

Worksheet
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)
NEPA #: DOI-BLM-AZ-G020-2014-0009-DNA

A. BLM Office: Tucson Field Office **Lease/Serial/Case File No.** AZA-36495

Project Title/Type: ARIZONA ARCHAEOLOGICAL AND HISTORICAL SOCIETY EDUCATIONAL FIELD TRIPS

Location of Proposed Action: Public lands administered by the Bureau of Land Management in the Ironwood Forest National Monument generally situated in T14S R10E Sec. 8 NE¼ G&SR PM, Pima County, Arizona. Map 1 shows the location of the proposed action and the access routes for the proposed educational field trips.

Description of the Proposed Action: Authorize a Special Recreation Permit (SRP) for use of public lands administered by the Bureau of Land Management in connection with organized educational field trips conducted by the Arizona Archaeological and Historical Society (AAHS) to the Cocoraque Butte Cultural Resource Management Area (CRMA). The educational field trips are described in the operating plan submitted with the SRP application (Exhibit A). The trips are scheduled in advance, and are offered to members of the AAHS as part of educational programs with field trips to archaeological or historic sites at various locations representing the variety of cultural resources in Arizona. The AAHS proposes to conduct an educational tour to the Cocoraque Butte cultural resource management area (CRMA). The trips involve small groups of participants driving on existing roads, to access an informal trailhead, and walking on an existing footpath to the destination where participants will view and engage in interpretive talks about the features on the site. Motor vehicles will park at the existing parking area along Cocoraque Ranch Road, and enter the CRMA at the existing pedestrian gate. The day field trips will be guided and supervised by the AAHS, and will be subject to the applicable terms, conditions and stipulations in Exhibit B.

Applicant (if any): Arizona Archaeological and Historical Society (K. Cerino).

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name*	<u>Ironwood Forest National Monument RMP/EIS</u>	Date Approved	<u>Feb. 2013</u>
Other document**	_____	Date Approved	_____
Other document**	_____	Date Approved	_____

*List applicable LUPs (e.g., Resource Management Plans or applicable amendments).

**List applicable activity, project, management, water quality restoration, or program plans.

The proposed action is in conformance with the applicable LUPs because **it is specifically** provided for in the following LUP decisions:

Comments: Issuance of SRPs is addressed in the IFNM Record of Decision, Page 74 in Decisions # AA-144, AA-145, AA-146, AA-147. Access within the Cocoraque CRMA is restricted to non-motorized travel to protect cultural resource values. Impacts of issuance of SRPs for the allowable recreational uses in the Monument were included in the analysis of impacts in the EIS:

AA-144: Manage special recreation use permits to accommodate a variety of recreation opportunities consistent with land use allocations and management objectives.

AA-145: Manage commercial/group vehicle touring opportunities in accordance with special recreation use permits (SRPs).

AA-146: Manage SRPs in accordance with 43 CFR §2930 Special Recreation Permits requirements for:

(1) commercial, (2) competitive, (3) vending, (4) individual or group use in special areas, and (5) organized group activity and event use, and on a case-by-case basis, and to achieve recreation management objectives.

AA-147: Limit issuance of SRPs based on the potential for resource damage and conflicts with other uses.

AA-149: Ensure recreation tours remain on the designated route system.

CL-011: Restrict visitor access, group tours, and group size as needed to prevent any damage from visitor use. Require commercial tour operators to receive Arizona Site Steward training and provide appropriate educational information on archaeological site etiquette and resource conservation to their customers if cultural sites are included on tours. Require tour operators to report vandalism or damage to sites.

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 decisions (objectives, terms, and conditions):

Comments: N/A

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

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

Comments:

1. *Special Recreation Permits for Commercial Recreation Activities on Public lands in Arizona, approved August 3, 1993 (EA-AZ-931-93-001). This document analyzes impacts of issuance of permits for hunting, sightseeing and other dispersed recreational activities on public lands.*

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

1. *Special Recreation Permit application, and operating plan are on file.*

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Documentation of answer and explanation:

Yes, the proposed is substantially the same as previously analyzed.

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

Documentation of answer and explanation:

Yes, the range of alternatives analyzed in the existing NEPA document is appropriate for the current proposed action; issuance of the permit as proposed, issuance of the permit with modifications, or denial of the permit.

3. Is the existing analysis valid in light of any new information or circumstances (such as, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; inventory and monitoring data; most recent lists of endangered species listing; updated BLM-sensitive species)? Can you reasonably conclude that all new information and new circumstances would not substantially change the analysis of the new proposed action?

Documentation of answer and explanation:

Yes, The Ironwood Forest National Monument Resource Management Plan Environmental Impact Statement is valid and no new information no new information or circumstances have come up to invalidate it.

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?

Documentation of answer and explanation:

Yes, direct, indirect and cumulative impacts from the currently proposed action are similar to those analyzed in the existing NEPA documents. The impact of the proposed tours is anticipated to be minimal and typical of impacts associated with driving motor vehicles on designated, existing roads and primitive roads provided for that purpose, and walking on existing non-motorized trails and paths.

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

Documentation of answer and explanation:

Yes. Extensive public and interagency review was conducted for the IFNM RMP/EIS. The current proposed action is in response to public demand.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource/Agency Represented
Francisco J. Mendoza,	Outdoor Recreation Planner	Recreation, Access, Transportation
Amy Sobiech,	Archaeologist	Cultural Resources
Darrell Tersey	Natural Resource Specialist	IFNM
Amy Markstein	Coordinator	NEPA Compliance
Katherine Cerino	Applicant	Arizona Archaeological and Historical Soc.
Claire Crow	Manager	IFNM

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

- Based on the review documented above, it is my determination that the proposed action conforms to the applicable land use plan and the existing NEPA documentation fully covers the proposed action and constitute BLM’s compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a determination of conformance and/or NEPA adequacy cannot be made and the proposed action described above must undergo further NEPA review.

/s/Francisco J. Mendoza
Francisco J. Mendoza, Project Lead

/s/Amy Markstein
Signature of NEPA Coordinator

/s/Viola Hillman
Signature of Responsible Official

03/11/2014
Date

Note: The signed DETERMINATION on this Worksheet concludes the review of the currently proposed action for compliance with the National Environmental Policy Act.