

## Worksheet

### Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

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

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**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:** #361088

**Proposed Action Title/Type:** The proposed action is to renew an expiring 10-year grazing permit (#361088) for Barrett Livestock (Glenn Barrett) for approximately 800 acres of BLM administered land known as the Horton Allotment (0883). The permit expires on 2/28/01 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 3 (Taylor Grazing Act) administered lands that comprise the Horton allotment are located 6-7 miles east of Bonanza, Oregon, in north Langell Valley just north of Lorella (see attached map). In addition to the BLM lands, there are at least between 300-400 acres of private land included with and grazed in common with the BLM lands.

**Description of the Proposed Action:** The term of the renewed permit will be 3/1/2001 through 2/28/2011; 10 years as authorized by the current grazing regulations at §4130.2(d). This permit could be changed in the future and reissued with different parameters, if information from a future Rangeland Health Standards Assessment (to be 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:

<u><b>ALLOTMENT</b></u>	<u><b>LIVESTOCK</b></u>	<u><b>GRAZING PERIOD</b></u>	<u><b>AUMs</b></u>
Horton (0883)	71 cattle	4/21 - 5/20	62 AUMs *

(\*Note: Due to intermingled private lands owned by the permittee, the % public lands is authorized at 88%; thus, the AUM figure is somewhat lower than would otherwise be calculated for 71 head for one month. The permittee also has a private land lease for an additional 160 acres (16 AUMs) which are grazed under an exchange-of-use agreement for private lands unfenced and within the fenced perimeter of the allotment. One additional note: The Bonanza

Unit (all the section 3 grazing lands in and around the Gerber Block, including this allotment) had a range re-survey completed in 1958. Based on that survey, significant grazing reductions were made effective for the 1960 grazing year. The Horton allotment received a 78% reduction at that time. This has undoubtedly led to the improved vegetation conditions on the allotment - juniper excluded.)

**Applicant (if any):** Barrett Livestock (Glenn Barrett)

## **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 KFRA ROD/RMP/RPS - Appendix H - lists the grazing parameters for the Horton allotment on page H-54. The parameters for the proposed action (permit renewal) are the same as the past grazing permit, though somewhat different than that listed in the KFRA ROD/RMP/RPS. Specifically, that plan listed a proposed season of use was 5/1 to 6/15. The 1994 KFRA RMP/EIS (Final RMP) listed the existing season of use (4/21-5/20) as the “no action” alternative. Both the KFRA RMP/EIS (page L-1) and ROD/RMP/RPS (page H-1) state the following:

*Grazing Administration Information. This section provides basic information on the grazing license and other forage demands within the allotment including active preference, suspended nonuse, total preference, exchange-of-use, current season-of-use (No Action) the proposed season-of-use (Proposed Resource Management Plan), the estimated average forage use by major wildlife grazing species. **All changes to these and other attributes of livestock***

*grazing management will be made through the monitoring and evaluation process as outlined in the section Rangeland Monitoring and Evaluations. (emphasis added)*

However, since an allotment evaluation (or an equivalent Rangeland Health Standards Assessment) has not been performed for this allotment, as required by policy and the Plan, no change in the season of use is justified at this time (see Question #3 below). Thus, the lease re-issuance is considered in conformance with the Plan. Additionally, both seasons-of-use are substantively the same and would be considered insignificant in the overall effects or impacts on the ground.

☐ 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 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 Horton allotment on page L-54. 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-54. 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 renewal grazing parameters) and Horton 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 (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. No new information was found that would significantly change the substance of the analysis in the RMP/EIS. However, some recent information is available that supports the analysis in that LUP. It is as follows:

In October 2000 a field “Rangeland Health Assessment” was performed on the Horton Allotment by a team of resource specialists (i.e. two botanists and two rangeland management specialists). This assessment process is a qualitative determination of rangeland health on upland areas, also known as an Upland PFC determination (as

outlined in the recent Technical Reference 1734-6). See the Horton allotment file and the memo dated 10/17/00 for more information. However, to summarize the information, the survey determined there was “moderate departure” from ecological site description parameters in the three broad rating categories, i.e. “Soil/Site Stability”, “Biotic Integrity” and Hydrologic Function”. The field worksheet goes on to attribute the divergence almost entirely due to the encroachment and/or increase of invasive western juniper. Perennial grasses were doing well in the area - a good sign - but the shrubs have been extensively “crowded out” by the juniper.

Over the past couple years, however, juniper control and some burning activities have been done within this allotment (and more is planned for the future). Approximately 130 acres have been mechanically/manually cut, the bigger wood being used commercially or for firewood, with some burning of the residual material piles. These activities were done primarily to enhance ecological conditions by removing invasive (not old growth) juniper in areas that should be dominated by shrubs (mountain big sagebrush and antelope bitterbrush) and bunchgrasses (Idaho fescue, needlegrasses, and others) as the natural and desired plant community. Bitterbrush seedlings have been planted in the juniper cut areas to give them a “jump start” on re-establishment. This juniper control work is consistent with, and to a large extent required by, the KFRA RMP/EIS and subsequent ROD.

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

- Ongoing analyses in the Interior Columbia Basin Ecosystem Management Plan (ICBEMP) has not indicated any new or significant information that would modify the management direction in this allotment; that plan’s broad scale not allowing for the specificity of the KFRA RMP.

- Limited rangeland monitoring studies (or other resource studies) have not been performed on this allotment since it is a low priority “C” (custodial) category allotment that is small in size, fragmented and intermingled with private lands limiting some management options. Besides the invasive juniper problem, there have been no other indications in recent years, that the allotment has any critical resource related problems that need extensive monitoring. Recent utilization checks - including a utilization pattern map in 2000 - 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 in the process of 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 the Horton allotment later this year (2001). The assessment will ascertain whether current management is meeting, not meeting, or making significant progress towards meeting, the 5 Standards for Rangeland Health. The assessment will be based on information

currently available as referenced above, with the possibility of some additional information that may be collected early this summer - if done in time for inclusion in the Assessment.

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. The plan is also “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, though there are some recent (2000) indications that the impacts of livestock grazing are *less* than analyzed.

The details of the proposed action were also covered specifically in Appendix H - *Grazing Management and Rangeland Program Summary* (page H-54) 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 judgement based on field observations

up to that time. Three “Identified Resources Conflicts/Concerns” were listed for Horton, with the accompanying “Management Objectives” - as follows:

**Identified Resources Conflicts/Concerns**

Under current management the range condition, level or pattern of utilization, and/or season-of-use may be unacceptable; or carrying capacity may be exceeded.

Critical deer winter range occurs in allotment.

Potential for grazing/recreation conflicts within the allotment.

**Management Objectives**

Maintain or improve rangeland condition and productivity through a change in grazing management practices, timing, and/or level of active use.

Management systems should reflect the importance of deer winter range.

Grazing management should consider recreation concerns.

The specific rationales supporting these objectives are not known as no records from this IDT process exists (or can be found). The rationals can be approximated based on current information. The recreation objective probably relates to either the potential for deer hunting or wood cutting, though there is no current “conflicts” known with the exception of wood cutters occasionally leaving the gates open. The recent juniper cutting and bitterbrush planting was primarily directed towards meeting the second objective on deer winter range, by improving ecological and deer habitat conditions. The first objective on grazing use has not been observed to be particularly relevant in recent years. During the mid-1980's there were documented over-utilization problems on the allotment. Since then, the allotment has been rested for many years and the current use levels seem to be generally light and well within the LUP objectives.

In summary, it is thought at this time, based on current information and judgement, 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, ongoing analyses in the Interior Columbia Basin Ecosystem Management Plan (ICBEMP) has 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 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.

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, and July 2000). 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 Standards and Guidelines assessments 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 Glenn Barrett, who is the existing permittee and 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 Management Specialist	Author/Range
(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.

Specifically for this allotment, 100 acres of juniper control and the construction of a reservoir were listed in Appendix H, “*Potential Range Improvements by Allotment*” -page H-68. The allotment will continue to receive some juniper control activities which, in hand with that already completed, should improve ecological, watershed, and wildlife habitat conditions. The allotment is scheduled for a *Rangeland Health Standards Assessment* in 2001. That Assessment could (though is not expected to) propose grazing management changes or other mitigation measures at that time. The previously noted 1994 Fire Management EA has also allowed for some slash pile burning within the allotment to clean up the post-harvest juniper residue and literally clear the way for the bitterbrush plantings.

**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 constitutes 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

/s/ Teresa A. Raml  
Field Manager, Klamath Falls Resource Area

3/28/01  
Date

Legend

- Blm - Allot. # 883

- Barrett Livestock  
(Base Property)

PART OF  
WILLIAMS  
0892

PRIVATE  
LEASED  
LANDS  
198

THIS PIECE  
SOLD, BUT  
STILL USED  
(NOT FENCED)

SOLD TO  
BARRETT  
~ 1999

Wolf

Flat

Lorella

RIVER

