

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

**Determination of NEPA Adequacy
DOI-BLM-UT-Y010-2016-0004 DNA**

November 2015

Special Recreation Permit Renewal for Adventure Rabbi

Location:

Hiking: Culvert Canyon, Jeep Arch, Corona Arch Trail, Fisher Towers Trail, Amphitheater Loop trail and Portal Overlook Trail, Moab Rim

Applicant/Address: Jeff Finkelstein, 5353 Manhattan Circle #103, Boulder, CO 80303

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Moab, Utah 84532
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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-Y010-16-007R

PROPOSED ACTION TITLE: Special Recreation Permit for Adventure Rabbi

LOCATION/LEGAL DESCRIPTION: *Designated hiking trails within the Moab Field Office:* Corona Arch Trail, Culvert Canyon, Jeep Arch, Fisher Towers Trail, Amphitheater Loop trail, Portal Overlook Trail, Moab Rim.

APPLICANT: Jeff Finkelstein, 5353 Manhattan Circle #103, Boulder, CO 80303

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

Jeff Finkelstein, on behalf of Adventure Rabbi, has requested a renewal of a Special Recreation Permit (SRP) to conduct hiking on designated trails and areas within the Moab Field Office of the BLM. All use would be day use only with any overnight use occurring in designated campgrounds or private facilities. Adventure Rabbi has held an SRP with the Moab BLM since 2009. Standard stipulations as well as and hiking stipulations would apply to the SRP for Adventure Rabbi.

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, page 98 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."

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

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. Notification for the proposed action, including the 30-day period for WSA use, was posted on the ENBB on August 2, 2013.

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 document addresses the impacts of permitted 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 Assessment DOI-BLM-UT-Y010-2013-0224 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: 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-Y010-2013-0224 *Special Recreation Permit Amendment For Western River Expeditions*), which was posted on the ENBB on August 2, 2013. This included the 30-day period for WSA use This notification 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
Dave Williams	Rangeland Management Specialist	T&E Plants, RHS, Livestock Grazing, Vegetation
Jordan Davis	Rangeland Management Specialist	Invasive Plants, Woodlands
Josh Relph	Fuels Specialist	Fuels/Fire Management
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.

Heidi A. Lawrence
Signature of Project Lead

11/4/2015
Date

XC Stevens
Signature of NEPA Coordinator

11/4/2015
Date

J. Daniel Smith
Signature of the Responsible Official

11/5/15
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

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Special Recreation Permit renewal for Adventure Rabbi

NEPA Log Number: DOI-BLM-UT-Y010-~~2055-1016~~²⁰¹⁶⁻¹⁸ DNA

File/Serial Number: MFO-Y010-16-007R

Project Leader: Katie Stevens

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
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)				
NC	Air Quality Greenhouse Gas Emissions		Am Arby	11/3/15
NC	Floodplains		Am Arby	11/3/15
NC	Soils		Am Arby	11/3/15
NC	Water Resources/Quality (drinking/surface/ground)		Am Arby	11/3/15
NC	Wetlands/Riparian Zones		Mark Heers	11/3/15
NC	Areas of Critical Environmental Concern		K Stevens	11/3/15
NC	Recreation		K Stevens	11/3/15
NC	Wild and Scenic Rivers		K Stevens	11/3/15
NC	Visual Resources		K Stevens	11/3/15
NC	BLM Natural Areas		K Stevens	11-3-15
NC	Socio-Economics		K Stevens	11-3-15
NC	Wilderness/WSA		K Stevens	11-3-15
NC	Lands with Wilderness Characteristics		K Stevens	11-3-15
NC	Cultural Resources		M. [Signature]	11-3-15
NC	Native American Religious Concerns		M. [Signature]	11-3-15

Determination	Resource	Rationale for Determination*	Signature	Date
NC	Environmental Justice		<i>OR Stevens</i>	11-3-15
NC	Wastes (hazardous or solid)		<i>JRM</i>	11/3/15
NC	Threatened, Endangered or Candidate Animal Species		<i>L Bryant</i>	11/3/15
NC	Migratory Birds		<i>L Bryant</i>	11/3/15
NC	Utah BLM Sensitive Species		<i>L Bryant</i>	11/3/15
NC	Fish and Wildlife Excluding USFW Designated Species		<i>L Bryant</i>	11/3/15
NC	Invasive Species/Noxious Weeds		<i>Jordan Davis</i>	11/3/15
NC	Threatened, Endangered or Candidate Plant Species		<i>D. Williams</i>	11/3/15
NC	Livestock Grazing		<i>Jordan Davis</i>	11/3/15
NC	Rangeland Health Standards		<i>Jordan Davis</i>	11/3/15
NC	Vegetation Excluding USFW Designated Species		<i>Jordan Davis</i>	11/3/15
NC	Woodland / Forestry		<i>Jordan Davis</i>	11/3/15
NC	Fuels/Fire Management		<i>JRM</i>	11/3/15
NC	Geology / Mineral Resources/Energy Production		<i>JRM</i>	11/3/15
NC	Lands/Access		<i>L Bryant</i>	11/3/15
NC	Paleontology		<i>R. Foster</i>	11/3/15

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	<i>OR Stevens</i>	11/3/15	
Authorized Officer	<i>JRM</i>	11/5/15	

**FINDING OF NO SIGNIFICANT IMPACT
AND
DECISION RECORD**
Adventure Rabbi: Synagogue w/o Walls (Organized Group camping and hiking)
DOI-BLM-UT-Y010-2016-0018 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 renew a Special Recreation Permit to Adventure Rabbi 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 reauthorize this Special Recreation Permit for Adventure Rabbi 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



Date