

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

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**Determination of NEPA Adequacy  
DOI-BLM-UT-Y010-2016-0095 DNA**

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**February 2016**

**Special Recreation Permit for Appalachian Mountain Club**

*Location: Designated hiking routes within the Moab Field Office*

*Moab Field Office:* Amasa Back/ Captain Ahab/ Rockstacker/ Pothole, Bartlett Wash Slickrock, Cable Arch, Copper Ridge Dinosaur tracks, Corona Arch/ Bowtie Arch Hiking Trail, Culvert Canyon to Jeep Arch, Day Canyon to Top and Back, Fisher Towers hiking Trail, Gemini Bridges to Overlook of Bull Canyon, Hurrah Pass/ Jackson's Ladder, Jewel Tibbetts Arch Trail, Kane Creek- Tombstone Trail, Cliffhanger Rock Art, Jackson Trail, Gatherer Canyon, Hunter Canyon, Hunter Canyon Rim, Kokopelli's Trail, Mary Jane/ Professor Creek, Mill Canyon Bartlett Alcove and rock art along Highway 313, Mill Canyon Track Site and Dinosaur Bone Trail, Moki Canyon to Overlook of River, Monitor & Merrimac/. Blue Buffalo, Pipedream, Poison Spider and Dinosaur Track Site, Portal Trail, Richardson Amphitheater Trail, Slickrock Trail, Longbow Arch, Tusher Tunnel to Determination Towers

*Applicant/Address:* Ron Janowitz, 5 Joy St. Boston, MA 02108

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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-Y010-16-0095

PROPOSED ACTION TITLE: Special Recreation Permit for Appalachian Mountain Club

LOCATION/LEGAL DESCRIPTION: *Guided hiking locations within the Moab and Monticello Field Offices, and the Henry Mountain Field Station in Hanksville*

APPLICANT: Ron Janowitz, 5 Joy St. Boston, MA 02108

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

Ron Janowitz, on behalf of Appalachian Mountain Club, has requested authorization through a Special Recreation Permit (SRP) to offer guided hiking tours within the Moab and Monticello Field Offices, and the Henry Mountain Field Station in Hanksville of the BLM. All use would be day use. Appalachian Mountain Club has not held an SRP with the Moab BLM previously. Standard stipulations as well as hiking stipulations would apply to the SRP for Appalachian Mountain Club. This DNA covers the Moab Field Office locations.

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

LUP Name: Moab Resource Management Plan

Date Approved October, 2008

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.

## 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 canyoneering, climbing 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 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. Environmental Assessment DOI-BLM-UT-Y010-2013-0224 *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. 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; Floodplains, Soils, Wetlands/Riparian
Mark Grover	Biologist	Water resources
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
Jordan Davis	Rangeland Management Specialist	Invasive Plants, Woodlands, RHS, Livestock Grazing, Vegetation
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.

*KC Stevens*

\_\_\_\_\_  
Signature of Project Lead

*2/10/16*

\_\_\_\_\_  
Date

*KC Stevens*

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

*2/10/16*

\_\_\_\_\_  
Date

*Jennifer*

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

*2/11/16*

\_\_\_\_\_  
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 Renewal for Appalachian Mountain Club

**NEPA Log Number:** DOI-BLM-UT-Y010-2016-0095 DNA

**File/Serial Number:** MFO-Y010-16-052R

**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 Greenhouse Gas Emissions		Ann Marie Aubry <i>Ann Marie Aubry</i>	2/10/16
NC	Floodplains		Ann Marie Aubry <i>Ann Marie Aubry</i>	2/10/16
NC	Soils		Ann Marie Aubry <i>Ann Marie Aubry</i>	2/10/16
NC	Water Resources/Quality (drinking/surface/ground)		Ann Marie Aubry <i>Ann Marie Aubry</i>	2/10/16
NC	Wetlands/Riparian Zones		Mark Grover <i>MG</i>	2/5/16
NC	Areas of Critical Environmental Concern		Katie Stevens <i>KS</i>	2/10/16
NC	Recreation		Katie Stevens <i>KS</i>	2/10/16
NC	Wild and Scenic Rivers		Katie Stevens <i>KS</i>	2/10/16
NC	Visual Resources		Katie Stevens <i>KS</i>	2/10/16
NC	Wild Lands (BLM Natural Areas)		Bill Stevens <i>BS</i>	2/5/16
NC	Socio-Economics		Bill Stevens <i>BS</i>	2/5/16
NC	Wilderness/WSA		Bill Stevens <i>BS</i>	2/5/16
NC	Lands with Wilderness Characteristics		Bill Stevens <i>BS</i>	2/5/16
NC	Cultural Resources		Jared Lundell <i>JL</i>	2-10-16
NC	Native American Religious Concerns		Jared Lundell <i>JL</i>	2-10-16
NC	Environmental Justice		Bill Stevens <i>BS</i>	2/5/16

Determination	Resource	Rationale for Determination*	Signature	Date
NC	Wastes (hazardous or solid)		David Pals <i>DP</i>	2/10/16
NC	Threatened, Endangered or Candidate Animal Species		Pam Riddle <i>PR</i>	2/10/16
NC	Migratory Birds		Pam Riddle <i>PR</i>	2/10/16
NC	Utah BLM Sensitive Species		Pam Riddle <i>PR</i>	2/10/16
NC	Fish and Wildlife Excluding USFW Designated Species		Pam Riddle <i>PR</i>	2/10/16
NC	Invasive Species/Noxious Weeds		Dave Williams <i>DW</i>	2/10/16
NC	Threatened, Endangered or Candidate Plant Species		Dave Williams <i>DW</i>	2/10/16
NC	Livestock Grazing		Dave Williams/ Jordan Davis/ Kim Allison <i>JDA</i>	2/10/16
NC	Rangeland Health Standards		Dave Williams/ Jordan Davis/ Kim Allison <i>JDA</i>	2/10/16
NC	Vegetation Excluding USFW Designated Species		John Davis <i>JD</i>	2/10/16
NC	Woodland / Forestry		John Davis <i>JD</i>	2/10/16
NC	Fuels/Fire Management		Josh Relph <i>JR</i>	2/10/16
NC	Geology / Mineral Resources/Energy Production		David Pals <i>DP</i>	2/10/16
NC	Lands/Access		Jan Denney <i>JD</i>	2.10.16
NC	Paleontology		ReBecca Hunt-Foster <i>RHF</i>	2/10/16

**FINAL REVIEW:**

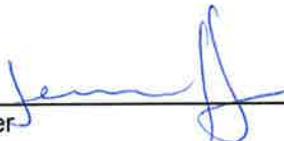
Reviewer Title	Signature	Date	Comments
Environmental Coordinator	Katie Stevens <i>KS</i>	2/10/16	
Authorized Officer	J.L. Jones <i>JL</i>	2/11/16	

**FINDING OF NO SIGNIFICANT IMPACT**  
**And**  
**DECISION RECORD**  
**Appalachian Mountain Club**  
DOI-BLM-UT-Y010-2016-0095 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 to Appalachian Mountain Club for commercial tours 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 for Appalachian Mountain Club 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 2/11/16