

**Worksheet**  
**Determination of NEPA Adequacy (DNA)**  
U.S. Department of the Interior  
Bureau of Land Management

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Office: Andrews/Steens Field Office

Tracking Number (DNA #): DOI-BLM-OR-B070-2013-0024-DNA

Case File/Project Number: SRP OR027-RP-2013-02 Backcountry Llama Rendezvous

Proposed Action Title/Type: Guided group overnight trips within the Steens Mountain Cooperative Management and Protection Area (CMPA) and Steens Mountain Wilderness.

Location/Legal Description: Primarily in the South Steens area within the Steens Mountain CMPA.

Applicant (if any): Backcountry Llama Rendezvous, Scott Noga

**A. Description of the Proposed Action and any applicable mitigation measures**

Applicant Scott Noga of Backcountry Llama Rendezvous requests issuance of a Special Recreation Permit (SRP) for authorization to conduct guided overnight llama trip from July 19-21, 2013, workshops, seminars and one-on-one assistance pertaining to pack llamas on portions of Burns District, Bureau of Land Management (BLM). The areas of use will be within the Steens Mountain CMPA. (See Attached Map). The applicant will have a base camp set up at South Steens Campground with a host that will have information about the rendezvous. Clients of Backcountry Llama Rendezvous are recommended to set up dispersed campsites within the wilderness and those who do not will camp at South Steens campground. All llama trips will be on existing trails and groups will not exceed 12 persons and 18 head of recreational stock. The rendezvous will last three days and all wilderness and standard stipulations throughout Burns District would apply (See Attached Stipulations).

**B. Land Use Plan (LUP) Conformance**

LUP Name\*

Steens Mountain CMPA Record of Decision (ROD) and Resource Management Plan (RMP)

Date Approved: 2005

Steens Mountain Wilderness and Wild and Scenic Rivers Plan

Date Approved: 2005

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):

Steens Mountain CMPA ROD/RMP, page 66, Recreation Goal, "Provide developed and undeveloped recreation opportunities while protecting resources, to manage the increasing demand for resource-dependent recreation activities." Objective 4, "Manage visitor use in the CMPA to protect natural resources and to provide a variety of recreation opportunities." Objective 6, "Manage commercial, competitive, educational, and organized group recreation activities."

Steens Mountain Wilderness and Wild and Scenic Rivers Plan, Appendix P, page 28, "To provide for the level and type of commercial services necessary, consistent with the Wilderness Act, WSRs Act and WSRs ORVs to enable the public to use, access, enjoy and experience recreational and other values of wilderness, emphasizing opportunities for primitive and unconfined types of recreation, inspiration, and solitude."

**C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

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

- Andrew/Steens Proposed RMP and Final EIS – August 2004
- Steens Mountain CMPA – August 2005
- Steens Mountain Wilderness & Wild and Scenic Rivers Plan, Appendix P – August 2005
- Oregon Llamas SRP EA OR-020-03-037
- Steens Mountain Packers SRP EA OR-020-03-038

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- A Needs Assessment was completed August 2011 in conformance with the Steens Mountain CMPA ROD/RMP.
- State, Local, and Tribal land use plans and regulations

**D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

The proposed action is a feature of the alternatives analyzed in the Oregon Llamas SRP EA, OR-020-03-037 and the Steens Mountain Packers SRP EA, OR-020-03-038. These EAs analyzed overnight llama trips, overnight hiking trips, day hiking trips, day trail rides, overnight horse pack trips, and scenic tours. The routes used would vary with each client's interests but would occur primarily in the South Steens area (See Attached Map).

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

Yes, the range of alternatives from the above EAs are appropriate given the current environmental concerns, interests and resource values and based on the nature of the proposed action using existing trails and no new construction. The Steens Mountain Packers and Oregon Llamas EAs analyzed one alternative to the Proposed Action, the No Action Alternative. The No Action Alternative would not authorize the issuance of an SRP. No issues were identified in the existing EAs that would have generated additional alternatives and none were identified for this proposed action.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

The Greater sage-grouse was and still is a BLM Sensitive species, but is now a Federal Candidate species under the Endangered Species Act following US Fish and Wildlife Service's review and determination that federal listing was "warranted but precluded by higher priorities" in 2010. The scope of this project would not have affects beyond those described in the existing NEPA documents. Activities associated with this permit would occur after breeding season (March 15 to June 1) except for the period from about May 15 to June 1 when the lower gates on the Steens Mountain access roads could be open depending on weather conditions each year. Vehicles would be restricted to main roads by wet soil conditions in most places so disturbance would be limited to foot traffic by participants. If sage-grouse are encountered, then the group leader would direct participants away from the area so that sage-grouse would not be disturbed any further. Areas accessible for these activities are limited by road and trail conditions and seasonal closures on Steens Mountain (November to July).

The applicant and clients are responsible to insure the use of certified weed free feed for recreational pack animals i.e. llamas. The applicant and clients will check their llamas and camping equipment for seeds that may be caught in the fur or equipment from previous trips.

Inventory of lands with wilderness characteristics has been completed within the CMPA. Three parcels within the CMPA were identified as possessing wilderness characteristics, but not given any special management. The areas within the CMPA are already protected by the mineral withdrawal, prohibition on cross-country motorized, mechanized vehicle use, ROW avoidance/exclusion areas and VRM classification. There would be no affects to these areas with implementation of the proposed action; therefore, previous NEPA analysis is adequate for this activity.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

The direct and indirect effects of the current proposed action are unchanged from those identified in the above referenced EAs. The EAs sufficiently document the site-specific impacts related to the current proposed action.

North Steens Transmission Line Right-Of-Way and the North Steens Ecosystem Restoration Project are Reasonable Foreseeable Future Actions within the Steens Mountain area. The cumulative impacts associated with these projects and the Steens Mountain Packers and Oregon Llamas SRP EAs would not be measurable as the types of activities do not change any features on the landscape. Implementation of the proposed action is limited to recreational pack animals and use of existing trails

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

Yes, public involvement is adequate since both of the above referenced EAs included public notices both in the newspaper and posted on the BLM website. There were no public comments.

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

FOR Lisa Grant 3-6-13  
Rob Sharp, Wild Horse Specialist Date

Daryl Bingham 6 MARCH 2013  
Daryl Bingham, Fisheries Biologist Date

Caryn Meinicke 3-7-13  
Caryn Meinicke,  
Natural Resource Specialist (Botanist) Date

Tom Wilcox 3/6/2013  
Tom Wilcox,  
Outdoor Recreation Planner (Recreation, Wilderness) Date

Andy Daniels 3-6-13  
Andy Daniels, Wildlife Biologist Date

Tara McLain 3-6-13  
Tara McLain, Realty Specialist Date

Lesley Richman 3/6/2013  
Lesley Richman,  
Natural Resource Specialist (Noxious Weeds) Date

Scott Thomas 3-6-13  
Scott Thomas, Archaeologist Date

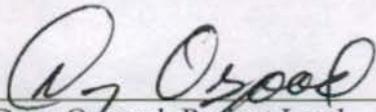
Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

**F. Others Consulted:** Identify other individuals, agencies or entities that were consulted with as part of completing the NEPA analysis.

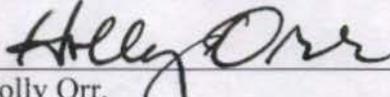
Steens Mountain Advisory Counsel  
Steens Mountain Packers Inc.  
Oregon Llamas, Barrett Dash

**Conclusion** (If you found that one or more of these criteria is not met, you will not be able to check this box.)

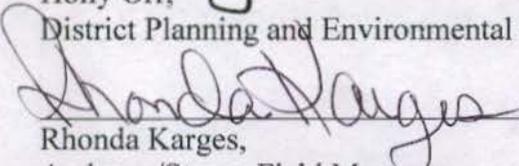
Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of the NEPA.

  
Dory Osgood, Project Lead

3-6-13  
Date

  
Holly Orr,  
District Planning and Environmental Coordinator

3-11-13  
Date

  
Rhonda Karges,  
Andrews/Steens Field Manager

3-12-13  
Date

**Note:** The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

*(Only include the following language if a lease, permit or other authorization is not issued or other program-specific regulations do not apply)*

**Decision:** It is my decision to implement the Proposed Action with Project Design Elements *(if applicable)* as described above.

This decision may be appealed to the Interior Board of Land Appeals (IBLA), Office of the Secretary, in accordance with regulations contained in 43 Code of Federal Regulations (CFR), Part 4 and Form 1842-1. If an appeal is filed, your notice of appeal should be mailed to the Burns District Office, 28910 Highway 20 West, Hines, Oregon 97738, within 30 days of receipt of the decision but no later than *[Insert Date - date decision mailed plus add 1 week]*. The appellant has the burden of showing the decision appealed is in error.

A copy of the appeal, statement of reasons, and all other supporting documents should also be sent to the Regional Solicitor, Pacific Northwest Region, U.S. Department of the Interior, 805 SW Broadway, Suite 600, Portland, OR 97205. If the notice of appeal did not include a statement of reasons for the appeal, it must be sent to the Interior Board of Land Appeals, Office of Hearings and Appeals, 801 North Quincy Street, Arlington, Virginia 22203. It is suggested appeals be sent certified mail, return receipt requested.

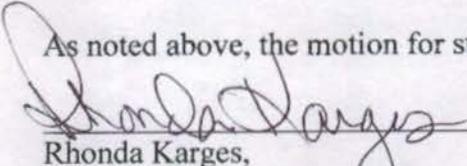
#### ***Request for Stay***

Should you wish to file a motion for stay pending the outcome of an appeal of this decision, you must show sufficient justification based on the following standards under 43 CFR 4.21:

- The relative harm to the parties if the stay is granted or denied.

- The likelihood of the appellant's success on the merits.
- The likelihood of immediate and irreparable harm if the stay is not granted.
- Whether or not the public interest favors granting the stay.

As noted above, the motion for stay must be filed in the office of the authorized officer.

  
Rhonda Karges,  
Andrews/Steens Field Manager

3/12/13

Date

# Backcountry Llamas Rendezvous

1 Mile

- Trails that will be used by BLR
- Steens Mtn Wilderness
- Perennial Streams
- Non-Paved Improved Road
- Open WSA Ways
- South Steens Campground
- Bureau of Land Management
- Intermittent Streams
- Natural/Unknown Road Surface
- Closed WSA Ways
- BLM Wilderness Study Area
- State
- Lakes
- Closed Roads
- Private/Unknown

U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
Bend, Oregon

Note: No warranty is made by the Bureau of Land Management as to the accuracy, reliability or completeness of these data for individual or aggregate use with other apps. Original data was compiled from various sources and may be updated without notification. 3/21/2013 edition.

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