

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

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**OFFICE:** *Hassayampa Field Office (HFO)*

**NEPA/TRACKING NUMBER:** DOI-BLM-AZ-P010-2015-0007-DNA

**CASEFILE/PROJECT NUMBER:**

**PROPOSED ACTION TITLE/TYPE:** Rim Tours: Guided Mountain Biking Tours / Recreation

**LOCATION/LEGAL DESCRIPTION:** Black Canyon National Recreation Trail

**APPLICANT (if any):** Rim tours, Inc. Owner: Matt Hebbard

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

Rim Tours, Inc. proposes to conduct guided mountain bike tours on the Black Canyon National Recreation Trail. These tours can range from ½ day riding up to as long as seven days of riding. The average group size will be eight people with a maximum of 12 people. Trips are proposed from November through April. They expect to offer approximately three trips per year.

**B. Land Use Plan Conformance**

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

Date Approved/Amended: April 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):

Special Recreation Permit (SRP) guidance is provided for this type of permit in decision the following decisions: RR-5: All proposed actions will conform to the managerial and social settings described for each recreation allocation.

RR-8: Designated camping locations and camping length of stay limits will be developed as needed for protecting resources, visitor safety, social conflict resolution, improving recreation experiences, and increasing recreation opportunities.

RR-29: An excerpt from RR-29 reads: Permits may be established if monitoring of resources, users, or social conflicts indicates a need to establish limits to protect resources, enhance safety, or reduce conflicts.

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 recreation activities.

RR-31: Issuance of SRPs is at BLM's discretion based on applicable laws and regulations and conformance with the RMP, including consistency with recreation and other resource objectives.

RR-33: Permits are authorized based on the inclusion and compliance of standard and activity specific stipulations regarding the proposed activities.

RR-77: Maintain an array of recreation settings and opportunities. Recreation activities include the following: intense route-based motorized use, permitted recreation events, developed facilities, developed hiking and equestrian trails, and remote semi-primitive wilderness settings with non-motorized recreation opportunities.

RR-78: Establish a system of high quality OHV and hiking trails affording many opportunities for hikers, equestrians, mountain bikers, four-wheel drivers, ATVs, and motorcycle enthusiasts.

RT-1: Provide for the ever increasing outdoor recreation needs of an expanding urban population to promote the preservation of, public access to, travel within, and enjoyment and appreciation of the open-air, outdoor areas and historic resources of the Black Canyon corridor.

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

Special Recreation Permit Environmental Assessment, AZ 931-93-001

Environmental Assessment Black Canyon Trail, AZA-024-93-030

Black Canyon Trail Master Plan and Environmental Assessment, AZA-024-93-030

The analysis is consistent to the Black Canyon Trail EA and Special Recreation Permit EA. User groups in these two documents are implied and range from casual users to commercial, competitive, and special events users including amenities associated with such use, i.e. vending such as photography, commemorative, and supplemental aids.

### **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?**

As listed above three environmental documents are similar in scope to the Rim Tours special recreation permit proposed action. The applicable documents are:

- Bradshaw-Harquahala Record of Decision and Approved RMP (April 2010)
- Statewide Programmatic EA for Special Recreation Permits , AZ 931-93-001
- Black Canyon Trail Master Plan and Environmental Assessment, AZA-024-93-030

The SRP permitting process involves interdisciplinary analysis of the proposed action with sideboards attached to protect the physical and biological resources and maintain or enhance social values. The premise of the documents listed above includes the provision of stewardship, while providing for ecotourism. It is through ecotourism that the public will care about the vastness of public lands and the values it offers. The National Recreation Trail provides a focal point where the public knows this is a quality trail and would want to protect it from competing uses that would be deferential to their experience. SRP use has been addressed in the current RMP and the Black Canyon National Recreation Trail is listed as a special designation. For this reason, Bradshaw-Harquahala Resource Management Plan (RMP) and Record of Decision's (ROD), RT-1 lines out the desired future condition of the trail. There is no reference within this RMP that SRPs would be prohibited on this trail. It is also recognized that a segment of the range of people recreating on the trail include those who enjoy the experience of riding on it and sharing it with others participating in like activities such as those offered via a touring company. Recreation opportunities allow for participants to meet new people and engage in a variety of opportunities that touring companies would offer as set forth in RMP/ROD management actions RR-77 and RR-78 and RT-1. Therefore, allowing SRP use on the trail would not be a deviation from the three EAs listed above in section "C".

**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 RMP/ROD outlines decisions relating to recreation use and SRPs. A range of alternatives to develop this plan was initiated in the draft environmental impact statement. Since SRP management is a priority program within the BLM, SRP guidance is gleaned from existing manuals, policy, and the RMP/ROD. See Appendix A under the heading of, "Operating Procedures in Special Recreation Management Areas and Recreation Management Zones (RMZ)," to find the bulleted statement, "Evaluate roads, routes, and trails on a case by case basis for permitted events and determine suitability for closure, re-routing, rehabilitation, upgrading, or authorization as an approved permitted course." This link will provide the information needed to access Appendix A:

[https://www.blm.gov/epl-front-office/projects/lup/1350/13345/13413/Bradshaw-Harquahala\\_Record\\_of\\_Decision\\_and\\_Approved\\_Resource\\_Management\\_Plan\\_pdf.pdf](https://www.blm.gov/epl-front-office/projects/lup/1350/13345/13413/Bradshaw-Harquahala_Record_of_Decision_and_Approved_Resource_Management_Plan_pdf.pdf)

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Rim Tours proposes to operate within the Black Canyon Hiking and Equestrian Trails RMZ and the North Black Canyon Hiking and Equestrian Trails RMZ.

The range of alternatives for SRP authorization in the Final Environmental Impact Statement (FEIS) of the current RMP is sufficient considering the low use on the BCNRT and the use of SRP for trail related activities is not controversial. The BCNRT designation was discussed in the FEIS, along with the recreation outcomes for the trail. This touring company adheres to the setting and managerial recommendations for the trail.

- 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?**

Stated in the Black Canyon Master Trail Plan, under the heading “Services”, page 23: “Services offered on the trail will include commercial recreation operations under permit to the BLM to provide trail users guided trail opportunities.”

The existing programmatic SRP EA analyzed impacts of issuing SRPs to commercial recreation operators in Appendix 2. Camping conditions analyzed support small group camping as outlined in Rim Tours plan of operation. The special designation of the Black Canyon Trail as a National Recreation Trail is not included in the BLM’s National Landscape Conservation System which means the conditions of the EA are still valid. This means the programmatic EA covers this activity. Activity opportunities for this area include hiking, backpacking, equestrian, and mountain biking (RMP, Appendix S:

[https://www.blm.gov/epl-front-office/projects/lup/1350/10812/10812/Appendix\\_S\\_Part\\_2.pdf](https://www.blm.gov/epl-front-office/projects/lup/1350/10812/10812/Appendix_S_Part_2.pdf)).

This type of use is provided for in the current RMP (2010) and there has not been any substantial change to this corridor since 2010.

In addition, the proposal submitted by Rim Tours to the Hassayampa Field Office has been discussed at the regularly scheduled NEPA interdisciplinary staff meetings, and there were no concerns about SRP permits on this trail. Conditions for Rim Tours SRP fit within the circumstances presented the various environmental analysis documents listed above.

- 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?**

Under the Cumulative Impacts section of the Black Canyon Trail Master Plan and Environmental Assessment, it states, “The development of a permanent access route through the Black Canyon corridor would invite additional people into the area for recreation. Most of these people will be hiking, riding horses, or riding mountain bikes. The impacts of this use are expected to remain confined to the trail corridor due to the ruggedness of the surrounding terrain.”

Impacts have been analyzed for cultural, wildlife, soils, recreation, vegetation, and water and riparian resources in the current RMP (2010). The permittee must agree to comply with the stipulation set forth as a term of their permit that addresses potential resource impacts, conflicts with other users, any public health and safety issues, and past and present performance of the applicant with BLM or other agencies. All this lays the foundation of pre-approval.

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

During the scoping phase of the current RMP, BLM wanted to devise extensive networking and communication channels with the public; and as a result employed a contractor, James Kent Associates (JKA), who established contacts with communities and received citizens’ comments on issues and concerns, while helping them to gain a better understanding of the land use planning process. These meetings occurred prior to the scoping process and took place in community settings and civic and social group meetings in Black Canyon City and a list of other towns. JKA mustered interest throughout the region about the Bradshaw-Harquahala planning process and record numbers of guests took time out of their busy schedules to attend these meetings.

The current RMP ROD decisions were approved based on RMP scoping and the presentation of a draft RMP/EIS and subsequent comment period. Comments were received on the use of the Black Canyon Trail which lead to the approval of these management actions:

RR-58: Sustain the Black Canyon Trail as an important component of the National Recreation Trail System in order to provide for the ever-increasing outdoor recreation needs of an expanding urban population and in order to promote public access to, travel within, and enjoyment and appreciation of the open-air, outdoors areas and historic resources of the Black Canyon Corridor.

RT-2: Provide for the ever-increasing outdoor recreation needs of expanding urban populations to promote the preservation of, public access, to, travel within, and enjoyment and appreciation of the open-air, outdoor areas and historic resources along the Black Canyon National Recreation Trail. Extend the existing trail northward and provide connections to other trail systems in Yavapai and Maricopa Counties.

During public scoping periods, for the RMP, the public showed support of economic gains of individuals, groups, companies, corporations, etc. using public lands in a sustainable manner. The primary recreation market strategy outlined in the RMP can be found at:

[https://www.blm.gov/epl-front-office/projects/lup/1350/10812/10812/Appendix\\_S\\_Part\\_2.pdf](https://www.blm.gov/epl-front-office/projects/lup/1350/10812/10812/Appendix_S_Part_2.pdf).

The strategy indicates this area to be a destination attracting local, regional, and national non-motorized recreationists including hiking, equestrian, and mountain bike riding, including long distance hikes and rides. The benefit opportunities and outcomes lists the following: increased local-tourism revenue while providing a means for recreationists to derive a greater environmental awareness and protection of natural resources, and establishing a closer relationship with the natural world. The recreation setting for this area for group size ranges from 13-25 people per group in the roaded natural sections down to six people per group in the semi-primitive non-motorized section; contacts with other groups range from 30 or more encounters en route down to 3-6 encounters per day off travel routes. Touring companies generally, but not always, operate during the off-peak times, i.e. Monday through Thursday to avoid others and to enhance the recreation experience of their clientele by enjoying the naturalness of the land with minimal disruption of other users.

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

| <b>Name</b>            | <b>Title</b>                | <b>Resource/Agency Represented</b> |
|------------------------|-----------------------------|------------------------------------|
| <b>Tom Bickauskas</b>  | <b>P&amp;EC, Acting</b>     | <b>BLM</b>                         |
| <b>Tom Bickauskas</b>  | <b>Travel Management</b>    | <b>BLM</b>                         |
| <b>Mary Skordinsky</b> | <b>Outdoor Recreation</b>   | <b>BLM</b>                         |
| <b>Codey Carter</b>    | <b>Wildlife Biology</b>     | <b>BLM</b>                         |
| <b>Casey Addey</b>     | <b>Rangeland Management</b> | <b>BLM</b>                         |
| <b>Bryan Lausten</b>   | <b>Archaeologist</b>        | <b>BLM</b>                         |

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.




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Mary Skordinsky, Project Lead

*Thomas V. Butka*

Thomas Bickauskas, Acting Planning & Environmental Coordinator

*D. Peering to Hawes*

Rem Hawes, Field Manager

*5/13/2015*

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.