Worksheet
Determination of NEPA Adequacy (DNA)

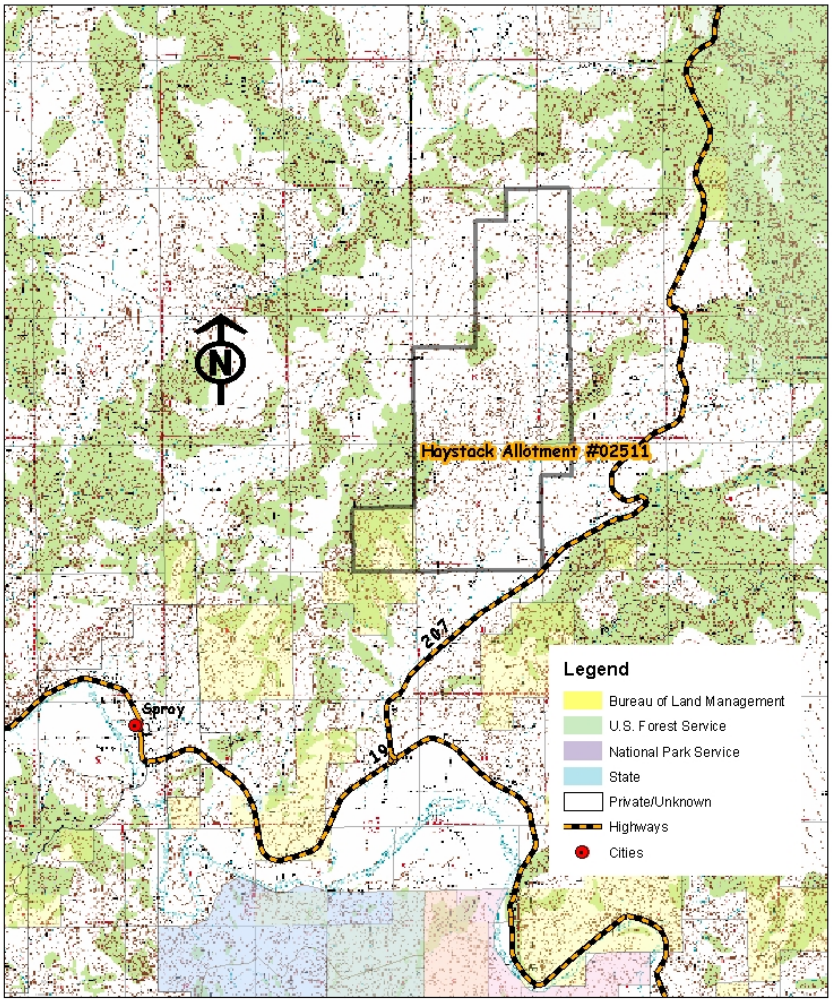
U.S Department of the Interior, Bureau of Land Management

A. Background

BLM Office: Central Oregon Field Office NEPA Log #: DOI-BLM- OR-P040-2008-0223-DNA

Grazing Authorization #: 3605370 Applicant: Joe Kintz

Location: Approximately 3 miles NE of Spray, Oregon



1 inch equals 0.8 miles

Proposed Action Title/Type: Haystack Allotment Grazing Lease Renewal

Description of the Proposed Action and any applicable mitigation measures:
Reissue the grazing lease for the grazing lessee in the above listed allotment for a term of ten years. Except for the term shown on the permit, all terms and conditions on the permit will remain the same; including permitted AUMs (animal unit months) and season of use.
Permitted Use is:

Permitted Use	Active Use	Suspended Use
11	11	0

Proposed annual grazing use is:

1 cattle	04/01-12/31	100% Public Land	9 AUMs

Due to computer calculation rounding, the above aums may not correspond with the actual permitted use.

Mitigation Measures: The Bureau of Land Management (BLM) is in the process of implementing the Standards for Rangeland Health and Guidelines for grazing management. This lease is subject to modification as necessary to achieve compliance with these standards and guidelines (43 CFR 4180).

B. Land Use Plan Conformance

Land Use Plan Name: Two Rivers Resource Management Plan
Record of Decision: June, 1986

The proposed action is in conformance with the applicable Land Use Plan(LUP)(s) because it is specifically provided for in the following LUP decisions:
Page 10: Goal and Objective of the Plan- Objective 1- Maintain forage production and livestock use at 17,778 AUMs (*entire planning area*). Maintain current livestock grazing levels and meet riparian and upland vegetation management objectives.
Page 14: Livestock Grazing- The availability of forage will remain at 17,778 AUMs (*entire planning area)* in the short term.
Appendix D indicates current levels of livestock grazing and present ecological condition for all allotments.

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

The following NEPA documents cover the proposed action:
Two Rivers RMP Draft Environmental Impact Statement (DEIS) 1985

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

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 and YES

The Preferred Alternative in the **Two Rivers RMP DEIS** was to continue to lease public lands in the planning area at current livestock grazing levels. When originally analyzed the Haystack Allotment was part of the Larson Allotment. In 1995 the allotment was split due to the sale of a portion of the base property. The Haystack Allotment was created at that time.
When originally analyzed grazing use in the Larson Allotment was:

Cattle 04/01-12/31 27 AUMs.

Cattle numbers were not specified. The allotment was split proportionately by base property acreage and the current Haystack Allotment grazing use is:

1 cattle 04/01-12/31 100%PL 9 AUMs

The current proposed action is substantially the same action on the same site as previously analyzed.

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

Livestock grazing was addressed under all alternatives in the **Two Rivers RMP DEIS**.
Alternative A (Preferred Alternative) – This alternative emphasized the management, production, and use of renewable resources on the majority of public lands in the planning area. Management would be directed towards providing a flow of renewable resources from public land on a sustained yield basis while protecting or enhancing natural values. Riparian areas would be managed for full potential. Upland vegetation would be managed for high mid seral to low late seral ecological condition except where wildlife concerns dictate otherwise. Forage available for livestock would remain at 17,778 AUMs in the short term and would be increased to 19,920 in the long term. Projects would be implemented to maintain current livestock grazing levels and meet riparian and upland vegetation management objectives.

Alternative B (Emphasize Commodity Production and Enhancement of Economic Benefits)
Public land management would emphasize the production of goods and services. Livestock would be excluded from riparian areas through fencing. Intensive management would be implemented to encourage change in ecological condition towards climax. Forage available for livestock would increase to 19,189 in the short term and 24,217 AUMs in the long term through intensive grazing management and project development.

Alternative C (No Action)
Current livestock grazing management would continue. Only range projects proposed in current management plans would be constructed. Grazing systems currently in place would continue however, BLM would continue to work with operators on improved management where needed. Forage available for livestock would remain at 17,778 AUMs .

Alternative D (Emphasize Natural Values While Accommodating Commodity Production)
Forage available for livestock would decrease to 12,309 in the short term and 13,834 AUMs in the long term. This decrease would result from livestock exclusion from riparian areas in the John Day River Canyon. Changes in period of use and/or livestock exclusion would occur where necessary to meet objectives. Intensive management designed to encourage ecological change towards climax conditions would be implemented on 177,000 acres.

Alternative E (Emphasize Natural Values)
Livestock grazing would be eliminated from public lands in the planning area.

The rationale for the Preferred Alternative was to balance conflicts and tradeoffs between land uses while protecting non renewable and/or natural values while maintaining current levels of forage availability for livestock (Two Rivers RMP DEIS, page 12).

The proposed action is to continue permitted grazing use on the Haystack Allotment as it was analyzed in the Two Rivers DEIS Preferred Alternative. Environmental concerns, interests, and resource values are unchanged from those that existed at the time of the DEIS. The Alternatives analyzed in the Two Rivers RMP DEIS continue to represent an appropriate range of management options for public land resources. There is no reason to believe that the Preferred Alternative in the Two Rivers RMP DEIS would not be selected after issue analysis at the current time.

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?
YES

Annual monitoring and compliance checks have revealed no resource conflicts or concerns. This area was reviewed for wilderness characteristics in 2007 and found not to possess them.

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)? YES

Impacts resulting from grazing are essentially unchanged from those analyzed in the **Two Rivers RMP DEIS**. The DEIS (Environmental Consequences, pages 57-72) analyzed impacts to soil, water, vegetation, wildlife, and livestock grazing of the Alternatives. Analysis indicated that under the preferred alternative no livestock grazing reductions would be necessary to maintain current livestock grazing levels and current acceptable ecological condition (page 60).

The **Two Rivers RMP DEIS** does not specifically address cumulative impacts of grazing but does address long term impacts of the action with the assumption that the grazing activity would continue (impact analysis begins on page 58 of DEIS). AUMs throughout the Two Rivers area will change from 17,778 to 19,920 under the Preferred Alternative over time. Recommendations and objectives in the document reflect the impacts and expected conditions that will continue with the ongoing grazing. The proposed action is substantially unchanged from those analyzed impacts.

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

Many of the individuals/organizations on our current "interested publics" list are the same as those on the mailing list for the NEPA documents referenced above. A copy of this DNA worksheet will be mailed to a representative of the Oregon Department of Fish and Wildlife, and to other individuals and organizations that have expressed an interest in this or similar actions.

E. Persons/Agencies/BLM Staff consulted

The following Prineville District BLM employees reviewed this analysis for accuracy in their area of expertise.

Name	Title	Resource Represented
John Zancanella	Archeologist	Cultural Resources
JoAnne Armson	NRT	Botany, Special Status Plants
Mike Tietmeyer	RMS	Range, Livestock Grazing
Heidi Mottl	Recreation Planner	Recreation, Wilderness
Teal Purrington	Planning and Enviro. Coord.	NEPA Compliance
John Zancanella	Assistant Field Manager	CORA
Rick Demmer	Natural Resource Specialist	Wildlife
Jeff Moss	Natural Resource Specialist	Fisheries

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: /S/ Christina M. Welch 7/14/2009
Christina Welch, Field Manager, CORA 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: Vicki Van Sickle, Rangeland Management Specialist, Prineville Field Office, 3050 NE 3rd Street, Prineville, OR 97754, telephone (541) 575-3147.