

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

OFFICE: *Hassayampa Field Office (HFO)*

NEPA/TRACKING NUMBER: *DOI-BLM-AZ-PO10-2013-0035-DNA*

CASEFILE/PROJECT NUMBER: **Black Canyon Trail 100Km Footrace**

PROPOSED ACTION TITLE/TYPE: Black Canyon Trail 100Km Footrace

LOCATION/LEGAL DESCRIPTION: Black Canyon National Recreation Trail

APPLICANT (if any): *Aravaipa Running, LLC*

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

A competitive trail running event consists of a trail course that is approximately 100 Kilometers long. The course will begin in Mayer High School, run through the streets of Spring Valley, and connect with the Black Canyon National Recreation Trail at Antelope Creek Road. The course will end at the Emery Henderson Trailhead. The event will consist of approximately 150 trail runners and there will be approximately 40 employees/volunteers providing support. Runners will start the course in small groups spaced out by five minutes increments. This spacing and the use of paved roads will allow runners to establish a ranking order before gaining entrance to the BCNRT. Check points and first aid stations will be staged along the course every 4-8 miles. Checkpoints with vehicle access will be the only locations where spectators will be allowed. Most spectators will be at the finish line at Emery Henderson Trailhead. Trash containers will be located at all check points and toilets will be provided at the Gloriana Mine Trailhead, Table Mesa Trailhead, and the Emery Henderson Trailhead. The courses will be swept of runners and litter and all gates will be closed. Prepackaged food and water will be provided by the event host.

B. Land Use Plan Conformance

Land Use Plan (LUP) Name: Land Use Plan (LUP) Name: Bradshaw-Harquahala Record of Decision and Approved Resource Management Plan

Date Approved/Amended: 4/22/2010

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):

RR-30. SRPs are authorized on a case-by-case basis for all recreation activities meeting the requirements in 43 CFR 2930 and applicable manuals, policies, and guidance. SRPs are required for all commercial or competitive use recreation activities. SRPs may also be required for the following: noncommercial, noncompetitive organized group activities and events, vending operations, individual noncommercial recreation use in Special Area Designations, and/or academic, educational, scientific or research uses.

The criteria for when permits are required for these uses may be found in BLM Manual H-2930-1, Recreation Permit Administration Manual and Handbook. Definitions of the types of uses may be found in the Glossary.

RR-31. Issuance of SRPs is at BLM's discretion. BLM will evaluate permit applications on the basis of applicable laws and regulations and conformance with the RMP, including consistency with recreation and other resource objectives. The decision to authorize a proposed use will depend on the following: potential resource impacts conflicts with other users, health and safety concerns, past or present performance with BLM or other agencies, and BLM's ability to timely process the application and effectively administer the permit.

RR-32. Authorized permits will ensure compliance with Federal, State, county, and local air quality and noise regulations.

RR-33. Permits are authorized based on the inclusion and compliance of standard and activity specific stipulations regarding the proposed activities. These stipulations for SRPs have been developed to protect natural resources, reduce user conflicts, and minimize health and safety risks. The stipulations must be adhered to keep the permit in good standing. Failure to comply with the stipulations can result in loss of permit privileges and/or lead to penalties prescribed in 43 CFR 2933.33.

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 “commercial recreation activities,” “day-use or multi-day trips,” 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.

“Bumble Bee Adventures, LLC” (EA No. AZ020-99-009), January, 1999. This document analyzed the commercial / recreational use of portions of the Black Canyon Trail for day-use of the trail by large groups.

D. NEPA Adequacy Criteria

- 1. Is the 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 exiting NEPA document(s)? If there are differences, can you explain why they are not substantial?**

The proposed action, issuance of a permit for a footrace on the Black Canyon National Recreation Trail (BCNRT) with small aid stations along the course, 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. Additional stipulations specific to this commercial use of the BCNRT will also be made a part of the permit issued. See Attachment A for stipulations.

- 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 planning process of the Bradshaw – Harquahala Resource Management Plan. The proposed action has been considered within the context of this recent analysis of current environmental conditions and prescribed recreation settings for the Black Canyon Trail Recreation Management Zone.

- 3. Is the existing analysis valid in light of new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and 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 in the Bradshaw – Harquahala Resource Management Plan. The proposed action has been considered within the

context of this recent analysis of current environmental conditions and prescribed recreation settings for the Black Canyon Trail Recreation Management Zone

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 routes. No discernible incremental cumulative impact to natural resources of the BCNRT 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 BCNRT 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>
Victor Vizcaino	Outdoor Recreation Planner	Recreation / BLM
Cody Carter	Wildlife Biologist	Wildlife / T&E Species / Riparian BLM
Tom Bickauskas	Travel Management Coordinator	Transportation / BLM
Bryan Lausten	Archeologist	Cultural / BLM
Dave Eddy	Geologist	Minerals / BLM
Jim Andersen	Realty Specialist	Lands / 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 constitute BLM's compliance with the requirements of NEPA.

_____/S/_____
Project Lead: Victor Vizcaino

_____/S/_____
P&EC: Leah Baker

_____/S/_____
Field Manager: D. Remington Hawes

_____**06/26/2013**_____
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.