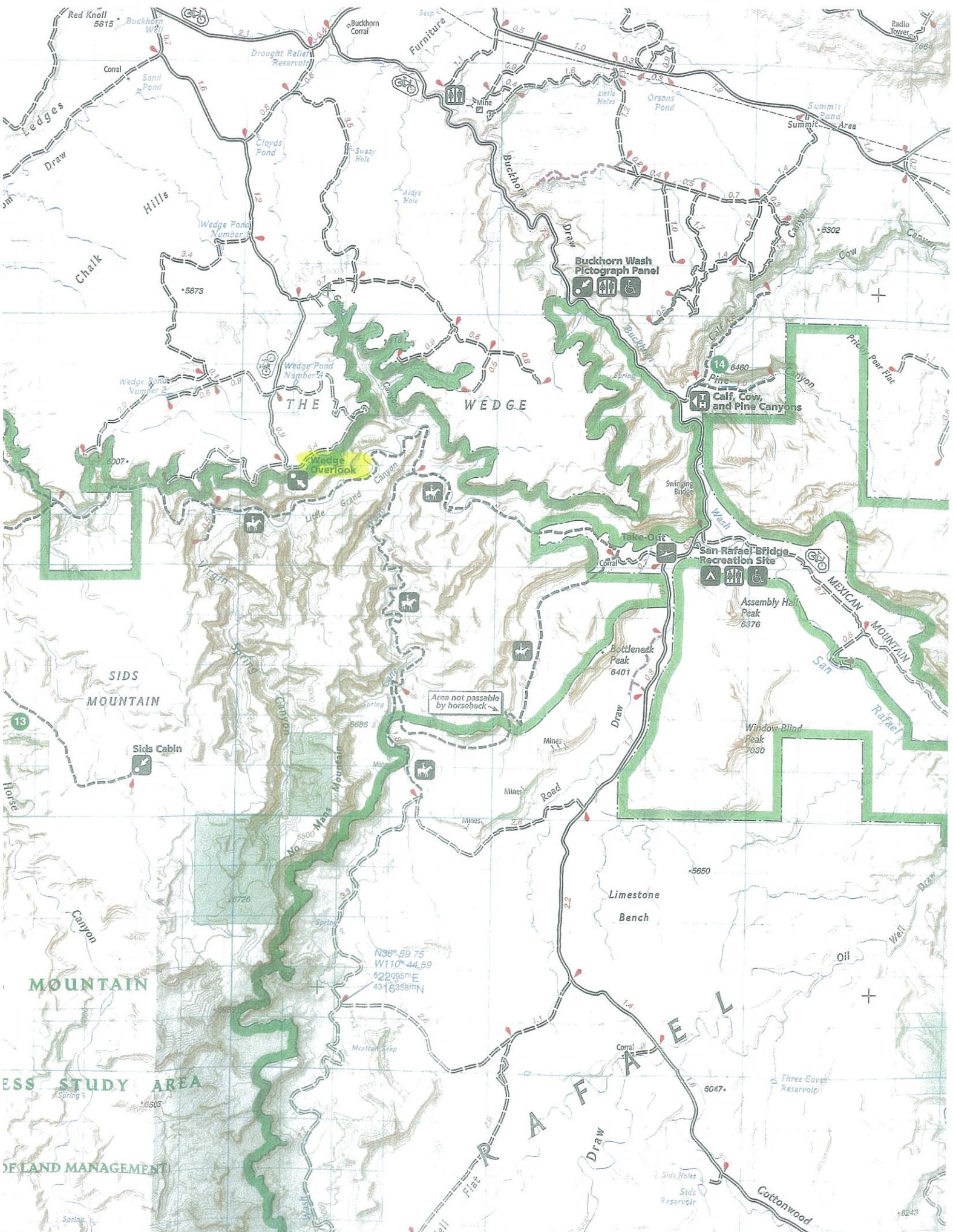
Three Finger Canyon

Eardley Pool  
zero parking



HELL TRAIL

SHAD S  
ME



ESS STUDY AREA  
LAND MANAGEMENT

N36° 59' 75"  
W110° 44' 59"  
E522095  
M56144

Area not passable by horseback

