

**Worksheet**  
**Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)**  
 U.S. Department of the Interior  
 Bureau of Land Management (BLM)

---

**Note:** This worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy" transmitting this worksheet and the "Guidelines for Using the DNA Worksheet" located at the end of the worksheet. (Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision.)

**A. BLM Office:** Klamath Falls R.A. OR-014

**Range Project #:** OR-010-5201 (existing project #)

**Project Name:** Malone-Willow Valley Chaining fence

**Proposed Action Title/Type:** The proposed action is to construct approximately 0.45 mile of new 4-strand barbed wire fencing on the surveyed BLM/private land boundary on the extreme western edge of the Willow Valley Chaining. This action is necessary to replace the portion of the South Langell Valley Fence (project #OR-010-5201) which now encroaches upon private land and will be removed by the private land owner in the near future. Without the proposed replacement fence, cattle would have access to East Langell Valley Road creating both a range administration problem and a road hazard.

(Note: The existing portion of this fence on private lands was a result of past agreements with a past land owner who was the grazing permittee on the Willow Valley allotment. The current land owner - Don Meyers - does not wish cattle grazing or the fence to be on his lands. He has cooperated in this effort and paid for the surveying & marking of the property boundary and removal of the old fence; the BLM has agreed to build the new fence.)

**Location of Proposed Action:** The proposed fencing project is located on the extreme southwestern edge of the Willow Valley Allotment (0890) and the extreme western edge of the Willow Valley Chaining Pasture. The legal description of the fence is T41S, R14W, Section 18 (western edge of the SE $\frac{1}{4}$ SE $\frac{1}{4}$ ) and section 19 (western edge of the NE $\frac{1}{4}$ NE $\frac{1}{4}$ ). The Willow Valley Allotment is one of the KFRA's larger allotments and located in the southwestern corner of the Gerber Block. It is approximately 45 miles southeast of Klamath Falls, Oregon. (See attached map.)

**Description of the Proposed Action:** The 0.45 mile of fencing will be built to BLM standards (BLM Manual Handbook H-1741-1), i.e. the three upper strands are barbed wire with the 4<sup>th</sup> lower wire smooth, wire spacing (bottom to top) 16" (to 18")-6"-6"-12", steel "T" posts 18-20' apart, and rock cribs and/or tree scabs as needed, at gated road crossings (2 needed), and at the ends. The fence will tie into the existing South Langell Valley Fence on the north end along East Langell Valley Road and tie off at the steep edge and/or rim rock at the south end on the edge of Malone Reservoir.

**Applicant (if any):** This fence is being proposed by the BLM; thus, there is no applicant per se

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

LUP Name\*: *Klamath Falls R.A. Resource Management Plan and Environmental Impact Statement (KFRA RMP/EIS dated September 1994)*

Date Approved: June 1995 via the *Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary* (KFRA ROD/RMP/RPS)

Other documents\*\*: *Gerber-Willow Valley Watershed Analysis* (GWA dated July 2003) which includes a summary of the *Rangeland Health Standards Assessment* (RHSA) for the Willow Valley Allotment; the 2000 Willow Valley RHSA.

\* List applicable LUPs (e.g., Resource Management Plans or applicable amendments).

\*\*List applicable 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 decisions:**

The 1995 KFRA ROD/RMP/RPS states on page 63 the general objective to:  
“Construct rangeland improvements as needed to support achievement of management objectives. Rangeland improvements may include, but are not limited to fence and reservoir construction, spring developments, vegetation manipulation, and prescribed burns. See Appendix H for a listing of proposed range land improvements, for each grazing allotment, predicted to be necessary at this time...”

On page H-68 of the ROD/RMP/RPS Appendix H (the “*Potential Range Improvements by Allotment*”), it was noted that the Willow Valley allotment was envisioned to need up to 4 miles of fencing. Less than one mile of this fencing has been constructed to date.

**-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 decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions:**

Not Applicable - the action is specifically provided for in the LUP.

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

**List by name and date all applicable NEPA documents that cover the proposed action.**

*Klamath Falls R.A. Resource Management Plan and Environmental Impact Statement* (KFRA RMP/EIS dated September 1994) approved via the June 1995 *Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary* (KFRA ROD/RMP/RPS). This is the overall land use plan (LUP) for the Klamath Falls Resource Area.

**List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard’s assessment and determinations, and monitoring the report).**

The Willow Valley *Rangeland Health Standards Assessment* (RHSA) was completed in 2000. The *Gerber-Willow Valley Watershed Analysis*, which includes a summary of the Willow Valley RHSA, was completed in July 2003.

**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 proposed action (pasture fencing) is consistent with the grazing management identified in the KFRA RMP/EIS Preferred Alternative - called the "Proposed Resource Management Plan" or PRMP (also called the "Final RMP/EIS"). Specifics by allotment are found in Appendix L, with the Willow Valley allotment on page L-61. The preferred alternative was affirmed and implemented by the KFRA ROD/RMP/RPS, where the allotment specific information is found in Appendix H, page H-61. The specific proposed fencing for the allotment was listed on page H-68. Environmental impacts of grazing, for all alternatives, are found in Chapter 4 - "Environmental Consequences" (4-1 through 4-143) - of the KFRA RMP/EIS. Since the proposed action and the Willow Valley allotment were specifically analyzed in the plan, the answer to this NEPA adequacy question must be "yes".

**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 proposed action (permit/ease renewal) lies within the range of various alternatives identified and analyzed in the KFRA RMP/EIS (summarized in table S-1 "Comparisons of Allocations and Management by Alternative", pages 18-50; and S-2 "Summary of Environmental Consequences by Alternative", pages 52-53). This array and range of alternatives included the No Action alternative (status quo); five other alternatives (A through E) that covered a span of management from a strong emphasis on commodities production to a strong emphasis on resource protection/preservation; and the PRMP that emphasizes a balanced approach of producing an array of socially valuable products within the concept of ecosystem management. Since this plan is relatively recent (1995), it more than adequately reflects "current environmental concerns, interests, and resource values". Recent formal evaluations of the RMP (1999 & 2003) affirmed the validity and adequacy of the plan. Given all the above, the answer to this NEPA adequacy question must be considered "yes."

**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:** A review was conducted to determine if any new information, studies, and/or analyses has been collected/completed since 1995 that would materially differ from that collected/completed during the RMP/EIS process. No new information has been collected or analyzed for this allotment **that would change the analysis and conclusions completed during the RMP/EIS process. In fact, more recent information affirms and supports fully the analysis of the LUP.** The following information is pertinent to the full addressing of this NEPA adequacy question:

- An Ecological Site Inventory (ESI) was completed on this allotment during the 1997-1998

- field seasons. The ESI is the BLM's rangeland vegetation inventory method, comparing the current vegetation on a given area against the Potential Natural Community (PNC) that should or could be present. It found that 72.1% of the BLM lands in the allotment were in either late seral (30.3%) or PNC (41.8%) condition – both determined to be functionally unimpaired upland vegetation conditions. The remaining areas (27.9%) were primarily in mid seral condition, but the current condition was not a function of recent livestock grazing.
- A *Rangeland Health Standards Assessment* (RHSA) was completed in 2000 for the Willow Valley Allotment. This Assessment found that one of the 5 *Standards for Rangeland Health* (riparian/wetland functionality) was not being met, but that the upland related Standards were being met with the current rest-rotation grazing system. It also affirmed that the continuance of the grazing system was critical to continued improvements; the proposed fencing is essential to making the system work.
  - The Gerber-Willow Valley Watershed Analysis (GWA) analyzed the entire Gerber Block and surrounding areas – including the Willow Valley allotment. It reiterated the findings of the RHSA noted above.
  - The science done during the Interior Columbia Basin Ecosystem Management Planning (ICBEMP) effort did not indicate any new or significant information that would modify the management direction in this allotment; that effort's broad scale did not allow for the specificity of the KFRA RMP.
  - Recent formal evaluations of the RMP/ROD/EIS (1999 & 2003) affirmed its overall validity, adequacy, and appropriateness. Specifically, the recent 2003 evaluation found the direction outlined for the grazing/rangeland management program was still pertinent and in need of no revisions or amendments.

To summarize, the existing analysis and subsequent conclusions in the LUP are still considered valid at this time, including the described and analyzed livestock grazing impacts. In fact, the new (post-1995) information noted above affirms the conclusion of the LUP that fencing is necessary on this allotment to meet the objectives of the plan. Given all the above, the answer to this NEPA adequacy question must be considered “yes.”

#### **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:**

The KFRA RMP/EIS, and subsequent ROD/RMP/RPS, designated domestic livestock grazing as a principle or major use for this allotment under the principle of multiple-use on a sustained yield basis in accordance with FLPMA. The development of the Proposed Resource Management Plan in the RMP/EIS, as adjusted or affirmed by the ROD/RMP/RPS, meets NEPA standards for impact analysis. The methodology and analyses employed in the RMP/EIS are still considered valid as this planning effort is relatively recent (ROD - June 1995) and considered up to date procedurally. Recent formal evaluations of the RMP/ROD/EIS (1999 & 2003) affirmed the validity, adequacy, and appropriateness of this Land Use Plan. Litigation related or induced direction since the ROD has not indicated that the LUP “methodology and analytical approach” is dated, obsolete, or in need of amendment. The plan is “maintained” regularly to keep it current by incorporating new information, updating for new policies and procedures, and correcting errors as they are found. In addition, all the rangeland monitoring, studies, and survey methods (i.e. ESI) utilized in the resource area prior to and during the planning process continue to be accepted (or required) BLM methods and procedures. These accepted methods continue to be utilized where and as needed. Given all the above, the answer to this question must be considered “yes.”

**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 proposed action is consistent with the impact analysis KFRA RMP/EIS, as affirmed or adjusted by the ROD/RMP/RPS. The impacts of livestock grazing were analyzed in most of the major sections of Chapter 4 - Environmental Consequences (pages 4-1 through 4-143) in the RMP/EIS. No new information has come to light since completion of the plan that would indicate that the previously analyzed direct/indirect impacts would be substantially different. In fact, recent information directly supports the analysis in the RMP (see question #3 above). Recent formal evaluations of the RMP/ROD/EIS (1999 & 2003) have also affirmed the validity, adequacy, and appropriateness of this Land Use Plan, including its impact analysis.

The details of the proposed action were also covered specifically in Appendix H - *Grazing Management and Rangeland Program Summary* of the KFRA ROD/RMP/RPS. Specifically, page H-61 covers the Willow Valley allotment objectives/management and page H-68 notes the project work proposed to address the objectives.

In summary, based on current information and judgment the answer to this NEPA adequacy question is “yes”; that the direct and indirect impacts of the proposed project are unchanged from that identified in the LUP and that plan also adequately analyzes the site-specific impacts.

**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 as analyzed in the PRMP of the KFRA RMP/EIS, as affirmed or adjusted by the ROD/RMP/RPS, would not change analysis of cumulative impacts. Any adverse cumulative impacts are the same as, and within the parameters of, those identified and accepted in that earlier planning effort for this allotments grazing use, since the proposed action was specifically analyzed in the RMP/EIS. Recent formal evaluations of the RMP/ROD/EIS (1999 & 2003) affirmed the validity, adequacy, and appropriateness of this Land Use Plan, including the cumulative impact analysis. In addition, the relatively recent analyses in the Interior Columbia Basin Ecosystem Management Plan (ICBEMP) have not indicated any cumulative impacts beyond those anticipated in the earlier analyses. (In addition, the ICBEMP, due to its regional approach does not have the specificity of the RMP.)

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

**Documentation of answer and explanation:**

The KFRA RMP/EIS and ROD/RMP/RPS were distributed to all interested publics and other government agencies for review. Since this proposed fencing project is as listed in the LUP - and that plan went through all of the appropriate and legally required public/agency review - public involvement is considered at least adequate.

All of those publics/agencies have also been kept informed of plan implementation through

periodic planning update reports (i.e. May 1995, October 1997, February 1999, July 2000, August 2002, FY 2003, and FY 2004). These planning updates, or Annual Program Summaries, include information on range program and project accomplishments, updates to the RPS, monitoring accomplishment reports, planned activities for the upcoming year, allotment evaluation and Rangeland Health Standards Assessment scheduling, and other information necessary to allow for adequate public involvement opportunities.

No specific public involvement or "interested public" status (under the grazing regulations at 43 CFR 4100.0-5) has been requested for this allotment, with the exception of the existing permittee who is granted "automatic" status.

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

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Bill Lindsey	Rangeland Mgmt. Specialist	Author/Grazing Mgmt.

(See cover sheet for other participants and/or reviewers)

**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.

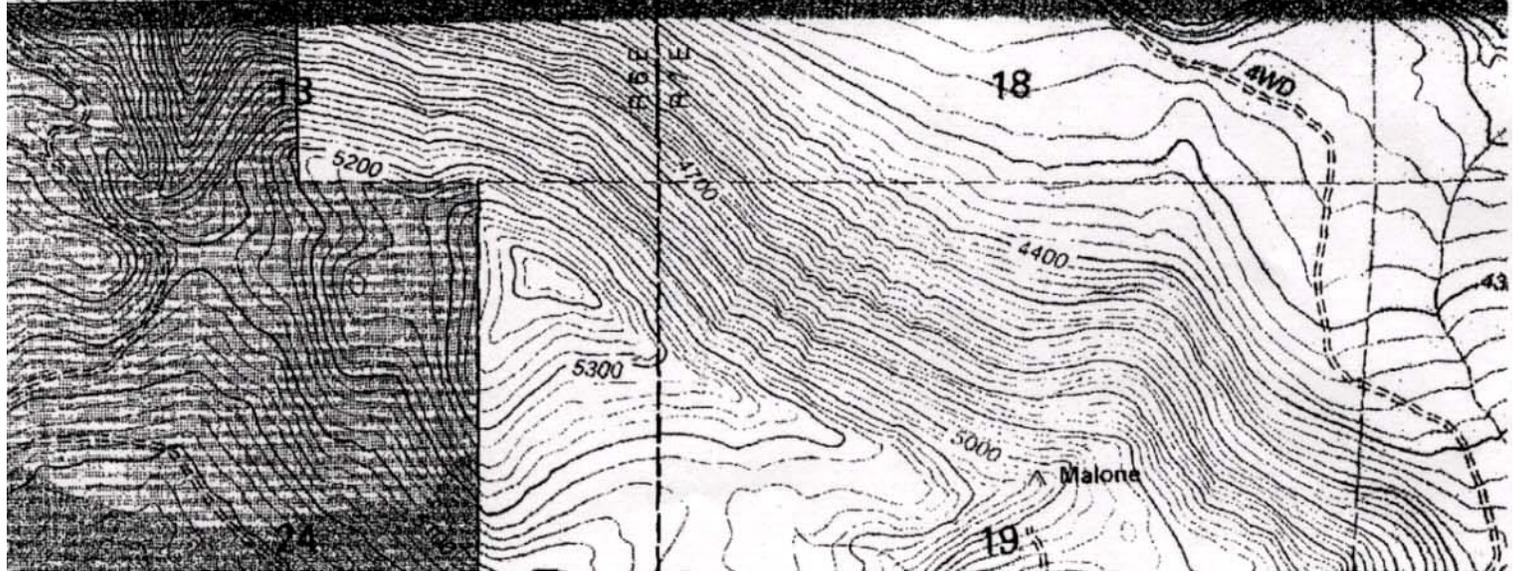
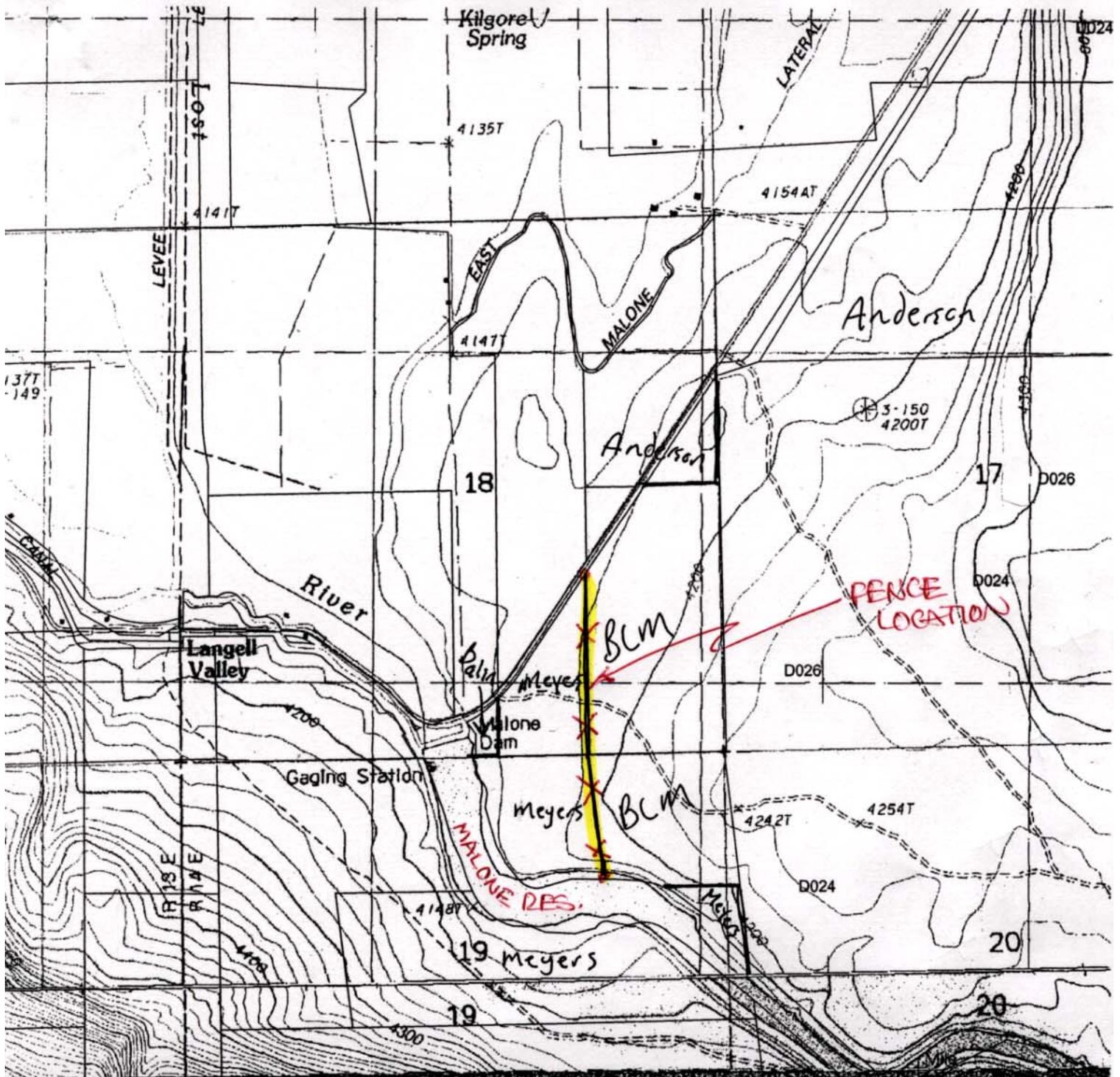
There are no specific mitigation measures needed beyond the typical BLM standards for constructing a barbed wire fence. These requirements are laid out in BLM Manual Handbook H-1741-1.

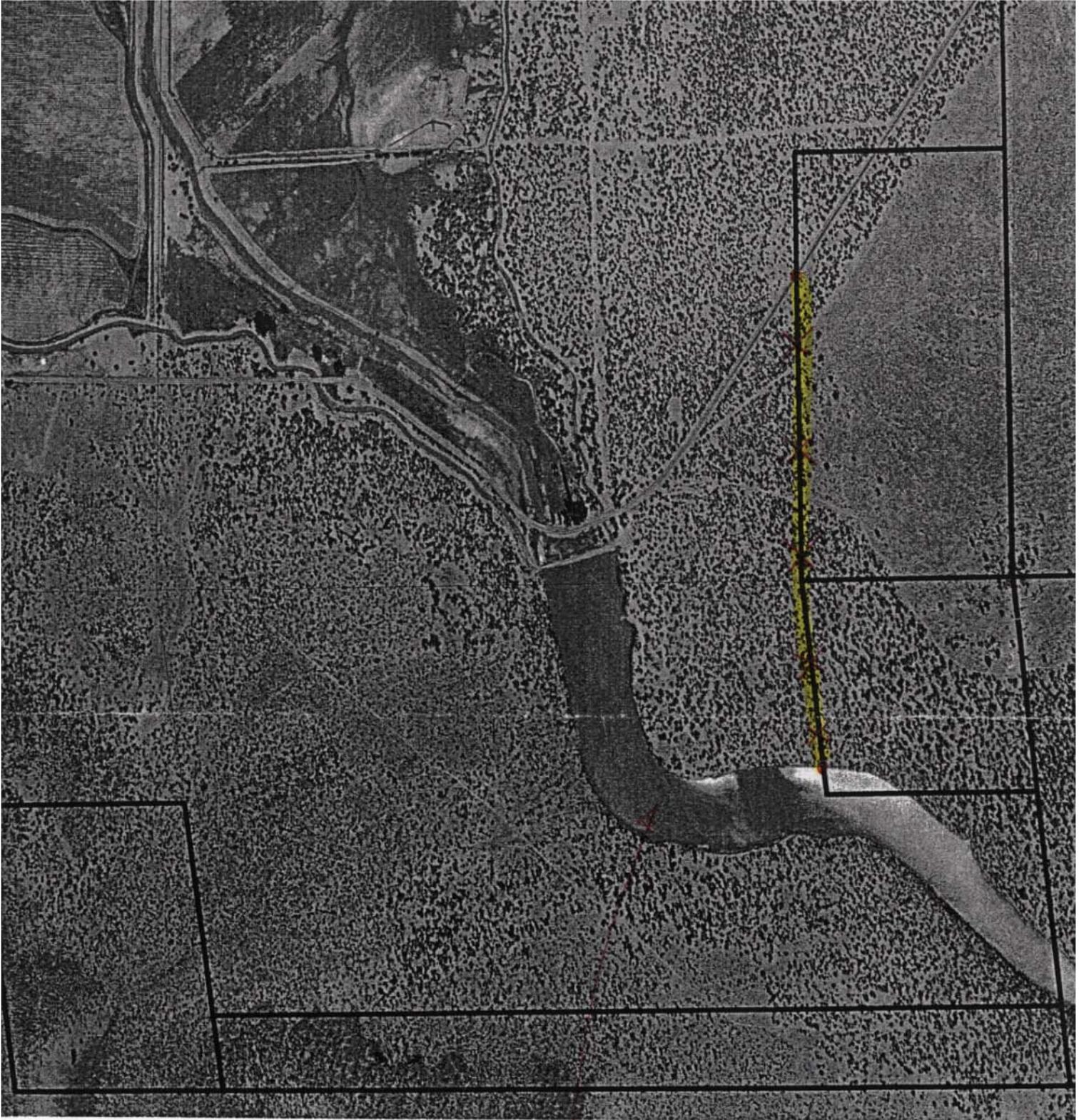
**CONCLUSION**

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

  
\_\_\_\_\_  
Field Manager, Klamath Falls Resource Area

9/7/05  
\_\_\_\_\_  
Date





↑  
MALONE RES.  
(S. END LANGRISH VALLEY)

**Klamath Falls Resource Area NEPA Document Routing Slip for Internal Review**

Project Name: MALONE-WILLOW V. CHAINING FENCE (RECONSTRUCT.)  
 Date Initiated: 8/10/05 Project Lead/Contact: BILL LINDSEY

Resource or Staff Responsible	Review Priority	Preliminary Review Initials / Date	Comments Attached / Incorporated	Final Review Initials / Date
* Manager: Jon Raby	Last			JR 9/7/05
* Branch Chief: Heather Bernier	Second to Last		None	HAB 9/7/05
* Branch Chief: Larry Brooks	Second to Last		Check legal descriptions	LB 9/7/05
* Planner/EC: Don Hoffheins, Kathy Lindsey	Third from Last		none	KL 9/6/05
* Range: Bill Lindsey, Dana Eckard		BL	AUTHOR	BL 8/10
Wild Horses: Tonya Pinckney				
Fire/Air Quality: Eric Johnson Joe Foran				
Silviculture: Bill Johnson				
Timber: Mike Bechdolt				
* Botany/ACEC/Noxious Weeds: Lou Whiteaker		JW 9/6/05	Surveyed in 2003. No special status or noxious weed sites.	JW 9/6/05
* Cultural: Tim Canaday, Michelle Durant		TC 8/10/2005	Surveys are complete - several sites in area	TC 8/10/2005
Safety/HazMat: Tom Cottingham				
Lands/Realty/Minerals: Linda Younger				
Recreation/Visual/Wilderness: Scott Senter				
Hydrology/Riparian: Liz Berger		LB 8/10/05	none	LB 8/10/05
* Wildlife/T&E: Steve Hayner		SWA 8/10	none	SWA 8/10
Wildlife/Fuels: Matt Broyles				
Fisheries/T&E: Scott Sneed		SS 8/10	none	SS 8/10/05
W/S Rivers: Grant Weidenbach				
Engineering: Brian McCarty				
Soils/Veg Surveys: Molly Juillerat Amber Knoll				
Wood River Wetlands: Wedge Watkins				
<b>Clearances/Surveys</b>	<b>Needed</b>	<b>Done/Attached</b>	*This document will not sit on your desk for more than 8 hours. Please check on calendar to make sure that the next person will be available to review the document.  **Some resource areas may not apply for all projects. If so, just mark "N/A" in "Review Priority" column.	
Cultural		TC 8/10/2005		
Botanical		JW 9/6/05		
T&E, BA & or Consultation				
R-O-W Permits				

9/8 DONE

→ T-posts through sites will be okay - do not collect rock for rock cribs from within site boundaries - please let me know when this is planned - I can help with cultural issues during implementation. T2