

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

Bureau of Land Management  
Safford Field Office  
Safford, AZ

**A. Identifying Information**

NEPA No.: DOI-BLM-AZ-G010-2016-0022-DNA

Lease/Serial/Case File No.: AZA- 36950

Project Title/Type: Back2Basics Special Recreation Permit (SRP)

**Location of Proposed Action:**

Aravaipa Canyon Wilderness/Turkey Creek, T 6 S, R 18 E, S 15 and UTM: 12S 548023 3641835.

Gila Box, T 5S, R 29E, S 31 and UTM: 12S 643891 3650742

See Figure 1 (attached).

**Description of the Proposed Action and Any Applicable Mitigation Measures:**

The Back2Basics proposes to provide a hiking, backpacking, camping and rafting trips within the Aravaipa Canyon Wilderness/Turkey Creek and the Gila Box Riparian National Conservation Area (GBRNCA). Trip lengths would be from one to four days (maximum of three days in Aravaipa Canyon). Maximum group size would be 10 people including guides. All solid human waste and liquids will be disposed of according to Leave No Trace principles. All other trash will be packed out. Commercial SPR stipulations for the Safford Field Office will apply. This would be a five year permit. Currently, trips are proposed for spring and fall. But, the permit would be valid year round.

Applicant: Kelly McGrath

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

LUP Name\* Safford District Resource Management Plan (RMP)/Environmental Impact Statement (EIS)

Date Approved Record of Decision (ROD) part I: Sept 1992. ROD part II: July 1994

LUP Name\* Aravaipa Ecosystem Management Plan (AEMP)/Environmental Assessment (EA)

Date Approved September 2015

LUP Name\* Gila Box Management Plan (GBMP), Environmental Assessment (EA), and Finding of No Significant Impact (FONSI).

Date Approved December 19, 1997.

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.

## DNA Worksheet

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

The proposed action is in conformance with the LUP(s), even though it is **not specifically** provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

**Safford District RMP**

**RR07** The Safford District will endeavor to provide a variety of recreational opportunities that meets public demand and are compatible with the Bureau's stewardship responsibilities. Partial ROD I page 7.

**AEMP EA DOI-BLM-AZ-G010-2006-0001**

**Objective H.2:** Manage visitor use in Aravaipa Canyon Wilderness (ACW) to preserve the wilderness characteristics of the canyon, minimize impacts on resources, maintain an environment with few traces of human presence, and preserve a unique place for solitude and appreciation of nature.

**GBMP EA-AZ-040-08-03****Category 2- Recreation and Transportation System Management. Objective: 2.**

SRPs will be used to meet the diverse visitor needs of the Gila Box National Riparian Conservation (GBRNCA) and to protect the riparian resources (p. 11).

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

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

- Safford District RMP EIS, July 1994.
- AEMP EA, September, 2015. DOI-BLM-AZ-G010-2006-0001.
- GBMP EA-AZ-040-08-03
- Special Recreation Permits for Commercial Recreation Activities on Public Lands in Arizona EA, August 1993. AZ-931-93-001

List by name and date other documentation relevant to the proposed action (*e.g.*, biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- U.S Fish and Wildlife Service (USFWS) Biological Opinion on the Aravaipa Ecosystem Management Plan EA (AESO/SE 02EAAZ00-2012-F-0282).
- U.S Fish and Wildlife Service (USFWS) Biological Opinion, Gila Box Riparian National Conservation Area Interdisciplinary Activity Plan, Graham County, Arizona (AESO/SE 02-21-96-F-0160-R7).
- U.S Fish and Wildlife Service (USFWS) Biological Opinion on the Re-initiation of Consultation/Conference on the Gila Box Riparian National Conservation Area Interdisciplinary Activity Plan, Graham County, Arizona (AESO/SE 02-21-92-F-0070-R2).

**D. NEPA Adequacy Criteria**

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

Yes  No

**Documentation of answer and explanation:**

The proposed actions (hiking, backpacking, camping and rafting) are in conformance the Safford District RMP and EIS ROD. Additionally, the existing AEMP EA (DOI-BLM-AZ-G010-2006-0001) analyzed day use and multi-day commercial trips inside Aravaipa Canyon Wilderness and the surrounding area. Additionally, the GBMP EA (AZ-040-08-03) analyzed non-motorized recreational activities (hiking, backpacking, rafting) which are the same activities that are being proposed by Back2Basics. Additionally, the existing Special Recreation Permits EA (AZ-931-93-001) also analyzed the same activities (hiking, backpacking, and camping) that Back2Basics is proposing.

**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?**

Yes  No

**Documentation of answer and explanation:**

- The Special Recreation Permits for Commercial Recreation Activities EA (AZ-931-93-001) analyzed the impacts of a variety of outdoor recreation opportunities, including hunting, fishing, backpacking, trail riding and bird watching. From the analysis, the EA developed Attachment A- Arizona BLM Stipulations for Commercial Special Recreation Permits to help protect the lands or resources involved, reduce user conflicts, or minimize health and safety hazards. Resources that were analyzed were: Cultural Resources, Wildlife, Threatened or Endangered Species, Wild Horses and Burros, Wilderness, Recreation, Soils, Water and Riparian Areas and vegetation. The proposed activities and impacts from the Back2Basics are the same that were addressed in the Special Recreation Permits EA (AZ-931-93-001).
- The AEMP EA (DOI-BLM-AZ-G010-2006-0001) specifically addressed activities and impacts associated with commercial SRP use within the Aravaipa Canyon Wilderness and surrounding area. The following resources were analyzed in the AEMP EA: Water and Riparian, Upland, Wildlife, Cultural, Environmental Justice and Socioeconomics, Recreation, Travel Management and Special Area Designations. The proposed activities from Back2Basics are the same as the activities analyzed in the AEMP EA (DOI-BLM-AZ-G010-2006-0001) and would not create any new resource issues or concerns that were not analyzed previously.
- The GBMP EA (AZ-040-08-03) range of alternatives analyzed the impacts of non-motorized recreational activities (hiking, backpacking, camping and rafting). The analysis found these activities would not cause a significant impact. Resources that were analyzed were: Environmental, Social and Economic Consequences, Soil and Water Resources, Upland Vegetation, Riparian Vegetation, Wildlife, Fish, Cultural Resources, Lands, Recreation, Minerals and Livestock.

**3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?**

Yes  No

**Documentation of answer and explanation:**

## DNA Worksheet

There has been no significant change in the circumstances or significant new information germane to the Proposed Action. The Bureau of Land Management, Safford Field Office, consulted with the USFWS on the Aravaipa Ecosystem Management Plan (AESO/SE 02EAAZ00-2012-F-0282) and the proposed actions of hiking and backpacking on federally endangered loach minnow (*Tiaroga cobitis*) and its critical habitat, federally endangered spikedace (*Meda fulgida*) and its critical habitat, Gila topminnow (*Poeciliopsis occidentalis occidentalis*), and desert pupfish (*Cyprinodon macularius*), within Aravaipa Canyon Wilderness and surrounding area. The USFWS determined that the actions of recreational use may affect listed fish species and their habitat. However, the USFWS expects effects to individuals to be small, infrequent, and not be sufficient to affect the presence of the species or their populations as most adults will likely avoid the disturbances from hiking/backpacking. Some eggs and larvae may also be affected, but effects are anticipated to be small, infrequent, and not measurable for reproduction. Effects to habitat will either be temporary or limited to specific areas. The vast majority of the creek where the fish could occur will continue to provide the necessary characteristics to maintain the populations. In addition to federally listed fish species, Aravaipa Creek also supports four BLM Special Status Species, including Roundtail chub (*Gila robusta*), federally proposed as threatened, and four BLM Sensitive fish species, Longfin dace (*Agosia chrysogaster*), Speckled dace (*Rhinichthys osculus*), Sonora sucker (*Catostomus insignis*), and Desert sucker (*Pantosteus clarkii*). The above-mentioned impacts to listed fish species and their habitat from the proposed actions would be the same for the five BLM Special Status Species and their habitats.

Hiking and backpacking in Aravaipa Canyon have been determined by the USFWS to “may adversely affect” Mexican spotted owl. In the Biological Opinion on the Aravaipa Ecosystem Management Plan, EA #AZ-0410-2006-040, the service states, “Due to the relatively narrow canyon of Aravaipa and Turkey creeks and the inability to predict where an owl may be roosting, road activities and recreation have the potential to cause flushing or an alteration in roosting owl behavior during the breeding season. Visual and noise disturbances may adversely affect the behavior of Mexican spotted owls during breeding, nesting, or foraging activities. Most of these actions will occur during the day when owls are roosting or nesting in the side canyons, and, generally, any nest or roost location is isolated sufficiently from roads and recreational use such that these actions are unlikely to result in disturbance.” Yellow-billed cuckoo and southwest willow flycatcher may also be encountered in the canyons; however brief encounters such as small groups of hikers are unlikely to cause impacts beyond brief flushing behavior. It is unlikely that this brief abandonment of foraging, roosting, or nesting habitat would pose any significant impact.

Due to the presence of these species, it has been determined that there may be an effect from the proposed activities, however the effects will be minimal and most likely will be insignificant.

**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  No

Documentation of answer and explanation:

The direct, indirect and cumulative impacts of the proposed activities (hiking, backpacking, camping and rafting) are the same as those impacts already identified in the AEMP EA (DOI-BLM-AZ-G010-2006-0001), the SRP EA (AZ-931-93-001) and the GBMP EA (AZ-040-08-03). The impacts of these proposed activities (hiking, backpacking, camping and rafting) would be mitigated by the Commercial SRP Stipulations for Safford Field Office. The resulting impacts will be less than significant as determined in the EAs and their associated FONSI.

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

Yes  No

**Documentation of answer and explanation:**

The AEMP EA (DOI-BLM-AZ-G010-2006-0001), the SRP EA (AZ-931-93-001) and the GBMP EA (AZ-040-08-03) included substantial public/interagency comment and review. The EAs addressed public comments/issues. Public comments/responses are documented in all EAs.

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

<b>Name</b>	<b>Title</b>	<b>Resource</b>
Todd Murdock	BLM Outdoor Recreation Planner	Recreation, Wilderness
Amelia Underwood	BLM Assistant Field Manager (Renewables)	Air Quality, Climate Change, Flood Plains, Water Quality, Water Rights, Wetland Riparian
Dan MCGrew	BLM Archeologist	Cultural Resources, Native American Relations
Jason Martin	BLM Range Management Specialist	Environmental Justice and Socioeconomics, Nonnative/invasive Plants, Prime/Unique Farmlands, Range, Soils
RJ Estes	BLM Range Management Specialist	Hazardous Materials, Solid Waste
Roberta Lopez	BLM Realty Specialist	Lands/Realty
Sharisse Fisher	BLM GIS Specialist	NEPA Maps
Mark McCabe	BLM Wildlife Biologist	Threatened, Endangered, and Sensitive Species (TES), Animal Species, Wildlife
Jeff Conn	BLM Natural Resource Specialist	TES Plant
Heidi Blasius	BLM Fisheries Biologist	TES Fish/Fisheries
Amy Corathers	BLM Planning & Environmental Specialist	NEPA

**Note:** Refer to the DOI-BLM-AZ-G010-2006-0001-EA, AZ-931-93-001-EA and the GBMP -AZ-040-08-03-EA 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 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 in Section D above are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked.

Todd Murdock  
Project Lead

Amy Crothers 4.28.16  
NEPA Coordinator

Scott C. Cooke  
Scott C. Cooke, Field Manager

5/2/16  
Date

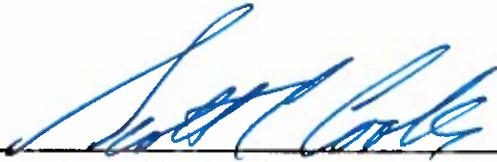
**Note:** The signed CONCLUSION on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal pursuant to 43 CFR Part 4 and the program-specific regulations.

**DECISION**

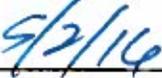
I have reviewed this plan conformance and NEPA compliance record and have determined that the proposed action is either (a) in conformance with or (b) clearly consistent with terms, conditions, and decisions of the approved land use plan(s) and that no further environmental analysis is required. It is my decision to implement the project, as described, with any mitigation measures identified below.

Mitigation measures or other remarks:

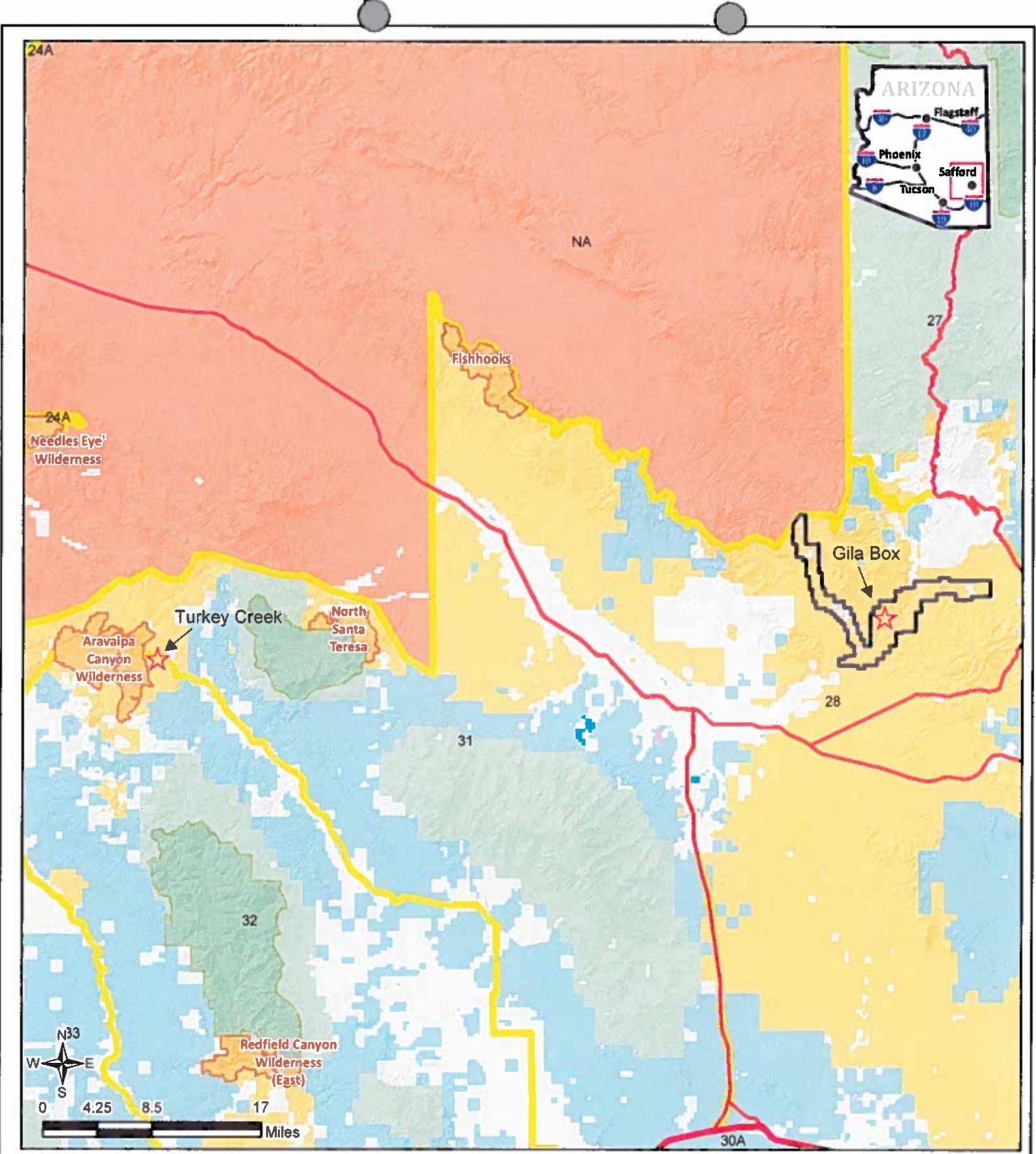
- 1) Safford BLM Commercial SRP stipulations (attached)
- 2) Stipulations from the 1993 SRP EA Attachment A-Arizona BLM Stipulations For Commercial Special Recreation Permits (attached) will be incorporated into the SRP stipulations.



\_\_\_\_\_  
Scott C. Cooke, Field Manager



\_\_\_\_\_  
Date



**Figure 1. Project Location Map**

**Back2Basics SRP**

**DOI-BLM-AZ-G010-2016-0022-DNA**

- BLM Wilderness Area
- BLM
- Indian Lands
- State
- Private
- Gila Box RNCA
- AGFD Game Mgmt Units
- Interstates
- US Highways
- Proposed use locations

*While every effort has been made to ensure the accuracy of this information, the BLM makes no warranty, expressed or implied, as to its accuracy and expressly disclaims liability for the accuracy thereof.*

United States Department of the Interior  
Bureau of Land Management  
Gila District Office  
Safford Field Office