Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
U.S. Department of the Interior Bureau of Land Management
Grand Junction Field Office, Colorado

West Salt Common Allotment, David Terrell Grazing Permit Renewal

DOI-BLM-CO-N030-2015-0012-DNA

CASEFILE/PROJECT NUMBER: Grazing Permit #0507034

APPLICANT AND ALLOTMENT: David Terrell, West Salt Common Allotment #16603

PLANNING UNIT: Baxter Pass, Colorado

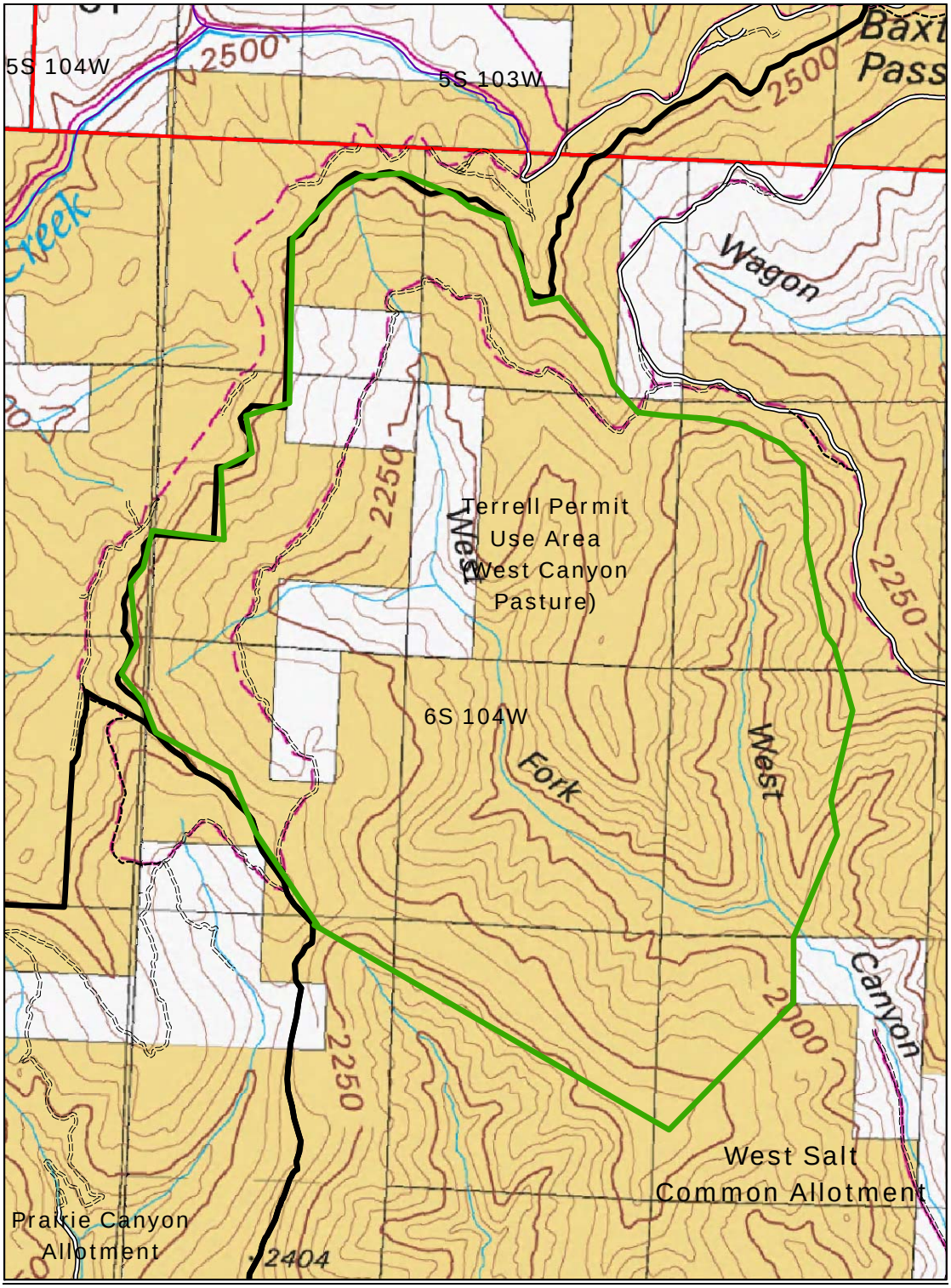
BACKGROUND: The Terrell Permit use area (West Canyon Pasture) is approximately 3,808 acres located in the West Fork of West Canyon in the West Salt Common Allotment. The area is 20.5 miles northwest of Mack, Colorado and is located west of Baxter Pass Road. Elevation ranges from 5,880 feet to 8,280 feet and annual precipitation averages 18 - 20 inches. Brushy Loam and Mountain Loam are the main ecological sites and the dominant trees and shrubs are Douglas fir, pinyon-juniper, sagebrush, serviceberry, snowberry, and Gambel oak with understories of stipa, poa, June grass, western wheat, salina wildrye, carex, and brome. A Land Health Assessment conducted in 2008 determined the area was meeting Land Health Standards. There are no range study sites located within the pasture but trend monitoring conducted on the West Salt Allotment in 2014 rated upward at two sites south of the pasture (Range Study Site #12F and Range Study Site #9F) and one site northeast of the pasture (Range Study Site #7F) (see Map 3 for locations of the range study sites). These monitoring sites are in the same ecological sites as the West Canyon Pasture and have similar summer-fall cattle use. The West Fork and West Canyon Creeks are ephemeral drainages with flow occurring from snow melt and occasionally from thunderstorms. Six springs have been recorded in the northern portion of the West Canyon Pasture. A field visit on June 15, 2015 determined that at least two of the springs were out of the reach of livestock, and did not supply water sufficient to pool and become accessible to livestock or wildlife. The remaining springs that were visited appeared to be producing little water even with a wetter than normal late spring. A 0.5 acre pond was discovered by the ID team during the June 2015 field visit that has developed from slumping soils during the past 10 to 20 years. The pond was determined to be in Proper Functioning Condition. Follow up site visits will be necessary to further map the existing springs. The geology in the pasture area is not highly saline. Any low saline sediment produced from the permit area would likely settle out long before reaching the reach of West Salt Creek.

David Terrell is also the permittee for the Prairie Canyon Allotment that borders the west side of the pasture. Since he uses the pasture separately from the main permit for the West Salt Common Allotment and is already the permittee for the Prairie Canyon Allotment, the boundary between the two allotments would be changed to incorporate the pasture into the Prairie Canyon Allotment. Season of use and animal unit months (AUMs) allocated to the pasture would remain

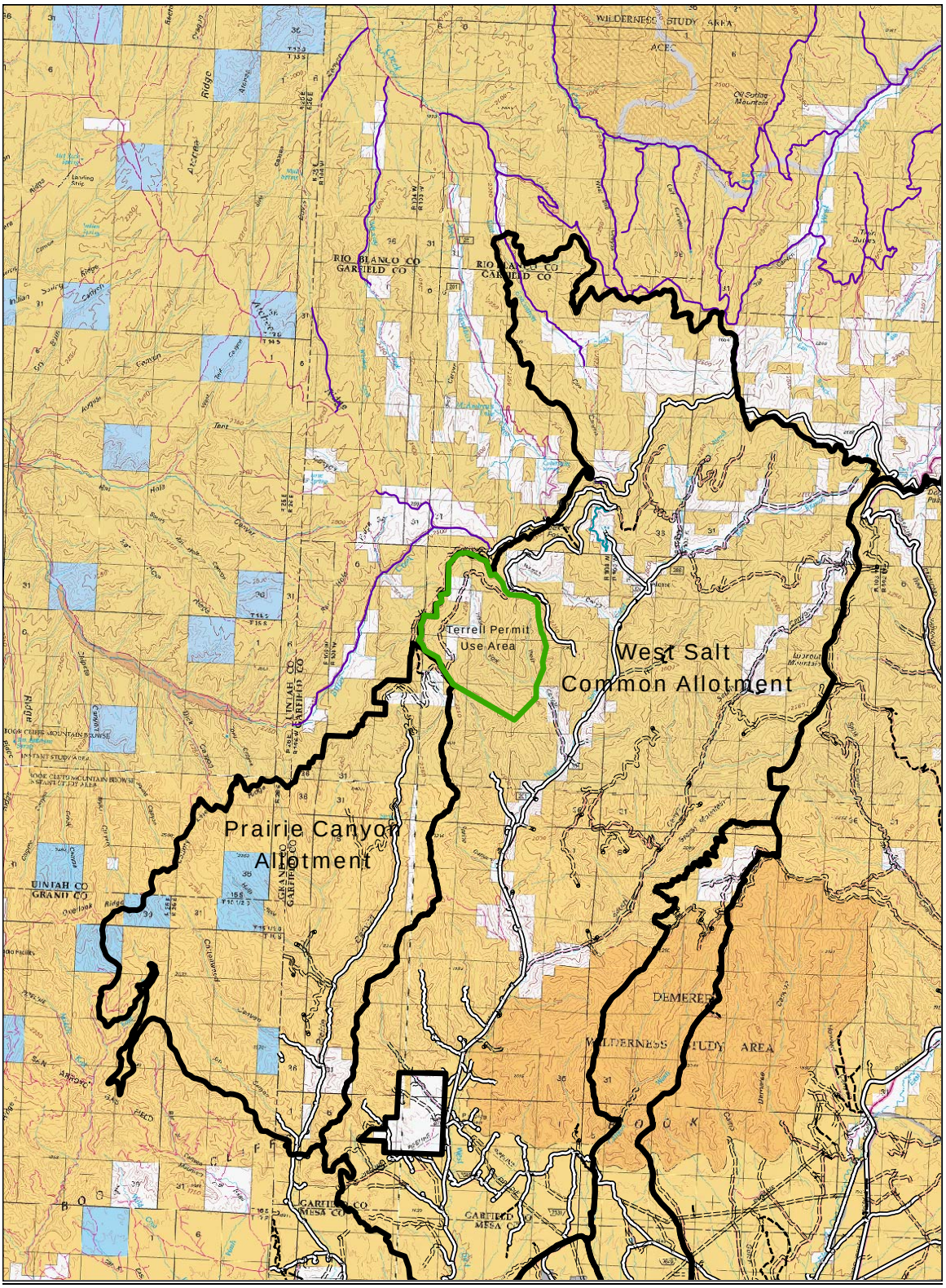
the same as the current permit. The Prairie Canyon Allotment grazing permit is due for renewal February 28, 2018 at which time the two permits may be incorporated into one.

ISSUES AND CONCERNS: No issues or concerns have been brought forward in regards to the Terrell grazing permit (West Canyon Pasture) within the West Salt Allotment. The West Salt Common Allotment is ranked in the Improve "I" category to improve existing resource conditions involving management for livestock grazing, oil and gas, archeology, wildlife habitat, and the McInnis National Conservation Area located in the southern portion of the allotment that does not include the Terrell Permit use area.

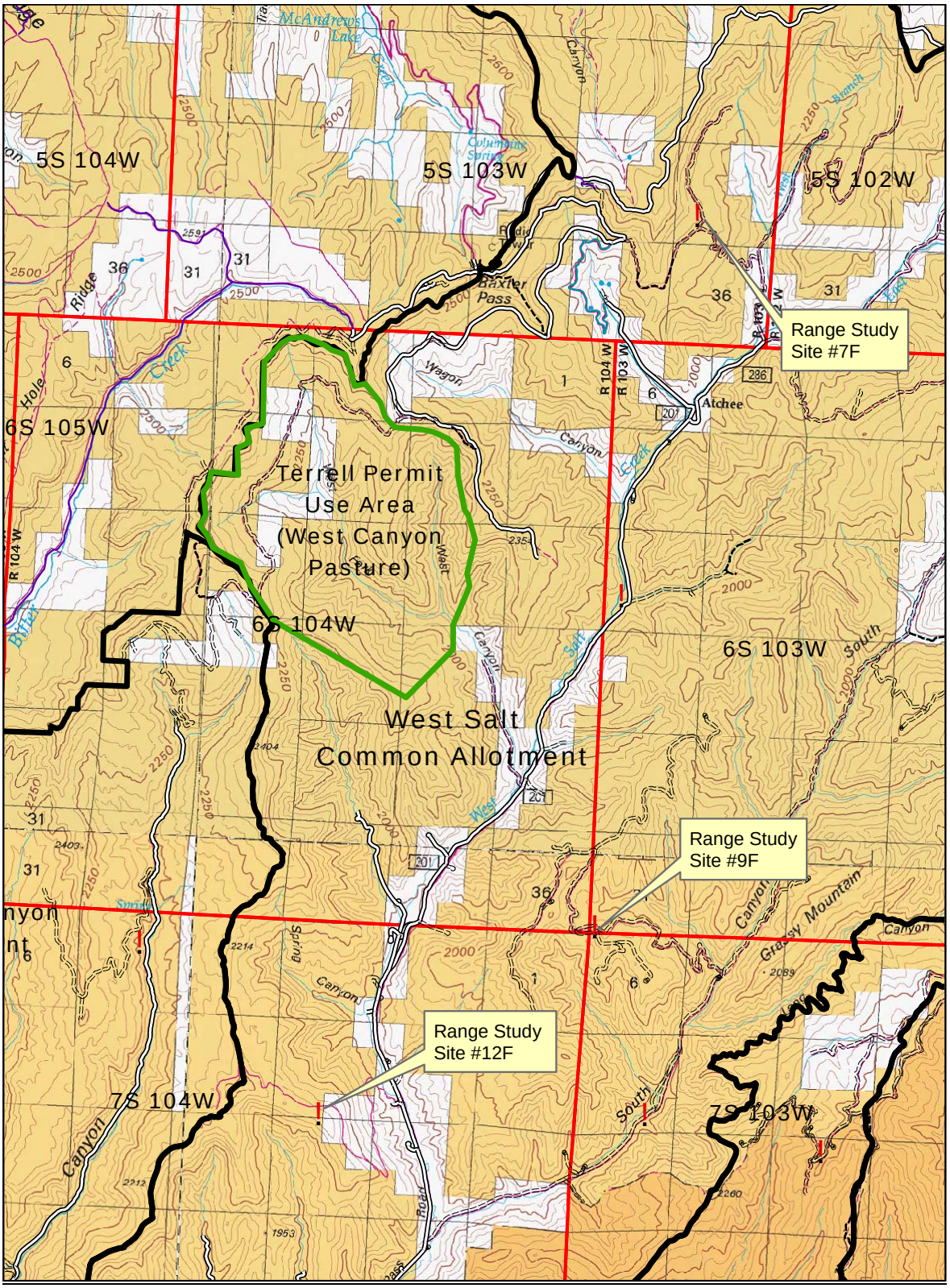
MAP 1, TERRELL GRAZING PERMIT USE AREA, WEST CANYON PASTURE



MAP 2, TERRELL PERMIT USE AREA (WEST CANYON PASTURE), WEST SALT COMMON AND PRAIRIE CANYON ALLOTMENTS



MAP 3, RANGE STUDY SITE LOCATIONS



PROPOSED ACTION:
Under the Proposed Action adjustment between the West Salt Common Allotment and Prairie Canyon Allotment boundary would occur based on current use. The West Canyon Pasture contains 3,808 acres that would be moved from the West Salt Common Allotment to the Prairie Canyon Allotment. Livestock numbers and the grazing season in the pasture would remain the same as the current permit.

The Proposed Action would allow for continuation of livestock grazing on public land by processing the Grazing Permit Renewal for David Terrell #0507034. The proposed grazing schedule would be as follows and upon approval the West Canyon Pasture would be moved to the Prairie Canyon Allotment, otherwise it will remain in the West Salt Common Allotment.

Use Area/Allot	Livestock Number	Livestock Kind	Grazing Period		%PL	Type Use	AUMs
			ON	OFF			
West Canyon Pasture/West Salt Allot or Prairie Canyon Allotment	52	Cattle	07/01	11/01	75	Active	159

%PL is the percentage of BLM lands used for grazing within the allotment.
AUM – The amount of forage necessary for the sustenance of one cow or its equivalent for a period of one month.

TERMS AND CONDITIONS:

Terms and Conditions of the Grazing Permit would be the following if the permit is approved:

1. Use supervision checks by BLM staff will be conducted to assure grazing compliance. The Grand Junction Field Office will use utilization checks, collect trend data, and evaluate allotments whenever necessary. Evaluation of monitoring will be used to make appropriate changes to grazing management in order to protect land health.

2. This permit is subject to change if results from a land health or riparian proper functioning condition assessment conclude that the Standards for Rangeland Health or Riparian Health are not being met and livestock grazing is determined to be the cause.

3. Salting and mineral blocks will be placed at least one quarter (1/4) mile or further from water sources and riparian areas. Less than one quarter mile may be allowed if terrain does not allow for one quarter mile distance and approved by the BLM Authorized Officer (AO).

4. All new range improvement projects will be in accordance with BLM standards.
    - Example - wildlife escape ramps are required in water troughs under BLM standards.

5. Water source areas will be monitored by the permittee and BLM for infestation of noxious weeds. The permittee and BLM will coordinate to treat and eradicate any weed infestations should they occur.

6. Upon approval by the AO, the permittee will have the option to apply for more cattle over a shorter time period as long as AUMs are not exceeded in a grazing season and use is within the season of use.

7. Construction of new range improvements (RI) on BLM administered lands is prohibited without approval from the authorized officer.

8. Maintenance of all structural rangeland improvements (RI) and other projects are the responsibility of the permittee to which they have been assigned. Maintenance would be in accordance with cooperative agreements and/or range improvement permits (43 CFR §4120.3-1). Failure to maintain assigned projects in a satisfactory/functional condition may result in withholding authorization to graze livestock until maintenance is completed.

    a. The BLM authorized officer shall be contacted 60 days prior to any range project maintenance activity involving soil surface disturbance. An example includes but not limited to cleaning of ponds with heavy equipment, which would involve soil surface disturbance. All heavy equipment will be washed and free of debris and weed seeds before entering BLM lands.

9. Permittees or lessees shall provide reasonable access across private and leased lands to the Bureau of Land Management for the orderly management and protection of the public lands related to grazing administration.

10. Grazing will be deferred on new vegetation treatments and rehabilitated burned areas to allow at least two growing seasons of rest unless otherwise authorized. Coordination and cooperation will occur with the permittee prior to any treatment.

11. It is the responsibility of the Permittee to inform all persons associated with work on federal lands subject to the permit that they would be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts.

12. Surface disturbing range improvements associated with the allotment (e.g., fences, ponds) are subject to compliance requirements under Section 106 and will undergo standard cultural resources inventory and evaluation procedures.

13. If newly discovered cultural resources are identified during project implementation, work in that area should stop and the BLM Authorized Officer should be notified immediately (36 CFR §800.13).

14. Notify the Authorized Officer (AO) by telephone and with written confirmation, immediately upon discovery of human remains, funerary items, sacred objects, or

objects of cultural patrimony. Activities would stop in the immediate area of the find, and the discovery would be protected for 30 days or until notified to proceed in writing by the AO.

15. During dry and drought conditions adjustments will be made that involve reduction of AUMs or non-use as stated under Code of Federal Regulations §4110.3-2, "Decreasing permitted use (a) Permitted use may be suspended in whole or in part on a temporary basis due to drought, fire, ..." and §4110.3-3 "Implementing reductions in permitted use (a) After consultation, cooperation, and coordination with the affected permittee or lessee, … reductions of permitted use shall be implemented through a documented agreement or by decision of the authorized officer. (b) When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, … the authorized officer shall close allotments or portions of allotments to grazing by any kind of livestock or modify authorized grazing use notwithstanding the provisions of paragraph (a) of this section."

16. An Actual Use Statement will be sent to the BLM within 15 days following grazing use.

Additional Standard Terms and Conditions can be found on the signature page of the Grazing Permit.

Terrell Permit Use Area Summary:

Federal Acres	Private Acres	Animal Unit Months (AUMs)		
		Active	Suspended	Total
3328	480	159	0	159

LAND USE PLAN (LUP) CONFORMANCE REVIEW: The proposed action is subject to the following plan:

PLAN CONFORMANCE REVIEW: The Proposed Action is subject to and has been reviewed for conformance with (43 CFR §1610.5, BLM 1617.3) the following plan:

Name of Plan: Grand Junction Resource Management Plan

Date Approved: January 1987

Decision Number/Page: 2-17

Decision Language: Manage livestock grazing as described in the Grand Junction Grazing Management Environmental Statement using the new priorities and general management categories established through the allotment categorization process and this plan.

REVIEW OF EXISTING NEPA DOCUMENTS:

List by name and date all existing NEPA documents that cover the Proposed Action.

Name of Document: CO-076-9-38 EA; Dave Terrell, West Salt Common Permit Renewal Extension

Date Approved: July 12, 1999

Name of Document: CO-130-2005-062-EA; West Salt (COMMON) (16603) Grazing Permit Renewal

Date Approved: August 10, 2005

NEPA ADEQUACY CRITERIA:

1. *Is the Proposed Action substantially the same action and at the site specifically analyzed in an existing document?*

   The Permit to be issued has the same grazing schedule and at the same specific sites as analyzed in the existing document. The proposed terms and conditions have been slightly altered to better describe protection of various resource needs.

2. *Was a reasonable range of alternatives to the Proposed Action analyzed in the existing NEPA document(s), and does that range and analysis appropriately consider current environmental concerns, interests, and resource values?*
   Other than the proposed action alternative, there was only the No Action alternative which was eliminated from detailed analysis because it does not meet the purpose and need for the action, which is to allow grazing on public lands in a responsible manner that is compatible with Standards for Public Land Health. Current environmental concerns, interests, and resource values are the same as those analyzed in the 2005 NEPA document.

3. *Does the information or circumstances upon which the existing NEPA document(s) are based remain valid and connected to the Proposed Action?*

   The information is valid and connected to the proposed action. This allotment was reviewed in 2005 prior to permit renewal.

4. *Is the analysis still valid in light of new studies or resource assessment information?*

Hydrology: The most recent monitoring information combined with the assessment of resource conditions found that the previous analysis in 2005 is still valid. Since the 2005 EA, the state of Colorado has added Salt Creek to the 303(d) List of impaired streams for sediment. The sediment levels impair at least one of the classified uses of the stream (aquatic warm water life/2, recreation 1a or 1b, and agriculture). The data used for the listing was collected in the lower reaches of the creek below irrigated lands. This permit is located in the upper portions of the Salt Creek watershed, however, and is upstream of more erosive saline soils. Rangeland monitoring does not indicate that this pasture is contributing to the water quality impairment, as the pasture is meeting Land Health Standards for upland soils and vegetation.

The 2005 EA indicates that PFC would be done in association with the Land Health Assessment. An initial site visit of the springs was done in June 2015 by the hydrologist and riparian lead, and a follow up visit will be scheduled to update the mapping of the springs and associated water developments. PFC was completed on one pond. While there are 6 recorded springs in the West Canyon pasture, the majority of the springs are on extremely steep slopes with very limited associated wetlands, and no protection is required.

Cultural Resources: Range permit renewals are undertakings under Section 106 of the National Historic Preservation Act. For the purposes of Section 106 review, a cultural resource assessment of allotments in the GJFO began in 1999 and was completed in 2009, reviewing existing site and survey information to compare against the results of other known literature reviews conducted for grazing evaluation. A Class I assessment synthesizing ten years of permit renewal evaluations of 240 grazing allotments managed by GJFO was completed for the BLM by Grand River Institute (GJFO-CRIR 1109-09; Conner and Darnell 2009), which updated and upgraded the previous 5 year grazing permit renewal synthesis (McDonald 2003).

The West Salt Common allotment is located in Physiographic Units C and D. Physiographic Unit C is north of the Colorado River and south of the Book Cliffs from Mt. Garfield to the Fruita Desert. The physiographic unit has been modified from the 2003 synthesis, continuing the unit west to the state line instead of the arbitrary division at Hwy 139. At the time of the 2009 synthesis, 13 allotments had been previously evaluated in unit C, approximately 38,000 acres or 20.1 percent of the allotments have had cultural resource inventory completed on BLM lands. Based on previous inventories the average site/acre ratio in unit C is 1:142 (Conner and Darnell 2009: 50).

Physiographic Unit D is north of the Book Cliffs from the state line east to a more clearly defined eastern watershed boundary. The physiographic unit has been modified from the 2003 synthesis, more clearly defining the boundary between the East Salt Creek drainage to the south and Roan Creek Drainage to the north in Unit G, and the Book Cliff canyon draining to the south and the “backside” of the Book Cliffs that drain to the east in Unit F. At the time of the 2009 synthesis, 18 allotments have been previously evaluated in unit D, approximately 38,650 acres or 17.6 percent of the allotments have had cultural

resource inventory completed on BLM lands. Based on previous inventories the average site/acre ratio in unit D is 1:495 (Conner and Darnell 2009:50).

In the 2005 permit renewal EA, 200 acres of additional inventory was recommended for the West Salt Common allotment. Since 2005, these acres have been surveyed by BLM GJFO Cultural Resource Inventory Numbers 1011-05, 1013-09, 1011-07, and 711-01. Within the West Canyon Pasture, specifically, no cultural resource inventories have been conducted and no cultural resources have been recorded. For purposes of Section 106 compliance, at least 20 acres of cultural resource inventory is recommended within the West Canyon Pasture, focused on a cluster of four springs in the northwest quarter of T. 6 S. R. 104 W., Section 3 (see livestock concentration overlay maps located in the cultural resource files at the GJFO BLM).

5. *Does the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the Proposed Action?*

   The methodology and analytical approach used in the 2005 document continues to be appropriate for development of the proposed action.

6. *Are the direct and indirect impacts of the Proposed Action unchanged from those identified in the existing NEPA document?*

   Though terms and conditions have been added to clarify the protection of various resource needs analyzed in the 2005 EA, direct and indirect impacts are unchanged from those identified in the existing NEPA document.

7. *Are the cumulative impacts that would result from implementation of the Proposed Action unchanged from those analyzed in the existing NEPA document(s)?*

   The cumulative impacts would remain the same as those analyzed in the 2005 EA.

8. *Is the public involvement and interagency review associated with the existing NEPA document(s) adequate for the Proposed Action?*

   Public involvement was conducted along with interagency review. This review was adequate for the Proposed Action.

INTERDISCIPLINARY REVIEW: Identify those team members conducting or participating in the NEPA analysis and preparation of this work sheet (by name and title).

Name	Title	Review Completed
Heidi Plank	Wildlife Biologist/Special Status Animal Species	3/6/15
Anna Lincoln	Ecologist/Special Status Species, Riparian	2/27/15
Kevin Hyatt	Hydrologist	7/6/15

Natalie Clark	Archaeologist	3/4/15
Sparky Taber	Weed Management Specialist	2/20/15
Andy Windsor	Outdoor Recreation Planner	3/4/15
Christina Stark	Planning & Environmental Coordinator	2/19/15

Table 1 – Potentially Impacted Resources

Resources	Not Present On Location	No Impact	Potentially Impacted	Effects sufficiently analyzed/ mitigated in previous NEPA document or proposed action?	Comments included in DNA text	BLM Evaluator Initial & Date
PHYSICAL RESOURCES						
Air and Climate	☐	☒	☐	☐	☐	PLB 2/23/2015
Geological	☐	☒	☐	☐	☐	DSG 3/4/15
Mineral Resources	☐	☒	☐	☐	☐	DSG 3/4/15
Soils	☐	☐	☐	☒	☐	PLB 2/27/2015
Water (surface & subsurface, floodplains)	☐	☐	☐	☒	☐	PLB 2/27/2015
Invasive, Non-native Species	☐	☐	☒	☒	☐	MT 2/20/15
Sensitive Species	☒	☐	☐	☐	☐	ARL 2/27/15
Threatened or Endangered Species	☒	☐	☐	☐	☐	ARL 2/27/15
Vegetation, Forestry	☐	☐	☐	☒	☐	SC 2/25/15
Wetlands/Riparian Zones	☐	☒	☐	☐	☐	ARL 2/27/15
Wildlife	☐	☐	☒	☒	☐	HLP 3/6/2015
Cultural or Historical	☐	☐	☒	☐	☒	NFC 3/4/15
Paleontological	☐	☒	☐	☐	☐	DSG 3/4/15
Tribal & American Indian Religious Concerns	☐	☒	☐	☐	☐	NFC 3/4/15
Visual Resources	☐	☒	☐	☒	☐	AW 3/4/15
Social	☐	☒	☐	☐	☐	CS 2/19/15
Economic	☐	☐	☒	☒	☐	CS 2/19/15
Environmental Justice	☐	☒	☐	☐	☐	CS 2/19/15
Transportation and Access	☐	☒	☐	☒	☐	AW 3/4/15
Wastes, Hazardous or Solid	☐	☐	☐	☒	☐	AK 3/3/15
Prime or Unique Farmlands	☒	☐	☐	☐	☐	PLB 2/27/15
Recreation	☐	☒	☐	☒	☐	AW 3/4/15
Special Designations (ACEC, SMAs etc.)	☒	☐	☐	☐	☐	SC 8/12/15
Wild and Scenic Rivers	☒	☐	☐	☐	☐	AW 3/4/15
Wilderness	☒	☐	☐	☐	☐	AW 3/4/15
Range Management	☐	☐	☐	☒	☐	SC 2/25/15
Wild Horse and Burros	☒	☐	☐	☐	☐	SC 2/25/15
Land Tenure, ROW, Other Uses	☒	☐	☐	☐	☐	RBL 3/16/15

NAME OF PREPARER: Scott Clarke - RMS

NAME OF ENVIRONMENTAL COORDINATOR: Christina Stark

DATE: 8/12/15

CONCLUSION

DOI-BLM-CO-N030-2015-0010-DNA

Grazing Permit Renewal for David Terrell #0507034

✓ Based on the review documented above, I conclude that this proposal conforms to the land use plan and that the NEPA documentation previously prepared fully covers the Proposed Action and constitutes BLM's compliance with the requirements of NEPA.

____ Based on the review documented above, I conclude that either the proposal does not conform with the land use plan, or that additional NEPA analysis is needed.

Note: The signed Conclusion on this document 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.

REVIEW OF EXISTING NEPA DOCUMENTS:

Name of Document: CO-076-9-38 EA; Dave Terrell, West Salt Common Permit Renewal Extension

Date Approved: July 12, 1999

Name of Document: CO-130-2005-062-EA; West Salt (COMMON) (16603) Grazing Permit Renewal

Date Approved: August 10, 2005

SIGNATURE OF RESPONSIBLE OFFICIAL: Katie A Stevens
Grand Junction, Field Manager

DATE SIGNED: 8-14-2015