

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

---

**A. Background**

BLM Office: Prineville District

NEPA Log #: DOI-BLM-OR-P040-2010-0050-DNA

Project/Lease/Serial/Case File #: 3605027

Applicant: Candace Thompson

Location: 17 miles southeast of Paulina, Oregon

Proposed Action Title/Type: McCullough transfer and permit renewal

Description of the Proposed Action and any applicable mitigation measures:

The permittee of the McCullough Allotment has passed away. His wife was not named on the permit, therefore, she is requesting the permit be transferred to her. The permit has since expired so it will also need to be renewed. The AUMs will remain the same, at 11.

Terms and Conditions to be added to permit:

- ◆ Standards and Guides have been completed 2005 and all five standards failed. Methods to mitigate the failures will be addressed in a Cooperative Rangeland Management Agreement to ensure compliance and improvement with Standards and Guides.
  
- ◆ The permittee is required to mitigate all failed Standards and Guides before grazing can occur on the McCullough allotment. This includes fencing off the northern 40 acres, and implementing a grazing system.
  
- ◆ Prior to being authorized to graze on the McCullough allotment, the house in trespass must be removed per government standards, according to CFR 4140.1(10) *Failing to reclaim and repair any lands, property, or resources when required by the authorized officer...*

**B. Land Use Plan Conformance**

Land Use Plan Name: *Brothers/La Pine Resource Management Plan (RMP) (ROD): July 1989.*

The proposed action is in conformance with the applicable plan because it is specifically provided for in the following land use plan decisions:

Brothers/La Pine RMP/ ROD, 1989- Allocate 11 AUMs of forage to the McCullough Allotment (p. 76). Livestock grazing specific to this allotment is addressed on pages 74 through 86 of this RMP.

**C. Identify applicable National Environmental Policy Act (NEPA) documents**

## **and related documents that cover the proposed action**

The following NEPA documents (EA, DEIS, FEIS) cover the proposed action:

*Brothers/La Pine Final Environmental Impact Statement, 1988*

*Brothers/La Pine Draft EIS, October 1987*

*Brothers Grazing Management Program Draft Environmental Impact Statement, 1982*

The following other documentation is relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report):

*Results of Assessment for Standards and Guides, McCullough Allotment 10.13.04*

### **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?

**Yes, this action has already been analyzed under the existing NEPA documents and is within the same location as before. There are no changes or differences with this action compared to the action previously analyzed. Grazing was analyzed throughout the Brothers Grazing Management DEIS; specific alternatives are discussed on pages 10-14.**

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. Alternatives are displayed on pages 10 through 14 of the Brothers LaPine Draft EIS, and ranged from optimizing livestock to the elimination of livestock grazing. This range appears to be appropriate, given the current issues.**

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 all new information and new circumstances would not substantially change the analysis of the new proposed action?

**The existing analysis of the Brothers/La Pine FEIS is still valid. New information, which would enter into the analysis, includes the Standards for Rangeland Health & Guidelines for grazing management (43 CFR 4180, available for review at the Prineville District BLM). The BLM is required to assess all public land grazing allotments for compliance with the Standards and Guidelines. The McCullough Allotment has been evaluated and was found to be failing standards 1 through 5 on the northern 40 acres of the allotment. Mitigation measures would include removing the house in trespass, and fencing off the northern 40 acres to create a separate pasture. A grazing system will be**

**implemented when the operator decides to graze again to ensure continued improvement of the allotment.**

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(s)?

**The direct, indirect and site specific effects of renewing this grazing permit were adequately addressed in the Brothers Grazing Management Program, DEIS 1982. It considered continuing vs. discontinuing grazing in many allotments and described the effects of allotment closures on forage availability, the local economy, BLM management costs, permittee costs, and other factors (pages 52 through 75). The effects of livestock grazing on soil, vegetation, and ecological processes were likewise included. These effects have not substantially changed.**

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

**Yes. The list of “interested publics” is updated on a regular basis and many of the individuals and organizations on the current “interested publics” list are the same as those on the mailing list for the planning and NEPA documents listed on page 1. A final copy of this DNA and the subsequent Proposed Decision will be posted on the Prineville District’s internet page for public review. A printed copy of these documents will be available on request.**

### **E. Persons/Agencies/BLM Staff consulted**

<u>Name</u>	<u>Title</u>	<u>Resource/Agency represented</u>
Steve Castillo	Forester	Forestry
Rick Demmer	Natural Resource Specialist	Wildlife
Jeff Moss	Natural Resource Specialist	Fisheries
Cari Taylor	Rangeland Mgmt Specialist	Range
Berry Phelps	Outdoor Recreation Planner	Recreation
John Zancanella	Archeologist	Cultural Resources
JoAnne Armson	Biological Science Technician	Botany, Special Status Plants
Mike McKay	Hydrologist	Hydrology
Teal Purrington	Planning and Enviro. Coord.	NEPA Compliance

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.

Conclusion

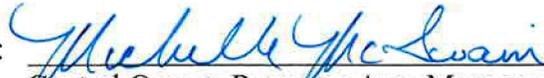
Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

Signature

Responsible official:

for

H. F. "Chip" Faver,

  
Central Oregon Resource Area Manager

11/8/10  
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.

Contact Person

For additional information concerning this review, contact: Cari Taylor, Rangeland Management Specialist, Prineville Field Office, 3050 NE 3rd Street, Prineville, OR 97754, telephone (541) 416.6790, cari\_taylor@or.blm.gov.

