

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

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**Determination of NEPA Adequacy  
DOI-BLM-UT-Y010-2016-0046**

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**December, 2015**

**Special Recreation Permit for  
Grass Root Events - Amasa**

*Location: Designated roads and mountain bike trails within the Moab Field Office:  
Amasa Back, Rockstacker, Pothole and Jackson trails*

*Applicant/Address: Chris Martinez, 1170 Canon Vista Drive,  
Moab, UT 84532*

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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

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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: Moab Field Office

PROJECT NUMBER: MFO-Y010-11-019R

PROPOSED ACTION TITLE: Special Recreation Permit for Grass Roots Events

LOCATION/LEGAL DESCRIPTION: Designated mountain bike trails in the Moab Field Office: Amasa Back, Rockstacker, Pothole, Jackson trail.

APPLICANT: Chris Martinez, 1170 Canon Vista Drive, Moab, UT 84532

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

Chris Martinez, on behalf of Grass Root Events, has requested reauthorization through an organized group event Special Recreation Permit (SRP) to conduct a foot race on designated roads and mountain bike trails in the Moab Field Office. The event would be held in spring. The permit is for a period of five years. Martinez has held two other races and SRPs with this office. Any and all event related signs, course marking and trash would be removed within 24 hours following the race. The event would offer two courses, a 6 mile and an 8.5 mile option. Both courses would begin at the Kane Creek trailhead which would be the start/ finish staging area. The 6 mile course would be follow the Kane Creek road to Amasa Back and down Jackson trail to the finish line. The 8.5 mile course would utilize the same route as well as the Ahab, Rockstacker and Pothole loops. Portable toilets would be provided at the Kane Creek trailhead. Standard stipulations, OHV and mountain bike specific as well as permit specific stipulations would apply to the SRP for Grass Roots Events.

**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.**

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

Environmental Assessment DOI-BLM-UT-Y010-2013-0033 *Special Recreation Permit for Grass Roots Events*, covers the running race on the identical course.

**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:

Yes; the existing NEPA documents address the impacts of permitted organized group climbing 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-Y010-2013-0033 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-Y010-2013-0033 *Special Recreation Permit for Grass Roots Events*. Notification for the proposed action, including the 30-day period for WSA use, was posted on the ENBB on December 6, 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 resources; Floodplains, Soils;  |
| Katie Stevens   | Recreation Planner          | Areas of Critical Environmental Concern; Visual Resources, Recreation Wild & Scenic Rivers |
| Jan Denney      | Realty Specialist           | Environmental Justice, Wastes (hazardous or solid)   |
| Jared Lundell   | Archaeologist               | Cultural Resources; Native American Religious Concerns                                     |
| Mark Grover     | Ecologist                   | Wetland/riparian   |
| David Williams  | Range Management Specialist | Invasive, Non-native species; Threatened, Endangered, or Candidate Plant Species;          |

|                     |                             |   |
|---------------------|-----------------------------|---|
| Jordan Davis        | Range Management Specialist | Invasive, Non-native species; Threatened, Endangered, or Candidate Plant Species; Livestock Grazing, RHS, Vegetation, Woodland/forestry |
| Pam Riddle          | Wildlife Biologist          | Threatened, Endangered, or Candidate Animal Species, Migratory Birds, Utah Sensitive Species, Fish and Wildlife                         |
| Bill Stevens        | Recreation Planner          | Wilderness, BLM Natural Areas, Socioeconomics, Environmental Justice, Lands with Wilderness Characteristics                             |
| ReBecca Hunt Foster | Paleontologist              | Paleontology  |

**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

12/16/15  
Date

KC Stevens  
Signature of NEPA Coordinator

12/16/15  
Date

[Signature]  
Signature of the Responsible Official

12/17/15  
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 Grass Roots Events – Amasa

**NEPA Log Number:** DOI-BLM-UT-Y010-2016-046 DNA

**File/Serial Number:** MFO-Y010-16-017R

**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     |
|--|--|------------------------------|----------------------------|----------|
| <b>RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)</b> |  |                              |                            |          |
| NC   | Air Quality<br>Greenhouse Gas<br>Emissions           |                              | A.M. Aubry<br><i>AMA</i>   | 12.16.15 |
| NC   | Floodplains  |                              | A.M. Aubry<br><i>AMA</i>   | 12.16.15 |
| NC   | Soils  |                              | A.M. Aubry<br><i>AMA</i>   | 12.16.15 |
| NC   | Water Resources/Quality<br>(drinking/surface/ground) |                              | A.M. Aubry<br><i>AMA</i>   | 12.16.15 |
| NC   | Wetlands/Riparian Zones                              |                              | Mark Grover<br><i>M.G.</i> | 12/15/15 |
| NC   | Areas of Critical<br>Environmental Concern           |                              | Kate Stevens<br><i>KS</i>  | 12/15/15 |
| NC   | Recreation   |                              | Kate Stevens<br><i>KS</i>  | 12/15/15 |
| NC   | Wild and Scenic Rivers                               |                              | Kate Stevens<br><i>KS</i>  | 12/15/15 |
| NC   | Visual Resources                                     |                              | Kate Stevens<br><i>KS</i>  | 12/15/15 |
| NC   | BLM Natural Areas                                    |                              | Bill Stevens<br><i>BS</i>  | 12-15-15 |
| NC   | Socio-Economics                                      |                              | Bill Stevens<br><i>BS</i>  | 12-15-15 |
| NC   | Lands with Wilderness<br>Characteristics             |                              | Bill Stevens<br><i>BS</i>  | 12-15-15 |
| NC   | Wilderness/WSA                                       |                              | Bill Stevens<br><i>BS</i>  | 12-15-15 |
| NC   | Cultural Resources                                   |                              | Jared Lundell<br><i>JL</i> | 12/15/15 |
| NC   | Native American<br>Religious Concerns                |                              | Jared Lundell<br><i>JL</i> | 12-15-15 |
| NC   | Environmental Justice                                |                              | Bill Stevens<br><i>BS</i>  | 12-15-15 |

| Determination | Resource  | Rationale for Determination* | Signature                          | Date     |
|---------------|---|------------------------------|------------------------------------|----------|
| NC            | Wastes<br>(hazardous or solid)                            |                              | <i>RD</i><br><i>fw</i> David Pals  | 12/15/15 |
| NC            | Threatened, Endangered<br>or Candidate Animal<br>Species  |                              | Pam Riddle <i>PR</i>               | 12/15/15 |
| NC            | Migratory Birds   |                              | Pam Riddle <i>PR</i>               | 12/15/15 |
| NC            | Utah BLM Sensitive<br>Species                             |                              | Pam Riddle <i>PR</i>               | 12/15/15 |
| NC            | Fish and Wildlife<br>Excluding USFW<br>Designated Species |                              | Pam Riddle <i>PR</i>               | 12/15/15 |
| NC            | Invasive Species/Noxious<br>Weeds                         |                              | <i>JD</i> Jordan Davis             | 12/15/15 |
| NC            | Threatened, Endangered<br>or Candidate Plant<br>Species   |                              | <i>DW</i> Dave Williams            | 12/15/15 |
| NC            | Livestock Grazing   |                              | <i>JD</i> Dave Williams            | 12/15/15 |
| NC            | Rangeland Health<br>Standards                             |                              | <i>JD</i> Dave Williams            | 12/15/15 |
| NC            | Vegetation Excluding<br>USFW Designated<br>Species        |                              | <i>JD</i> Dave Williams            | 12/15/15 |
| NC            | Woodland / Forestry                                       |                              | <i>JD</i> Jordan Davis             | 12/15/15 |
| NC            | Fuels/Fire Management                                     |                              | <i>JR</i> <i>JK</i><br>Josh Reilph | 12/15/15 |
| NC            | Geology / Mineral<br>Resources/Energy<br>Production       |                              | <i>RD</i><br><i>fw</i> David Pals  | 12/15/15 |
| NC            | Lands/Access  |                              | <i>JD</i> Jan Denney               | 12-15-15 |
| NC            | Paleontology  |                              | <i>RKF</i><br>ReBecca Hunt-Foster  | 12/15/15 |

**FINAL REVIEW:**

| Reviewer Title            | Signature            | Date     | Comments |
|---------------------------|----------------------|----------|----------|
| Environmental Coordinator | <i>KC Stevens</i>    | 12/15/15 |          |
| Authorized Officer        | <i>John P. Smith</i> | 12/17/15 |          |

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

**Grass Roots Events - Amasa (organized group event)**

DOI-BLM-UT-Y010-2016-046 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 commercial Special Recreation Permit for Grass Roots Events 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 Grass Roots Events 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

12/17/15  
\_\_\_\_\_  
Date