Worksheet
Land Use Plan Conformance and Determination of NEPA Adequacy (DNA)
DOI-BLM-ORWA-L050-2016-0004-DNA

U.S. Department of the Interior
Bureau of Land Management (BLM)

A. BLM Office: Lakeview District, Lakeview Resource Area
Lease/Serial/Case File No.:
Proposed Action Title/Type: Grazing Permit Renewal for the Coglan Hills (#00400) and Tim Long Creek (#00410) Allotments.
Location of Proposed Action: Coglan Hills and Tim Long Creek Allotments. See attached map.
Description of the Proposed Action: The proposed action is to renew the 10-year term livestock grazing permit #3601411 for the Coglan Hills and Tim Long Creek Allotments. This permit is due to expire 2/28/2016. The permittee has submitted a permit renewal application to the BLM for consideration. BLM must respond to the permittee's permit renewal application and consider whether or not to reissue or modify the grazing permit for a 10-year period in accordance with 43 CFR Part 4130. The permit would be renewed in accordance with 43 CFR 4110.1 Mandatory qualifications, 4110.2-1 Base Property, 4110.2-2 Specifying permitted use, 4130.2 Grazing permits or leases, 4130.3(1) through 4130.3(2) Mandatory and Other terms and conditions, 4130.3-3 Modification of permits or leases, and 4180.2 Standards and guidelines for grazing administration. This permit will be renewed under the same terms and conditions as the expiring permit and authorize 18 AUMs of forage use annually.

B. Conformance with one or more of the following Land Use Plans (LUPs)/Programmatic Strategies:

Land Use Plan Name: *Lakeview Resource Management Plan/Record of Decision*
Date Approved/Amended: November 2003, as maintained

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

_____ The proposed action is in conformance with the plan, even though it is not specifically provided for, because it is clearly consistent with the following decision(s) (objectives, terms, and conditions):

Management Goals and Objectives

Livestock Grazing Management Goal—***Provide for a sustainable level of livestock grazing consistent with other resource objectives and public land-use allocations*** (Page 52, as maintained).

Management Direction

The current licensed grazing levels (presented in Appendix E1) will be maintained until analysis or evaluation of monitoring data or rangeland health assessments identify a need for adjustments to meet objectives. Applicable activity plans (including existing allotment management plans, agreements, decisions and/or terms and conditions of grazing use authorizations) will be developed, revised where

necessary, and implemented to ensure that resource objectives are met.

The full permitted use level for each allotment has been and continues to be analyzed through individual allotment assessments, such as rangeland health and livestock grazing guidelines…. (Page 52, as maintained).

Plan Conformance

Renewing the 10-year permit on the Coglan Hills and Tim Long Creek Allotments is consistent with the above livestock grazing management goal and direction. In particular, all public land within the allotments has been identified as available for, or open to, livestock grazing use in Table 5 (Page 46, as maintained), Appendix E1 (page 33 and 41, as maintained), and Map G-3. Table 5 and Appendix E1 also specify the initial forage allocation, season of use, grazing system, and management objectives for the allotments. Additional clarification of this grazing management direction has been provided through periodic plan maintenance conducted in accordance with 43 CFR 1610.5-4 (see *Lakeview Resource Management Plan Maintenance – Appendix E1* and *Lakeview Resource Management Plan Maintenance – Table 5* (BLM 2015) posted on www.blm.gov/or/districts/lakeview/plans/lakeviewrmp.php.

The forage allocation, grazing system, and season of use are designed to protect other resource values identified in these allotments (Page 33 and 41, as maintained). Grazing systems and season of use are described in more detail in Appendix E5 and Table E5-1. Though no changes in grazing management are proposed at this time, carrying capacity studies will continue and the permit may be modified in the future if studies show conclusively that carrying capacity should be adjusted (pages 52-55, as maintained).

Land Use Plan Name: *Rangeland Reform '94 ROD*
Date Approved/Amended: 1994

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

_____ The proposed action is in conformance with the plan, even though it is not specifically provided for, because it is clearly consistent with the following decision(s) (objectives, terms, and conditions):

Plan Conformance

The ROD required the BLM to develop regional rangeland health standards and complete health assessments for all grazing allotments by the end of 2008. In 1997, the Oregon/Washington State Director fulfilled one of these requirements by approving *Rangeland Health Standards and Guidelines for Oregon and Washington*. These standards and guidelines were developed with public participation and included the formation of and review by, a number of regional resource advisory committees (RACs).

The Lakeview Resource Area has completed rangeland health assessments for all of the grazing allotments under its management jurisdiction, thus fulfilling the other main requirement of this ROD. In addition, the Lakeview Resource Area recently updated its rangeland health assessments for these allotments. The results of these assessments are summarized later in this document.

Land Use Plan Name: *Record of Decision and Oregon Greater Sage-Grouse Approved Resource Management Plan Amendment*
Date Approved/Amended: September 2015

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

_____ The proposed action is in conformance with the plan, even though it is not specifically provided for, because it is clearly consistent with the following decision(s) (objectives, terms, and conditions):

Management Goals and Objectives

Livestock Grazing/Range Management (LG)

Objective LG 1: Manage livestock grazing to maintain or improve Greater Sage-grouse habitat by achieving Standards for Rangeland Health (SRH).

Management Direction

MD LG 2: …When SRH are being met, no changes in current management or activity plans or permits/leases are required, but could occur to meet other resource management objectives.

Plan Conformance

The *Coglan Hills Rangeland Health Assessment* (2006) and update (2015) found all applicable standards were being met. The *Tim Long Creek Rangeland Health Assessment* (2006) and update (2015) found all applicable standards were being met. The assessments found no known substantial conflicts between livestock grazing and sage-grouse habitat within either allotment. For these reasons, re-issuing the term grazing permit for these allotments, with the same terms and conditions, would comply with management direction in this plan amendment.

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

1. List by name and date any additional applicable NEPA documents that cover the proposed action.

Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final EIS (2015)
Lakeview Proposed RMP/Final EIS (2003)
Lakeview Grazing Management Final EIS (1982)

2. List by name and date other documentation relevant to the proposed action (*e.g., subbasin review, source drinking water assessment, biological assessment, biological opinion, watershed/landscape assessment, allotment evaluation, rangeland health standard assessments, and monitoring reports*).

Rangeland Health Assessment for the Coglan Hills Allotment (2006)
Rangeland Health Assessment Update for the Coglan Hills Allotment (2015)
Rangeland Health Assessment for the Tim Long Creek Allotment (2006)
Rangeland Health Assessment Update for the Tim Long Creek Allotment (2015)
Wilderness Characteristics Evaluation for Tucker Hill Area (2011)
Wilderness Characteristics Evaluation for Coglan Buttes Proposed WSA (2012)

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? (*Documentation of answer and explanation*):

The current proposed action is a component of the livestock management alternatives previously analyzed in the *Lakeview Grazing Management Final EIS* (1982) and more recently considered and analyzed in both the *Lakeview Proposed RMP/Final EIS* (2003) and *Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final EIS* (2015). The issuance or renewal of an individual grazing permit represents a "step-down" action that implements the broader grazing management direction previously approved in both the *Lakeview RMP/ROD* and the *ROD for the Oregon Greater Sage-Grouse Approved Resource Management Plan Amendment* within a given allotment.

Specifically, Map G-3 of the *Lakeview Proposed RMP/Final EIS* shows the location of Allotment 00400 and 00410. Pages 3-38 to 3-40 list the livestock management direction for five different grazing management alternatives that were analyzed in detail in the Final EIS, including the preferred Alternative D, which was ultimately adopted as the RMP. Table 2-26 (page 2-41) lists the specific forage allocations (livestock and wildlife), management category, season of use, grazing system, and management objectives for the two allotments that were considered and analyzed in the EIS. Grazing seasons are specified in Table E5-1 (page A-167). Grazing system descriptions are found in Appendix E5 on pages A-163 through A-169. In addition, Appendix E1 (pages A-63) identifies specific management direction for the Coglan Hills Allotment and (page A-410). In addition, Map 2-41 in the *Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final EIS* (2015) shows that the two allotments were available for livestock grazing under proposed plan.

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*):

The range of alternatives analyzed in the two Final EISs were appropriate for the permit renewal decision currently under consideration.

Five alternatives were analyzed in the *Lakeview Proposed RMP/Final EIS,* including the preferred alternative – Alternative D, covering a wide range of possible management actions. The alternatives are summarized as follows:

1) Alternative A - No Action or no change in current management
2) Alternative B - Commodity Production Emphasis
3) Alternative C - Resource Restoration and Protection Emphasis
4) Alternative D - Balance Between Commodity Production and Resource Protection
5) Alternative E - No Commodity Production and Emphasize Natural Process.

In addition, the *Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final EIS* analyzed a total of 7 alternatives, including two reduced grazing and one no-grazing alternative.

The proposed action (renewing a grazing permit) is one of the methods of implementing the livestock management components of many of the alternatives analyzed in these EISs. In addition, several alternatives considered the effects of reduced or no authorized grazing across the entire planning area, including the Coglan Hills and Tim Long Creek Allotments. The range of alternatives analyzed in these EISs is adequate, as the concerns, interests, and resource values on the allotment have not changed substantially since these analyses were completed.

3. Is the existing analysis adequate and are the conclusions 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 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? (*Documentation of answer and explanation*):

BLM's original wilderness inventory did not find wilderness characteristics to be present within either allotment. Since 2007, the BLM has been conducting wilderness inventory updates following current inventory guidance. In 2011 and 2012, BLM staff updated its inventory of wilderness characteristics within and surrounding the allotments and found them to be lacking. BLM hereby incorporates these findings and all other inventory information by reference in its entirety. These evaluations are available on BLM's website at www.blm.gov/or/districts/lakeview/plans/inventas.php.

Rangeland Health Assessments for the allotments were completed in 2006 and updated in 2015. On the basis of these findings, BLM determined that existing grazing management practices or levels of grazing use on the allotment promoted achievement of, or significant progress towards, the Oregon Standards of Rangeland Health and conformed with the Guidelines for Livestock Grazing Management. Based on these assessments, no changes in grazing management were required, nor did changes to grazing management need to be considered during the grazing permit renewal process. However, the ID team did make a couple of recommendations as to how to improve riparian management in the Tim Long Creek Allotment. Separate NEPA analysis would need to be prepared to implement those recommendations. A more detailed discussion of current rangeland conditions is contained in the rangeland health assessment documents available on BLM's website at www.blm.gov/or/districts/lakeview/plans/inventas.php.

In 2015, BLM completed a Final EIS that analyzed relevant new information regarding the greater sage-grouse, its habitat, and the potential impacts of livestock grazing within the Oregon region. As a result of this analysis (and similar EIS-level analyses completed throughout the range of this species), and BLM's commitment to implement management changes via the adoption of the *ROD for the Oregon Greater Sage-Grouse Approved Resource Management Plan Amendment* (and similar RODs completed throughout the range of this species), the U.S. Fish and Wildlife Service determined that protection of the greater sage-grouse under the Endangered Species Act (ESA) was no longer warranted and withdrew the species from the candidate species list in September of 2015. This proposed permit renewal conforms to this management direction adopted in this plan amendment (refer to Section B).

For the reasons described above, these new assessment/inventories/findings do not represent significant new information that would substantially change the existing environmental analyses. Therefore, the existing analyses contained within the two Final EISs are adequate in addressing the potential effects of continued grazing.

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*):

Both the *Lakeview Proposed RMP/Final EIS* and the *Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final EIS* analyzed the impacts of livestock grazing across the Lakeview Resource Area, including lands within the two allotments. The Final EISs analyzed the impacts of the grazing program on other resource values and uses.

The *Lakeview Proposed RMP/Final EIS* further defined the management actions that would be applied on an allotment-specific basis. It also described the methodologies, such as completing rangeland health assessments or

allotment evaluations (pages 3-38 to 3-40), that would be used in the future to determine if management changes needed to be made at the allotment scale.

The methods used in support of the proposed permit renewal (completing a rangeland health assessment update) are consistent with the methodology specified in both Final EISs. No new methodologies or analytical approaches have been developed or prescribed by BLM policy since the Final EISs were completed. Therefore, the methodology used for analyses in the Final EISs, as well as the methodology used to determine if management changes needed to be made (i.e. rangeland health assessment), remain appropriate to support the proposed permit renewal.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action? (*Documentation of answer and explanation*):

The direct and indirect impacts are substantially unchanged from those identified in the Final EISs. As noted in response to question 3, there is no relevant significant new information available that would indicate the impact analyses contained in the Final EISs are inadequate or in need of update. The proposed action of continuing to allow grazing in this allotment (with the same terms and conditions) is a component of implementing the preferred alternatives that ultimately were adopted as the approved plan in the *Lakeview RMP/ROD* and ROD for the *Oregon Greater Sage-Grouse Approved Resource Management Plan Amendment*.

The direct impacts of livestock grazing on other resources/uses for the preferred alternative (D) are described on pages 4-76, 4-81 through 4-82 of the *Lakeview Proposed RMP/Final EIS*. Indirect and secondary impacts are described on pages 4-83 and 4-84. Allotment-specific impacts are provided by cross-referencing the specific grazing system, forage allocation, and season of use for the Coglan Hills and Tim Long Creek Allotments (00400) listed in Table 2-26 (pages 2-40 and 2-41) with the grazing system descriptions and plant community impacts described on pages 4-2 through 4-6, and 4-9 through 4-10 of the Final EIS. The impacts of the grazing system on the different vegetation communities found in the allotments are also described in more detail in Appendix E2 of the *Draft Lakeview RMP/EIS* (2001).

The effects of livestock grazing under the proposed plan on sage-grouse habitat are described on pages 4-201 to 4-204 of the *Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final EIS.*

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)? *(Documentation of answer and explanation*):

The proposed action is a component of the overall implementation of the livestock grazing management direction associated with the preferred alternative (D) in the *Lakeview Proposed RMP/Final EIS*. It will result in grazing related impacts on approximately 12,658 acres out of the 3,161,415 acres of public land administered by the Lakeview Resource Area (see Table 2-26, page 2-40 and 2-41 and Table 1-1, page 1-2). Continuing livestock grazing use on this allotment by renewing the grazing permit will contribute a small portion of the overall total cumulative impacts associated with grazing and other management actions on public lands within the Lakeview Resource Area. However, the impacts of continuing to authorize grazing on the allotment is well within the range of the total cumulative impacts discussed and analyzed throughout Chapter 4 of the *Lakeview Proposed RMP/Final EIS*.

The proposed action is also a component of the overall implementation of the livestock grazing

management direction associated with the proposed plan analyzed in the *Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final EIS.* Cumulative effects were addressed in Chapter 5 of this EIS.

No relevant or significant new information is available that would indicate that the cumulative impact analysis contained in these Final EISs are inadequate or in need of update.

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)*:

Public and inter-agency review and tribal consultation opportunities for the Lakeview RMP/EIS process are described in detail on pages 5-7 of the *Lakeview RMP/ROD*. This involvement process was adequate for the purposes of adopting a livestock grazing management program at the Resource Area scale.

Public and inter-agency review and tribal consultation opportunities for the *Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final EIS* are described in detail in Chapter 6 of that document. This involvement process was adequate for the purposes of adopting livestock grazing management decisions at the broad planning scale.

In addition, the issuance of a grazing permits under 43 CFR Part 4100 §4130.2 (b) states that the authorized officer shall consult, cooperate, and coordinate with affected permittees or lessees, the State …, and the interested public. The Lakeview Resource Area sends an annual notification of proposed permit issuance and renewals to permittees, State (when applicable), and interested public. This proposed permit issuance and renewal list is also posted to the BLM's website at www.blm.gov/or/districts/lakeview/range.php.

For these reasons, BLM finds that the public involvement opportunities provided for the proposed permit renewal is adequate.

E. Interdisciplinary Analysis: Refer to original NEPA document for the list of team members participating in the preparation of the original environmental analyses. The following individuals participated in the preparation or review of this DNA.

Name	Title	Resource Represented
Lori Crumley	Rangeland Mgmt. Specialist	Rangeland Management
Paul Whitman	Planning & Environmental Coord.	Quality Control
Bill Cannon	Archeologist	Cultural & Historic Resources
Chris Bishop	Recreation Planner	Recreation
Jimmy Leal	Fisheries Specialist	Fisheries
Theresa Romasko	Assistant Field Manager	Rangeland Management
Grace Haskins	Natural Resource Specialist	Weeds/Botany
David Probasco	Wildlife Biologist	Wildlife

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):*

No mitigation measures are deemed necessary (see also discussion in Section B above).

G. Conclusion*:

Based on the review documented above, I conclude that this proposal conforms to the applicable land use or other existing plans and, therefore, meets the land use plan consistency requirements of the Federal Land Policy and Management Act. Further, the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the National Environmental Policy Act.

12/9/15

J. Todd Forbes, Field Manager **Date**
Lakeview Resource Area

** Note: If one or more of the above criteria (questions 1-7) are not met, a conclusion of conformance and/or NEPA adequacy cannot be made. In addition, the signed CONCLUSION above is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision.*