

**Determination of NEPA Adequacy (DNA)**  
**U.S. Department of Interior**  
**Bureau of Land Management**

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**OFFICE:** *Sonoran Desert National Monument (SDNM)*

**NEPA/TRACKING NUMBER:** DOI-BLM-AZ-P040-2013-0001-DNA

**CASEFILE/PROJECT NUMBER:** N/A

**PROPOSED ACTION TITLE/TYPE:** Special Recreation Permit

**LOCATION/LEGAL DESCRIPTION:** Sonoran Desert National Monument, North of Estrella Siding, BLM Route 8002

**APPLICANT (if any):** Lonnie Slawson

**A. Description of the Proposed Action and any applicable mitigation measures**

The proposed action provides for the issuance of a commercial, non-competitive Special Recreation Permit (“SRP”) to Tempe Union High School District #213, care of Lonnie Slawson. Mr. Slawson proposes to supervise a one night educational and camping event associated with a band class. The applicant's description of activities follows:

"The activity is scheduled for November 17-18, 2012 (SA-SU). We will arrive at the site @0800 on SA and will vacate at @0700 on SU. Currently 20 students are on the roster to complete the activity, which involves constructing a shelter, fire pit and solar still in their assigned field area using minimal (if any) belongings and items found in the land. In addition, a group of @12 adult chaperones and student assistants will also be present at the activity. We request that we be able to park @8-10 vehicles in the area inside the fencing bordering Hwy. 238. We would like to request permission to stage our vehicles further in from the road to an open area @300-400 yards inside the posted signage. This request is based on the premise that while the activity is intended to simulate a survival scenario, we must maintain a base camp in close proximity to the student participants for security and monitoring purposes throughout the entire 24 hour period. The vehicles will not be driven around, just moved in on SA and out on SU to respect the ongoing restoration efforts in the area."

The proposed use area is within an area closed to use by motor vehicles; however, the closure provided for the issuance of special recreation permits to provide for events such as the proposed action. Vehicle authorization will not be provided other than for access to the campsite.

**B. Land Use Plan Conformance**

Land Use Plan (LUP) Name: Sonoran Desert National Monument Record of Decision & Approved Resource Management Plan  
Date Approved/Amended: 9/14/2012

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decision(s):

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decision(s) (objectives, terms, and conditions):

RM-2.1.10: At the discretion of the authorized officer, SRPs will be authorized on a case-by-case basis as outlined in 43 CFR 2930.5; in subsequent policies and guidance (See Appendix D, Best Management Practices and Standard Operating Procedures); and in the decisions below. (p. 2-75)

RM2.1.11: Organized groups numbering greater than 25 participants will require a special recreation permit. (p. 2-75)

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

“Special Recreation Permits for Commercial Recreation Activities on Public Lands in Arizona” (E.A. No. AZ-931-93-001), August, 1993. This document analyzed the environmental effects of commercial recreation permitting on public lands in Arizona, including “base camps of 14 days or less,” and established a standard set of “Arizona BLM stipulations for commercial special recreation permits.” These stipulations were designed to protect the lands or resources involved, reduce user conflicts, and minimize health and safety hazards, and are made a part of the permit.

List by name and date other documentation relevant to the proposed action (e.g. biological assessment, biological optioning, watershed assessment, allotment evaluation, and monitoring report.

**D. NEPA Adequacy Criteria**

- 1. Is the proposed action a feature of, or essentially similar to, an alternative analyzed in the existing ENPA 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 exiting NEPA document(s)? If there are differences, can you explain why they are not substantial?**

The proposed action—the establishment of a single site base camp to be used for a period of less than 14 consecutive days, non-mechanized and non-motorized camp activities, and hiking in the adjacent public lands—is substantially the same type of

action for which the environmental analysis “Special Recreation Permits for Commercial Recreation Activities on Public Lands in Arizona” (E.A. No. AZ-931-93-001), August, 1993 was completed. All activities will remain within the scope of this document, and all standard commercial special recreation permit stipulations referenced in the environmental analysis will be attached to, and made a part of, the special recreation permit issued. No additional stipulations specific to this commercial use of the SDNM were identified by Phoenix District BLM staff specialists.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

The range of alternatives analyzed in the existing NEPA document(s) remains appropriate with respect to the new proposed action. Current environmental concerns, interests, and resource values were thoroughly considered during the recently completed land use planning process for the Sonoran Desert National Monument. The proposed action has been considered within the context of this recent analysis of current environmental conditions.

**3. Is the existing analysis valid in light of new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists 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?**

No new information or circumstances with regard to the potential environmental impacts of the proposed action are known. Current environmental concerns, interests, and resource values were thoroughly considered during the recently completed land use planning process for the Sonoran Desert National Monument. The proposed action has been considered within the context of this recent analysis of current environmental conditions.

**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?**

The direct and indirect impacts of the proposed action are substantially unchanged from those identified in the existing NEPA documents specified above. The activities proposed to be authorized by special recreation permit are limited to existing disturbed areas and vehicle routes. No discernable incremental cumulative impact to natural resources of the SDNM is expected to result from the proposed action.

**5. Are the public involvement and interagency review associated with existing NEPA documents(s) adequate for the current proposed action?**

During the recently completed land use planning process extensive public outreach and opportunity for public comment were provided. No public or interagency concerns about existing commercial recreation permitting on the SDNM were made evident. As the proposed action has not changed substantially from previously permitted activities, the level of public involvement is believed adequate.

**E. Persons/Agencies/BLM Staff Consulted**

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Lower Sonoran Field Office Staff	@ monthly PDO NEPA meeting	BLM
Hassayampa Field Office Staff		BLM

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents

**CONCLUSION:**

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 NEPA.

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David L. Scarbrough

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Leah Baker

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Richard B. Hanson, Manager **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.