

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

**Determination of NEPA Adequacy
DOI-BLM-UT-Y010-2016-0024**

December 2015

**Special Recreation Permit for
Moab Trail Marathon (USA Triathlon of Colorado-Training
RX, LLC)**

Location: designated roads and trails in the Kane Creek area

Applicant/Address: Danelle Ballengee, 577 Cliffview Dr., Moab, UT 84532

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82 East Dogwood
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-Y010-16-009R

PROPOSED ACTION TITLE: Special Recreation Permit for Moab Trail Marathon (USA Triathlon of Colorado, Training RX, LLC)

LOCATION/LLEGAL DESCRIPTION: designated roads and trails in the Kane Creek area

APPLICANT: Danelle Ballengee, 577 Cliffview, Moab, UT 84532

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

Danelle Ballengee, on behalf of Training RX, has requested renewal of a Special Recreation Permit (SRP) for operating a running race weekend on designated roads and trails within the Moab Field Office of the BLM. The event would occur in November, usually on the first weekend. All running would occur on designated roads and trails, including Pritchett Canyon, Hunter Canyon Rim, Kane Creek, Jackson, and Ahab. Training RX has held an SRP with the Moab BLM for several years. The 2015 race weekend had 1700 runners, including the children running primarily on private lands. Standard BLM Utah statewide as well as running race stipulations would apply to the SRP for Training RX.

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 lands with 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-Y010-2012-0089, *Special Recreation Permit for Training RX*, covers the running activities. This EA analyzed the exact race course with the exact aid stations and staging areas for the same company in 2012. This EA was signed on March 22, 2012.

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 documents address the impacts of running on this exact course.

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 Environmental Assessment listed above 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. 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: The public was notified of the preparation of the Environmental Assessment listed above by posting on the ENBB on February 22, 2012. This level of involvement and notification 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, Soils, Wetlands/Riparian
Katie Stevens	Recreation Planner	Areas of Critical Environmental Concern; Wild & Scenic Rivers, Recreation, Visual Resources
David Pals	Geologist	Geology, Wastes (hazardous or solid)
ReBecca Hunt-Foster	Paleontologist	Paleontology
David Williams	Rangeland Management Specialist	T&E Plants
Jordan Davis	Rangeland Management Specialist	Rangeland Health Standards. Vegetation, Weeds, RHS, Grazing, Woodlands
Jared Lundell	Archaeologist	Cultural Resources; Native American Religious Concerns
Pam Riddle	Wildlife Biologist	Threatened, Endangered, or Candidate Animal Species, Wildlife, Migratory Birds, Utah Sensitive Species
Jan Denney	Realty Specialist	Lands and Realty
Bill Stevens	Recreation Planner	Wilderness, Natural Areas, Lands with Wilderness Characteristics, Socioeconomics, 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.

KC Stevens
Signature of Project Lead

11/27/15
Date

KC Stevens
Signature of NEPA Coordinator

11/27/15
Date

[Signature]
Signature of the Responsible Official

11/30/15
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 for Moab Trail Marathon (USA Triathlon of Colorado - Training RX LLC)
NEPA Log Number: DOI-BLM-UT-Y010-2016-0024 EA
File/Serial Number: MFO-Y010-16-009R
Project Leader: Jennifer Jones/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		Ann Marie Aubry MA2	11/17/15
NC	Floodplains		Ann Marie Aubry MA2	11/17/15
NC	Soils		Ann Marie Aubry MA2	11/17/15
NC	Water Resources/Quality (drinking/surface/ground)		Ann Marie Aubry MA2	11/17/15
NC	Wetlands/Riparian Zones		Ann Marie Aubry MA2	11/17/15
NP	Areas of Critical Environmental Concern	See 2008 RMP	Katie Stevens KS	11/19/15
NC	Recreation		Katie Stevens KS	11/17/15
NC	Wild and Scenic Rivers		Katie Stevens	11/17/15
NC	Visual Resources		Katie Stevens	11/17/15
NC	Wild Lands (BLM Natural Areas)		Bill Stevens BS	11-17-15
NC	Socio-Economics		Bill Stevens BS	11-17-15
NC	Wilderness/WSA		Bill Stevens BS	11-17-15
NC	Lands with Wilderness Characteristics		Bill Stevens BS	11-17-15
NC	Cultural Resources		J. Lundell JL	11-24-15
NC	Native American Religious Concerns		J. Lundell JL	11-24-15
NC	Environmental Justice		Bill Stevens BS	11-17-15

Determination	Resource	Rationale for Determination*	Signature	Date
NC	Wastes (hazardous or solid)		David Pals <i>DP</i>	11/17/15
NC	Threatened, Endangered or Candidate Animal Species		Pam Riddle <i>PR</i>	11/27/15
NC	Migratory Birds		Pam Riddle <i>PR</i>	11/27/15
NC	Utah BLM Sensitive Species		Pam Riddle <i>PR</i>	11/27/15
NC	Fish and Wildlife Excluding USFW Designated Species		Pam Riddle <i>PR</i>	11/27/15
NC	Invasive Species/Noxious Weeds		Jordan Davis <i>JD</i>	11/17/15
NC	Threatened, Endangered or Candidate Plant Species		Dave Williams <i>DW</i>	11/17/15
NC	Livestock Grazing		Dave Williams/ Jordan Davis/ Kim Allison <i>JD</i>	11/17/15
NC	Rangeland Health Standards		Dave Williams/ Jordan Davis/ Kim Allison <i>JD</i>	11/17/15
NC	Vegetation Excluding USFW Designated Species		Jordan Davis Dave Williams <i>JD</i>	11/17/15
NC	Woodland / Forestry		Jordan Davis <i>JD</i>	11/17/15
NC	Fuels/Fire Management		Josh Relph <i>JR</i>	11/17/15
NC	Geology / Mineral Resources/Energy Production		D. Pals <i>DP</i>	11/17/15
NC	Lands/Access		Jan Denney <i>JD</i>	11.17.15
NC	Paleontology		Rebecca Hunt-Foster <i>RHF</i>	11/17/15

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	Katie Stevens <i>KS</i>	11/27/15	
Authorized Officer	J. Rockford Smith <i>JRS</i>	11/30/15	

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

**Moab Trail Marathon dba Training RX
(Competitive endurance foot race)
DOI-BLM-UT-Y010-2016-0024 EA**

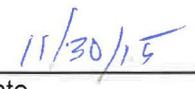
FONSI: Based on the analysis of potential environmental impacts contained in the present document, I have determined that the action will not have a significant effect on the human environment and an environmental impact statement is therefore not required.

DECISION: It is my decision to issue the commercial Special Recreation Permit for Moab Trail Marathon-Training RX.com 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 this Special Recreation Permit for Moab Trail Marathon- Training RX. 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