

**United States Department of the Interior  
Bureau of Land Management**

---

**Determination of NEPA Adequacy  
DOI-BLM-UT-Y010-2015-0242 DNA**

---

**September 2015**

**Special Recreation Permit Renewal for  
Red Rocks Community College**

*Location: Canyoneering Routes within the Moab Field Office*

*Applicant/Address: Sally Palmer, 13300 W. 6<sup>th</sup> Ave., Box 20, Lakewood, CO 80228*

---

Moab Field Office  
82 East Dogwood  
Moab, Utah 84532  
Phone: 435-259-2100  
Fax: 435-259-2158



## Worksheet

### Determination of NEPA Adequacy

U.S. Department of the Interior  
Utah Bureau of Land Management

---

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: Moab Field Office

PROJECT NUMBER: MFO-Y010-15-106R

PROPOSED ACTION TITLE: Special Recreation Permit Renewal for Red Rocks Community College

LOCATION/LEGAL DESCRIPTION: Canyoneering Routes within the Moab Field Office, specifically, Medieval Chamber and Granary.

APPLICANT: Sally Palmer, 13300 W. 6<sup>th</sup> Ave., Box 20, Lakewood, CO 80228

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

Sally Palmer, on behalf of Red Rocks Community College has requested authorization through an SRP to conduct an outdoor education course involving canyoneering in Medieval and Granary Canyons. (Medieval Canyon is within the Negro Bill WSA). The course would be held in March. Red Rocks Community College previously held an SRP with the Moab Field Office and is in good standing. The proposed use would be day use only and offered annually during the spring. Leave No Trace practices would be followed and all solid human waste and garbage would be packed out. Standard Utah BLM stipulations and the stipulations developed in the referenced Environmental Assessment would be attached to the SRP for Red Rocks Community College.

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

LUP Name\* Moab Resource Management Plan                      Date Approved    October, 2008

\*List applicable LUPs (for example, resource management plans; activity, project, management or program plans; or applicable amendments thereto).

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

Page 97 of the Moab RMP reads as follows: "Special Recreation Permits are issued as a discretionary action as a means to: help meet management objectives, provide opportunities for economic activity, facilitate recreational use of public lands, control visitor use, protect

recreational and natural resources, and provide for the health and safety of visitors.” In addition, on page 98 of the Moab RMP, it states, “All SRPs will contain standard stipulations appropriate for the type of activity and may include stipulations necessary to protect lands or resources, reduce user conflicts, or minimize health and safety concerns...Issue and manage recreation 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.”

The Moab Resource Management Plan (RMP), Final Environmental Impact Statement, signed October 31, 2008, identified lands with wilderness characteristics. The proposed use does not include any areas determined to have wilderness characteristics. The proposed activity would not result in any changes in the impacts that were analyzed in the FEIS for the RMP.

**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.

Environmental Assessment DOI-BLM-UT-Y010-2012-0212, Special Recreation Permit for Navtec, signed December 28, 2012 covers 10 canyoneering routes: Winter Camp/Repeat Junior, Negro Bill (Medieval Chamber), BLM portion of Mystery Towers (in side canyon of Onion Creek), Pritchett (Rock of Ages), Professor Creek (aka Mary Jane), Cable Arch, Cameltoe (Culvert), Granary (no use from April 1 to August 15), and Big Cave

List by name and date other documentation relevant to the proposed action (e.g. biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report): None

**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 existing NEPA document addresses the impacts of canyoneering use in 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: Environmental Assessment DOI-BLM-UT-Y010-2012-0212, Special Recreation Permit for Navtec contains 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: 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: The direct and indirect impacts are substantially unchanged from those identified in the existing NEPA document. 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: Public involvement for Environmental Assessment DOI-BLM-UT-Y010-2012-0212, Special Recreation Permit for Navtec, was posted on the ENBB on August 24, 2012. The public scoping period included a 30-day scoping period and covered action in a WSA. This level of public involvement and interagency review is adequate for the current proposed action.

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

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Ann Marie Aubry	Hydrologist	Air quality; Water quality; Floodplains, Wetlands/Riparian

		Zones
Katie Stevens	Recreation Planner	Areas of Critical Environmental Concern; Recreation, Visual Resources, Wild & Scenic Rivers
Don Montoya	Archaeologist	Cultural Resources; Native American Religious Concerns
David Williams	Range Management Specialist	Threatened, Endangered, or Candidate Plant Species; Livestock Grazing, RHS, Vegetation
Jordan Davis	Range Management Specialist	Invasive, Non-native species, Woodland
David Pals	Geologist	Geology, , Wastes (hazardous or solid)
ReBecca Hunt-Foster	Paleontologist	Paleontology
Pam Riddle	Wildlife Biologist	Threatened, Endangered, or Candidate Animal Species, Migratory Birds, Utah Sensitive Species, Fish and Wildlife
Bill Stevens	Recreation Planner	Wilderness, Socioeconomics, Lands with Wilderness Characteristics, Natural Areas, Environmental Justice

## 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

9/20/15  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Signature of NEPA Coordinator

10/7/15  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Signature of the Responsible Official

10/7/15  
\_\_\_\_\_  
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**
- IMP WSA**

## INTERDISCIPLINARY TEAM CHECKLIST

**Project Title:** Special Recreation Permit Renewal for Red Rocks Community College

**NEPA Log Number:** DOI-BLM-UT-Y010-2015-0242 DNA

**File/Serial Number:** MFO-Y010-15-106R

**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.

Determination	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>AMA</i>	9-15-15
NC	Floodplains		Ann Marie Aubry <i>AMA</i>	9-15-15
NC	Soils		Ann Marie Aubry <i>AMA</i>	9-15-15
NC	Water Resources/Quality (drinking/surface/ground)		Ann Marie Aubry <i>AMA</i>	9-15-15
NC	Wetlands/Riparian Zones		Ann Marie Aubry <i>AMA</i>	9-15-15
NC	Areas of Critical Environmental Concern		Katie Stevens <i>KS</i>	9/15/15
NC	Recreation		Katie Stevens <i>KS</i>	9/15/15
NC	Wild and Scenic Rivers		Katie Stevens <i>KS</i>	9/15/15
NC	Visual Resources		Katie Stevens <i>KS</i>	9/15/15
NC	Wild Lands (BLM Natural Areas)		Bill Stevens <i>BS</i>	9-15-15
NC	Socio-Economics		Bill Stevens <i>BS</i>	9-15-15
NC	Wilderness/WSA		Bill Stevens <i>BS</i>	9-15-15
NC	Lands with Wilderness Characteristics		Bill Stevens <i>BS</i>	9-15-15

Determination	Resource	Rationale for Determination*	Signature	Date
NC	Cultural Resources		Jared Lundell	10-5-15
NC	Native American Religious Concerns		Jared Lundell	10-5-15
NC	Environmental Justice		Bill Stevens <i>BS</i>	7-15-15
NC	Wastes (hazardous or solid)		Rebecca Doolittle <i>RD</i>	9-15-15
NC	Threatened, Endangered or Candidate Animal Species		Pam Riddle <i>PR</i>	9/15/15
NC	Migratory Birds		Pam Riddle <i>PR</i>	9/15/15
NC	Utah BLM Sensitive Species		Pam Riddle <i>PR</i>	9/15/15
NC	Fish and Wildlife Excluding USFW Designated Species		Pam Riddle <i>PR</i>	9/15/15
NC	Invasive Species/Noxious Weeds		Dave Williams <i>DW</i>	9/15/15
NC	Threatened, Endangered or Candidate Plant Species		Dave Williams <i>DW</i>	9/15/15
NC	Livestock Grazing		Dave Williams/ Jordan Davis/ Kim Allison <i>DW</i>	9/15/15
NC	Rangeland Health Standards		Dave Williams/ Jordan Davis/ Kim Allison <i>DW</i>	9/15/15
NC	Vegetation Excluding USFW Designated Species		<i>DW</i>	9/15/15
NC	Woodland / Forestry		<i>DW</i>	9/15/15
NC	Fuels/Fire Management		Josh Relph	
NC	Geology / Mineral Resources/Energy Production		David Pals <i>DP</i>	9/15/15
NC	Lands/Access		Jan Denney	
NC	Paleontology		ReBecca Hunt-Foster	

**FINAL REVIEW:**

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	Katie Stevens		
Authorized Officer	J. Rockford Smith <i>JRS</i>	10/7/15	

**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-Y010-2015-0242-DNA

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

Proposed by: Red Rocks Community College

Description of action: Red Rocks Community College has requested authorization through a renewed Special Recreation Permit (SRP) to offer canyoneering trips to participants on designated canyoneering trails in the Moab Field Office of the BLM. Trips are day use only. One of the canyoneering routes (Negro Bill Canyon) is within a Wilderness Study Area (WSA). Red Rocks Community College will have a maximum group size of up to 7 students and one guide, with up to two trips per year. Standard stipulations would apply to the SRP for Red Rocks Community College. The only portion of the permit to be analyzed in this document is that activity within the WSA. *The only portions of the permit to be analyzed in this document are those activities within the WSA.*

Location: Negro Bill Canyon

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

Negro Bill Canyon

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 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 a constructed, marked and well-used trail. Impacts could involve soil, vegetation, and water quality (in Negro Bill Canyon). The canyoneering in Negro Bill Canyon is on a heavily used marked and maintained trail which currently receives almost 35,000 hikers annually. 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; this route has been popular since before establishment of the WSA, and the original write-ups for the WSA emphasized outstanding opportunities for solitude as being present in the backcountry of the unit, but not necessarily in the more heavily used front country in which the canyoneering route is situated.

**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. This route has been popular since before establishment of the WSA, and the original write-ups for the WSA emphasized outstanding opportunities for solitude as being present in the backcountry of the unit, 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 alcover plants, and do not occur along the trail where the proposed action would occur.

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

**Rationale:** 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  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



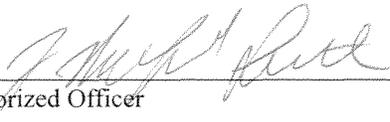
**FINDING OF NO SIGNIFICANT IMPACT  
AND  
DECISION RECORD**

**Red Rocks Community College (Organized Group)**  
DOI-BLM-UT-Y010-2015-0242 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 this Special Recreation Permit Renewal to Red Rocks Community College for group canyoneering instruction 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 the Special Recreation Permit Renewal for Red Rocks Community College 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.

  
\_\_\_\_\_  
Authorized Officer

10/7/15  
\_\_\_\_\_  
Date