

# United States Department of the Interior Bureau of Land Management

**Determination of NEPA Adequacy  
DOI-BLM-UT-Y010-2015-0216 DNA**

## **Special Recreation Permit for RIDGE Mountain Academy August 2015**

*Location: Designated mountain bike trails within the Moab Field Office:*

Amasa Back/ Ahab/ Rockstacker/ Pothole/ Jackson, Bar M Mountain Bike Focus Area/  
Moab Brand trails, Bartlett and Jedi Slickrock, Blue Hills Road, Gemini Bridges/  
Magnificent Seven trails, Kane Creek Road and Hurrah Pass, Klondike Bluffs Mountain  
Bike Focus Area, Klonzo, Kokopelli's Trail, Long Canyon, Lower Porcupine Singletrack (LPS)/Lazy Man's/  
Porcupine Rim, Mineral Bottom Road, Monitor and Merrimac,  
Navajo Rocks, Onion Creek Road, Pipe Dream, Potash Road, Sand Flats Road, Shafer Trail (BLM portion),  
Slickrock, , Sovereign trail (BLM portion), Moab Canyon and Highway  
128 Paved Paths

*Hiking:* Corona Arch Trail, Fisher Towers Trail, Amphitheater Loop trail and  
Portal Overlook Trail, Moab Rim, Hidden Valley trail, Negro Bill Trail, Hunter Canyon,  
Tibbetts Arch, Amphitheater Loop, Mill Canyon Dinosaur Trail and Track Site

*Canyoneering:*

Pritchett Canyon Loop/ Rock of Ages, Culvert Canyon/ Cameltoe and Entrajo Canyon

*Climbing:*

Highway 128/ River Road: Big Bend Boulders, River Road Dihedrals, Take Out Beach  
Crag/ Cinema, Lighthouse and Dolomite Towers, Castleton Group and Parriot Mesa/ Crooked Arrow Spire, Fi  
Towers  
Kane Creek: Abraxis Wall Bakery, Ice Cream Parlor, Predator , Space Tower, Tombstone  
Poash Road: Wall Street routes excluding routes inside of the Williams Bottom Campground,  
Culvert and Day Canyon, The Scar, Kings Hand, Reptillian Wall and Off Width City  
Sand Flats Recreation Area: Elvis's Hammer and Rhino Horn  
Highway 313: Hunchback  
North Tusher: House of Putterman, Determination Towers, Echo Tower, Monitor /Merrimac Buttes

***Applicant/Address:* William O'Donnell, 231 First St. Whitefish, MT 59937**

Moab Field Office  
82 East Dogwood  
Moab, Utah 84532  
Phone: 435-259-2100  
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Environmental Assessment DOI-BLM-UT-Y010-2010-0082 *Special Recreation Permit for Jackson Hole Mountain Guides*, signed February 2010. This covers the climbing locations Environmental Assessment DOI-BLM-UT-Y010-2013-0224 *Special Recreation Permit Amendment For Western River Expeditions*), signed January 2, 2014. This covers the hiking locations requested. Environmental Assessment DOI-BLM-UT-Y010-2014-0076, *Special Recreation Permit for Idaho State University*, (signed March 6, 2014) analyzed use of the designated mountain bike trails.

### 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: Yes; the existing NEPA documents address the impacts of permitted mountain bike, rock climbing, canyoneering and hiking tours within the Moab Field Office.

**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: Yes; Environmental Assessments DOI-BLM-UT-Y010-2010-0082, DOI-BLM-UT-Y010-2013-0224, and DOI-BLM-UT-Y010-2014-0076 contain analysis of the proposed action and a no action alternative. The environmental concerns, interests, resource values, and circumstances have not changed to a degree that warrants broader consideration.

**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: Yes; the existing analysis and conclusions are adequate as there has been no new information or circumstances presented. It can be reasonably concluded that all new information and circumstances are insignificant with regard to analysis of the proposed action.

**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: Yes; the direct and indirect impacts are substantially unchanged from those identified in the existing NEPA documents. Yes; site-specific impacts analyzed in the existing document are the same as those associated with the current proposed action.

**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: Yes; the public was notified of the preparation of Environmental Assessment DOI-BLM-UT-Y010-2010-0082 *Special Recreation Permit for Jackson Hole Mountain Guides*, when it was posted on ENBB January 6, 2010. *Special Recreation Permit Amendment For Western River Expeditions*, was posted on the ENBB on August 2, 2013. This included the 30-day period for WSA use. Environmental Assessment DOI-BLM-UT-Y010-2014-0076, *Special Recreation Permit for Idaho State University*, was posted on the ENBB on January 2, 2012. These notifications provided sufficient time for public involvement and interagency review.

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

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Ann Marie Aubry	Hydrologist	Air quality; Water resources; Floodplains, Soils, Wetlands/Riparian
Katie Stevens	Outdoor Recreation Planner	Areas of Critical Environmental Concern; Wild & Scenic Rivers, Recreation, Visual Resources
Jordan Davis	Rangeland Management Specialist	Invasive Weeds, Woodland/forestry, T&E Plants
Kim Allison	Rangeland Management Specialist	RHS, Livestock Grazing, Vegetation
Jordan Davis	Rangeland Management Specialist	Invasive Plants, Woodlands
Jared Lundell	Archaeologist	Cultural Resources; Native American Religious Concerns
David Pals	Geologist	Geology, Wastes
ReBecca Hunt Foster	Paleontologist	Paleontology
Pam Riddle	Wildlife Biologist	Threatened, Endangered, or Candidate Animal Species, Wildlife, Migratory Birds, Wildlife
Bill Stevens	Outdoor Recreation Planner	Wilderness, Natural Areas, Socioeconomics, Environmental Justice, Lands with Wilderness Characteristics

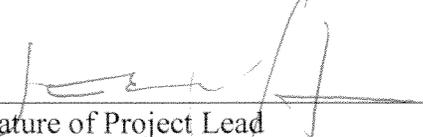
**CONCLUSION**

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 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.

 _____ Signature of Project Lead	<u>8/15/15</u> _____ Date
 _____ Signature of NEPA Coordinator	<u>8/19/15</u> _____ Date
 _____ Signature of the Responsible Official	<u>8/19/15</u> _____ 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  
WSA IMP**

## INTERDISCIPLINARY TEAM CHECKLIST

**Project Title:** Special Recreation Permit for RIDGE Mountain Academy

**NEPA Log Number:** DOI-BLM-UT-Y010-2015-0216 DNA

**File/Serial Number:** MFO-Y010-15-0101R

**Project Leader:** Jennifer Jones

**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 column may include NI and NP discussions.

The following elements are not present in the Moab Field Office and have been removed from the checklist:  
Farmlands (Prime or Unique), Wild Horses and Burros.

Determi- nation	Resource	Rationale for Determination*	Signature	Date
<b>RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)</b>				
NC	Air Quality Greenhouse Gas Emissions		Ann Marie Aubry <i>ANA</i>	8-18-15
NC	Floodplains		Ann Marie Aubry <i>Ana</i>	8-18-15
NC	Soils		Ann Marie Aubry <i>ANA</i>	8-18-15
NC	Water Resources/Quality (drinking/surface/ground)		Ann Marie Aubry <i>ANA</i>	8-18-15
NC	Wetlands/Riparian Zones		Ann Marie Aubry <i>Ana</i>	8-18-15
NC	Areas of Critical Environmental Concern		Katie Stevens <i>KS</i>	8/18/15
NC	Recreation		Katie Stevens <i>KS</i>	8/18/15
NC	Wild and Scenic Rivers		Katie Stevens <i>KS</i>	8/18/15
NC	Visual Resources		Katie Stevens <i>KS</i>	8/18/15
NC	Wild Lands (BLM Natural Areas)		Bill Stevens <i>BY</i>	8-18-15
NC	Socio-Economics		Bill Stevens <i>BY</i>	8-18-15
NC	Wilderness/WSA		Bill Stevens <i>BY</i>	8-18-15
NC	Lands with Wilderness Characteristics		Bill Stevens <i>BY</i>	8-18-15

Determination	Resource	Rationale for Determination*	Signature	Date
NC	Cultural Resources		Jared Lundell	
NC	Native American Religious Concerns		Jared Lundell	
NC	Environmental Justice		Bill Stevens <i>BS</i>	8-18-15
NC	Wastes (hazardous or solid)		David Pals <i>DP</i>	8/18/15
NC	Threatened, Endangered or Candidate Animal Species		Pam Riddle	8/18/15
NC	Migratory Birds		Pam Riddle	8/18/15
NC	Utah BLM Sensitive Species		Pam Riddle	8/18/15
NC	Fish and Wildlife Excluding USFW Designated Species		Pam Riddle	8/18/15
NC	Invasive Species/Noxious Weeds		Dave Williams <i>DW</i>	8/18/15
NC	Threatened, Endangered or Candidate Plant Species		Dave Williams <i>DW</i>	8/18/15
NC	Livestock Grazing	<i>JK</i>	Dave Williams/ Jordan Davis/ Kim Allison	8/18/15
NC	Rangeland Health Standards	<i>JK</i>	Dave Williams/ Jordan Davis/ Kim Allison	8/18/15
NC	Vegetation Excluding USFW Designated Species		Kim Allison <i>KA</i>	8/18/15
NC	Woodland / Forestry		<i>[Signature]</i>	8/18/15
NC	Fuels/Fire Management		Josh Relph <i>JR</i>	8/18/15
NC	Geology / Mineral Resources/Energy Production		David Pals <i>DP</i>	8/18/15
NC	Lands/Access		Jan Denney	
NC	Paleontology		ReBecca Hunt-Foster	

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	Katie Stevens <i>KS</i>	8/19/15	
Authorized Officer	J. Rockford Smith <i>KS</i> <i>fn</i>	8/19/15	

Rock  
Smith

**FINDING OF NO SIGNIFICANT IMPACT  
AND  
DECISION RECORD**

**RIDGE Mountain Academy  
(Permitted mountain bike, hiking/ canyoneering and rock climbing)**

DOI-BLM-UT-Y010-2015-0216 DNA

**FONSI:** Based on the analysis of potential environmental impacts contained in the present document, I have determined that the action will not have a significant effect on the human environment and an environmental impact statement is therefore not required.

**DECISION:** It is my decision to issue the Special Recreation Permit RIDGE Mountain Academy to operate in the areas listed under the Proposed Action. This decision is contingent upon meeting all stipulations and monitoring requirements attached.

**RATIONALE:** The decision to authorize a Special Recreation Permit for RIDGE Mountain Academy has been made in consideration of the environmental impacts of the proposed action. The action is in conformance with the Moab Resource Management Plan, which allows for recreation use permits for a wide variety of uses to enhance outdoor recreational opportunities, provide opportunities for private enterprise, manage user-group interaction, and limit the impacts to such uses upon natural and cultural resources.

*K Stevens for Rod*                      *8/19/15*  
Authorized Officer                      Date  
*Smith*

**WILDERNESS INTERIM MANAGEMENT  
IMPAIRMENT/NON-IMPAIRMENT EVALUATION FORM**

With the passing of the deadline for completion of reclamation activities in September of 1990, only temporary, non-surface-disturbing actions that require no reclamation; grandfathered uses, and actions involving the exercise of valid existing rights can be approved within WSA's. The reference document for evaluators and managers is Manual 6330, Management of Wilderness Study Areas (July, 2012).

**DESCRIPTION OF ACTION**

Name of action: DOI-BLM-UT-Y010-2015-0216-DNA

Proposed Action:  Alternative Action: \_\_\_\_\_ (check one)

Proposed by: Ridge Academy

Description of action: Ridge Academy has requested authorization through a Special Recreation Permit (SRP) to offer canyoneering and hiking trips to participants on designated canyoneering and hiking trails in the Moab Field Office of the BLM. Trips are day use only. Two of the day hikes (Hidden Valley trail, Negro Bill Canyon trail) and one of the canyoneering routes (Rock of Ages, and one of the biking routes (Porcupine Rim) are within Wilderness Study Areas (WSA). Ridge Academy will have a maximum group size of up to 12 people, with 2-3 staff, and two groups per trip. Standard stipulations would apply to the SRP for Green Mountain College. *The only portions of the permit to be analyzed in this document are those activities within the WSAs.*

Location: Negro Bill Canyon, Hidden Valley, Rock of Ages, Porcupine Rim.

What BLM WSAs are included in the area where the action is to take place?

Negro Bill Canyon, Behind the Rocks

VALID RIGHTS OR GRANDFATHERED USES (if any)

Is lease, mining claim, or grandfathered use pre-FLPMA? \_\_\_\_\_ Yes  No

If yes, give name or number of lease(s), mining claim(s) or grandfathered use and describe use or right asserted:

Has a valid existing right been established? \_\_\_\_\_ Yes  No

**EVALUATION OF POTENTIAL FOR IMPAIRMENT OF WILDERNESS VALUES**

Is the action temporary and non-surface disturbing?  Yes \_\_\_\_\_ No

If yes, describe why action would be temporary and non-surface disturbing and identify the planned period of use:

Activity would consist of commercial guided hikes, mountain bike trips and canyoneering tours. Commercial activities are permitted uses in wilderness,

including WSA's. The Wilderness Act states: "Commercial activities may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas." The BLM's Manual 6330, Management of Wilderness Study Areas (July, 2012), states that most recreational activities are allowed within WSA's. Failure to adhere to the permit's stipulations could result in non-renewal by the BLM's Administrative Officer.

When the use, activity, or facility is terminated, would the area's wilderness values be degraded so far as to significantly constrain the Congress's prerogative regarding the area's suitability for preservation as wilderness?

**Naturalness:** Effects to the natural environment would center on two constructed marked and well-used trails. Impacts could involve soil, vegetation, and water quality (in Negro Bill Canyon). The hiking in Negro Bill Canyon is on a heavily used marked and maintained trail which currently receives almost 40,000 hikers annually. The trail from Hidden Valley to Moab Rim follows a constructed and well-used hiking trail for a portion of the trip, and then follows a marked 4WD trail on the border of the WSA. The canyoneering route (Rock of Ages) follows a well-used and clearly defined trail. The bike route on Porcupine Rim follows a constructed and marked trail. Based on past use, any impacts would be minimal relative to total current use on these routes.

**Outstanding Opportunities for Solitude:** These activities would not decrease opportunities for solitude; these trails have been popular since before establishment of the WSAs, and the original write-ups for the WSAs emphasized outstanding opportunities for solitude as being present in the backcountry of the units, but not necessarily in the more heavily used front country in which the hiking and biking trails are situated. The route off Pritchett Canyon in the Behind the Rocks WSA is on its very periphery, and in an area which receives little current public use, presumably because of its technical difficulty. If this were the only travel route in the area, there could be some concern for impacts to solitude. However, the 1991 EIS points out that the large number of fins and narrow canyons in this WSA provide numerous opportunities for selection of unused travel routes. Specifically, the above-mentioned report states:

"Regardless of the outside influences (proximity to Moab), it is easy for a visitor to find seclusion within the WSA due to the screening and alternate travel paths afforded by the sandstone fins. In these areas, sights and sounds of others within the unit can easily be avoided". *1991 Utah Statewide Wilderness Study Report, Volume IIB, p. 706.*

On Porcupine Rim, the only potential impacts to solitude would occur from encounters with other bikers. The trips, however, are very small. The route in the Negro Bill Canyon WSA is on a maintained front-country trail which currently receives heavy use (approximately 25,000 users per year), and almost all in a single direction. Any impact to solitude would be very temporary. Additionally, the proposed activity is in a front-country area which was never identified as providing outstanding opportunities for solitude in the original wilderness inventory.

**Outstanding Opportunities for Primitive and Unconfined Recreation:** There is no reason to believe that the proposed action will reduce these opportunities. There are no plans for trail construction or other modifications of the area. These trails have been popular since before establishment of the WSAs, and the original write-ups for the WSAs emphasized outstanding opportunities for solitude as being present in the backcountry of the units, but not necessarily in the more heavily used front country in which the proposed activities are located.

**Optional Supplemental values:** No perceived negative impacts. The 1990 Final Environmental Impact Statement identified several threatened and endangered animal and plant species that *may* occur in the WSA. The current status is the presence of several plant species on the Utah state sensitive list. These species are all alceve plants, and do not occur along the hiking trail where the proposed action would occur.

Considered cumulatively with past actions, would authorization of the action impair the area's wilderness values?        Yes   X   No

**Rationale:** Hiking, canyoneering and commercial activities are permitted not only in WSA's, but in officially-designated wilderness.

#### RESULTS OF EVALUATION

##### Non-impairment Standard

The only actions permissible in study areas are temporary uses that do not create surface disturbance, require no reclamation, and do not involve permanent placement of structures. Such temporary or no-trace activities may continue until Congress acts, so long as they can be terminated easily and immediately.

The only exceptions to the non-impairment standard are:

- 1) emergencies such as suppression activities associated with wildfire or search and rescue operations,
- 2) reclamation activities designed to minimize impacts to wilderness values created by IMP violations and emergencies;
- 3) uses and facilities which are considered grandfathered or valid existing rights as defined in Manual 6330,
- 4) uses and facilities that clearly protect or enhance the land's wilderness values or that are the minimum necessary for public health and safety in the use and enjoyment of the wilderness values, and
- 5) reclamation of pre-FLPMA impacts.

##### MAJOR CONCLUSION OF NON-IMPAIRMENT EVALUATION

Action clearly fails to meet the non-impairment standard or any exceptions, e.g. VER, and should not be allowed:        Yes        X    No

Action appears to meet the non-impairment standard:  Yes  No

Action may be allowable, pre-FLPMA grandfathered use:  Yes  No  N/A

Action may be allowable, pre-FLPMA VER:  Yes  No  N/A

OTHER CONCLUSIONS

Restrictions proposed may unreasonably interfere with pre-FLPMA rights or grandfathered uses:  Yes  No  N/A

Reasonable measures to protect wilderness values and to prevent unnecessary or undue degradation of the lands are incorporated:  Yes  No  N/A

Environmental Assessment required:  Yes  No

Plan of Operations Required:  Yes  No  N/A

Discovery verification procedures recommended:  Yes  No  N/A

Consider initiating reclamation through EA:  Yes  No  N/A

RELATED ACTIONS

Dated copy of Electronic Notification Board notice attached to case file:  Yes  No

Media notification appropriate: (optional)  Yes  No

Federal Register Notice appropriate: (optional)  Yes  No

Information copy of case file sent to USO-933:  Yes  No

Evaluation prepared by: William P. Stevens August 19, 2015  
 Name(s) Date