



Bureau of Land Management

Boise District Office
Bruneau Field Office
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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-B020-2013-0007-DNA

Lease/Serial Case File No.: NA

Proposed Action Title/Type: Bruneau Field Office Livestock Trailing DNA

Location/Legal of Proposed Action: Bruneau Field Office

Applicant (if any): Various

Description of the Proposed Action and any applicable mitigation measures: The Proposed Action is to issue crossing permits to permittees in the Bruneau Field Office (BFO) for the same locations, animal numbers, and frequencies of livestock trailing events and under the same stipulations described in the Proposed Action (Alternative C) in EA DOI-BLM-ID-B020-2012-0003-EA, hereafter referred to as the "Trailing EA." These crossing permits would be issued to permittees for the remaining term of their grazing permits (e.g., if remaining term on a permittee's grazing permit is 7 years, the permittee's associated crossing permit would also be for 7 years). Because of pending cultural evaluations, crossing permits were initially only issued for 1 year following completion of the EA in 2012. Cultural evaluations were conducted in 2012. BFO is preparing this DNA to evaluate whether authorizing livestock trailing for the remaining term of the permittees' grazing permits conforms to the applicable land use plan and is fully covered by existing NEPA documentation.

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

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP objective:

LUP/Document	Objective – allowable use	Date Approved
Bruneau MFP	Range Management Objective #3: “Allocate livestock forage in each of the allotments in the Bruneau Planning Unit within the limits necessary to maintain and/or enhance the range and soil resource.”	March 30,1983

This allows for livestock grazing on the public lands administered by the BFO. Trailing is one method by which operators can move their livestock to and from range allotments in the BFO in order to graze allotments. Although the MFP does not specifically mention trailing, trailing is a customary component of many livestock grazing operations, is not explicitly precluded by the MFP, and is consistent with other relevant objectives and actions within the Bruneau MFP.

C. Identify applicable NEPA documents and other related documents that cover the Proposed Action. List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

NEPA/Other Related Documents ¹	Sections/Pages	Date Approved
Bruneau Field Office Livestock Trailing Environmental Assessment DOI-BLM-ID-B020-2012-0003-EA	All	FONSI signed March 26, 2012 Various dates on Final Decisions issued to trailing applicants.
Idaho Bureau of Land Management Archaeological and Historical Inventory Record for Trailing Permit Renewals, CRM Reports # 12-B-32; 12-B-33; 12-B-34; 12-B-36 & 13-B-03.	All	Various
Bruneau-Kuna Grazing EIS Final	4-2, 4-5, 4-8, 4-10, 4-12,13, 4-15	1982

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 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: Yes, the Proposed Action described in this DNA is the same as the Proposed Action in the Trailing EA. There are not any differences in the analysis area, and the geographic and resource conditions are similar to those described in the Trailing EA, except for the areas that were burned in 2012 (see map). During 2013,

grazing management in and near burned areas will be modified until conditions warrant return of grazing (see Emergency Stabilization and Rehabilitation (ESR) plans for each fire). Consequently, trailing may not occur due to pasture rest, or the stipulation in the Trailing EA will necessitate that trailing be confined to the actual route until ESR objectives are met (Section 2.3.3 in Trailing EA, page 14):

Livestock trailing on routes in or adjacent to burned areas that have been temporarily closed to grazing would be kept on the route until the criteria for reopening the burned area to grazing are met. If the burned area has also had ESR treatments, livestock would be kept on the route until ESR objectives were met.

Cultural resource field inventory and evaluations focused on stream crossings and overnight areas of potential effect from cattle trailing and associated activities. Cultural resource conditions were unknown at the time of the initial EA. Since then, cultural sites have been documented in the area of potential effect (APE), and National Register of Historic Places (NRHP) determination of significance and effect for Section 106 consultation with Idaho State Historic Preservation Office has been completed (SHPO concurrence March 11, 2013).

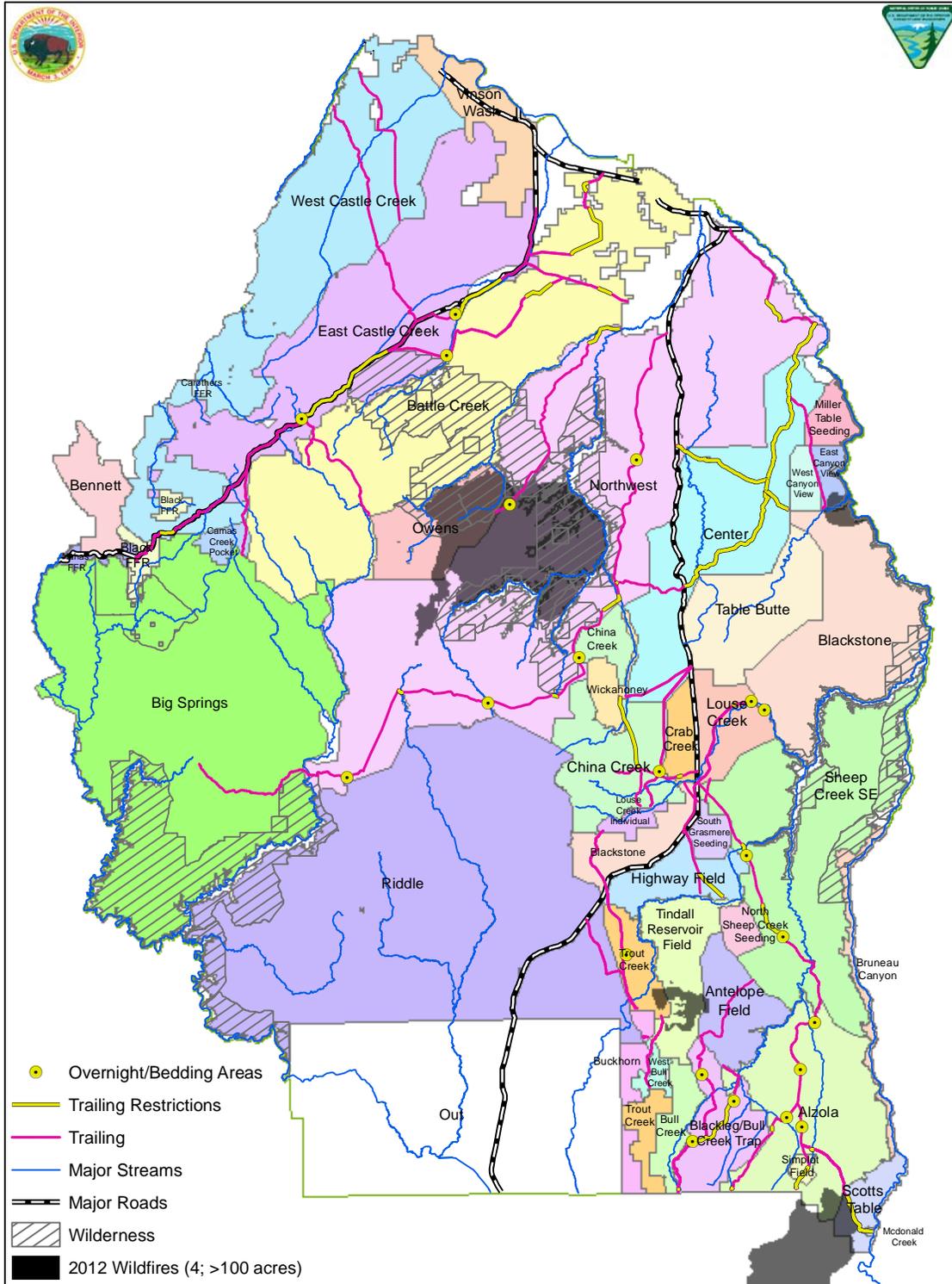
2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, resource values, and circumstances?

Documentation of answer and explanation: Yes. This proposal was analyzed in the Trailing EA. In addition, two alternatives were analyzed that considered the permittees' trailing applications without modifications and a No Action Alternative under which no crossing permits would be issued.

The range of alternatives analyzed in the Trailing EA is appropriate with respect to current environmental concerns, interests, resource values, and circumstances. While 7.5 miles of trailing routes in the Proposed Action in the Trailing EA were burned in 2012 fires, the Proposed Action included the following stipulation to address these situations (Section 2.3.3 in Trailing EA, page 14):

Livestock trailing on routes in or adjacent to burned areas that have been temporarily closed to grazing would be kept on the route until the criteria for reopening the burned area to grazing are met. If the burned area has also had ESR treatments, livestock would be kept on the route until ESR objectives were met.

BFO Trailing (Alt C) and 2012 Fires



No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed.



Compiled: Jan 2012 BLM
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3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (e.g., 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)? Can you reasonably conclude that all new information and all new circumstances would not substantially change the analysis of the new proposed action?

Documentation of answer and explanation: Yes, the analyses presented in the Trailing EA coincide with the conclusions currently reached for this action. In Fall/Winter 2012/2013, BFO staff reviewed monitoring data from several of the allotments crossed by trailing routes; none of the data reviewed would appreciably change the outcome of the analysis of the new Proposed Action or the analysis in the Trailing EA.

BLM IM 2012-043 provides policy guidance to maintain and restore sage-grouse habitat in the interim prior to the completion of an EIS in 2014 to amend land use plans in sage-grouse habitat. The provisions in this IM for livestock management relative to sage-grouse conservation were followed in the Trailing EA. The design features used to develop and the stipulations included in the Proposed Action in the Trailing EA, as well as the analysis of impacts to sage-grouse and their habitat, demonstrate the “hard look” taken relative to sage-grouse.

No changes in special status plant status have occurred since the analysis of trailing presented in the Trailing EA. No new information is available on special status plants along the trailing routes that would change the analysis of impacts. The analysis in the Trailing EA remains valid for special status plants.

The findings of the 2012 cultural evaluations do not change any of the terms and conditions or stipulations such that there needs to be a new analysis of impacts. Page 122 of the Trailing EA describes the scope of the five-year monitoring plan to collect data regarding impacts from cattle trailing. Currently, site 100E-6706 is being evaluated for impacts. One additional site, 100E-1852, is being evaluated for NRHP eligibility.

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: Yes, direct, indirect, and cumulative impacts of the new proposed action would be similar to those analyzed in the Trailing EA. Cumulative impacts of other land uses were carefully considered in the Trailing EA. Since the decisions were signed in 2012, wildfire suppression occurred on 56,000 acres. Livestock grazing will be excluded from the burned areas until monitoring objectives are met. ESR activities on the burned areas have occurred or will occur. Additionally, grazing on some unburned pastures surrounding the burned area will be modified to reduce impacts to sage-grouse and their habitat during the 2013 grazing season.

The direct, indirect, and cumulative impacts to fish species were adequately analyzed in the Trailing EA and are of the same type, timing, and magnitude as those that would occur under the new proposed action. The effects and impacts of the new proposed action would include the same number of cattle and the same trailing routes as originally analyzed. Federally listed fish species or their habitats are not present in the project area. Federally listed fish species or their habitat downstream of the project area would not be affected..

Modifications to the landscape from the 2012 wildfires represent a change in conditions since the Trailing EA was released, but the impacts analysis for wildlife described in the Trailing EA would be applicable to this new proposed action. Relative to sage-grouse, up to roughly 56,000 acres of sage-grouse nesting habitat was removed or degraded from the 2012 wildfires. However, impacts from trailing to sage-grouse nesting activities are minimal because of the protective placement of nests by sage-grouse and the overestimation of areas that will actually be trampled by cattle (decreasing impacts outward from routes; Trailing EA, p. 81-82). These minimal impacts from trailing, combined with the small portion of habitat that burned ($\approx 5\%$ of key habitat and $< 5\%$ of Preliminary Priority Habitat in the project area) in areas that are not close to most of the trailing routes, means that impacts (direct, indirect, or cumulative) to sage-grouse will not be measurably different from what was analyzed in the Trailing EA.

Impacts from this proposed action to other wildlife species described in the Trailing EA would also be similar in light of the 2012 wildfires. Some species would incur the same impacts because the 2012 wildfires did not affect limiting components of their habitat (i.e., Columbia spotted frog), there were no impacts from trailing (i.e., California bighorn sheep), or the impacts from trailing were so minimal (i.e., pygmy rabbit, raptors) that the small amount of their habitat that was burned by the fires would not cumulatively impact the species any differently than was conveyed in the Trailing EA.

The analysis of effects to upland vegetation from the new proposed action is the same as the effects of implementing Alternative C as described in the Trailing EA. The analysis in the EA describes the effects of trampling and grazing on perennial herbaceous, annual herbaceous, and woody vegetation.

The analysis of direct, indirect, and cumulative impacts to special status plants in the Trailing EA is still valid. There has been no change in impacts and no new data on special status plants that would change the analysis in the EA.

The analysis in the Trailing EA for direct, indirect, and cumulative impacts to visual resources, wilderness, Wild & Scenic Rivers, and recreation still applies.

The analysis in the Trailing EA for direct, indirect, and cumulative impacts to cultural resources still applies, even with the subsequent identification and evaluation of cultural resources in the area of potential effect. Mitigation for impacts to cultural resources is ongoing and includes monitoring of two sites, 10OE-6706 and 10OE-1852, for determination of eligibility and effect.

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: Yes, interested publics, tribal governments, permittees and agencies participated in the scoping for the trailing (crossing) permit process. A detailed summary of public involvement is shown on pages 5-8 and pages 123-123 of the Trailing EA. The scoping process involved many interdisciplinary team meetings and full consideration of written comments.

E. Persons/Agencies /BLM Staff Consulted

Team Member	Discipline	Roles							
		Author**	Editor	Field Manager	GIS Specialist	P&EC	Project Administrator	Public Affairs	Team Lead**
Arnold L. Pike	Field Manager			X					
Aimee Betts	Assistant Field Manager		X						
Lois Palmgren	Archaeologist	X							
Holly Beck	Botanist	X							
Kavi Koleini	Ecologist	X							
Gene Dana	GIS Specialist				X				
Dave Draheim	Outdoor Recreation Planner	X							
Jon Haupt	Rangeland Mgmt. Specialist	X	X						X
Mike Boltz	Rangeland Mgmt. Specialist	X	X						
Bruce Schoeberl	Wildlife Biologist	X							
Jon Beck	P&EC					X			
Seth Flanigan	NEPA Specialist					X	X	X	
Dave Mays	Fisheries Biologist	X							

Note: Refer to page 123 of the Trailing EA for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

F. Mitigation Measures:

Mitigation measures identified on page 122 of the Trailing EA have been implemented. Cultural resource field inventory and evaluations focused on stream crossings and overnight areas of potential effect from cattle trailing and associated activities. Cultural resource conditions were unknown at the time of the initial EA. Since then, cultural sites have been documented in the area of potential effect (APE), and National Register of Historic Places (NRHP) determination of significance and effect for Section 106 consultation with Idaho State Historic Preservation Office has been completed (SHPO concurrence March 11, 2013). Furthermore, the five-year monitoring protocol for assessing whether trailing impacts are

occurring to the characteristics that would make site 100E-6706 eligible for listing on the NRHP is being implemented; the outcome of this monitoring is not yet definitive. Mitigation of potential impacts to cultural resources was incorporated into the 2012 Final Decisions and crossing permits and will be incorporated into the new decisions and permits as appropriate.

In addition, site 100E-1852 may be eligible for listing on the NRHP. In order to determine eligibility for this site, the presence of sub-surface cultural deposits needs to be determined. In order to do this, four to six shovel test holes or probes need to be executed on site. If site 100E-1852 is determined to be eligible for listing on the NRHP and trailing impacts are occurring to the characteristics that make the site eligible for listing, additional measures will be taken to mitigate those impacts.

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 and subsequent identification of NRHP eligible cultural resources and proposed mitigation of impacts fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

/s/ Jon Haupt
Preparer

3/26/2013
Date

/s/ Seth Flanigan
NEPA Specialist

3/26/2013
Date

/s/ Aimee Betts acting for
Bruneau Field Manager

3/26/2013
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.