

**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    **Permit/Lease:** #361054

**Proposed Action Title/Type:** The proposed action is to renew an expiring 10-year grazing permit/lease (#361054) for Mike Connelly for approximately 1,043 acres of BLM administered land known as the Harpold Ridge Allotment (#0851). The permit/lease expires on 2/28/2004 and is being renewed in accordance with the grazing regulations at 43 Code of Federal Regulations (CFR) §4110.1; §4110.2-1(a) (1) & (c); §4110.2-2(a); §4130.2; and §4130.3; and other pertinent policy and guidance.

**Location of Proposed Action:** The BLM Section 15 (*Taylor Grazing Act of 1934*) administered lands that comprise the Harpold Ridge allotment are in two unattached parcels located about 12 miles east of Klamath Falls, Oregon east of Harpold Road just south of Harpold Gap on Harpold Ridge (see attached map). In addition to the BLM lands, there is a larger amount of private base property lands in between the two BLM parcels. Both BLM parcels are fenced separately and used discretely from the private lands.

**Description of the Proposed Action:** The term of the renewed permit/lease will be 3/1/2004 through 2/28/2014; 10 years as authorized by the current grazing regulations at §4130.2(d). This permit/lease could be changed in the future and reissued with different parameters if information from a future *Rangeland Health Standards Assessment* (discussed later) determines such or future policy or laws dictate different grazing management. The parameters of the renewed grazing permit would be the same as the previous permit and as follows:

<b><u>ALLOTMENT</u></b>	<b><u>LIVESTOCK</u></b>	<b><u>GRAZING PERIOD</u></b>	<b><u>AUMs</u></b>
Harpold Ridge (0851)	46 cattle	4/21 - 6/30	107 AUMs

**Applicant (if any):** Mike Connelly  
 Permit/lease renewal application sent on 9/23/03 and returned by the lessee on 10/8/03.

**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 document\*\*: None

- \* 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 KFRA ROD/RMP/RPS states on page 62 to “*Provide for livestock grazing in an environmentally sensitive manner, consistent with other objectives and land use allocations. Resolve resource conflicts and concerns and ensure that livestock grazing use is consistent with the objectives and direction found in Appendix H (Grazing Management)*” (emphasis added). Also later on that same page is the following: “*Provide for initial levels of livestock grazing within the parameters outlined, by allotment, in Appendix H.*”

The 1994 KFRA RMP/EIS listed the parameters for the Harpold Ridge allotment on page L-40; parameters which are consistent with the current grazing permit/lease and proposed renewal. The 1995 KFRA ROD/RMP/RPS - Appendix H - lists the grazing parameters for the Harpold Ridge allotment on page H-40. The parameters for the proposed action (permit/lease renewal) are the same as the past grazing permit/lease, though slightly different than that proposed in the KFRA ROD/RMP/RPS. Specifically, that plan lists a season of use of 5/1 to 5/31. However, that plan also notes that “*All changes...livestock grazing management will be made through the monitoring and evaluation process as outlined in the (the plan)...*” The “*monitoring and evaluation process*” outlined in the plan is now the *Rangeland Health Standards Assessment (RHSA)* process, which as structured in this resource area, includes an evaluation of existing monitoring and related information. Until the RHSA process is completed, no management changes will be made - more on the RHSA process later. Thus, the grazing lease is proposed to be re-issued with the previous parameters, i.e. season-of-use of 4/21-6/30.

**-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.

Klamath Falls Resource Area Fire Management EA #OR-014-94-09 (June 10, 1994)

**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).**

In 1995, the grazing on this allotment was determined by the BLM to be a “no-effect” impact to the two endangered sucker species in the Klamath Basin.

#### **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 (permit/lease re-issuance) is consistent with, if not identical to, 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 Harpold Ridge allotment on page L-40. 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-40. Though the season-of-use of the proposed permit/lease renewal is slightly different than that found in the KFRA ROD/RMP/RPS, it is substantially the same. 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 (permit/lease renewal grazing parameters) and the Harpold Ridge 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/lease 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”.

##### **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. In 2000 and 2001, extensive juniper removal was performed on this allotment, followed by some salvage of the materials, planting of bitterbrush, and the burning of residual matter. All this will likely improve the ecological condition of the allotment.

However, the following information is pertinent to the full addressing of this NEPA adequacy question:

- 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.
- The Harpold Ridge allotment has been utilization checked several times since the existing lease was re-issued in 1994. Grazing use has been found to be appropriate. Actually, the allotment only receives use every few years at most – the choice of the grazing lessee due to the lack of water on the BLM lands. The allotment is an "M" (maintain) category allotment which implies that it is in decent condition and has no particular resource problems. Besides the ongoing invasive juniper problem, there have been no other indications in recent years that the allotment has any significant livestock grazing related resource problems that need extensive monitoring. Recent field checks of the allotment have indicated that the current grazing use is consistent with LUP objectives and appropriate for the perpetuation and/or improvement of the vegetation community.
- In accordance with 43 CFR §4180 and related policy direction, the Klamath Falls Resource Area is implementing the *Standards for Rangeland Health and Guidelines for Grazing Management* (S&G's), as approved by the Klamath PAC/RAC. A *Rangeland Health Standards Assessment* is scheduled for completion on this allotment during FY 2007. The Assessment will ascertain whether current management is meeting, not meeting, or making significant progress towards meeting, the 5 *Standards for Rangeland Health* as well as other pertinent resource objectives at that time. The Assessment will be based on information currently available at the time of analysis, including Ecological Site Inventory (ESI) information that is tentatively scheduled to be collected during the 2005 field season. If the Assessment identifies resource problems that are being caused or perpetuated by livestock grazing, changes in grazing management would be implemented through established processes.

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. Likewise, it is reasonable to conclude that the new information and new circumstances are insignificant with regard to the analysis of the proposed action.

**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. 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 utilized in the resource area prior to and during the planning process continue to be accepted (or required) BLM methods and procedures.

**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.

The details of the proposed action were also covered specifically in Appendix H - *Grazing Management and Rangeland Program Summary* (page H-40) of the KFRA ROD/RMP/RPS. During the pre-RMP process in 1990-91, a series of IDT meetings were held to specifically address the formulation of objectives for every grazing allotment in the KFRA. These objectives were based on the monitoring (or related) data collected, past allotment categorization efforts (1982, as subsequently revised), as well as professional judgment based on field observations up to that time. No “*Identified Resources Conflicts/Concerns*” were listed for the Harpold Ridge allotment.

In summary, it is thought at this time, based on current information and judgment, that this NEPA Adequacy “question” is in the affirmative; that the direct and indirect impacts of re-issuing this grazing permit 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. In addition, the 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 permit/lease issuance 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.

2002, and late 2003 (pending at the time of writing this DNA)). These planning updates, or Annual Program Summaries as they are now called, 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. Document that these applicable mitigation measures must be incorporated and implemented.

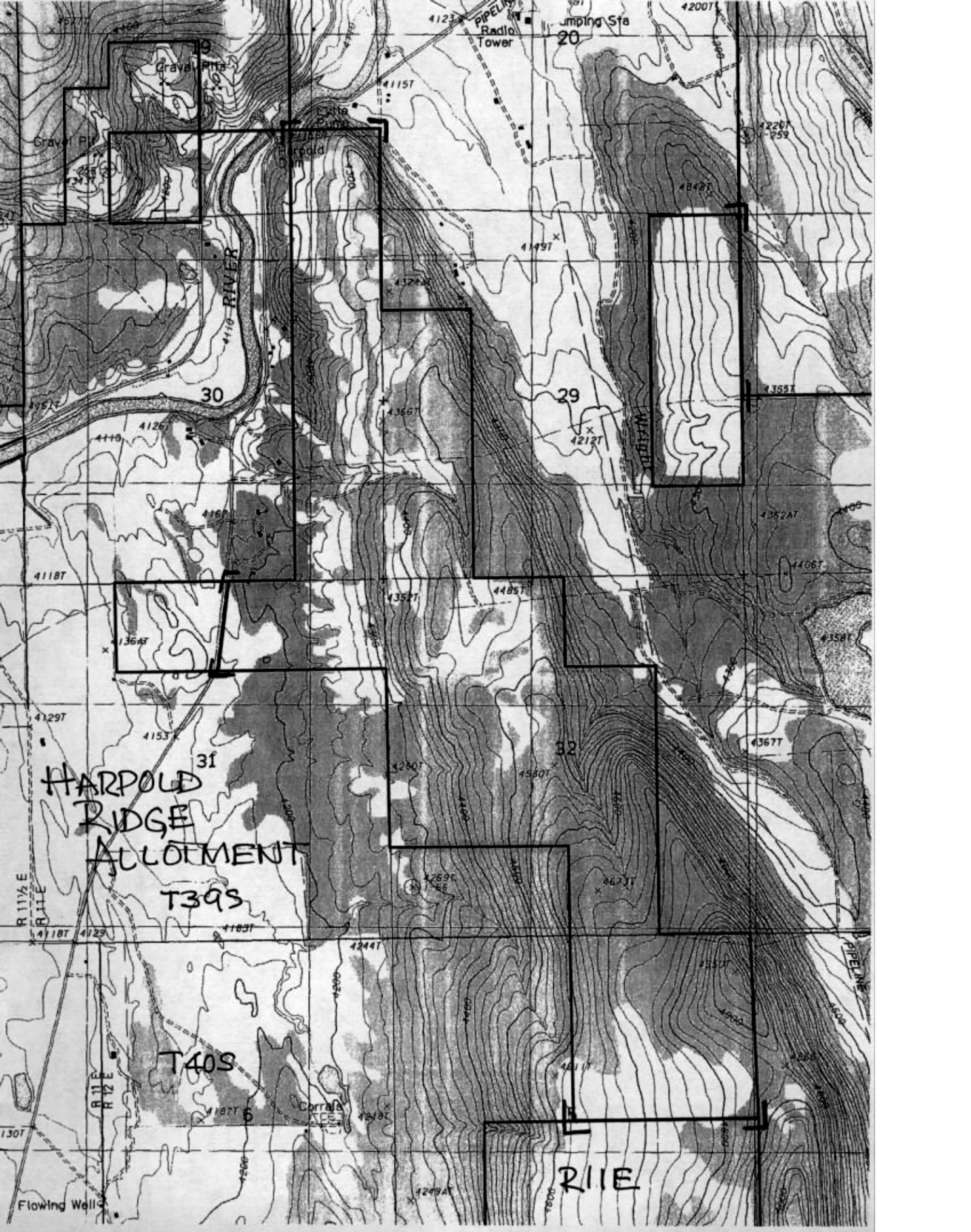
There is no specific mitigation measures needed. The allotment is scheduled for a *Rangeland Health Standards Assessment* in 2007. That Assessment could (though is not expected to) propose grazing management changes or other mitigation measures at that time.

### 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

11/24/07  
\_\_\_\_\_  
Date



Klamath Falls Resource Area NEPA Document Routing Slip for Internal Review

Project Name: HAROLD RIDGE GRAZING LEASE RENEWAL  
 Date Initiated: 11/19/03

Resource or Staff Responsible	Review Priority	Preliminary Review Date/Initials	Comments Attached/Incorporated	Final Review Date/Initials
Manager: Jon Raby	Last			JR 11/24/03
Branch Chief: Barbara Ditman	Second to Last			BD 11/20/03
Branch Chief: Larry Frazier	Second to Last			
Branch Chief: Rod Johnson	Second to Last			
Planner/EC: Don Hoffheins, Kathy Lindsey	Third from Last		minor editorial	KL 11/20
Range: Bill Lindsey, Dana Eckard			AUTHOR	BL 11/19
Wild Horses: Tonya Pinckney				
Fire/Air Quality: Joe Foran				
Silviculture: Bill Johnson, Gabi Sommerauer				
Timber: Mike Bechdolt				
Botany/ACEC/Noxious Weeds: Lou Whiteaker		11/20/03 JW	Surveyed 1999 & 2002. No special status plants. One weed site - treated	JW 11/20/03
Soils:				
Cultural: Tim Canaday				
Minerals/HazMat: Tom Cottingham				
Lands/Realty: Linda Younger				
Recreation/Visual/Wilderness: Scott Senter				
Hydrology/Riparian: Mike Turaski, Andy Hamilton				
Wildlife/T&E: Steve Hayner		11/20/03 SotA	NONE	SotA 11/20/03
Fisheries/T&E: Scott Snedaker				
W/S Rivers: Grant Weidenbach				
Engineering: Brian McCarty				
Survey/Manage: Molly Juillerat				
Clearances/Surveys	Needed	Done/Attached	*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				
Botanical		Done JW 11/20/03		
T&E, BA & or Consultation	NO SotA 11/24/03			
R-O-W Permits				

CHAM  
LAW