United States Department of the Interior
Bureau of Land Management

Environmental Assessment
DOI-BLM-UT-G010-2011-0005

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Mountain Homes Youth Ranch Special Recreation Permit

Location:

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(Various Sections see Maps 1-4)

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1.0 PURPOSE & NEED

1.1 Introduction

This Environmental Assessment (EA) has been prepared to disclose and analyze the environmental consequences of the proposed Mountain Homes Youth Ranch Special Recreation Permit (SRP). The EA is a site-specific analysis of potential impacts that could result with the implementation of a proposed action or alternatives to the proposed action. The EA assists the Bureau of Land Management (BLM) in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination as to whether any "significant" impacts could result from the analyzed actions. "Significance" is defined by NEPA and is found in regulation 40 CFR 1508.27. An EA provides evidence for determining whether to prepare an Environmental Impact Statement (EIS) or a statement of "Finding of No Significant Impact" (FONSI). If the decision maker determines that this project has "significant" impacts following the analysis in the EA, then an EIS would be prepared for the project. If not, a Decision Record may be signed for the EA approving the selected alternative, whether the proposed action or another alternative. A Decision Record (DR), including a FONSI statement, documents the reasons why implementation of the selected alternative would not result in "significant" environmental impacts (effects) beyond those already addressed in the Vernal Field Office Resource Management Plan (October 2008).

1.2 Background

Special Recreation Permits (SRPs) are authorizations which allow for recreational uses of the public lands and related waters. They are issued as a means to control visitor use, protect recreational and natural resources, and provide for the health and safety of visitors. Commercial SRPs are issued as a mechanism to provide a fair return to the United States for the commercial recreational use of public lands.

SRPs are managed through BLM handbook H-2930-1 *Recreation Permit Administration* and fees for use are authorized under the Federal Lands Recreation Enhancement Act (FLREA). The Bureau of Land Management (BLM) has recognized Wilderness Youth Therapy programs as a valid use of public lands within Utah.

1.3 Need for the Proposed Action

A Special Recreation Permit application has been received from Mountain Homes Youth Ranch. The need for the proposed action is for the applicant to operate its business within BLM regulations and standards on public land.

The application shall be fully processed using current NEPA guidelines to assess potential impacts from the proposed action. Following the analysis, a SRP may be

granted, granted with any modifications and/or additional Terms and Conditions included, or denied at the BLMs discretion.

1.4 Purpose for the Proposed Action

The Bureau of Land Management (BLM) has recognized Wilderness Youth Therapy programs as a valid use of public lands within Utah as provided for under the Federal Land Policy and Management Act (FLPMA). BLMs purpose is to evaluate Mountain Homes Youth Ranch's SRP application under the Federal Land Policy and Management Act of 1976 (FLPMA) and other applicable laws and policies which require BLM to manage public lands, including recreation, without undue environmental impacts. BLM policy provides for SRP applications, evaluation, approval/rejection and management.

1.5 Conformance with BLM Land Use Plan(s)

The proposed action and alternatives described below are in conformance with the Vernal Resource Management Plan (RMP) signed 31 October 2008. Although the proposed action and alternatives are not specifically mentioned in the plan they conform to decision REC-5, on page 106 which states, "Special Recreation Permits (SRPs) will continue to be considered on a case-by-case basis. All proposed applications for permits will be evaluated to determine compliance with the goals and objectives of this plan." All alternatives considered in detail in the EA are in conformance with the direction set out in the RMP.

1.6 Relationship to Statutes, Regulations, or Other Plans

The proposed action and alternatives are consistent with federal, state, and local laws and regulations, Rangeland Health Standards and Guidelines and Native American Trust Resource policies.

This document is completed under the authority of the Federal Land Policy and Management Act (FLPMA) of 1976, as amended, Public Law (P.L. 94-579 (43 United States Code (U.S.C.) 1701 et seq.) which states under Title I Declaration of Policy (8), "…the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use." The BLM uses the recreation permitting system to satisfy recreational demand within allowable use levels in an equitable, safe, and enjoyable manner while minimizing adverse resource impacts and user conflicts. The BLM recreation permit system authorizes the permittees use of public lands and/or related waters for specified purposes. The use of public lands and/or related waters is a privilege subject to the terms and conditions of the permits.

This document is completed under authority of the National Environmental Policy Act (NEPA) of 1969, P.L. 91-190 (42 U.S.C. 4321, et seq.) which requires the BLM to take a "hard look" at proposed actions and how they may impact public lands.
Title 36 CFR, Subpart 71 – Recreation Fees identifies the ability of the Federal government to collect fees on public lands.

Title 43 CFR, Subpart 2930 – Special Recreation Permits, Other than on Developed Recreation Sites allows for commercial use where appropriate on public lands.
BLM Manual 8300 Recreation Management provides policy and guidance on managing recreation on public lands.

BLM Manual H-2930-1 Recreation Permit and Fee Administration provides policy and guidance on administering and managing SRPs.

Utah Administrative Code Rule R501-8 oversees wilderness youth therapy programs to include regulations and licensing within the state of Utah.

Instruction Memorandum (IM) No. 2008-141 Health and Safety of Participants Attending "Wilderness Therapy Programs" or "Residential Treatment Programs for Troubled Youth" on Public Lands. This document gives guidance on State primacy in enforcement and specific direction on management for SRPs dealing with wilderness youth therapy programs.

The Uintah County Plan (2007) on page 4.2 states, "…Continue the County's progressive, proactive approach to economic growth and development." and, "…encourage and support entrepreneurial opportunities in the private sector." Additionally on page 4.4 the plan identifies small business assistance as one of its goals.

1.7 Identification of Issues

Identification of issues for this assessment was accomplished by considering the resources that could be affected by implementation of one of the alternatives, as well as through involvement with the public and input from a BLM interdisciplinary team (appendix A). Site visits were conducted between October 14th 2010 and October 16th 2010. Public involvement consisted of posting the proposal on the Utah BLM Environmental Notice Bulletin Board (ENBB) on October 19th 2010. No issues were brought forward through the ENBB notification.

Appendix A; contains a checklist of all resources considered but not necessarily analyzed. These elements are subject to the requirements specified in statute or executive order and must be considered in all EA's (BLM H-1790-1).

Issues Identified through the scoping process listed above were:

1.7.1 Recreation

- Hunting Camp Impacts

- Common issues with wilderness youth programs
- Public safety
- Permit Management requirement (staffing)

1.8 Issues Considered but Eliminated from Further Analysis

A literature review identified common concerns from a study of land management professionals (*What Managers are Saying and Doing About Wilderness Experience Programs,* Gager et al. 1998) with a study group of N=185. Common concerns are listed below with an associated rationale as to why BLM did not carry these issues forward for further analysis.

Establishing new trails and sites

"Social trails" are trails that are developed by users who repeatedly travel to and from points of interest (e.g. travel to and from bathrooms, overlooks or picturesque points etc…). Along social trails, where vegetation is less resilient to travel, soils can be compacted and vegetation does not grow back, thus creating a more lasting trail. As established site use increases, sites are either by-passed by other potential users or expanded to accommodate more users or new sites can be created.

The applicant has identified dispersed campsites with previous use and has committed to hike only on existing game/social trails and existing roads.

Overuse of user areas

When a large number of user days are applied in an area, competition and potential conflicts can increase. User demand on the resource may create an imbalance and limits of acceptable change might take place. Examples would be that vegetation might be completely removed, soils may become completely compacted, and sites might continue to expand into other sites.

The dispersed sites identified by the applicant receive limited use primarily in the fall during hunting season. The BLM may impose timing and use restrictions to alleviate any potential overcrowding issues.

Large group sizes

Large groups can potentially have greater impacts than many users over time if the resource is sensitive. Vegetation and soil trampling can have greater impacts more quickly than if use is spread out over time.

The dispersed sites identified average over 150' X 150'. The applicant has shown the ability to operate within this proposed footprint based on private land site inspections. This document will set group size numbers at 16 per site if a permit is issued. Large

groups are typically identified as greater than 25 in a wilderness area and greater than 75 for SRP's.

Lack of wilderness stewardship skills & knowledge

Wilderness Areas (as defined by Congress) have specific use sized recommended and allow for limited user impacts. Wilderness Study Areas restrict use from mechanized and motorized use, and generally do not allow for surface disturbing activities.

The BLM has determined that the above issues would be addressed through applicant committed measures, outlined below:

The applicant has committed to practice Tread Lightly© and Leave no Trace© principles, and currently is not operating in designated wilderness, or in an identified wilderness study area.

The applicant provided written permission to the BLM authorizing the BLM to impose necessary and prudent restrictions on sites use required to minimize potential impacts to public resources. (October 21, 2010, see administrative record). Using this authorization the BLM removed proposed site 21 (see map) from consideration based on internal scoping concerns.

Based on Mountain Homes Youth Ranch's request site 14 was removed from consideration based on recent impacts from the 2010 Augusi Canyon Fire.

1.9 Summary

This chapter has presented the purpose and need of the proposed project, as well as the relevant issues, i.e., those elements of the human environment that could be affected by the implementation of the proposed project. In order to meet the purpose and need of the proposed project in a way that resolves the issues, the BLM has considered and/or developed a range of alternatives. These alternatives are presented in chapter 2. The potential environmental impacts or consequences resulting from the implementation of each alternative considered in detail are analyzed in chapter 4 for each of the identified issues.

2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION

The interdisciplinary team explores and evaluates reasonable alternatives that meet the BLM's underlying purpose and need for the proposed action.

2.1 Introduction

An SRP application has been received from Mountain Homes Youth Ranch for requested use in the southeast portion of the Vernal Field Office. Mountain Homes

Youth Ranch operates what is commonly called a "wilderness therapy program" involving field based therapy for youth and young adults with behavioral issues. The following alternatives have been developed following site specific analysis of SRP use on these dispersed sites.

2.2 Alternative A – Proposed Action

Under this alternative, a probationary SRP would be issued to Mountain Homes Youth Ranch allowing it to operate within approved dispersed camping sites year round on Vernal Field Office managed lands within the south eastern portion of the Field Office.

Potential locations are identified on maps found in chapter one. Resource site inventories have been conducted for each location (see administrative record.) The BLM would be able to modify use to include restricting use by removing individual sites, adding timing and use restrictions on sites, closing sites, or choosing alternate dispersed sites within a reasonable distance of the restricted site.

Terms and Conditions

Under this alternative, the BLM would restrict use on identified high value pristine campsites during the highest season of use. Currently, the highest season of use is in the fall from October 15th through the end of November during hunting season, however if the BLM observes a rise in conflicts it may modify the timing and use restrictions.

During site visits conducted on October 12th 2010, the applicant committed to the following measures:

- The BLM may restrict use based on impacts to other resources
- Modify their operating plan (see administrative record) to include use of portable toilet systems.
- Either obtain a BLM commercial firewood permit or purchase wood for campfire use.
- The BLM may require a bond to be posted to protect public resources and public equipment/facilities from damage that may incur to public assets.
- The applicant would not create new trails in the area of operation. Leave no trace and tread lightly principles (see administrative record) would be followed, and groups would hike on existing game/social trails, or other durable surfaces only.
- Year one of any permit that may be issued would be a probationary year. The BLM would evaluate the program and determine if additional years

would be authorized (up to 10 years) if performance reports are acceptable.

- If the BLM determines that a significant incident(s) have occurred, the BLM may revoke the SRP, restrict the SRP, or continue with probationary status. Such action would be determined by the authorized officer.

- The BLM would monitor sites for impacts on a regular (monthly) basis during the probationary phase, and as staffing would allow following a successful probationary period. Monitoring reports would be tracked in the administrative file.

- The maximum number of individuals in one site would be 16 comprised of 12 students and 4 staff members.

- The applicant would be charged fees as deemed appropriate by the authorized officer through current BLM policy.

2.3 Alternative B – Exclusive Use Alternative

Under this alternative the above terms and conditions outlined under Alternative A would apply. The BLM may allow Mountain Homes Youth Ranch to reserve sites, thus granting them exclusive use for an additional monthly fee at a rate to be determined by the authorized officer. This would allow Mountain Homes Youth Ranch to post signs indicating dates of occupancy and would allow them exclusive use within the sites identified. The BLM would determine the availability of sites and have the flexibility to modify site reservations at the discretion of the BLM. This alternative would close the sites to the general public for the stipulated dates and times as agreed to under any permit that may be awarded.

2.4 Alternative C – No Action Alternative

Presently, Mountain Homes Youth Ranch does not have a permit to operate on BLM managed public lands within the Vernal Field Office. This alternative would prevent Mountain Homes Youth Ranch from operating on BLM managed public lands, but would not prevent the business from operating under agreements on lands managed by the state of Utah, or through private agreements with private land owners.

3.0 AFFECTED ENVIRONMENT

3.1 Introduction

This chapter presents the potentially affected existing environment (i.e., the physical, biological, social, and economic values and resources) of the impact area as identified in

the IDT Checklist (Appendix A) and presented in chapter 1 of this assessment. This chapter provides the baseline for comparison of impacts/consequences described in chapter 4.

3.2 General Setting

The Vernal Field Office managed lands within the Book Cliffs provide scenery ranging from the red rock often seen in southern Utah to the usual green color of the northern alpine regions. The altitude ranges from around 4500 feet to 8000 feet. A variety of colors are provided by the landscape and vegetation. The Book Cliffs begin about 50 miles south of Vernal, Utah and extend south to the Book Cliffs divide. Towards the east is the Colorado/Utah state line. The Uintah and Ouray Indian Reservation is on the west side of the Book Cliffs. Both southern Uintah County and northern Grand County are included. Roads are generally comprised of native surfaces and travel can be difficult during wet or snowy conditions.

Approximately 70% of the area is administered by the BLM, 25% by the School and Institutional Trust Land Administration (SITLA), and 5% is private.

Recreational camping in dispersed sites is generally associated with hunting season. Generally campers use tents or self-contained recreational vehicles (RVs). Campsites are primitive and consist of user created fire rings, social trails, game trails, primitive log/stone benches, and remnant game hangers and have low to moderate amounts of litter. There are limited entry hunts in the Book Cliffs; which means that individuals may wait years for an opportunity to hunt specific areas. Hunters currently compete for pristine campsites with a current youth program, licensed guide services and other hunters.

3.3 Issues Brought Forward for Analysis

3.3.1 Recreation

Hunting Camp Impacts

Dispersed hunting camps are generally located adjacent to two-track roads and main artery roads through the Book Cliffs. The sites identified include traditional sites that hunters have occupied during the hunting season which ranges from mid-August through the end of November.

Seasonal hunting data for the 2009/2010 hunting year compiled by the Utah Department of Natural Resources (*E-mail to BLM*, Mangus 2010) report that the total number of big game permits issued was 1527. This represents the majority of the dispersed campsite use for the Book Cliffs based on undocumented staff field observations.

Common Issues with Wilderness Therapy programs (*Wilderness Therapy as an Intervention and Treatment for Adolescents with Behavioral Problems,* Russell and Hendee, 2000)

Complaints related to wilderness therapy programs annually include:

- Noise
- Trash, litter, or unclean camps
- Site expansion (soil disturbance/compaction, vegetation removal)
- Increased traffic on area roads
- Failure to comply with a BLM Law enforcement and recreation requests
- Private land trespassing/issues
- "Runners" these are students/clients that run away, or leave programs without authorization

Public Safety

By nature, wilderness youth therapy groups serve young adults with behavioral issues. These at-risk youth would be camping on public lands in proximity to oil and gas industry facilities and employees, State facilities and assets, BLM facilities and assets, and other public land users.

4.0 ENVIRONMENTAL IMPACTS

4.1 Introduction

This chapter provides an analysis of the environmental consequences from implementing any of the alternatives identified in Chapter 2. Best management practices that would avoid or reduce impacts under Alternatives A and B have been included in Chapter 2 of this EA, and the analyses in this chapter assume that those measures would be implemented.

4.2 General Analysis Assumptions and Guidelines

The BLM conducted a field inventory of the 27 potential sites identified utilizing a standardized form for site inventory (see administrative record). The form includes a photo record of three points looking in, and identifies current use at the site, and any primitive improvements (i.e., rock fire ring, wood log benches, game hangers etc.) The form also provides additional anecdotal data and notes primary vegetation types and any observable resources in the immediate area. The data collected would provide a baseline for future site monitoring to determine compliance. The identified limitation of the field observations was the lack of occupancy at the majority of the sites to establish potential conflicts with the primary user group(s). Of the 27 sites identified, only two showed occupancy during the general elk hunt. Others had evidence of recent use including litter and fire ring use. The baseline data collected was a snapshot in time at the moment of collection, and it is an unknown factor how use may increase/decrease over time in the identified sites, though currently the BLM anticipates slight annual use fluctuation

within the identified sites. Outside economic trends, availability of hunting permits, and local population trends would have influence on use within the dispersed sites.

4.3 Direct and Indirect Impacts

Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.

4.3.1 Alternative A – Proposed Action

4.3.1.1 Recreation

Hunting Camp Impacts

Should Mountain Homes Youth Ranch be issued an SRP, use in the proposed sites may cause a change in the current use patterns for each identified proposed site. The nature of the potential impact could lead hunters/recreational campers to be displaced from a total of 5 sites for a two week period at one time. Hunters may be displaced and camp in alternate sites, or may create new sites. Generally sites would be available in the immediate area, and the displacement would be minor.

Statistically, 1527 hunting permits were issued in the Book Cliffs during the 2009/2010 hunting season (*Electronic mail,* Mangus 2010). If each permit holder occupied a campsite during their individual hunt, at minimum, less than 0.016% (based on an estimated average of 3 hunters per campsite) of the permitted hunters would be directly impacted through displacement by Mountain Homes Youth Ranch. This impact to recreation users would be considered short-lived and minimal.

Some sites are more highly regarded than others and potential competition for these specific sites could increase. If Mountain Homes Youth Ranch was issued an SRP, sites occupied by Mountain Homes Youth Ranch may be cleaned by the group prior to leaving the site unoccupied after two weeks of occupancy. This could potentially improve 27 dispersed sites for use by the public when the applicant is not in the site. If Mountain Homes Youth Ranch was issued an SRP and failed to clean sites prior to rotating, the sites would have greater impacts from litter.

Common Issues with Wilderness Therapy Programs

If Mountain Homes Youth Ranch was issued an SRP, the BLM may have an increase in complaints due to issues identified in chapter 3.

Noise/Unclean Camps

Noise, and unclean camps directly impact other users experience when they camp near a wilderness youth group. This creates potential for conflicts and the potential for

intervention requiring a law enforcement presence. This may prevent BLM law enforcement or other law enforcement entities from responding to other calls in a timely manner.

Site expansion (soil disturbance/compaction, vegetation removal)

Soil compaction and site expansion could lead to increases in runoff, loss of vegetation, and cause displacement or further site expansion from the general public.

Increased traffic on area roads

Primary travel for the road is stems from the oil and gas industry with secondary uses coming from recreation and other resources. Traffic patterns may shift and change minimally with the proposed use.

Private land trespassing/issues

If Mountain Homes Youth Ranch trespassed on private land, privately owned assets could potentially be at greater risk for theft, destruction, or vandalism. Participants that leave wilderness therapy programs without authorization are known as "runners." Youth wilderness programs have runners on occasion. The runners may pose a potential threat to themselves, the public, or to adjacent private land owners or public/private property.

Public Safety

Risks to the general public

The general public may come into contact with Mountain Homes Youth Ranch students and staff. This potential proximity increases the risk above general contacts between members of the public based on the program participants various behavioral issues. Should unmanageable conflicts occur, there is a risk for physical altercations between members of the public and the program participants, or staff members and participants, or between the groups.

Risks to program participants

Youth involved in the programs have safety protocols and state regulations designed to ensure their safety needs and sustenance are provided for, however, the Book Cliffs is a harsh environment with extremes in temperatures, sudden storms, and severe weather year round. Even with emergency preparation, there is an increased risk of heat stroke, dehydration, hypothermia, or other health issues caused by rapid change in the environment and other program driven increased physical stressors, (detoxification issues, withdrawal issues, medication issues.)

Additionally wildlife in the Book Cliffs poses risk from bites, stings, etc. The Book Cliffs are home to numerous species such as bear, mountain lion, badger, venomous

reptiles etc. The state of Utah has had fatalities within wilderness youth programs in the past stemming from the above concerns as well as staffing issues stemming from identified abuse and neglect. Youth may be exposed to: the elements, arduous labor, a lack of modern resources, dehydration, and other health issues.

Mitigation

The BLM would propose that campsites be monitored on a weekly or bi-weekly basis by a BLM staff member to ensure that permit stipulations were being met during any probationary phase of any permit granted. Specific issues would be identified and referred to in writing to Mountain Homes Youth Ranch for improvement. Should Mountain Homes Youth Ranch fail to follow stipulations or make required changes identified by monitoring, the authorizing officer would determine an appropriate action regarding permit management.

Mountain Homes Youth Ranch will be required to remove all solid human waste. This shall be accomplished through a third party or through the use of as portable toilets, PET toilets, chemical toilets etc. The BLM will allow liquid human wastes to remain on site in an identified latrine.

The BLM would address concerns/complaints from the general public through written follow-up with Mountain Homes Youth Ranch. Mountain Homes Youth Ranch would be expected to respond to those concerns with a written action plan, and monitoring from the BLM would ensure that corrective actions had been taken.

The BLM will require public notification that Mountain Homes Youth Ranch is operating within a specific area through a monthly press release from Mountain Homes Youth Ranch identifying general operation areas (such as “the south eastern portion of the Book Cliffs”) and will approach any campers/hunters or members of the general public (when feasible) within ¼ mile to identify themselves.
Mountain Homes Youth Ranch has identified their standard operation procedures (SOPs) and will update their (SOPs) to identify their plans for dealing with the identified common issues. At a minimum, the company through its representative will notify the BLM when one or more of these identified issues have occurred. The BLM will determine the adequateness of the SOPs and through collaborative efforts will recommend changes that will be applied to the permit stipulations.

The BLM will also require all vehicles to be clearly marked with a minimum of the company name, primary phone number and city of operation on both sides and readable at 50 feet. The BLM will require signs with the company’s name be posted at each occupied site within clear view of the public. Signs will be readable at 50 feet.
The BLM will notify the state license inspector to request state primacy inspections for compliance with state regulations. BLM law enforcement will have unrestricted access to camps and will report any known violations to the state licensing officer, and the authorized officer. Should a safety violation be identified, the authorized officer will determine an appropriate action.

Monitoring/Compliance

Monitoring and/or compliance can provide important information regarding desired outcomes compared to actual outcomes. The main purpose monitoring is to: evaluate the effectiveness of compliance with the decision made based on the NEPA analysis. The primary resource identified for monitoring are recreational dispersed campsites within the proposed project area. These sites will be monitored and compared to the baseline site inventory to help the BLM track potential changes and impacts to the resource. Through site monitoring and compliance checks, potential impacts identified in chapter 4 can be effectively tracked to ensure that proposed mitigation is being effective. This is a valuable tool which allows the BLM to modify the SRP to protect resources should unforeseen impacts occur.

Monitoring may be accomplished through:

- Law enforcement field contacts
- Recreational Staff field/office contacts
- Other field office staff field contacts as available
- State licensing officer field/office contacts

Methods would be:

- Contacting occupied camps and conducting walkthrough inspections for SRP compliance
- Inspecting unoccupied camps on follow up to ensure appropriate clean up is taking place
- Field reports would be compiled and presented to the authorized officer for any needed SRP actions

Reports would be kept in the administrative file for the duration of the SRP.
Any field reports generated by the state licensing officer would be requested and contact within the agency and the state would be maintained on a regular (semi-annual basis) or as needed should reportable incidents/violations occur.

4.3.2 Alternative B – Exclusive Use Alternative

The impacts would be similar to Alternative A, however; the sites listed would no longer be available for public use year round. It is likely that the agency would receive numerous complaints about losing access to sites, primarily during the hunting season. Mitigation and monitoring would be the same as Alternative A.

4.3.3 Alternative C – No Action Alternative

If the proposal is rejected, impacts from current use would continue and may include increased or decreased use of dispersed campsites, creation of new dispersed campsites

by the general public, and increased or decreased vandalism/litter on public lands from the general public.

The analysis of this alternative provides important baseline information for the decision maker and the public.

4.4 Cumulative Impacts

"Cumulative impacts" are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions.

4.4.1 Cumulative Impact Area (CIA)

The CIA area for all resources identified in the IDT checklist is the southeastern portion of public lands managed by the Vernal Field office within the Book Cliffs region identified and described in Chapter 3. The duration for CIA would be the potential for the life of a 10 year SRP.

4.4.2 Past and Present Actions

Past or ongoing actions that affect the same components of the environment as the proposed action include current wilderness youth therapy permittee operating in the same or overlapping area currently during the winter months only. This permittee has a different operating plan and would not be in direct competition for the identified sites at this time. Sites for this permittee are generally more hidden from the public and more remote (less adjacent to well used two-track roads).

4.4.3 Reasonably Foreseeable Action Scenario (RFAS)

The NEPA Handbook (Section 6.8.3.4) defines a reasonably foreseeable action to those for which there are existing decisions, funding, formal proposals, or which are highly probable, based on known opportunities or trends.

The following RFAS identifies reasonably foreseeable future actions that would cumulatively affect the same resources in the cumulative impact area as the proposed action and alternatives.

Anticipated new application from current wilderness youth program
The current permittee is at the end of their permit and will require new NEPA analysis in the future. This document will be a reference document for that process. That would be a separate action and may or may not take place in the same geographical area in the future and may or may not have cumulative effects on the dispersed campsites within the geographic region.

Anticipated programmatic EA for wilderness youth programs or upland guides/hunting opportunities within lands managed by the Vernal Field Office
This may create limits of acceptable change, set use restrictions on this wilderness youth therapy programs, set standard operating procedures, and dictate management style and philosophy for wilderness youth programs or upland guided opportunities within the VFO.

Anticipated continued expansion and project for the oil and gas industry.
This may create future conflicts and require compromises from both the oil and gas industry and Mountain Homes Youth Ranch for conflict resolution.

4.4.4 Cumulative Impacts Analysis

It has been determined that cumulative impacts would be negligible as a result of the proposed action or alternatives because of the small percentage of dispersed sites that would be occupied at any one time and the identified user committed measures and stipulations contained within this document. Additionally, if recommended mitigation becomes part of the decision record, impacts to the resource by have positive impacts on site cleanliness and improve the general public's opportunity to enjoy more pristine dispersed sites when not in use by the permittee.

5.0 CONSULTATION AND COORDINATION

5.1 Introduction

The issue identification section of Chapter 1 identifies those issues analyzed in detail in Chapter 4. The IDT Checklist provides the rationale for issues that were considered but not analyzed further. The issues were identified through the public and agency involvement process described in sections 5.2 and 5.3 below.

5.2 Persons, Groups, and Agencies Consulted

Table 5.2-1 List of all Persons, Agencies, and Organizations Consulted

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Second Nature Wilderness Therapy	Second Nature Wilderness Therapy currently operates within the Vernal Field Office area.	Second Nature Wilderness Therapy has indicated that it will comment during the public comment period.

5.3 Summary of Public Participation

This project was posted on the Utah Environmental Notification Bulletin Board (ENBB) on 9/27/2010. A public comment period has been requested by interested parties within the Uintah Basin that own/operate similar businesses. Scoping was conducted internally and through a public comment period which was available for 30 days between January 2011 and February 2011.

5.4 List of Preparers

For a list of BLM preparers refer to the IDT checklist in Apendix A

6.0 REFERENCES

Gager, Dan., Hendee, John C., Kinziger, Mike, Krumpe, Ed. *What Managers are Saying and Doing About Wilderness Experience Programs,* University of Idaho, ID 1998.

Mangus, Dax., E-mail to BLM, November 04, 2010.

Russell, Keith C., Hendee John C., *Wilderness Therapy as an Intervention and Treatment for Adolescents with Behavioral Problems,* USDA Forest Service Proceedings RMRS-P-14. 2000.

INTERDISCIPLINARY TEAM ANALYSIS RECORD CHECKLIST

Project Title: Mountain Homes Youth Ranch Special Recreation Permit Application

Project Lead: Jason R.West

NEPA Log Number: DOI-BLM-UT-G010-2011-0005

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 significant impact analyzed in detail in the EA; or identified in a DNA as requiring further analysis

Determi-nation	Resource	Rationale for Determination*	Signature	Date
NI	Air Quality	Dust emissions currently occur from vehicles utilizing the project area roads. NOx, VOCs, and HAPs emissions occur from equipment in the project area. Air quality impacts are within the Uinta Basin Air Quality Study (UBAQS) that was conducted in 2009. An additional model was run for the Greater Natural Buttes (GNB) EIS. The results of that project specific model correspond with the results of the general UBAQS model. Overall, air quality in the Basin was modeled as being within attainment of the NAAQS. The 2012 horizon of UBAQS and the 2018 horizon of GNB showed isolated areas where NAAQS were exceeded, which are thought to be residual effects from utilizing Wasatch Front monitors (which are 120 miles away in a non-attainment area) used to calibrate the model. There are no regulatory monitoring data for the project area to verify and calibrate the results of either model, although monitoring of air quality began in the Uinta Basin in January 2010. Preliminary monitoring results indicate that ozone NAAQS were exceeded in the Uinta Basin during the winter. However, ozone formation from its component parts (NOx and VOCs) is a nonlinear, photo-reactive process that can be difficult to predict with limited data. It is anticipated that the incremental change from this project's alternatives would be small in scope and likely undetectable through modeling and by monitoring.	Mark Wimmer	09/27/10
NP	Areas of Critical Environmental Concern	Non present as per Vernal RMP/ROD and GIS Layer review	Jason West	12/17/2010
NP	BLM natural areas	Non present as per Vernal RMP/ROD and GIS Layer review	Jason West	12/17/2010
NI	Cultural Resources	There are no cultural resources in the project area APE	Kieth Waldron	9/27/2010

Determi-nation	Resource	Rationale for Determination*	Signature	Date
NI	Environmental Justice	The proposed alternatives would not likely create disproportionately high and adverse human health impacts or environmental effects on minority or low-income populations since there are none in the project area.	Mark Wimmer	9/27/2010
NP	Farmlands (Prime or Unique)	All prime or unique farm lands in the Uintah Basin must be irrigated to be considered under this designation, among other factors. No irrigated lands are located in the proposed action area; therefore this resource will not be carried forward for analysis.	Mark Wimmer	9/27/2010
NP	Floodplains	Camps are not located within HUD inventoried or non-HUD inventoried floodplains. Camps and other activities would not negatively impact floodplain if encountered.	Stan Olmstead	1/05/2011
NI	Fuels / Fire Management	No fire/fuels project impacts anticipated.	Blaine Tarbell	9/27/2011
NI	Geology / Mineral Resources / Energy Production	No adverse impacts to geology, mineral resources, Or energy production expected.	Betty Gamber	1/28/2011
NI	Greenhouse Gas Emissions	No standards have been set by EPA or other regulatory agencies for greenhouse gases. In addition, the assessment of greenhouse gas emissions and climate change is still in its earliest stages of formulation. Global scientific models are inconsistent, and regional or local scientific models are lacking so that it is not technically feasible to determine the net impacts to climate due to greenhouse gas emissions. It is anticipated that greenhouse gas emissions associated with this action and its alternative(s) would be negligible.	Mark Wimmer	9/27/2011
NI	Hydrologic Conditions (stormwater)	Camps and other activities by the students and staff would not cause alteration of surface water flow patterns and would not be subject to storm water issues associated with Section 402 of the Clean Water Act.	Stand Olmstead	1/05/2011
NI	Invasive Plants / Noxious Weeds	Noxious weed proliferation is expected to be insignificant as a result of the proposed action.	Maggie Marston	01/8/11
NI	Lands / Access	The 27 existing dispersed campsites as proposed are located on public lands. No right-of-way is required for the use of these sites. Access to the proposed camp sites are authorized Uintah County road rights-of-way. Sites 21, 22 and 27 are located near a high pressure natural gas pipeline (UTU-092176). It is unknown at this time if any valve structures are near these camp sites, potential for someone turning a valve on the pipeline could cause a safety problem. These sites are also located along or near Seep Ridge road. We currently have a ROW amendment application filed by Uintah County to upgrade, widen, realign and pave Seep Ridge Road to the county line. Depending on the outcome of this EA, Seep Ridge road may be widened, re-aligned and paved which may cause the camps to move during construction.	Cindy McKee	9-27-2010

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NI	Livestock Grazing	There are no issues related to livestock grazing resources that cannot be resolved without the applicant committed measures. Compliance of these measures could assure that impacts to livestock grazing resources would be negligible or nonexistent.	Dusty Carpenter	1/12/2011
NI	Lands With Wilderness Characteristics (LWCs)	No new surface disturbance, existing activity on public lands adjacent to existing roads.	Jason West	12/17/2010
NI	Migratory Birds	Migratory bird species may be present within the area; however, no surface disturbance is proposed.	Brandon McDonald	1/12/11
NI	Native American Religious Concerns	No concerns identified, the nature of the project is NSO and is taking place in currently used dispersed campsites within the VFO	Keith Waldron	9/27/2010
NP	Paleontology	No paleontology issues expected. No paleo localities near campsites.	Betty Gamber	1/28/2011
NI	Rangeland Health Standards and Guidelines	Rangeland Health Assessments have not been evaluated for Sunday School, Sweetwater, Atchee Ridge AMP, or Lower McCook Allotments. Therefore, no impacts are anticipated to Rangeland Health at this time. However, future monitoring of the camp sites may indicate otherwise.	Dusty Carpenter	1/12/2011
PI	Recreation	Dispersed recreation sites would be used in the proposed action, limiting use for the public.	Jason West	12/17/2010
NI	Socio-economics	Effects on social and economic values would be minimal and would not require further analysis due to the small scale nature of the action when compared to the larger economy in the area. Hunting conflicts are discussed in the above recreation section.	Mark Wimmer	9/27/2010
NI	Soils	Camps and other activities of the program would not negatively impact soils other than minor compaction which would quickly naturalize after the camps move to the next camp site.	Stan Olmstead	9/27/2010
NI	Special Status Plant Species other than USFWS candidate or listed species	The removal of Site 21 from the proposed action mitigated special status plant habitats on Green River shale sites.	Maggie Marston	01/08/11
NI	Threatened, Endangered or Candidate Animal Species	As per BLM inventories and field visits there are no threatened, endangered, or candidate species including their habitats present within or near the proposed camp sites.	Brandon McDonald	01/12/11
NI	Threatened, Endangered or Candidate Plant Species	The removal of Site 21 from the proposed action mitigated special status plant habitats on Green River shale sites.	Maggie Marston	01/08/11
NI	Visual Resources	Use would be the same as current use, in current dispersed sites, no new structures or facilities would change or alter the line form, texture or color of the landscape.	Jason West	12/17/2010
NI	Wastes (hazardous or solid)	*Hazardous Waste:* No chemicals subject to reporting under SARA Title III in an amount equal to or greater than 10,000 pounds will be used, produced, stored, transported, or disposed of annually in association with	Mark Wimmer	9/27/10

Determi-nation	Resource	Rationale for Determination*	Signature	Date
		the project. Furthermore, no extremely hazardous substances, as defined in 40 CFR 355, in threshold planning quantities, will be used, produced, stored, transported, or disposed of in association with the project. *Solid Wastes:* Trash would be confined in a covered container and hauled to an approved landfill. Burning of waste or oil would not be done. Human waste would be contained and be disposed of at an approved sewage treatment facility.		
NP	Waters of the U.S.	Waters of the U.S. would not be affected by camps or other program activities since camps are not located near perennial waters or ephemeral drainages.	Stan Olmstead	1/05/2011
NP NP	Water Resources/Quality (surface/ground)	Surface Waters: Camps and other program activities would not be negatively impacted since protocol of the program provides the necessary surface management to prevent water and soil contamination or soil erosion concerns. Ground Water: The proposal is strictly a surface activity and ground waters would not be impacted.	Stan Olmstead Stan Olmstead	1/05/2011
NP	Wetlands / Riparian Zones	Camps and other program activities have no direct or indirect contact with inventoried or non-inventoried riparian habitat and would not negatively impact these resources.	Stan Olmstead	1/05/2011
NP	Wild and Scenic Rivers	Non present as per Vernal RMP/ROD and GIS Layer review	Jason West	12/17/2010
NP	Wild Horses and Burros	None Present as per Vernal RMP and GIS layer review	Jason West	1/5/2011
NP	Wilderness/WSA	Non present as per Vernal RMP/ROD and GIS Layer review	Jason West	12/17/2010
NI	Woodland / Forestry	Proposed activities will not impact forests and woodlands. Gathering firewood from BLM land will require a BLM commercial wood permit.	David Palmer	1/13/2011

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
NEPA / Environmental Coordinator			
Authorized Officer			