

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

**DNA-AZ-100-2008-034**

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

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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.

Project title; Hunting Guides Special Recreation Permits

**A. BLM Office:** AZ-110, AZ-120, AZ-130

**Lease/Serial/Case File No.** N/A

**Applicants:** Clay Bundy, Double D Outfitters, Double H Outfitters, Goswick Outfitters, Great Outdoors Outfitters, James Guide Service, Johnson Brothers, Sage Outfitters, Tory Brock and Trophy Outfitters

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

**Description of the Proposed Action:** Authorize Special Recreation Permits for Clay Bundy, Double D Outfitters, Double H Outfitters, Goswick Outfitters, Great Outdoors Outfitters, James Guide Service, Johnson Brothers, Sage Outfitters, Tory Brock and Trophy Outfitters to conduct commercial hunting guide activities. Permits may be issued for a period up to ten years. The BLM requires that an annual letter of authorization be issued for each subsequent year under the permit to ensure that permits conditions are fulfilled on an ongoing basis. The letter of authorization would be signed by the appropriate authorized officer (i.e., District, Field or Monument Manager), provided the following criteria are met: no changes are made to the permittee's operations plan; all permit stipulations are followed; fee payments and post-use reports are submitted in a timely manner; and appropriate insurance coverage is maintained. A permit holder who does not fulfill a permit condition would not receive a letter of authorization and therefore permitted activities would be suspended or terminated.

The proposed action would apply throughout the Arizona Game and Fish Department's game management units 13A, 13B and 12B on public lands administered by the BLM

Arizona Strip Field Office, Grand Canyon - Parashant National Monument, and Vermilion Cliffs National Monument.

This type of action is typical for a commercial outfitter guiding for deer, mountain lion, bighorn sheep, pronghorn, elk and bear on the Arizona Strip. Applicants anticipate conducting anywhere from one to four trips per year, with average group sizes ranging from two to seven, including both guides and clients. Maximum group size would be ten. Average trip length would be one week or less. Camp stays in a single location are limited to 14 consecutive days. Extensions beyond 14 consecutive days would require approval from the authorized officer prior to the last day of the 14 day camp limit. Due to the unpredictability of hunting activity, the exact location of overnight campsites cannot be determined. However, according to the 2008 approved land use plans, the permittees are required to camp along the designated road system in existing disturbed areas only and comply with all overnight camping stipulations.

Commercial photography or filming of the hunting activity would be authorized under this SRP (see the Recreation Permit Administration Handbook, H-2930-1, pages 13 and 14) so long as the photography takes place at the same time, location, and in association with the activity permitted under this SRP. A 2920 filming permit would not be required. However, both the SRP fee (43 CFR 2930) and commercial filming fee (43 CFR 2920) would be charged. Filming is limited to the use of hand-held and tripod mounted cameras with no set construction or site adaptations, see specific stipulations attached to this DNA.

Any photographs taken by the SRP holder for use in the permittee's own promotional material or given to guests as a memento of the trip, and any motion or still picture photography done by guests or using a guest's camera equipment for non-commercial purposes would not require a film permit or filming fees in conjunction with this SRP.

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

### **Arizona Strip Field Office Resource Management Plan**

**Date Approved: 2008**

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

MA-RR-12 No person or persons shall occupy one area within the Arizona Strip FO for longer than 14 consecutive days in any 28-day period; however, extensions beyond the 14-day length of stay can be authorized for permitted uses on a case-by-case basis. Any site on public land within 30 air miles constitutes the same area for the purpose of this rule. Persons occupying a regular campsite within the Virgin River Canyon Recreation Area are exempt from this rule. To protect resources, for public safety, or for other administrative purposes, an authorized officer may, by posting notification, close a given site to occupancy.

MA-RR-13

- Camping may be limited in listed species and other sensitive habitats (see Special Status Species & Vegetation Management decisions).
- Camping may be restricted or limited to protect cultural and/or natural resources through campsite monitoring and LAC.
- Dispersed camping will be allowed, subject to Trail and Travel Management decisions.

MA-RR-24 Special recreation permit (SRP) application packages (application, operating plan, maps, etc.) will be considered for authorization on a case-by-case basis upon receipt of application. (See 43 CFR 2930 for requirements)

MA-RR-28 Commercial, competitive, organized group/event, and special area permits can be authorized when such uses accomplish or are compatible with management objectives and other plan provisions. Commercial services in designated wilderness shall meet guidelines for commercial activities within wilderness.

**Grand Canyon Parashant National Monument Resource Management Plan /  
General Management Plan**

**Date Approved: 2008**

DFC-RR-01 Recreation and visitor services will be managed to provide varying levels of structured recreation opportunities that offer a range of specific benefits, activities, and experiences within outdoor settings (Special Recreation Management Areas [SRMAs]; See Map 11).

DFC-RR-13 The primary strategy for the Parashant SRMA/NPS SMA will be to target a demonstrated undeveloped recreation-tourism market demand from local community and regional/national visitors for trophy hunting opportunities, guided backcountry tours, hiking, viewing and appreciating wildland landscapes and cultural sites, canyoneering and motorized/mechanized/non-mechanized exploring. This demand is supported by the area's distinctive remote, rugged landscape; its proximity to the Grand Canyon; its vast size; and the largely open and undeveloped character of its recreation settings. Regional and local recreation-tourism visitors value this area for the distinctive kinds of dispersed recreation it produces. (See RMP Appendix J for more information.)

MA-RR-12 No person or persons should occupy one area on BLM-administered lands within the Monument for longer than 14 consecutive days in any 28-day period; however, extensions beyond the 14-day length of stay can be authorized for permitted uses on a case-by-case basis. Any site on public land within 30 air miles constitutes the same area for the purpose of this rule. To protect resources, for public safety, or for other administrative purposes, an authorized officer may, by posting notification, close a given site to occupancy.

MA-RR-27

- Commercial, competitive, organized group/event, and special area permits can be authorized when such uses accomplish or are compatible with management objectives

and other plan provisions. Commercial services in designated or proposed wilderness should meet guidelines for commercial activities within wilderness.

- Recreation activities requiring use authorization can be limited in listed species and other sensitive habitats. (See Special Status Species and Vegetation Management decisions.)

## **Vermilion Cliffs National Monument Resource Management Plan**

**Date Approved: 2008**

DFC-RR-01 Recreation and visitor services will be managed to provide varying levels of structured recreation opportunities that offer a range of specific benefits, activities, and experiences within outdoor settings (Special Recreation Management Areas (SRMAs; See Map 2.8).

DFC-RR-06 In Backways and Specialized TMAs, recreation opportunities associated with somewhat remote settings, such as exploring backcountry roads, vehicle camping, hunting, sightseeing, recreation aviation, and picnicking will be maintained/enhanced on existing roads, provided they will be compatible with the protection and enhancement of sensitive resource values and Monument objects, where appropriate.

MA-RR-13 No person or persons shall occupy one area within the Monument for longer than 14 consecutive days in any 28-day period; however, extensions beyond the 14-day length of stay can be authorized for permitted uses on a case-by-case basis. Any site on public land within 30 air miles constitutes the same area for the purpose of this rule. To protect resources, for public safety, or for other administrative purposes, an authorized officer may, by posting notification, close a given site to occupancy.

MA-RR-27 SRP application packages (application, operating plan, maps, etc.) will be considered for authorization on a case-by-case basis upon receipt of application. (See 43 CFR 2930 for requirements)

### **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?**

X 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 including hunting, hiking and camping, which are the three main activities that would take place under these permits; these activities are mentioned specifically in page 1 of the document.

“This document generally covers the specific type of proposed action which involves 1) commercial recreation activities; 2) day-use or multi-day trips onto public lands; 3) base camps of 14 days or less; 4) spike camps, where relatively small groups (up to 6 people or 6 pack stock) would use a site for one or two nights and then move on; and 5) where general stipulations in this document are applied.”

This DNA (DNA-AZ-100-08-034) clarifies the proposed action on one point. SRP holders using base camps under this current proposed action can request a base camp extension beyond the 14 day camp limit. Under the 2008 Arizona Strip Field Office, Grand Canyon-Parashant National Monument Management, and Vermilion Cliffs National Monument Management Plans, no person or persons can occupy one area for longer than 14 consecutive days in any 28-day period; however, extensions beyond the 14-day camp limit to 28 days can be authorized for permitted uses on a case-by-case basis. EA-AZ-93-001 states “It is recognized that in some circumstances, such as delays to weather, emergencies, or tracking a wounded animal, guides may be required to extend stays to base and spike camps.” These types of extensions and a 14 day camp extension are deemed “substantially the same”; they were already analyzed and found to not substantially increase impacts to the land over those that have already occurred under EA-AZ-931-93-001. Under the current land use plans “Visitor limits, regulations, or restrictions may be instituted and/or adjusted when monitoring of resource and social conditions indicate a trend toward unacceptable resource and social changes brought about by such use.”

Filming is an additional proposal by 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, would not substantially differentiate this added use from the action analyzed in the existing EA.

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**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?**

X 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.

The alternative to the proposed action would be to deny hunting and guide permits. The current EA states the denial of permits “would likely 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. (EA-AZ-931-93-001, p.8)

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 since EA-AZ-931-93-001 is the designation of the Grand Canyon-Parashant and Vermilion Cliffs National Monuments within the Arizona Strip District. The designation of these monuments has not changed the validity of the EA. The proposed guiding activities are consistent with the monument proclamations and Arizona Strip Field Office, Vermilion Cliffs National Monument Management and Grand Canyon Parashant National Monument Management Plans. The management guidance in these documents does not preclude this proposal from being authorized or conflict with the existing analysis.

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**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 methods for this type of activity have not changed since the existing EA was issued.

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**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:

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.

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**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.

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**7. 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 existing EA was widely distributed, including 550 copies to agencies, organizations, and individuals, including those on the wilderness mailing list. That public involvement and interagency review was, and continues to be, adequate for the current proposed action.

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

Name	Resource Represented
Gloria Benson	Native American Liaison, Arizona Strip District Office
Diana Hawks	Recreation/Wilderness/Cultural Resources/Arizona Strip District Office
Laurie Ford	Lands/Realty/Minerals, Arizona Strip District Office
Linda Price	Vermilion Cliffs National Monument Manager, Standards & Guidelines
Kitti Jensen	Wildlife, Arizona Strip District Office
John Herron	Cultural Resources, Arizona Strip District Office
Lee Hughes	Special Status Plants, Arizona Strip District Office
Ray Klein	Law Enforcement, National Park Service
Whit Bunting	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, Arizona Strip Field Office
Tom Edgerton	Grand Canyon-Parashant National Monument Manager
Jeff Bradybaugh	Grand Canyon-Parashant National Monument Superintendent, National Park Service
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.

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## **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.

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**Arizona Strip Field Office Manager**

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**Date**

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**Grand Canyon Parashant National Monument Manager, BLM**

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**Date**

Permittee

\_\_\_\_\_  
Permit Number  
\_\_\_\_\_

Arizona Strip District Office  
SPECIAL RECREATION PERMIT  
TERMS, CONDITIONS AND STIPULATIONS

In order to protect and preserve the natural and cultural resource values on the Arizona Strip and provide for public safety, the attached supplemental stipulations and rules are in effect for all commercial recreation permits. These stipulations are specific to the Arizona Strip District Office and are in addition to those found within Form 2930-1 (SRP Application/Permit) and BLM H-2930-1 (Recreation Permit Administration). These forms can be obtained through any BLM office or on-line at <http://web.az.blm.gov/cfiles/forms/forms.html>. These stipulations are considered a part of the permit. Please make sure these stipulations are fully understood; failure to comply can result in loss of permit privileges. Thank you for your interest and stewardship of your public lands.

General Stipulations

1. SRP's for commercial recreation uses requiring a State license (i.e., outdoor youth programs, hunting guides, etc.) will be valid only when accompanied by a valid State license.
2. Food, water, and/or equipment caches will not be allowed unless prior approval is obtained from the BLM's authorized officer. Location of proposed caches must be identified in the permittee's approved operating plan.
3. The authorized officer, or other duly authorized representative of the BLM, may examine any of the records or other documents related to the permit, the permittee or the permittee's operator, employee, or agent for up to 3 years after expiration of the permit.
4. The permittee must submit a Post-Use Report to the authorized officer within 30 days after the use season. This report will be used to determine if additional fees are required of the permittee based upon total permitted use. For hunting and fishing outfitters, the report is due by January 31 for every year the permit is in effect. If the permittee desires, use reports may be submitted periodically throughout the permit period.
5. All signs placed on public lands by the permittee must be authorized by the BLM in writing. Permittee shall not construct cairns, use flagging, or paint to mark trails, unless specified in their permit. All permitted signs and flagging must be removed from public lands at the end of the use period.
6. The permittee will help prevent noxious weed spread by using certified weed-free feed and bedding for livestock and/or dogs. In addition, all machinery (street legal motorized vehicles, tractors, non-street legal all terrain vehicles, dirt bikes, etc) that has been used outside the Arizona Strip must be free of accumulated soil and plant parts (including the undercarriage) prior to their use on the Arizona Strip in order to prevent the possible introduction and spread of noxious weeds.

7. Permittee will not camp within one-quarter mile of a water hole containing water, or human made watering facility containing water in order to allow wildlife access to water.

8. Follow Leave No Trace” principles. (See enclosed materials)

9. Disposal of human waste:

a. At vehicle accessible base camps and/or base camps with a group size greater than eight, a portable toilet is required. Portable toilets are the preferred method for human waste disposal and must be emptied only at approved disposal sites.

b. At camps not accessible by vehicles and/or when the group size is less than eight, group latrines will be located on sites that maximize direct sunlight and no closer than 200 feet from water sources and active dry washes. The hole excavated for the latrine will be 8-12 inches deep and will be completely filled in and disguised when camp is broken. SRP holders are required to bury or dispose of toilet paper in the trash.

10. The permittee must use existing campfire circles when they exist, rather than construct new ones. If no existing fire circles, sites should be selected that can be "naturalized" at departure.

11. Camp fires will be away from trees, shrubs and other vegetation. Do not build fires next to rocks or encircle your fire with stones/rocks.

12. The permittee must take all reasonable precautions to prevent wild land fires. Fires must be out and cold when camp is unattended.

13. The permittee is hereby advised that in time of severe fire danger or other emergencies, in order to protect public resources, the BLM may close large areas to the public. This permit does not entitle the holder to an exception to emergency closures.

14. Wildfires caused by the permittee should be reported immediately to the nearest BLM office. Permittee is responsible for informing employees and clients of the current fire danger and required precautions that may be placed in effect by the BLM or the State.

15. The BLM issued Special Recreation Permit (SRP) does not cover operations on the National Park Service administered portion of the Grand Canyon-Parashant National Monument (GCPNM); a separate Commercial Use Authorization from the GCPNM is required for activities on NPS lands.

16. Additional stipulations will be applied to all SRPs authorized within special status species habitat.

17. Permit holders must notify the BLM wildlife team lead if California condors visit the site while permitted activities are underway. The BLM may request that project activities be modified, relocated, or delayed where adverse effects to condors may result.

18. The permittee or their agent shall notify Arizona Strip Field Office Supervisory Law Enforcement Officer Ron Wadsworth (435 688-3200) at least 24 hours prior, to the use of any aircraft on or over the Arizona Strip for the purposes of this SRP. This notification shall include the purpose, location, and estimated duration of each aircraft use.

19. SRP holders must adhere to 43 CFR 4140.1 which prohibits: installing, using, maintaining, modifying, and/or removing range improvements without authorization; cutting, burning, spraying, destroying, or removing vegetation without authorization; damaging or removing U.S. property without authorization; littering; failing to reclose any gate or other entry during periods of livestock use; and interfering with lawful uses or

users including obstructing free transit through or over the public lands by force, threat, intimidation, signs, barriers, or locked gates.

20. Filming is limited to the use of handheld and tripod mounted cameras. Use of dollies, tracks, cranes, high lines, aircraft and other camera support devices are not allowed, unless the camera support device is part of the recreation activity authorized under the SRP. Construction or removal of vegetation for the creation of a camera platform or to clear a shot is not allowed. Filming is generally done using only ambient light sources. No more than two, battery-powered, auxiliary lighting sources may be used. If the filming project is more complex than allowed for under this stipulation, then a separate 2920 permit should be issued.

21. No commercial filming would be authorized in designated wilderness areas.

22. The permittee shall comply with all Federal, State, and local laws, ordinances, regulations, orders, postings, or written requirements applicable to the area or operations covered by the Special Recreation Permit (SRP). The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents of the permittee and by all clients, customers, participants, or spectators under the permittee's supervision.

**DECISION MEMORANDUM**  
***Hunting Guides Special Recreation Permits***  
***DNA-AZ-100-2008-034***

U.S. Department of the Interior  
Bureau of Land Management  
*Arizona Strip Field Office*  
*Grand Canyon Parashant National Monument*  
*Vermilion Cliffs National Monument*

**Approval and Decision**

Based on a review of the project described in the attached Determination of NEPA Adequacy (DNA) documentation and Field Office and Monument staff recommendations, we have determined that the project is in conformance with the Arizona Strip Field Office, Grand Canyon Parashant National Monument and Vermilion Cliffs National Monument Resource Management Plans (approved 2008). The DNA is based on EA-AZ-931-93-001, *Special Recreation Permits for Commercial Recreation Activities*, and specifically addresses outfitting and guiding services. It is our decision to approve the action as proposed.

**Administrative Review or Appeal Opportunities**

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4 and the attached Form 1842-1. If an appeal is taken, your notice of appeal must be filed at the Arizona Strip District Office, 345 East Riverside Drive, St. George, Utah 84790, within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition (pursuant to regulation 43 CFR 4.21 (58 FR 4939, January 19, 1993) (request) for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the Office of the Solicitor (Department of the Interior, Office of the Field Solicitor, Sandra Day O'Connor U.S. Court House #404, 401 West Washington Street SPC44, Phoenix, AZ 85003-2151) (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

Standards for Obtaining a Stay

1. The relative harm to the parties if the stay is granted or denied,
2. The likelihood of the appellant's success on the merits,
3. The likelihood of immediate and irreparable harm if the stay is not granted, and
4. Whether the public interest favors granting the stay.

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Lorraine M. Christian  
Arizona Strip Field Manager

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Date

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Tom Edgerton  
Grand Canyon Parashant National Monument Manager

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Date

Attachment: Form 1842-1