

DECISION MEMORANDUM
Prescott College SRP
DOI-BLM-AZ-A010-2009-0025-DNA

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

Approval and Decision

Based on a review of the project described in the attached Determination of NEPA Adequacy documentation and Arizona Strip Field Office staff recommendations, I have determined that the proposed action is in conformance with the Arizona Strip Field Office Resource Management Plan (approved 2008), and the Grand Staircase-Escalante National Monument Management Plan (approved 2000). It is my decision to approve the action as proposed, with the permit stipulations identified in Attachment A.

Authorize a Special Recreation Permit (SRP) for Prescott College to conduct Arizona National Scenic Trail (ANST) backpacking and horseback trips.

This decision includes the mitigation measures listed in the attached DOI-BLM-AZ-010-2009-0025-DNA stipulations document.

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 Field 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.

Lorraine M. Christian, Arizona Strip Field Manager

Date

SPECIAL RECREATION PERMIT STIPULATIONS
DOI-BLM-AZ-010-2009-0025-DNA
Prescott College
Attachment A

Failure to comply with the following stipulations can result in permit revocation

1. Any filming/photography of permitted activities that takes place with the express intent to sell the product back to the guided client(s) as souvenirs or training videos, etc. would be subject to a vending permit being included as part of the Special Recreation Permit. A separate Land Use Permit would be required for other commercial filming on public lands, defined in IM No. 2004-73 as, "The use of motion picture, videotaping, sound recording, or other moving image or audio recording equipment on public lands that involves the advertisement of a product or service, the creation of a product for sale, or the use of actors, models, sets, or props, but not including activities associated with broadcasts for news programs. For purposes of this definition, creation of a product for sale includes a film, videotape, television broadcast, or documentary of participants in commercial sporting or recreation event created for the purpose of generating income."
2. 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.
3. Conviction of violating federal or state statutes relating to the resources on public land (cultural, wildlife laws, etc.) may cause existing permits to be suspended or cancelled. BLM may suspend or cancel an existing SRP if the permittee commits any of the acts prohibited in 43 CFR 8365 (Rules of Conduct), or violates any site specific rules posted in the area.
4. A Special Recreation Permit authorizes special uses of the public lands and should circumstances warrant, the permit may be modified by the BLM at any time, including the amount of use. The authorized officer may suspend or terminate a SRP if necessary to protect public resources, health, safety, the environment, or noncompliance with permit stipulations. Actions by the BLM to suspend or terminate a SRP can be appealed.
5. No value shall be assigned to or claimed for the permit, or for the occupancy or use of Federal lands or related waters granted thereupon. The permit privileges are not to be considered property on which the permittee shall be entitled to earn or receive any return, income, price or compensation. The use of a permit as collateral is not recognized by BLM.
6. Unless expressly stated, the SRP does not create an exclusive right of use of an area by

the permittee. The permittee shall not interfere with other valid uses of the Federal land by other users. The United States reserves the right to use any part of the area for any purpose.

7. Permittee is responsible for knowing the location of special management areas, such as Areas of Critical Environmental Concern (ACECs) and designated wilderness areas, as well as the use restrictions that apply, and complying with those use restrictions.
8. All advertising and representations made to the public and the authorized officer must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, official agency symbols may not be used. The permittee shall not use advertising that attempts to portray or represent the activities as being conducted by the BLM. The permittee may not portray or represent the permit fee as a special Federal user's tax. The permittee must furnish the authorized officer with any current brochure and price list if requested by the authorized officer.
9. Food, water, and/or equipment caches will not be allowed unless prior approval is obtained from BLM's authorized officer. Location of proposed caches must be identified in the permittee's approved operating plan.
10. 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.
11. The permittee must submit a Post-Use Report to the authorized officer within 30 days after the use season for every year the permit is in effect. This report will be used to determine if additional fees are required of the permittee based upon total permitted use. If the permittee desires, use reports may be submitted periodically throughout the permit period. If the post use report is not received by the established deadline, the permit will be suspended and or fines assessed.
12. The applicant/permittee is required to provide the Authorized Officer with a copy of a valid insurance policy or proof thereof covering the periods of use prior to being issued a SRP authorizing any use. The U.S. Government and the permittee must be named as additional insured on the policy. Permittee must keep insurance in effect; during any period when the insurance is not in effect or cancelled, the SRP is suspended.
13. Collection of prehistoric or historic artifacts is prohibited on Federal Lands and is prosecutable under the Archaeological Resources Protection Act. (Historic artifacts are those more than 50 years old). Disturbance, defacement, or excavation of prehistoric and historic sites is also prohibited. Disturbance of human graves of natives is a violation of the Native American Graves Protection and Repatriation Act.
14. Harassment of livestock, wildlife, wild horses or burros, or destruction of private and public improvements such as wildlife catchments, fences and gates is prohibited. Gates will be left open or closed, as they are found.

15. The permittee shall notify the authorized officer of any accident which occurs while involved in activities authorized by this permit which results in: death, personal injury requiring hospitalization or emergency evacuation, or in property damage greater than \$2,500. Reports must be submitted to BLM within 48 hours in the case of death or injury, and within 10 days in accidents involving property damage.
16. The permittee will practice proper precautions for noxious weed spread. Therefore all machinery (street legal motorized vehicles, non-street legal all terrain vehicles, etc) that has been used outside the Arizona Strip must be cleaned prior to use on the Arizona Strip in order to prevent the possible introduction and spread of noxious weeds. In addition, all machinery (street legal motorized vehicles, dirt bikes, etc) that has been used outside the Arizona Strip must be cleaned prior to use on the Arizona Strip in order to prevent the possible introduction and spread of noxious weeds.
17. Unless otherwise specified in writing, all backpacking trips are limited to a maximum of ten participants, two guides and two support staff providing shuttle services.
18. "Leave No Trace" principles must be followed. (See enclosed reference materials).
19. California condors are highly susceptible to the effects of micro-trash. Micro-trash is defined as small and easily ingestible materials such as bottle caps, pull tabs, broken glass, cigarette butts, small plastic bits, lead bullets, and bullet casings, even food materials. The accidental ingestion of micro-trash is a leading threat to the continued existence of the California condor. Participants will need to be educated on the importance of immediately picking up micro-trash from the site as part of the students "Leave No Trace" training.
20. The permit holder will notify the BLM wildlife team lead if California Condors visit the participants while permitted activities are underway.
21. Campsites and staging areas will be cleaned up at the end of each day (e.g., trash removed, scrap materials picked up) to minimize the likelihood of condors visiting the site. BLM staff may conduct site visits to the area to ensure adequate clean-up measures are taken.

SPECIAL STIPULATIONS THAT APPLY TO THE USE OF STOCK

22. The applicant will be required to begin feeding horses certified weed free hay and forage at least three days in advance and continue feeding weed free hay or forage during the entire length of the trip. If the applicant would want to certify their own feed, the Arizona Department of Agriculture inspector will need to be contacted.
23. The applicant cannot use wildlife catchments and the water that they contain.
24. Horses that die for any reason on BLM lands must be removed quickly and completely by

the permit holder.

OVERNIGHT CAMPING STIPULATIONS:

25. All camps will be located at least 200 feet from any known archaeological sites, including prehistoric camps, rock shelters, caves, and historic buildings.
26. All refuse must be carried out of the area and disposed of in a county approved disposal site. Burying garbage is prohibited.
27. Campsites to be used on backpacking trips must be identified prior to the first trip, or any time a new location is desired, and a GPS locations given to BLM Arizona Strip representative at least two weeks prior to scheduled trip.
28. A campsite must be at least ¼ mile from springs, seeps or livestock or wildlife water catchments, tanks, drinkers, etc.

STIPULATIONS ON THE USE OF FIRE and FIRE SAFETY:

29. The permittee may use only dead and down wood for campfires (unless otherwise directed). Cutting or removing any live vegetation or standing dead vegetation is prohibited.
30. Camp and cooking fires are permitted unless otherwise posted during periods of wildfire danger or for other circumstances. The use of camp stoves and fire pans is strongly encouraged. Camp fires will be away from trees, shrubs and other vegetation. Do not build fires next to rocks and avoid the need to encircle your fire with stones.
31. Wildfires caused by permitted use 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 BLM or the State.

SPECIAL STIPULATIONS THAT APPLY TO VEHICLE OPERATIONS:

32. Permittee is responsible for the proper cleanup of all trash, vehicle fluid (including, but not limited to, fuel, motor oil, hydraulic fluid, gear oil, and coolants), vehicle parts, etc., prior to submission of the Post-Use Report and prior to the release of any required posted bond.
33. Permittee may not clean out stock trucks or trailers on the BLM Arizona Strip lands.
34. Permittee shall limit vehicle traffic to the authorized existing routes contained within the Special Recreation Permit (SRP). No cross-country travel is permitted.

Worksheet

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior

Bureau of Land Management

OFFICE: Arizona Strip Field Office

TRACKING NUMBER: DOI-BLM-AZ-A010-2009-0025-DNA

CASEFILE/PROJECT NUMBER: DOI-BLM-AZ-A010-2009-0025-DNA

PROPOSED ACTION TITLE/TITLE: Prescott College SRP

LOCATION/LEGAL DESCRIPTION: FAMS ID #1561 Arizona National Scenic Trail

A. Description of the Proposed Action and any applicable mitigation measures

Description of Proposed Action: Authorize a Special Recreation Permit (SRP) for Prescott College to conduct Arizona National Scenic Trail (ANST) backpacking and horseback trips. Generally, the expeditions would begin at the Stateline Campground and end at the Coronado National Memorial on the Arizona/Mexico border.

The Buckskin Mountain portion of the trail is 12.3 miles long and is entirely on BLM administered land under the jurisdiction of the Arizona Strip Field Office as shown on Attachment B. The non-motorized trail is primarily used by hikers, mountain bikers, and equestrians. The Stateline Campground is the northern terminus of the newly designated Arizona National Scenic Trail. This northernmost section of the Arizona Trail connects the northern Kaibab National Forest section with the Utah border. The Stateline Campground is located partially within Arizona (Arizona Strip Field Office) and partially in Utah (Grand Staircase-Escalante National Monument).

This type of action would be typical for a commercial guide service offering backpacking and horseback trips within the area. The college adheres to Leave No Trace and Tread Lightly principles. The applicant currently holds a valid SRP with multiple NPS, BLM and USFS units including Dinosaur National Monument, Kaibab National Forest and the Price Field Office. The demand for overnight trips traveling along the entire length of Arizona National Scenic Trail has seen a slight increase within the last five years. Current use patterns suggest that the majority of the use on the Arizona Strip Field Office portion of the trail is day hiking with about 20% of the users completing through hiking and horseback trips a year.

This would be the first commercial SRP for the segment of the ANST within the Arizona Strip Field Office. There is a potential that the demand for commercial backpacking and horseback trips on the Arizona Trail may increase over the next ten years due to the recent designation as a National Scenic Trail. The average trip length within the Arizona Strip Field Office would be less than two days. The horseback group would spend the night on the ANST at Stateline Campground, within the equestrian campsite area.

Two types of trips are proposed:

Trip 1: An equine-based 16 semester credit course. The horse packing expedition would travel the entire 800 mile Arizona Trail from Utah to Mexico and would provide an ideal environment to pursue both theoretical as well as applied understanding of relational leadership, and the ways in which the psychology of relationship and choice can inform more sustainable ways of being. The equine-based course may occur every four or five years.

Stock management would include up to 12 horses depending on the number of persons on the trip and up to four pack animals for a maximum of 10 students, 2 guides, and two support staff. Stock animals would be picketed only on dry-well drained soils at least 200 feet from any water source, secured by a 20 foot rope secured to screw stakes. All water for human and animal consumption would need to be hauled in as there is no public water source along the Arizona Strip portion of the trail. The closest water source is Coyote Spring east of BLM 1065.

Trip 2: A backpacking based semester course. The backpacking expedition would travel the entire 800 mile Arizona Trail from the Utah state line to Mexico and would provide environmental education (EE) that would explore the developing interface between these two fields from a philosophical and practical perspective. It is designed for students who anticipate employment in the adventure education field, and who recognize the importance of EE in their instructional repertoire. Students would experiment with designing an adventure-based EE thematic unit and/or curriculum that combines skills instruction and experiential education techniques with interpretive natural history, ecology, and environmental issues. The backpacking based course may occur every two to three years.

On backpacking trips, campsites would be located in previously established sites identified by compacted soils or visible signs of tent, horse or car camping sites. Unless, otherwise specified, all trips are limited to a maximum of 10 students, 2 guides, and two support staff (see stipulation #17).

For trips that include backcountry camping, all refuse, including trash, garbage, and camp fire ash (where permitted) would be packed out of the area. Participants would be instructed to practice Leave No Trace principles for human waste disposal with a preference for the use of human waste bags provided by the applicant or use a carryout system provided by vehicle support services although the practice of human waste disposal can occur using small, personal cat holes if necessary. Goshawks are protected and are likely to nest in the area, as a result of the potential for goshawk nests, if trips would occur within the nesting season of the majority of North American birds, the applicant care be taken to minimize noise and disturbance when traveling and especially at camp sites.

Mitigating Measures would be attached to the permit as stipulations. The stipulations applicable for this SRP can be located in Attachment A.

B. Land Use Plan (LUP) Conformance

LUP Name/Date Approved Arizona Strip Field Office (FO) Resource Management Plan, January 29, 2008

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

DFC-RR-03: Existing opportunities for visitors to enjoy sightseeing and viewing wildlife in the Backways TMAs will be maintained/enhanced.

DFC-RR-05: 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, where appropriate.

MA-RR-20: Recreational stock use may be limited in listed species and other sensitive habitats or in the vicinity of cultural properties.

MA-RR-21: Certified weed-free feed is required for all recreation stock use.

MA-RR-24: SRP application packages--- will be considered for authorization on a case-by-case basis upon receipt of application.

MA-RR-29: Outreach efforts will be established, such as will field institutes or elder hostels, to focus on interpretive and environmental educational niches not previously addressed.

MA-TE-77: Within the 10 (j) area, the BLM will not restrict authorized and/or permitted activities solely for the benefit of California condors. Persons engaged in authorized or permitted actions that encounter a condor will be requested not to haze the birds, but to notify the BLM or the Peregrine Fund. .

LUP Name/Date Approved Grand Staircase-Escalante National Monument Management Plan, February 2000.

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

CAMP-1 Camping in developed campgrounds or in designated primitive camping areas will be allowed in the Frontcountry and Passage Zones. Dispersed primitive camping will not be allowed in these zones.

SRMA-4: Activities in this SRMA include canyoneering, equestrian use, backpacking, hiking, hunting, and scenic touring along the House Rock Valley Road. Management of this SRMA will be in coordination with the Kanab and the Arizona Strip Field Offices.

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.

EA-AZ-931-93-001 Special Recreation Permits for Commercial Activities on Public Lands in Arizona.

EA-AZ-010-94-13 Arizona Trail-Buckskin Mountain Passage-Recreation Project Plan

D. NEPA Adequacy Criteria

1. Is the new 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?

Documentation of answer and explanation:

EA-AZ-931-93-001 was written specifically for this type of recreational activity. “The purpose of the EA is to allow the use of public lands for commercial recreation activities.” While the EA applies to a large range of guided outdoor activities, hiking and backpacking are mentioned specifically in the introduction section of the document (page 1), and the activities are analyzed in both of the alternatives.

The potential impacts of recreation use along the ANST corridor in this proposed action were also reviewed and analyzed in EA-AZ-010-94-13. The EA states, “The non-motorized trail will be 750 miles long and is intended for use by hikers, equestrians and mountain bikers...Other non-motorized activities such as walking, jogging, bird watching, environmental education, packstock use, and llama trekking will also be accommodated if appropriate. The Arizona Trail is intended to be a primitive, long distance trail traversing a scenic and natural corridor that highlights the State’s topographic, biologic, historic, and cultural diversity”

The proposed action contains two types of proposed trips: horseback riding that have no backcountry camping outside of a designated campground designed that currently has three campsites designed for stock, and backpacking trips. EA-AZ-931-93-001 provides no restrictions to the number of stock or participants that do not spend at least one night in the backcountry. Thus, Trip 1, as described in the proposed action, would not be substantially different then to the alternatives analyzed in the existing EAs.

The backpacking trips, which may spend at least one night in the backcountry on the trail, and which may have up to 10 participants, two guides and two support staff are not substantially different then EA-AZ-010-94-13 which analyzes the impacts of larger groups and states “the proposed action does not include any special visitor use limits or rules beyond standard visitor use regulations already found at 43 CFR 8360, Visitor Services”. Thus, Trip 2, as described in

the proposed action, would not be substantially different than the alternatives analyzed in the existing EAs.

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?

Documentation of answer and explanation:

The range of alternatives considered in the existing EAs is appropriate with respect to the current proposed action.

The range of alternatives considered in the existing EA is appropriate with respect to the current proposed action of Trip 1. The proposed alternative in EA-AZ-931-93-001 involves 1) commercial recreation activities; 2) day-use or multi-day trips onto public lands with limits on group size of the number of stock only on those trips that would require spike or base camps.

The backpacking trips, which may include one spike camp, would exceed the limits analyzed in EA-AZ-931-93-001 which states “spike camps, where relatively small groups (up to 6 people or 6 stock) would use a site for one or two nights and then move on”. Information Bulletin Number AZ-93-331 it states: “Commercial activities which do not meet the above requirements (such as those involving larger groups, or in areas which do not meet the general stipulations), will require separate NEPA documentation”. EA-AZ-010-94-13 states that “groups would likely average 3-4 in size, with larger groups occasionally using the trail” and analyzes the impacts of larger groups stating that “the proposed action does not include any special visitor use limits or rules beyond standard visitor use regulations already found at 43 CFR 8360, Visitor Services. However, should monitoring reveal that use of the trail is causing significant conflicts or negatively impacting other resources or uses, special limits or rules would be developed and implemented through required procedures to mitigate those impacts”. ANST use is currently monitored by trail registration sheets, and vehicle counts. Trail counters will be added to the ANST to increase the effectiveness of monitoring trail users. Monitoring results have produced no signs of negative impacts to area resources as related to trail use and show through current use patterns that all through hikers who sign into the register has a group size of two or less people. Thus, Trip 2 of proposed action would create no direct or indirect impacts to resources in the area that were not previously analyzed in the existing EAs. Thus, Trip 2, as described in the proposed action, has been previously analyzed in the alternatives in the existing EAs.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, 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?

Documentation of answer and explanation:

Since the existing EAs (EA-AZ-931-93-001 and EA-AZ-010-94-13) were issued, Grand Staircase-Escalante National Monument was designated in 1996 and Vermilion Cliffs National

Monument was designated in 2000 through Presidential Proclamations. The Arizona Trail and Stateline campground complex is within the Arizona Strip Field Office and Grand Staircase-Escalante National Monument. Vermilion Cliffs National Monument is located due east of the campground.

The Arizona National Scenic Trail formerly known as the potential Arizona Trail-Buckskin Mountain Passage was officially designated by Congress as a National Scenic Trail in March 2009. Although this designation occurred subsequent to preparation of the Arizona Trail-Buckskin Mountain Passage-Recreation Project Plan EA, use of the Arizona Trail was considered and analyzed in that EA. The use proposed in this current proposed action is the same as that previously analyzed, and does not conflict with the trail's new designation.

The original EA, EA-AZ-010-94-13 , stated "Approximately 9 miles to the south of the project area, the U.S. Fish and Wildlife Service plans to release a non-essential, experimental population of California Condors (*Gymnogyps californianus*) as a part of a species recovery effort." The condor reintroduction project began, after the completion of the EA, in 1996. Impacts to condors were addressed in the EA. There would be no new impacts to the condor reintroduction project from the proposed action.

Designation of the two national monuments would not change the analysis contained within the existing EAs. Resources present in the monuments were analyzed in the EAs.

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?

Documentation of answer and explanation:

The impacts of the proposed action are similar to those contained within EA-AZ-931-93-001 and EA-AZ-010-94-13 in that:

Visual Resources

The proposed action would permit organized groups to hike or ride horses along the ANST corridor. During the construction of the ANST, the project took full advantage of topographic and vegetation screening by preventing the removal of established pinion-juniper and minimizing the removal of other vegetative screening that would negatively impact the visibility of the trail from House Rock Valley Route, BLM route 1065. Thus, any activity as described in the proposed action would create no visual impacts to other local visitors except for short durations in which participants pass each other on the trail. Thus, the current proposed action would create no direct impacts to visual resources in the area that were not previously analyzed in the existing EAs

Recreation

EA-AZ-931-93-001 states that “the outfitter does not, by virtue of the permit, have exclusive use of a parcel of public land. Thus no displacement of private individual use is anticipated” as a result of this proposed action. This would be the first commercial SRP for the segment of the ANST within the Arizona Strip Field Office. If in the future, multiple requests for commercial SRPs are received for the ANST, further NEPA analysis may need to be completed to ensure that recreation resources and private individual use are not displaced.

As stated in EA-AZ-010-94-13, the proposed action, “would address an increasing recreation demand by directly and moderately improving non-motorized recreation opportunities on public lands in the region. It would give users the opportunity to engage in various recreational activities along the trail corridor chosen and designed to maximize a higher-quality experience to horsemen and other users than currently exists.” The steps necessary to minimize social impacts of recreation use in the area have been implemented to including recreation monitoring protocols and recreation use surveys.

Thus, the current proposed action would create no direct or indirect impacts to recreation resources in the area that were not previously analyzed in the existing EAs.

Cultural

The proposed action footprint would be contained within the footprint of the Arizona National Scenic Trail which was designed to avoid known cultural resources. Campsite locations would be required to be located in previously disturbed areas along the trail that are currently being utilized by other trail users and BLM 1025 dispersed campsite users. “Recreation activities such as those provided by commercial operators are currently occurring by current trail users, and the standard stipulations in “Appendix A” would reduce the potential for adverse impacts to cultural properties attributable to commercial activities” as stated in EA-AZ-931-93-001. Mitigating measures addressing cultural and historical resources would be attached to the permit as stipulations. The stipulations applicable for this SRP can be located in Attachment A.

Although there are cultural resources located in proximity to the ANST, there are no significant cultural resources occurring within the area of the proposed action footprint thus the current proposed action would create no direct impacts to cultural resources in the area that were not previously analyzed in the existing EAs.

Rangeland

The trail corridor crosses the Coyote Allotment. A number of livestock grazing-related developments (fences, water facilities, corrals) and use patterns (summer grazing, cow/calf operations, and pasture rotation) form the basis of grazing operations. The use of the trail as described in the proposed action was analyzed in EA-AZ-010-94-13.

There would be no change in season of use or measurable loss of AUMs due to implementation of the proposed action. There should be a very slight to no disturbance of grazing livestock during the short timeframe in which the participants will travel past any grazing livestock. Thus,

the proposed action would create no direct impacts to rangeland resources in the area that were not previously analyzed in the existing EAs.

Wildlife

EA-AZ-010-94-13 also stated “the anticipated direct and indirect impacts of the proposed action to the successful establishment of the experimental population of California Condors in the region would be slight to none.” The condor reintroduction project began, after the completion of the EA, in 1996. The California condor has been successfully introduced into the region with no known impacts from the use of the Arizona Trail-Buckskin Mountain and Stateline Campground facilities. There would be no new impacts to the condor reintroduction project from the proposed action. Conservation measures as described in the stipulations in Attachment A would be utilized to minimize any adverse impacts to the experimental population that could occur through the activities of this proposed action.

The minimal use, small group size and recreation activity should pose no direct or indirect impacts on the Buckskin Mountain deer herd. Thus, the proposed action would create no direct impacts to wildlife resources in the area that were not previously analyzed in the existing EAs.

Vegetation and Soils

The proposed action would be contained within the footprint that was analyzed in EA-AZ-010-94-13 which included review of the direct impacts to vegetation and soils during the construction phase of the Arizona Trail corridor and the development of water bars to prevent trail erosion. The trail corridor is currently being impacted by existing trail corridor usage. To mitigate impacts associated with the compaction of soils related to the establishment of campsites, the applicant would be required to inform the BLM of campsite locations along the trail corridor one month prior to the proposed hiking date. Issuing “permits would not result in any significant overall increase in visitation on the public lands” as stated in EA-AZ-931-93-001. Utilizing the general recreation use patterns data the Arizona Strip has on the ANST, it appears that there would be minimal increased foot and horse traffic as a result of the proposed action.

Conservation measures as described in the stipulations in Attachment A would be utilized to minimize any adverse impacts to vegetation and soils by the proposed action. The current proposed action would thus, create no new impacts to vegetation and soils that were not previously analyzed in the existing EAs.

Socio-Economic

The proposed action would not likely directly contribute to a growing tourism industry in the region as the proposed action would present a recreation and educational opportunity for organized school groups, every few years. The proposed action may indirectly contribute to a growing tourism industry as analyzed in EA-AZ-010-94-13. There would be no change in season of use or measurable loss of AUMs due to implementation of the proposed action. External promotion of the local resources and the National Scenic Trail designation has contributed to a

growing tourism industry in the area. The current proposed action would likely not contribute to the increased notoriety of the area.

The proposed actions would have little potential for adverse cumulative impacts to the resources. Local impacts and visitor trends are likely to see an increase of visitor use over time due to the new designation of the Arizona National Scenic Trail and increased destination orientated travelers to the House Rock Valley area. Issuing permits through this proposed action would not result in any significant overall increase in visitation to the area. The location of the staging area for horseback trips would be maintained within the current footprint of the Stateline Campground which would negate any cumulative impacts from the proposed action. The current proposed action would thus, create no new direct cumulative impacts that were not previously analyzed in the existing EAs.

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

Documentation of answer and explanation:

Consultation and coordination for EAs were extensive. During the public review process, 271 persons and/or organizations received information about EA-AZ-010-94-13 and over 700 persons and/or organizations received information about EA-AZ-931-93-001. Public involvement and interagency review associated with the review of both EAs are adequate for the current proposed action as there is no deviation of the proposed action outside those areas and activities as stated and analyzed in the existing EAs.

E. Persons/Agencies /BLM Staff Consulted

Name Title Resource

Gloria Benson, Tribal Liaison, Arizona Strip District Office
Diana Hawks, Recreation/Wilderness/VRM, Arizona Strip Field Office
Laurie Ford, Lands/Realty/Minerals, Arizona Strip Field Office
Larry Denniston, Wildlife/T&E Wildlife, Grand Canyon-Parashant National Monument
John Herron, Cultural, Arizona Strip Field Office
Jon Jasper, Outdoor Recreation Planner, Arizona Strip Field Office
Lee Hughes, Special Status Plants, Arizona Strip Field Office
Whit Bunting, Range/Vegetation, Arizona Strip District Office
Richard Spotts, Environmental Coordinator, Arizona Strip District Office
Ron Wadsworth, Supervisory Law Enforcement, Arizona Strip Field Office
Linda Price, Monument Manager, Vermilion Cliffs National Monument, S&G
John Sims, Vermilion Cliffs National Monument, Law Enforcement
LD Walker, Weed Coordinator, Arizona Strip Field Office
Lorraine Christian, Field Manager, Arizona Strip Field Office
Rene Berkhout, Monument Manager, Grand Staircase-Escalante National Monument
Clay Stewart, Outdoor Recreation Planner, Grand Staircase-Escalante National Monument

Required Recipients of electronic distribution E-mails only (not reminders):

Andi Rogers, Habitat Specialist, Arizona Game and Fish Department
Sarah Reif, Habitat Specialist, Arizona Game and Fish Department
LeAnn Skrzynski, Environmental Program Director, Kaibab Paiute Tribe

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plans and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

Lorraine M. Christian
Arizona Strip Field Office 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, any lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and program-specific regulations.

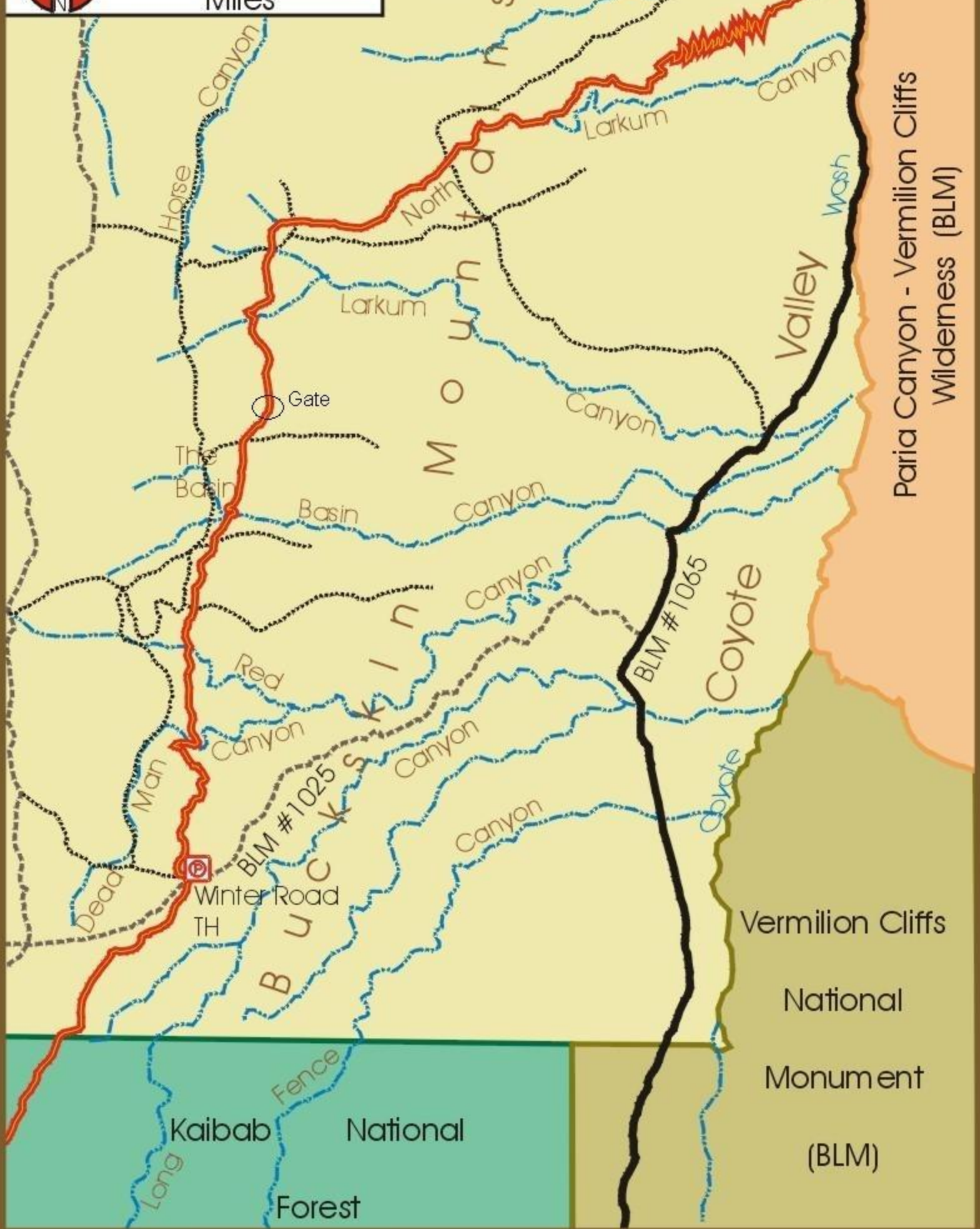
-  Arizona Trail
-  Primary road
-  Secondary road
-  4WD road
-  Drainage

Attachment B



Grand Staircase - Escalante
National Monument
(BLM)

Utah
Arizona
Stateline TH



Paria Canyon - Vermilion Cliffs
Wilderness (BLM)

Vermilion Cliffs
National
Monument
(BLM)

Kaibab National
Forest