



U.S. Department of the Interior Bureau of Land Management

Anchorage Field Office
4700 BLM Road
Anchorage, Alaska 99507

<http://www.blm.gov/ak/st/en/fo/ado.html>

Administrative Determination (AD)/Documentation of NEPA Adequacy (DNA)

Applicant: Thomas Gray	Case File No.: FF-024210
Applicant: Merlin Henry	Case File No.: F-030387
Applicant: Roger Menadelook	Case File No.: FF-085288
Applicant: James Noyakuk	Case File No.: FF-019442
Applicant: Palmer Sagoonick	Case File No.: FF-000839
Applicant: John A. Walker	Case File No.: FF-087313

DOI-BLM-AK-010-2009-0008-DNA



Location:

Bureau of Land Management lands on the Seward and Baldwin peninsulas, Alaska

Prepared By:

Anchorage Field Office, December 30, 2008

Administrative Determination (AD)
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
U.S. Department of the Interior - Bureau of Land Management
Anchorage Field Office

A. BLM Office: Anchorage Field Office

Lease/Serial Case File No.:

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Proposed Action Title/Type: Extend six reindeer grazing permits, listed above, for five months until March 31, 2009.

Location of Proposed Action: Seward and Baldwin peninsulas, Alaska.

Description of the Proposed Action

Six reindeer grazing permits expire December 31, 2009. The AFO is finishing up a new Programmatic Environmental Assessment for Reindeer Grazing on the Seward and Baldwin peninsulas, and wants to allow five months for discussions with reindeer herders and cooperators to adjust to the new Programmatic Environmental Analysis permit stipulations and mitigations. We propose to extend the existing permits for five months, until May 31, 2009, to allow this transition to occur smoothly. The 2009 Programmatic Environmental Assessment would be implemented on or about April 1, 2009.

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

Extending the six reindeer grazing permits for five months is consistent with the 2008 Kobuk-Seward Peninsula Approved Management Plan.

C. Identify applicable NEPA documents and other related documents that cover the Proposed Action.

2008 Environmental Assessment - AK-010-08-EA-001, Reindeer Grazing Permits on the Seward Peninsula.

D. NEPA Adequacy Criteria

- 1. Is the current Proposed Action substantially the same action (or is a part of that action) as previously analyzed? Is the current Proposed Action located at a site specifically analyzed in an existing document?** Yes. This Proposed Action merely extends the expiration date of the existing permits for five months, with no changes to the location of the activities authorized.
- 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, and resource values?** Yes. This Proposed Action is the same as in the existing NEPA document, and there are no new or changed environmental concerns, interests, or resource values. The other alternative would be to not extend the grazing permits and that does not meet our fiduciary responsibility under the Reindeer Industry Act, nor is it reasonable or prudent.
- 3. Is the existing analysis valid in light of any new information or circumstances?** Yes. The existing analysis is still valid. Continuing to authorize the reindeer grazing permits is in the best interest of the BLM, and meets our fiduciary responsibility under the Reindeer Industry Act of 1937. By extending the existing permits for five months, we will have ample time to transition with the herders to the new grazing permit stipulations and requirements under the recently completed Reindeer Grazing Programmatic Environmental Assessment.
- 4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current Proposed Action?** Yes. The existing NEPA document considered reindeer grazing impacts and found that the continuation of the authorizations was appropriate. The terms and conditions on the existing grazing permits and our annual monitoring methodology are still valid and appropriate for this Proposed Action to extend the permits for five more months.
- 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 analyze site-specific impacts related to the current Proposed Action?** Yes. (See page 24 of the 2008 EA). We have been conducting annual monitoring of the range conditions, and will continue to do so for the ongoing reindeer grazing activities on BLM land. As the reindeer herds have been declining in numbers, grazing impacts have declined in the reindeer ranges and heavily impacted areas have begun to recover with sufficient rest (herd rotation or complete absence of reindeer throughout each allotment). There will be no new or different impacts as a result of extending the

existing permits for five months while we transition and implement the new Programmatic EA.

- 6. Are the cumulative impacts that would result from implementation of the current Proposed Action substantially unchanged from those analyzed in the existing NEPA document(s)?** There will be no additional cumulative impacts by extending the existing permits for five months. The cumulative impacts of extending the reindeer grazing permits are the same as considered under the existing NEPA document - 2008 Environmental Assessment AK-010-08-EA-001, Reindeer Grazing Permits on the Seward Peninsula (see Section 4.1.2, page 29, Cumulative Impacts).
- 7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current Proposed Action?** Yes. The existing NEPA document involved the reindeer herders and other land owners associated with the grazing permits; they were informed that we were extending the permits for one year while we undertook the Programmatic Environmental Analysis. The reindeer herders requested an extension of the existing permits, so this Proposed Action is responsive to their request. Also, all parties will receive the new Programmatic EA and notification that we are extending the existing permits for five months while we transition to the new schema.

E. Interdisciplinary Analysis:

The interdisciplinary team, including two natural resource specialists and wildlife biologist, who prepared the existing NEPA document is supportive of extending the existing permits for five months while we transition to the new schema and have no concerns otherwise. Additionally, our NEPA coordinator advised us that we would be prudent to allow sufficient time (at least 30 days) for the reindeer herders to appeal/protest the December 30, 2008 signed FONSI Decision for the new Programmatic EA. All parties have reviewed this Proposed Action and agree that it is in everyone's best interest.

F. Mitigation Measures:

There are approximately 8,000 reindeer grazing on the Seward Peninsula, the same as a year ago considered under the existing NEPA. The mitigations (see Section 4.1.3, Mitigation Measures, page 30) in the existing NEPA document are:

1. Herders should be required to periodically rotate their herd's summer and winter grazing areas to allow for vegetation and riparian zone recovery.
2. Camps and activities associated with reindeer herding, including corralling, should be located and conducted in a manner designed to minimize disturbance to riparian vegetation and stream banks.

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3. Allotment management plans should continue to be developed to address rotational grazing, particularly with regard to critical winter lichen areas. The terms and conditions in the existing grazing permits are adequate to prevent adverse impacts to the human environment and are responsive to these mitigations. Furthermore, many herders have grazing management plans and/or work with the Natural Resource Conservation Service to minimize adverse grazing impacts to the range resources.

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 fully covers the Proposed Action and constitutes BLM's compliance with the requirements of NEPA.

James M. Fincher
Anchorage Field Manager

December 31, 2008
Date