



Bureau of Land Management
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Determination of Land Use Plan Conformance and NEPA Adequacy (DNA)
U.S. Department of the Interior - Bureau of Land Management

A. BLM Office: Bruneau Field Office

NEPA Log Number: DOI-BLM-ID-B020-0002-DNA

Lease/Serial Case File No.: GRN# 1100291, 1102995, 1101607, 1102293

Proposed Action Title/Type: Stipulation to Dismiss Appeals (Stipulation). This Stipulation settles appeals ID-BO2000-09-001 and ID-BO2000-09-002 filed by Gordon King and John Anchustegui, respectively.

Location/Legal of Proposed Action: East Castle Creek Allotment #0893, Bruneau Field Office, Owyhee County, Idaho, 5 to 30 miles southwest of Grand View, Idaho

Applicant (if any): John Anchustegui (GRN #1100291, 1102995), Gordon King (1101607, 1102293)

Description of the Proposed Action and any applicable mitigation measures: On February 20, 2009, the Bruneau Field Office Manager issued final grazing decisions to renew grazing permits in the East Castle Creek Allotment (Final Decisions). Two of the five grazing decisions were appealed by the permit holders. They submitted a proposed Stipulation to Dismiss Appeals (Stipulation) as an alternative to appearing at a hearing in front of an Administrative Law Judge. This Stipulation proposed some changes to four of the final grazing decisions issued to the permittees. Four decisions are affected because each of the two permit holders currently has 2 permits each. Since the decisions have similar (or the same) features they are being consolidated to one permit for each permit holder. Following much negotiation, the Stipulation was modified and agreement was reached. It will be signed once this document is completed and a copy will be attached. The main changes from the respective final decisions with page citations are listed below:

- Consolidation of Gordon King's renewed Grazing Permit #1101607 (Final Decision, page 10) and King's renewed Grazing Permit #1102293 (Final Decision, page 10);
- Consolidation of John Anchustegui's renewed Grazing Permit #1100291 with Phillips Brothers' renewed Grazing Permit #1102187. Phillips Brothers held their permit based on preference attached to base property which they leased from John Anchustegui.

The lease of the base property expired and was not renewed since the issuance of the grazing decisions. The preference for that permit was transferred back to John Anchustegui who retains ownership and control of the base property.

- Spring nonuse would be applied for and licensed annually as voluntary nonuse rather than temporarily delayed or discontinued in accordance with IM No. 2009-057.
- The 15% reduction in permitted use and the 16 days reduction in season length would be available for summer use in pastures 28 and 28A as long as the annual indicator criteria (AIC) for shrub utilization and other relevant AIC are not exceeded.
- The upper segment of Sheep Creek in pasture 28A would be excluded from livestock by a fence rather than managed under riparian AIC.
- The projects in Alternative D are priority projects that are necessary to make progress toward meeting the Standards for rangeland health and they would be constructed as described in the EA (pages 22-23, 48-50, EA). Other projects identified in the EA would be reviewed¹ and considered for construction if monitoring shows they would help make progress toward meeting standards for rangeland health.
- Clarification of other terms and conditions
 - Allowance of supplemental salt, mineral, and protein to be located near artificial water sources on a case by case basis with prior authorization from the authorized officer.
 - Periodically allowing livestock grazing use in exclosures with prior authorization from the authorized officer and only where it would improve vegetation conditions for other resources.
 - Changing the reference from the Little Jacks Creek Wilderness Study Area to Little Jacks Creek Wilderness Area as a result of the Omnibus Public Land Management Act of 2009 (Public Law 11-11; Subtitle F) that was signed into law on March 30, 2009.
- Clarification in management flexibility
 - The permittees must get prior authorization from the Authorized Officer at least 2 days before grazing use beyond 5 days flexibility. This authorization would be for infrequent, extenuating circumstance such as change in weather conditions.
 - Adding language that permittee may remove livestock prior to reaching AIC.
- Clarification of annual indicator criteria.
 - AIC would be measured as a pasture wide average of key areas. However, adjustments during the grazing year would include redistribution of livestock within a pasture if not all areas exceed the annual indicators.
- Minor modifications to the Final Decision and Monitoring Plan.
 - Delete Table 3 (pages 14-15, Final Decisions).
 - Include the Long-Term Effectiveness Monitoring Table from the Final Decisions in the Monitoring Plan (Appendix B of the Final EA)
 - The AIC for browse utilization in riparian areas is changed from an average of 25% to an average of "light use". This measurement conforms to the MIM monitoring protocol. The original 25% that was in the AIC for riparian browse

¹ This review would include, but not be limited to, use of the adaptive management Decision Tree presented in the EA, reviewing the EA analysis, reviewing clearance reports, and reviewing design for needed mitigation

utilization is actually the midpoint of light use (11-40%) as described in the MIM protocol.

Only modifications listed above that potentially influence resource conditions or trends will be discussed under Section D (NEPA Adequacy Criteria).

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

LUP/Document ¹	Sections/Pages	Date Approved
Bruneau MFP		March 30, 1983
Bruneau/Kuna Final EIS		March 1983

¹List applicable LUPs (e.g., Resource Management Plans, Management Framework Plans, or applicable amendments) and activity, project, management, water quality restoration, or program plans.

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

Range:

Objective RM-1 in part states: “. . . Increase total production from 126,372 AUMs to 167,976 AUMs and increase livestock use from 123,149 AUMs to 164,753 AUMs within 20 years. Increase vigor, density, and production of desirable vegetation on 421,436 acres within 20 years. . . . Increase 532,855 acres currently in poor range condition to fair condition in 20 years. Increase 448,698 acres currently in fair condition to good condition in 20 years. Maintain the condition class of 338,716 acres currently in good . . . condition.”

- Decision RM-1.1 in part states: “Implement AMPs on 14 allotments [Including Castle Creek, which received 5th priority]. . . Adjust management or exclude grazing on sage grouse brood-rearing areas to improve habitat. . . Design grazing management to improve crucial antelope winter/early spring ranges. Establish grazing systems and seasons to meet bighorn sheep requirements.”
- Decision RM-1.4 in part states: “Develop livestock management facilities needed for implementation of AMPs and/or grazing systems that are designed to reach or maintain [MFP] objectives and Decisions. . .” Constraints to project design and location are listed.
- Decision RM-1.5 states: “Adjust Livestock season of use and/or implement grazing systems on spring and summer ranges to meet minimum growth needs of preferred plant species.”

Objective RM-3 states in part: “Allocate livestock forage . . . so as to maintain or enhance the range and soil resources.”

- Decision RM-3.1 in part states: “Initial livestock use levels . . . will be established at the five-year licensed active use levels. . . Any subsequent increase or reduction in AUMs will be based on monitoring, and other resource needs as identified in this MFP. . .”

Objective RM-5 states in part: “Provide for protection and conservation of rare and endangered plants . . .”

- Decision RM-5.1 in part states: "Manage all lands in a manner which will provide [sic] or enhance rare and endangered plants where they exist. . ."

Watershed:

Objective WS-1 states in part: "Maintain stability of 408,300 acres of moderate, high, and critical erosion classes by reducing or minimizing wind and water erosion."

- The primary WS decision in part states: "Allocate no more than 50 percent of vegetation to consumptive use. . ."

Wildlife/terrestrial:

Objective WL-2 states: "Manage sensitive species habitats in the BPU to maintain or increase existing and potential populations."

Objective WL-3 states: "Manage 1,143,000 acres of big game habitat in the BPU to obtain good ecological condition."

- Decision WL- 3.1 states in part: "Implement livestock grazing systems and practices to improve palatable shrub composition, reproduction, and forage availability. Allow no more than 30 per cent utilization of annual production on key shrub species". . . on mule deer winter and early spring ranges.
- Decision WL- 3.2 states in part: "Implement livestock grazing systems and practices that will improve composition, reproduction, and forage availability of palatable forbs and shrubs in both upland and riparian habitats. Limit utilization of key shrub species to 50 per cent of current annual growth". . . on mule deer spring, summer, and fall ranges.

Objective WL-4 states: "Manage upland game and waterfowl habitats in the BPU to increase populations of these highly desired species."

- Decision WL- 4.3 states in part: "Manage springs, seeps, meadows, and adjacent upland areas as key wildlife habitats for upland game by controlling livestock grazing, protecting springheads and wet areas. . ."
- Decision WL- 4.4 states in part: ". . . all poor and fair big sagebrush, meadow, and riparian ecological sites should be improved and managed for good ecological condition . . . to improve the quality of sage grouse nesting and brood rearing habitats . . ."

Objective WL-6 states in part: "Manage all meadows and riparian habitat in the BPU to obtain a maximum diversity of vegetative species . . . [and] a maximum diversity and optimum abundance of wildlife species."

- Decision WL- 6.1 states in part: ". . . riparian and meadow habitats will be managed to attain and/or maintain a good ecological condition class . . . [by] . . . employing livestock management systems/practices/improvements including the exclusion of grazing where necessary."

Wildlife/aquatic:

Objective WL(aq)- 2 states in part: "Improve fisheries physical habitat to fair and good condition by 1989 in 144 miles of stream and improve chemical water quality . . . for trout. Give special priority to improving habitat for red-band trout. . ."

- Decision WL(aq)- 2.1 states in part:” Upgrading fisheries habitat condition for red-band trout and riparian-associated wildlife will be the primary management objective on 94.4 miles of streams....”
- Decision WL(aq)- 2.2 states in part:” Improve fisheries habitat to good condition on 40 miles (listed) of streams through intensive livestock management. Strive to limit livestock use to light or moderate. . .”
- Decision WL(aq)- 2.6 states in part:”Designate watershed areas draining into major or perennial streams. . . as special management areas for watershed stabilization. Provide adequate cover on granitic slopes exceeding 25 percent. . .Adjust livestock use. . . to reduce soil movement. . .”

C. Identify applicable NEPA documents and other related documents that cover the Proposed Action.

NEPA/Other Related Documents¹	Date Approved
East Castle Creek Grazing Permit Renewal, EA#ID-120-2008-EA-45 (EA)	February 20, 2009
East Castle Creek Allotment Final Assessment (Assessment)	February 5, 2008
East Castle Creek Allotment Evaluation and Determination (Evaluation and Determination)	May 22, 2008
Bruneau Field Manager’s Proposed Decision (Proposed Decision)	December 24, 2008
Bruneau Field Manager’s Final Decisions (Final Decisions)	February 20, 2009
Monitoring data for 2009 grazing season	various

¹List applicable NEPA documents that cover the proposed action or documentation relevant to the proposed action (i.e., source drinking water assessment, biological assessment, biological opinion, watershed assessment, rangeland health standard assessment and determination, or monitoring report).

D. NEPA Adequacy Criteria

1. Is the current Proposed Action substantially the same action (or is a part of that action) as previously analyzed? Is the current Proposed Action located at a site specifically analyzed in an existing document?

Documentation of answer and explanation: Yes. The actions described in the Stipulation are the same or substantially the same as those analyzed in EA# ID-120-2008-EA45 (EA) completed on February 20, 2009.

The Final Decisions as modified by this Stipulation would continue to implement the Proposed Action of the EA with minor modifications and additional clarifications to the Terms and Conditions, Flexibility, the AIC, and to the included Monitoring Plan. The wordings of the following portions of this Stipulation differ slightly from the respective Final Decisions (page citations are provided), but effectiveness in meeting the Purpose and Need would be the same as disclosed by the EA:

- Consolidation of Gordon King's renewed Grazing Permit #1101607 (page 10, Final Decision) and King's renewed Grazing Permit #1102293 (page 10, Final Decision); and of John Anchustegui's renewed Grazing Permit #1100291 with Phillips Brothers' renewed Grazing Permit #1102187 are within the actions analyzed in the EA. The terms and conditions of the consolidated permits would be effectively the same as those analyzed in the EA (page 24, EA).
- Spring nonuse would be licensed annually as voluntary nonuse in accordance with IM Nol. 2009-057 rather than temporarily delayed or discontinued. This voluntary nonuse would continue for 3 years through the 2011 grazing season which is effectively the same as Alternative D (page 44, 1st paragraph, EA) and Term and Condition 2 in the final grazing decisions (page 11, Final Decision). After the 2011 grazing year, monitoring data would be analyzed to determine the need for further modification of grazing management. The EA discussed potential adjustments in grazing management after 3 years, based on implementation monitoring (page 44, EA) and after 5 and 10 years based on long-term effectiveness monitoring (page 212, EA).
- The 15% reduction in active use and the 16 days reduction in season length as required in Gordon King's final decision would be available for summer use in pastures 28 and 28A as long as the AIC for shrub utilization and other AIC are not exceeded. Alternative D in the EA also included flexibility to extend grazing use in Pastures 28 and 28A as long as the AIC were not exceeded (page 43, 2nd paragraph, EA). The permittee grazing in pastures 28 and 28A agrees to perform short-term monitoring to ensure grazing use is in conformance with the AIC. After the 2011 grazing year, monitoring data from these pastures would also be analyzed to determine the need of further modification to grazing management as provided for under both Alternatives C and D.
- The upper segment of Sheep Creek in pasture 28A would be excluded from livestock by a fence rather than managed under riparian AIC. This enclosure was analyzed as part of Alternative C (page 41, Item #39, EA).
- The projects in Alternative D (pages 48-50, EA) are priority projects that are necessary to make progress toward meeting the Standards for Rangeland Health. If monitoring shows that other sites or areas, as evaluated by the East Castle Creek Evaluation or Determination and analyzed in the EA, are not making progress toward meeting Standards for Rangeland Health, then additional projects analyzed in the EA would be further reviewed before approval for construction. This review would include, but not be limited to, use of the adaptive management Decision Tree presented in Appendix D of the EA, reviewing the EA analysis, reviewing clearance reports, and reviewing management designs (pages 22-23, EA) for needed mitigation.

Grazing practices under these permits would continue to be modified as necessary to respond to drought, fire, and other events, as required by the 2009 Final Decisions and by BLM Grazing Regulations. Adjustments after 3 years based upon implementation monitoring (AICs) and after 5 and 10 years based upon mid- and long-term effectiveness monitoring would follow the Decision Tree, as prescribed by the 2009 Final Decisions and the Stipulation and as previously analyzed in Alternative D.

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?

Documentation of answer and explanation: Yes. The EA included an analysis of an adequate and appropriate range of alternatives to address identified resource issues, including both greater and lesser levels of modification to these permits and greater and fewer numbers of supporting projects. It was completed less than a year ago, and the identified resource issues are still relevant based upon 2009 monitoring data. The management of livestock grazing in the East Castle Creek Allotment is currently being challenged in Idaho District Court by Western Watersheds Project. There has not been a court issued order as of the date of this DNA. Western Watersheds Project did not appeal the final grazing decisions.

The Stipulation retains most features analyzed as part of Alternative D of the EA, and represents a slightly modified approach to address the same issues identified in the 2008 Evaluation and Determination. The actions included in the Stipulation are within the alternatives analyzed in the EA and they would address the rangeland health issues identified in the Need and Purpose of the Proposed Action (pages 4-6, EA). The grazing management presented in the Stipulation would make progress toward meeting the Standards for Rangeland Health.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (i.e., riparian proper functioning condition reports; rangeland health standards assessments; inventory and monitoring data; most recent USFWS lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)?

Documentation of answer and explanation: Yes. Follow-up monitoring of the Annual Indicator Criteria was conducted in 2009 with the following results:

- Utilization of key perennial grasses in pastures 8B, 8BI, 8BIII, and 10B was less than the 40% AIC prescribed by the Final Decision.
- Utilization of key perennial grasses in pastures 11B and 12 was less than the 50% AIC prescribed by the Final Decision.
- Stubble height of key riparian species in pastures 11B and 12 and riparian browse utilization in pasture 11B was less than the AIC prescribed by the Final Decision.
- Streambank alteration in pastures 11B and 12 and riparian browse utilization and fecal coliform in pasture 12 exceeded AIC prescribed by the Final Decision, but livestock removal began when feedback for these AICs became available to the permittees.
- Browse utilization in pastures 28 and 28A was less than the 50% AIC prescribed.

These monitoring results are part of the adaptive management process identified in the EA. Consideration of these results would be reviewed as part of the development of next year's grazing schedule through the adaptive management Decision Tree presented in the EA. Needed adjustments to next year's grazing schedule would be made based on this

management approach. The grazing management outlined in the Stipulation would provide the same responses to these monitoring results.

The Little Jacks Creek Wilderness Study Area in portions of pastures 8B and 12 was designated Wilderness under the Omnibus Public Land Management Act of 2009. This area was already being managed for its wilderness qualities under the BLM's Interim Management Policy. No new facilities in the wilderness are planned as part of the Stipulation. Managing this area as wilderness would be the same as was described and analyzed in the EA (page 24, EA).

No additional resource issues have been identified since these documents were completed. The management of livestock grazing identified the proposed grazing decisions for the East Castle Creek Allotment and other allotments in Idaho and Nevada are currently being challenged in Idaho District Court by Western Watersheds Project. However, there has not been a court issued order as of the date of this DNA. Western Watersheds Project did not appeal the Final Decisions.

Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Documentation of answer and explanation: Yes. The new information collected was the same type of information considered in the development and analysis of the alternatives in the EA; and in the implementation of grazing management prescribed in the February 20, 2009 Final Grazing Decisions. The management strategy that would be continued in the Stipulation recognizes the new Wilderness designation and addresses it as a term and condition (page 5, Stipulation). Therefore the available new information is insignificant with regards to the analysis in the EA.

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

Documentation of answer and explanation: Yes. The methodology and analytical approach used in the EA is appropriate because it is consistent with CEQ (43 CFR 1500) and BLM (Departmental Manual 1790-1, handbook 1742-1) which are the current requirements and guidelines for the development of an EA. All of the same issues related to livestock grazing are still relevant, were adequately analyzed in the existing EA, and would still be monitored. The monitoring and analysis methods are still relevant, are supported by current BLM technical references, and are still used today. Continuity in methodology and study location have been provided in Alternative D of the EA and are retained in this Stipulation so that results of changes in grazing practices can be clearly identified and the adaptive management approach can be readily applied.

5. Are the direct and indirect impacts of the current Proposed Action substantially unchanged from those identified in the existing NEPA document(s)?

Documentation of answer and explanation: Yes. The 2008 East Castle Creek Allotment Evaluation and Determination identified resource issues that were the basis for development of Alternatives B, C, D, and E in EA. Continuity in grazing practices and monitoring has occurred over the past 20 years, and necessary changes to grazing practices have been primarily incremental. This Stipulation continues the favorable management actions in Alternative D analyzed in the EA which would provide for favorable trends or reduce grazing impacts where necessary.

The Stipulation represents minor modifications and provides additional clarification to the appealed decisions (see Question 1 and also the Description of the Proposed Action above) to incorporate appellant concerns and to address the same issues presented and analyzed in the EA (particularly on page 43, EA). The impacts of Stipulation are analyzed under Alternatives D and C. AIC would still apply over the short-, mid- and long-term resulting in a 'reasonable expectation that long term desired conditions would be achieved'. Direct and indirect impacts and short and long-term impacts were consequently adequately analyzed. They are of the same kind and magnitude as those being documented by current monitoring.

The Stipulation, like Alternative D in the EA, includes the same amount of reduced grazing use in the spring pastures for these two permittees, would monitor the same AIC, and would be subject to adjustment at the same times during the life of the Stipulation using the same information and following the same process prescribed by the Final Decision and analyzed in Alternative D. The allowance by this Stipulation of the 310 AUMs of grazing use in the summer pasture which is part of Alternative C (page 34, Table 12, EA) still includes the requirement to meet the AICs which were part of Alternative D (page 44, EA). Continuing adherence to the AICs would limit impacts and result in trends within those projected by Alternative D. The Purpose and Need for modifying grazing use of the short segment of Sheep Creek in Pasture 28A would now be addressed by including it within an enclosure. Artificial waters would adequately supply that pasture.

Does the existing NEPA document analyze site-specific impacts related to the current Proposed Action?

Documentation of answer and explanation: Yes. The management actions identified in the stipulation are analyzed as part of Alternative D or C (refer to Item 1 above). The voluntary nonuse would continue for 3 years through the 2011 grazing season effectively the same as Alternative D (page 44, 1st paragraph, EA) and Term and Condition 2 in the final grazing decisions (page 11, Final Decision). Therefore, the grazing management analysis referring to Alternative D (pages 67, 87, 112-113, 160, 167, EA) would apply to the spring pastures.

Allowing a longer season of use and greater number of AUMs in the pastures 28 and 28A as long as AIC are not exceeded, would effectively result in the same outcome as was analyzed in Alternative D of the EA. The analysis focused on heavy browse use which is most applicable to watershed, upland vegetation, and wildlife resources. Alternative C included a longer season of use (page 34, Table 11, EA) but use was tied to an AIC for browse.

utilization (page 35, Item 5, EA) similar to Alternative D (page 44, Item 5, EA)². The analysis of alternative C (pages 82, 108, 154, EA) focused on the increase in use as not resulting in progress toward meeting standards without mention of the AIC. The analysis for Alternative D (pages 85, 113, 161, EA) indicates that a shorter season and using AIC to monitor use would result in progress toward meeting rangeland health standards. The wildlife analysis for alternative C sums up the concern raised in the analysis where it states, "... close watch would need to be made every year to remove cattle as they approached the 50% level." The analysis goes on to say "... browse use levels could be exceeded quickly in these pastures. Trying to manage browse use levels entirely by monitoring during the grazing period may be unrealistic, given the current staffing levels in the Bruneau FO and the size of the BFO (approximately 1.5 million acres) where other monitoring must also be done." (page 154, EA). As part of the Stipulation, the permittees agreed to do part of the monitoring to avoid exceeding the AIC. Therefore by following the AIC, it is reasonable to expect that the livestock grazing management provided for in the stipulation would result in the same positive effects as portrayed in the analysis for Alternative D.

The change of the AIC for browse utilization in riparian areas from an average of 25% to an average of "light use" brings this measurement in line with the Monitoring Stream Channels and Riparian Vegetation –Multiple Indicator (MIM) protocol which is the methodology included in Alternative D of the EA. This protocol measures utilization in ranges rather than a specific percentage. The original 25% actually is the midpoint of 'light use' range (11-40%), which was considered in the analysis for Alternative D in the EA.

Projects would be reviewed and any special status species and cultural resource clearances, if not done, would be done prior to construction of the projects. This review would include, but would not be limited to: use of the adaptive management Decision Tree presented in the EA, review of the EA analysis, reviewing clearance reports, and review of standard management designs for any needed mitigation. Additional NEPA documentation would be completed if the projects were not adequately analyzed in the EA.

The Sheep Creek Riparian Enclosure would be added to the list of priority projects. This project was analyzed as part of Alternative C (pages 86, 111, 121, and 159, EA). The analysis stated that, "excluding springs and wetlands from livestock grazing is the fastest way to improve functioning condition and overall health of the system (page 106, EA)". The analysis for the Sheep Creek Riparian area indicates, "This project ... would improve the condition of the Sheep Creek here to PFC in the mid-term." (page 111, EA). The project would be designed to avoid or mitigate any impacts to cultural or historical resources.

6. Are the cumulative impacts that would result from implementation of the current Proposed Action substantially unchanged from those analyzed in the existing NEPA document(s)?

² Item 5 on page 44 of the EA also refers to 30 percent utilization in mule deer winter range which does not apply to the subject pastures, 28 and 28A).

Documentation of answer and explanation: Yes. The provisions of Alternative D retained in the Stipulation received full analysis of cumulative impacts completed less than a year ago (pages 188-193, EA). The Terms and Conditions, Flexibility, AIC, and Monitoring Plan are substantially the same as those in alternative D. The cumulative impacts were disclosed by the final EA, including those of supporting new and existing range improvements. Activities presented in the Stipulation are the same activities described in the cumulative impact section of the EA (page 188, EA). AIC would still apply over the short-, mid- and long-term resulting in a 'reasonable expectation that long term desired conditions would be achieved' and would fall within the existing cumulative impacts analysis.

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

Documentation of answer and explanation: Yes. A wide variety of interested publics and other agencies participated in the East Castle Creek permit renewal process. This participation is summarized in the EA (pages 11-13 and 197-199, EA), and the February 20, 2009 Final Decisions. Negotiations for this Stipulation in July and August 2009 were deliberately held within alternative limits established by the existing NEPA documents for which interested public were invited to participate and did participate. No appeals were filed for the Final Decisions by the interested public.

E. Interdisciplinary Analysis:

Interdisciplinary Team	Title	Discipline
Mike Boltz	Rangeland Management Specialist	Watershed
Pam Druliner	Fisheries Biologist	Fisheries, Riparian
Holly Beck	Botanist	Vegetation, Special Status Plants
Bruce Schoeberl	Wildlife Biologist	Wildlife, Special Status Wildlife
Lois Palmgren	Archaeologist	Cultural Resources
David Draheim	Outdoor Recreation Planner	Recreation and Wilderness

Reviewed by:

Reviewer	Title
Mike O'Donnell	Planning and Environmental Coordinator
John Biar	Resource Coordinator
Margaret Van Gilder	NEPA Specialist

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 have been incorporated and implemented.

Mitigation measures are incorporated into the terms and conditions and project design features of the Stipulation and alternatives in the EA or are part of standard operating procedures (i.e., clearances) required by BLM policy.

A FONSI applying to this DNA indicates that the EA adequately analyzed the impacts of the Stipulation, and that none of them would have a significant effect on the quality of the human environment including modifications and additional clarifications to the Terms and Conditions, Flexibility, the AIC, and to the included Monitoring Plan incorporated in Final Decisions and the Stipulation.

G. Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the Proposed Action and constitute BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked.

Michael Boltz
Preparer

October 27, 2009
Date

Matt McGly
NEPA Specialist

October 27, 2009
Date

Arnold I. Plo
Bruneau Field Manager

10/27/09
Date