

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

OFFICE: Tucson Field Office

NEPA/TRACKING NUMBER: DOI-BLM-AZ-G020-2016-0007-DNA

CASEFILE/PROJECT NUMBERS:

1. Southern Arizona German Short Haired Pointer Club: AZ-028260
2. AZ Region NSTRA: AZA-032220
3. Greater Phoenix Brittany Club: AZA-028327
4. Cochise Bird Dog Club: AZA-032900
5. Sahuaro Brittany Club: AZ-028278
6. Grand Canyon Brittany Club: AZ-035730

PROPOSED ACTION TITLE/TYPE:

Special Recreation Permit (SRP) Renewals for Bird Dog Club activities within Las Cienegas National Conservation Area (LCNCA).

LOCATION/LEGAL DESCRIPTION:

Two sites within the LCNCA:

1. Air Strip Group Site: *T. 19 S., R. 17 E., Section 7, 8.*
2. Maternity Well Group Site: *T. 19 S., R. 16 E., Section 24.*

APPLICANTS:

1. Southern Arizona German Short Haired Pointer Club (AZ-028260)
2. AZ Region NSTRA (AZA-032220)
3. Greater Phoenix Brittany Club (AZA-028327)
4. Cochise Bird Dog Club (AZA-032900)
5. Sahuaro Brittany Club (AZ-028278)
6. Grand Canyon Brittany Club (AZ-035730)

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

Renew six Special Recreation Permits for Bird Dog Clubs to conduct competitive and non-competitive field trials and hunt tests the next 5 years in Las Cienegas National Conservation Area.

Six bird dog clubs Special Recreation Permits are up for renewal. LCNCA's grasslands are suitable for this type of recreational activity.

Events will be staged at the Airstrip and Maternity Well Recreation Group Sites.

The Airstrip Group Site contains a permanent restroom. Clubs rent additional restroom facilities as needed. Fires in rock fire rings are used within the group site boundary, no other fires are built outside the group site boundary.

Water is obtained from the water faucet at the Airstrip Group Site, and the water faucets at the Empire Ranch Headquarters.

The trash generated by each club is managed and removed from LCNCA by the club actively using their permit.

The BLM 2920 Recreation Program guidelines allows for scheduling exact event dates six months ahead of a planned event. Events are reserved on a first-come first serve basis with BLM. Most Bird Dog Clubs coordinate with each other before they propose event dates to BLM. The Outdoor Recreation Planner then coordinates with LCNCA staff, including those working on the Vegetation Treatment project, the grazing program, and others to finalize the event date and site, then adds their event date to a shared calendar for BLM staff to access for reference and continued coordination.

Dog Field Trials and Hunt Test events would be subject to the guidelines found in the LCNCA RMP that guide where this type of activity can occur. Permits are subject to the general Tucson Field Office Special Recreation Permit Terms, Conditions and Stipulations and supplemental guidance for Field Dog Trials and Hunt Test events.

Some clubs use captive quail in a Hunt Tests or Trials. Hunting and use of captive game birds are authorized, permitted and managed by the Arizona Game and Fish Dept.

Vehicles are parked within the fenced area developed for groups at the Airstrip Group Recreation Group Site.

Participants walk with their dogs or ride horses within 1 to 2 miles from the fenced parking and camping areas.

Courses do not cross pasture fences.

All riparian areas are fenced off and not part of the event's activities locations.

Some of the clubs use a horses and riders to facilitate the trials out in the field. (See map with general walking direction within each fenced pasture).

The proposed total number of people in attendance and number of vehicles parked and camped at any one time does not exceed the carrying capacity set for the Airstrip Group Site. (@ 500 people).

Up to three groups may overlap their camping schedules in the same area inside the Airstrip Group Site so that participants can participate in each other's clubs events.

The proposed number of people in attendance and number of vehicles parked is within the carrying capacity set for Maternity Well Group Site. (@ 150 people or 30 vehicles)

Two overlapping events may camp at Maternity Well Group Site at any one time.

Bird Dog Club activities normally take place October 1 through March 30 of every year in Las Cienegas NCA due to the need to conduct events in cooler fall and winter temperatures and due to the LCNCA pronghorn fawning management guidelines of not authorizing dog events between April 1 through June 30. 2016-2020 scheduled events to be determined and usually occur during same time frame as previous years.

	Number of Participants	Number of vehicles to be parked in Group Site	Location and Dates: Airstrip Group Site Walking field areas: east and west of the Airstrip Group Site within the North Pasture.	Location and Dates: Maternity Well Group Site Walking field areas: east of Maternity Well Group Site Parking area and within west portion of Enzenburg /Maternity Well Pasture.
1. So. Arizona German Short Haired Pointer Club (AZ-028260)	25 Participants, 20 Spectators	25	January 20-February 4, 2016	December 5-9, 2016 March 5-8, 2016
2. AZ Region NSTRA (AZA-032220)	15 Participants	15	Dec 11-14, 2016 Feb 20- 21, 2016	Nov 20-23, 2015 Jan 16-17, 2016 March 18-20, 2016
3. Greater Phoenix Brittany Club (AZA- 028327)	30 Participants, 30 Spectators	30	Jan 13-18, 2016	
4. Cochise Bird Dog Club (AZA-032900)	20 Participants, 20 Spectators	20	Dec 19-22, 2016	
5. Sahuaro Brittany Club (AZ-028278)	30 Participants, 20 Spectators	30	Jan 8-12, 2016	
6. Grand Canyon Brittany Club (AZ-035730)	25 Participants, 25 Spectators, 15 Staff. (Average 65 people per event)	25	January 21-25, 2016	

PART I: PLAN CONFORMANCE REVIEW. This proposed action is subject to the following land use plan: Las Cienegas Resource Management Plan, July 2003.

The proposed action has been reviewed and determined to be in conformance with this plan (43 CFR 1610.5, BLM MS 1617.3).

Land Use Plan Conformance:

Land Use Plan (LUP) Name: Las Cienegas National Conservation Area Resource Management Plan, Record of Decision, Date Approved/Amended: July 2003.

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

Excerpt from Approved LCNCA RMP/ROD July 2003 (page 44):

1. Special Recreation Permits

- a. Many types of Special Recreation Permits may be applied for on Las Cienegas NCA for commercial, competitive and organized group events. These applications will continue to be considered on a case-by-case basis and issuance of permits is discretionary. Many applications for incompatible uses may be sought in areas that may not be suitable for the use and may conflict with the maintenance of certain desired resource conditions and established recreation settings. Indirect promotion of more primitive areas may also occur. Table 6 is designed to provide guidance and flexibility in considering the types, number, group sizes and frequencies of Special Recreation Permits in each Recreation Zone. (RR09).

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):

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

Las Cienegas National Conservation Area EIS, Record of Decision July 2003

EA NO. AZ-931-93-001 SPECIAL RECREATION PERMITS FOR COMMERCIAL RECREATION ACTIVITIES ON PUBLIC LANDS IN ARIZONA

B. 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?** *The proposed action is within the same analysis area as found in the Las Cienegas NCA RMP Recreation program guidelines.*

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 range of alternatives conforms with the Las Cienegas National Conservation Area RMP /ROD for this type of use and activity.*

The total number of users at any group site within LCNCA falls within the guidelines found in the RMP for group numbers in group sites.

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, new information does not change the analysis of the proposed action, since the proposed action will not take place directly in areas with updated or existing BLM sensitive species.*

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, the cumulative effects are the same as analyzed in the LCNCA EIS*

5. **Are there public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?** *Yes, the LCNCA RMP and EIS were prepared with extensive public involvement under collaborative planning guidelines. A meeting held with BLM and applicants was held in mid-2015 in the location of the proposed action to discuss the proposed action.*

C. Persons/Agencies/BLM Staff Consulted:

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Heather Swanson	Natural Resources Specialist	BLM
Amy Sobiech	Archaeologist	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.

<u>/s/ Catie Fenn</u>	<u>11/09/2015</u>
Project Lead, Outdoor Recreation Planner	Date

<u>/s/ Amy Markstein</u>	<u>11/13/2015</u>
Planning & Environmental Coordinator	Date

<u>/s/ Melissa D. Warren</u>	<u>11/20/2015</u>
Authorized Signing Official, Tucson 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.