

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

U.S. Department of the Interior
Bureau of Land Management (BLM)

BLM Office: Lower Sonoran Field Office **NEPA No.:** DOI- BLM-AZ-P0200-2016-0003
Case File No.: AZ-P020-SR16-002

Proposed Action Title/Type: Special Recreation Permit (SRP) for Hunting Guide Outfitter services.

Applicant: Pete Cimellaro dba Yellowhorn Outfitters

Location of Proposed Action: All BLM lands administered by the Lower Sonoran Field Office located in Arizona Game and Fish Department (AGFD) Game Management Unit 40A. Lands under other agency jurisdictions or on private land are not included or authorized under this permit.

Description of the Proposed Action: Approve a one year Special Recreation Permit (SRP) which will allow Yellowhorn Outfitters to conduct commercial guided big game hunt on BLM administered public lands located in the above AGFD game management unit. The permit will be effective from December 1, 2015 to December 31, 2015. The 2015 hunt in the Sonoran Desert National Monument (SDNM) and the Lower Sonoran Field Office (LSFO) will be for desert bighorn sheep in game units 40A and the season runs from December 1 to 31, 2015. No base camps are to be set up within the Wilderness Areas without prior approval from the BLM. Base camps are not to be established in undisturbed areas for groups larger than 8 people without prior approval from the BLM. Length of stay at base camps may occasionally exceed 14 days when necessary but the BLM must be notified 3 days in advance and the stay will not exceed the hunt season. Whenever feasible, hotels will be used in lieu of base camps. No motor vehicles may be driven cross country travel to retrieve down game. Hunting groups, including guides, are not expected to exceed seven people per trip. All trash will be hauled out and cat holes or portable chemical toilets will be used for human waste. *Leave No Trace* and *Tread Lightly!* Principles will be practiced. The "Phoenix District Office BLM SRP Stipulations for Commercial Hunting Guides and Outfitters" are hereby incorporated into this proposed action.

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

LUP Name Lower Sonoran RMP approved 9/14/2012 and the Sonoran Desert National Monument RMP", approved 9/14/2012

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

The proposed action is not specifically provided for in the Lower Sonoran And Sonoran Desert National Monument RMP. However, RM-3.1.15 (LSFO) and RM-2.1.10 (SDNM): At the discretion of the authorized officer, SRPs will be authorized on a case-by-case basis as outlined in 43 CFR, 2930, in subsequent policies and guidance.

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

This proposed action is covered in the following EA: "Special Recreation Permits for Commercial Recreation Activities on Public Lands in Arizona", Environmental Assessment, AZ931-93-001, dated 8/93.

D. NEPA Adequacy Criteria

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

The current proposed action is substantially the same action as previously analyzed in the above EA. On page 2 of the programmatic EA it describes the issuance of permits for these types of activities, and identifies a list of Terms and Conditions that would be imposed. The current proposed action includes such a list of stipulations which were substantially complied from the Umbrella EA. The areas identified for the current proposed action, including the camping/staging area, were not specifically analyzed in the EA; however, the action was found to be in conformance with plan and EA objectives with the inclusion of standard stipulations.

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?

Two alternatives, proposed action and no action, were analyzed in the existing EA and they are still appropriate with respect to the current proposed action. No new alternatives or concerns have been presented by the public, other agencies, or resource specialists.

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 standards 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?

New information and circumstances have appeared since the EA was written and are discussed below. Each one has been appropriately analyzed and considered by resource specialists for the proposed action and it has been determined that there is either, no affect, or no significant impacts, with regards to the new information and circumstances.

In August of 1999, three changes were made to the listing of Critical Elements of the Human Environment• which must be considered in all NEPA analysis; Invasive, Non-Native Species, Ground and Surface Water Quality, and Environmental Justice. It has been determined by resource specialists that this proposed action has no direct or indirect impacts on any of these elements in the affected area. Stipulations addressing this element have been added to mitigate any potential invasion of non-native species that might occur in the affected area by the proposed action. Ground and surface water quality will not be affected by the proposed action. In reviewing the proposed action it was determined that the proposed action will not disproportionately affect Native American tribes, or minority and/or low-income groups.

Standards for Rangeland Health were incorporated into all state LUPs through a statewide amendment in May of 1997; therefore, the proposed action was reviewed to determine whether it is in conformance with the approved standards. The proposed action will not adversely affect the watershed functional condition, the desired plant community or the riparian functional condition for the affected area.

Guided hunts are likely to occur on the national monuments sometime during the permit duration so the action was reviewed and it was determined that it is in compliance with the Interim Management Policy for Newly Created National Monuments. The proposed hunting activities will not negatively impact the objects of scientific and historic interest for which the monuments were established. All OHV activities will be limited to existing roads and trails. In addition, supplemental stipulations have been identified for the permit to further assure these monument values are protected.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

The process used in the existing EA is the agency standard for this type of action. The environmental impacts of the proposed action were analyzed during the development of the EA.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?

The direct and indirect impacts are the same as those identified and analyzed in the existing EA which analyzes site-specific impacts for activities identified in the proposed action, and includes standard stipulations to mitigate anticipated, non-significant impacts.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Yes, the cumulative impacts resulting from the proposed action activity on public land are substantially unchanged from those analyzed in the existing EA. Visitation and other uses in the area have not increased significantly to change or negatively affect the cumulative impacts analysis.

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

The interagency consultation and public involvement and review associated with the existing EA is adequate for the current proposed action. All agencies and the affected public addressed in the proposed action area had several opportunities for input and review during the analysis process. Nothing in the proposed action has changed, and no new circumstances or concerns have emerged since the EA was written.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

| <u>Name</u> | <u>Title</u> | <u>Resource Represented</u> |
|------------------------|-----------------------------------|---------------------------------|
| <u>Dallas Meeks</u> | <u>Outdoor Recreation Planner</u> | <u>Recreation and Preparer</u> |
| <u>Gloria Tibbitts</u> | <u>P&EC</u> | <u>NEPA Compliance/Reviewer</u> |

F. Mitigation Measures:

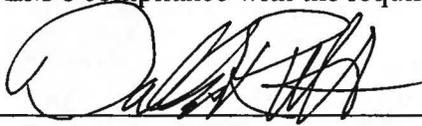
The attached Arizona State and Phoenix District Office BLM Stipulations for Commercial SRPs are incorporated herein.

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.

CONCLUSION:

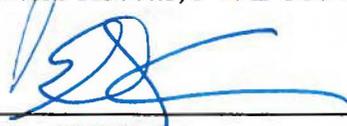
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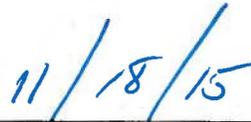
Dallas Meeks, Outdoor Recreation Planner



Gloria Tibbetts, P & E Coordinator



Edward J. Kender
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.