

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

OFFICE: *TUCSON FIELD OFFICE, Ironwood Forest National Monument*

NEPA/TRACKING NUMBER: DOI-BLM-AZ-G020-2014-0030-DNA

CASEFILE/PROJECT NUMBER: *AZA-35829*

PROPOSED ACTION TITLE/TYPE: *Special Recreation Permit (SRP) Renewal, Friends of the Ironwood Forest.*

LOCATION/LEGAL DESCRIPTION: *T11S R8E, T11SR9E, T11S R10E, T12S R8E, and T12S R9E, T10E 14S, G&SR PM, Pima Co., Arizona, as shown on attached maps.*

APPLICANT (if any): **Friends of Ironwood Forest**

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

Authorize renewal of Special Recreation Permit to authorize organized group use of Monument lands in connection with organized educational field trips and special events. The proposed use is part of the Friends of Ironwood Forest educational outreach programs promoting awareness of monument objects and need for protection. The field trips and events would continue to use the existing access routes and parking turnouts along Silverbell Road-Avra Valley Road, Waterman Road, Cocoraque Ranch Road, and side roads and trails to activity areas as described on the operating plan and maps, and subject to the permit Terms Conditions and Stipulations attached. The field trips would be conducted annually in the fall-spring season over the next five years (seasons 2015 through 2019). The schedule for field trips and events will be updated annually among other annual permit validation requirements (acceptable performance, liability insurance, operating plan, and payment of permit fees).

B. Land Use Plan Conformance

Land Use Plan (LUP) Name: Ironwood Forest National Monument Record of Decision and Approved Resource Management Plan.

Date Approved/Amended: February 2013.

☒ The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decision(s): *(See list of decisions from IFNM/ROD and comments relating to the proposed SRP operations below)*

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

Operations under this SRP provide education and recreation opportunities consistent with the land use allocations and management objectives for the IFNM.

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

Activities under the proposed operating plan will be managed in accordance with public land regulations and policies, and Monument decisions applicable to 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.

This permit will be administered under commercial and vending permitting requirements. Activities under the operations plan are planned in cooperation and coordination with the Monument manager to achieve public educational and recreational objectives.

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

This SRP is subject to the SRP Terms and Conditions and Stipulations attached which will avoid resource damage and conflicts with other uses. Additional limitations or stipulations may be applied if issues and concerns are identified.

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

The proposed use (field trips and events) will use existing designated routes, and existing parking turnouts.

WH-011: For the Desert Bighorn Sheep WHA: In coordination with AGFD, implement closures to human entry from January 1 through April 30, as needed, based on information and monitoring data gathered on lambing areas within the WHA, as identified by available information and monitoring data. Lambing areas are closed to sheep and goats year-round.

Some activities under the proposed use would occur in the Desert Bighorn Sheep Wildlife Habitat Area, including Ragged Top and Wolcott Peak, and Waterman Peak. Hikes to the top of the peaks will be limited by a special permit stipulation to dates outside of the lambing season (January 1 to April 30 annually). Hikes within the lambing season in the Ragged Top area will

be restricted to the existing path to the saddle between Ragged Top and Wolcott Peak. And hikes in the Waterman Mountains will be restricted to the existing trail routes from the Waterman Mts. restoration site parking area, and from Waterman Road.

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): N/A

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

1. *NEPA #: DOI-BLM-AZ-G020-2013-0013 for operations conducted under this SRP in 2013-14.*
2. *Ironwood Forest National Monument Proposed Resource Management Plan and Final Environmental Impact Statement, September 2011.*
3. *Ironwood Forest National Monument Record of Decision and Approved Resource Management Plan, February 2013.*
4. *Special Recreation Permits for Commercial Recreation Activities on Public Lands in Arizona, August 3, 1993 (EA NO. AZ-931-93-001).*

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 existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

Yes, the action analyzed in previous NEPA documents includes field trips and touring use and group site activities that are substantially the same as the current proposed action. The access routes and the use area, and site conditions, under the current proposed action are the same as under previous field trips and events conducted under this permit (access routes, wayside stop locations, group sites).

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?**

Yes, the alternatives considered in RMP EIS, previous permit specific assessments, and the Statewide EA are appropriate for the current proposed actions.

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?

Yes, the existing analysis is valid for the current proposed action, and no new information on resource values or land use, nor circumstances have come up that would substantially change the analysis of the current proposed action. Special Recreation Permit terms, conditions and stipulations (attached) would avoid potential impacts on resources and use conflicts.

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, potential impacts of the current proposed action are similar to those identified in the IFNM RMP/EIS and previous analysis. The proposed use will occur on designated roads, trails and parking areas or wayside stops along the designated routes. The level of use under the current proposed action is very low, and is within the level of use analyzed in the Proposed IFNM RMP/EIS for the travel routes involved in the tours.

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

Public involvement in developing the IFNM RMP/EIS was extensive, and included a variety of interests and agencies, and is adequate for the current proposed action.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource/Agency Represented
<i>Francisco Mendoza</i>	<i>Outdoor Recreation Planner; Recreation, SRPs, Travel Mgt.</i>	
<i>Darrell Tersey</i>	<i>Natural Resource Specialist; Range, Biological Resources</i>	
<i>Amy Sobiech</i>	<i>Archaeologist;</i>	<i>Cultural Resources</i>
<i>Claire Crow</i>	<i>Monument Manager</i>	<i>Management</i>
<i>Amy Markstein</i>	<i>NEPA Coordinator</i>	<i>NEPA Compliance</i>
<i>Jim Avramis</i>	<i>Coordinator</i>	<i>Friends of Ironwood Forest</i>

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.

<u>/s/ Francisco Mendoza</u>	9/16/2014
Project Lead: Francisco Mendoza, Outdoor Recreation Planner	Date
<u>/s/ Amy Markstein</u>	9/16/2014
Amy Markstein, Planning & Environmental Coordinator	Date
<u>/s/ Viola Hillman</u>	9/17/2014
Viola Hillman, Authorized Signing Official, Field 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.