

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

U.S. Department of the Interior
Bureau of Land Management
Arizona Strip District

This worksheet is to be completed consistent with the ‘Guidelines for Using the DNA Worksheet’ located at the end of the worksheet. The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM’s internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

A. BLM Office: AZ110, AZ120, AZ130

Lease/Serial/Case File No. DNA-AZ-110-2008-002

Applicants: Altimus Adventures, Lonetree Outfitters, JKF Outfitters

Proposed Action Title/Type: Hunting Guide Special Recreation Permits (SRP)

Location of Proposed Action: Vermilion Cliffs National Monument, Grand Canyon-Parashant National Monument, and Arizona Strip Field Office Public Domain Lands.

Description of the Proposed Action: Authorize Special Recreation Permits for Altimus Adventures, Lonetree Outfitters and JKF Outfitters for conducting commercial hunting guide activities. Altimus Adventures, Lonetree Outfitters and JKF Outfitters permits would be issued for a one year period. After the initial year, the permits could be reissued for 4 years. These multi-year permits could be renewed annually with a letter signed by the authorized officer, provided the following criteria are met: no changes are made to the permittee's operations plan during the four/five year period; all permit stipulations are followed; fee payments and post-use reports are submitted in a timely manner; and appropriate insurance coverage is maintained.

The area for the proposed action would be throughout the Arizona Game and Fish Department’s game management units 13A, 13B, and 12A, on public lands administered by the BLM Arizona Strip Field Office, the Grand Canyon Parashant National Monument, and the Vermillion Cliffs National Monument for Lonetree Outfitters and JKF Outfitters, while Altimus Adventures would be only 13A.

This type of action would be typical for a commercial outfitter guiding for deer/lion/bear/bighorn sheep/pronghorn/elk on the Arizona Strip. Applicants anticipate conducting anywhere from one to four trips per year, with average group sizes that could range from two to seven, which includes both guides and clients. Maximum group size would be ten. Average trip length would be one week or less. Any single camp stays

expected to exceed a 14 consecutive day period would require prior approval from the authorized officer. The applicants anticipate that the majority of trips would take place on the Shivwits Plateau, the Antelope Valley/Kanab Plateau area, and possibly Buckskin Mountain.

Due to the variability of hunting potential, the exact location of overnight campsites cannot be determined. However, the permittees would be required to camp along the road system in existing disturbed areas only and comply with all overnight camping stipulations.

Additionally, Lonetree Outfitters, as part of their permit, could photograph/film big game and/or clients' hunting for sale to clients or for use in video production. Filming would typically involve hand-held cameras with no set construction or site adaptations, so a 2920 permit would not be required. Separate fee calculations for filming would be applied.

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

LUP Name: Arizona Strip District Resource Management Plan
Date Approved: Jan 1992

Other document: Vermillion Resource Area Implementation Plan For The Arizona Strip Approved Resource Management Plan. (VRAIP)
Date Approved: July 1992

Other document: Shivwits Resource Area Implementation Plan for the Arizona Strip Approved Resource Management Plan (SRAIP)
Date Approved: 1992

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

VRAIP: RR01: Consider all applications for special recreation permits - - - subject to the constraints of this plan and the environmental assessment for the proposed use.

VRAIP: RR03: Provide recreation settings where traditional, backcountry, extensive recreation activities such as camping, hunting, and sightseeing are possible and the experience opportunities for such activities are high.

SRAIP: RR02: Evaluate requests for additional recreation permits through the National Environmental Policy Act process and for their consistency with management goals and objectives and processed on a case-by-case basis.

SRAIP: RR09: Commercial recreation permits would be issued to the extent that their cumulative impacts are consistent with the overall objectives of this plan and in the public interest.

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

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

EA No. AZ-931-93-001: Special Recreation Permits for Commercial Activities on Public Lands in Arizona. Approved 1993

D. NEPA Adequacy Criteria

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

Yes

No

Documentation of answer and explanation:

The existing EA (AZ-931-93-001) was written specifically for this type of activity. The EA analyzes a large number of guided outdoor activities, and hunting, hiking and camping, which are the three main activities that would take place under this permit; these activities are mentioned specifically in the introduction section of the document (page 1). Filming is an additional proposal by Lonetree Outfitters that is not specifically addressed in the existing EA. However, the use of small, hand-held cameras/video equipment with no film crews or sets, in conjunction with the guided hunting trips afield, would not substantially differentiate this added use from the action analyzed in the existing EA.

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:

There are two alternatives analyzed in the existing EA—the proposed action and no action.

Under the proposed action, SRPs would be issued on a case-by-case basis. The analysis states that resource impacts would be minimal because the BLM would have the ability to approve, deny, or modify a proposed operation, as well as modify or add to the list of stipulations that commercial operators must comply with. This offers improved resource protection over the no action alternative.

The alternative to the proposed action would be to not issue a permit. The existing EA states that denial of permits could increase illegal guiding activity and may hinder the BLM's ability to work with outfitters and monitor commercial activities. Unregulated activity could have greater resource impacts and create additional enforcement problems.

The range of alternatives analyzed in the existing EA is still valid under the current conditions and circumstances.

3. Is existing analysis 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 U.S. 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:

The only change that has happened since EA-AZ-931-93-001 was issued is the designation of two new national monuments within the Arizona Strip District (Grand Canyon-Parashant and Vermilion Cliffs National Monuments). However, the designation of these monuments has not changed the validity of the EA. The proposed guiding activities are consistent with the monument proclamations and interim monument management guidance. The guidance in these documents contains no information which would preclude this proposal from being authorized or conflict with the existing analysis.

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

Yes

No

Documentation of answer and explanation:

Analysis methodologies for this type of activity have not changed since the existing EA was issued.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Do the existing NEPA documents analyze impacts related to the current proposed action at a level of specificity appropriate to the proposal (plan level, programmatic level, project level)?

Yes

No

Documentation of answer and explanation:

The environmental impacts of the current proposed action would be similar to non-commercial hunting activities. These impacts are identical to those identified in the Environmental Impacts section (pages 5-8) of the existing EA. The nature of the proposed action is short-term and dispersed over a large area. The specificity of the existing analysis is adequate.

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

No

Documentation of answer and explanation:

The Cumulative Impacts section (pages 8-9) in the existing EA recognizes that backcountry recreation of all types can be expected to increase over time. However, the number of hunting tags being issued in a given year is finite and controlled by the Arizona Game and Fish Department. Many hunters choose to hire a guide to ease trip planning and enhance their backcountry experience, but because the number of hunting tags is strictly controlled, the issuing of guiding permits is unlikely to result in an overall visitation increase to public lands. The cumulative impact analysis from the existing EA recognizes this and is still valid.

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

X Yes

No

Documentation of answer and explanation:

The existing EA was widely distributed, including 550 copies to agencies, organizations, and individuals, including those on the wilderness mailing list.

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

<u>Name</u>	<u>Resource Represented</u>
Gloria Benson	Native American Coordinator, Arizona Strip District Office
Tom Folks	Recreation, Arizona Strip Field Office
Laurie Ford	Lands/Realty/Minerals, Arizona Strip District Office
Linda Price	Vermilion Cliffs National Monument Manager, S&G
Tom Denniston	Wildlife, Arizona Strip District Office
John Herron	Cultural, Arizona Strip District Office
Lee Hughes	Plants, Arizona Strip District Office
Ray Klein	Law Enforcement, National Park Service
Linda Price	S&G
Bob Sandberg	Range, Arizona Strip District Office
Richard Spotts	Environmental Coordinator, Arizona Strip District Office
Ron Wadsworth	Law Enforcement, Arizona Strip District Office
LD Walker	Weed Coordinator, Arizona Strip District Office
Lorraine M. Christian	Field Manager
Dennis Curtis	Monument Manager
Andi Rogers	Arizona Game and Fish
Rick Miller	Arizona Game and Fish
LeAnn Skrzynski	Kaibab Paiute Tribe

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

See attached stipulations.

CONCLUSIONS

Based on the review documented above, I conclude that:

Plan Conformance:

X This proposal conforms to the applicable land use plan.

 This proposal does not conform to the applicable land use plan

Determination of NEPA Adequacy

X The existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

 The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.

Signature of the Responsible Official
Arizona Strip Field Office Manager

Date

Signature of the Responsible Official
Grand Canyon Parashant National Monument Manager

Date