



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Colorado River Valley Field Office
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Silt, Colorado 81652
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DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: DOI-BLM-CO-N040-2012-0052-DNA

CASEFILE/PROJECT NUMBER (optional): N/A

PROJECT NAME: Grazing Permit Transfer on the Pretti-Roberts Allotment

PLANNING AREA: Silt, CO

LEGAL DESCRIPTION: T5S R91W sec 19-21, 28-30, 32-33. Refer to attached allotment map.

APPLICANT: Grazing Permittee

ISSUES AND CONCERNS (optional):

DESCRIPTION OF PROPOSED ACTION:

Transfer Grazing Preference: The Proposed Action is to transfer grazing preference from the current grazing permittee to a new grazing permittee. The existing base property has been leased to the applicant for the grazing permit. The transfer action is categorically excluded in the National Environmental Policy Act (NEPA) and no extraordinary circumstances apply and therefore no further analysis is required (516 DM 11.9 D1).

Issue Grazing Permit: A new grazing permit would be issued to the applicant. The number/kind of livestock, period of use, percent public land and Animal Unit Months (AUMs) will remain the same as the previous permit. The permit would be issued for the term of the base property lease (3 years, expiring on June 16, 2015). The proposed action is in accordance with 43 CFR 4130.2. Scheduled grazing use and grazing preference for the permit are summarized below.

Table 1 Mandatory Terms and Conditions Scheduled Grazing Use:

Allotment Name & No.	Livestock No. & Kind	Period of use	Percent Public Land	AUMs
Pretti-Roberts #18029	150 Cattle	5/16 to 6/15	100	153

Grazing Preference AUMS:

Allotment Name & No.	Active	Suspended	Total
Pretti-Roberts #18029	150	20	170

The following other terms and conditions will be included on the permit:

Adaptive management will be employed on this allotment. The BLM will allow up to 14 days of flexibility in the start and end dates on this permit depending on range readiness. The range will be considered ready when there is a minimum of 4 inches of new growth on grasses. AUMs may not exceed Active Preference. Use different than that shown in the Mandatory Terms and Conditions of the permit must be applied for in advance.

Average utilization levels by livestock should not exceed 50% by weight on key grass species, and 40% of the key browse species current year's growth. Once these levels are reached, livestock should be moved to another portion of the allotment, or removed from the allotment entirely for the remainder of the growing season. Application of this term may be flexible to recognize livestock management that includes sufficient opportunity for regrowth, spring growth prior to grazing, or growing season deferment.

Maintenance of range improvements is required and shall be in accordance with all approved cooperative agreements and range improvement permits. Maintenance shall be completed prior to turnout. Maintenance activities shall be restricted to the footprint (previously disturbed area) of the project as it existed when it was initially constructed. The Bureau of Land Management shall be given 48 hours advance notice of any maintenance work that will involve heavy equipment. Disturbed areas will be reseeded with a certified weed-free seed mixture of native species adapted to the site.

The permittee and all persons associated with grazing operations must be informed that any person who injures, destroys, excavates, appropriates or removes any historic or prehistoric ruin, artifact, object of antiquity, Native American remains, Native American cultural item, or archaeological resources on public lands is subject to arrest and penalty of law. If in connection with allotment operations under this authorization any of the above resources are encountered, the proponent shall immediately suspend all activities in the immediate vicinity of the discovery that might further disturb such materials and notify the BLM authorized officer of the findings. The discovery must be protected until further notified in writing to proceed by the authorized officer.

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

Name of Plan: Glenwood Springs Resource Management Plan

Date Approved: Jan. 1984, revised 1988, amended in November 1991 - Oil and Gas Leasing and Development - Final Supplemental Environmental Impact Statement; amended Nov. 1996 - Colorado Standards and Guidelines; amended in August 1997 - Castle Peak Travel Management Plan; amended in March 1999 - Oil and Gas Leasing & Development

Final Supplemental Environmental Impact Statement; amended in November 1999 - Red Hill Plan Amendment; and amended in September 2002 – Fire Management Plan for Wildland Fire Management and Prescriptive Vegetation Treatment Guidance; amended in September 2009.

- The Proposed Action is in conformance with the LUP because it is specifically provided for in the following LUP decision(s):

Decision Language: The action is in conformance with Administrative Actions (pg. 5) and Livestock Grazing Management (pg. 20). Administrative actions states, “Various types of actions will require special attention beyond the scope of this plan. Administrative actions are the day-to-day transactions required to serve the public and to provide optimal use of the resources. These actions are in conformance with the plan”. The livestock grazing management objective as amended states, “To provide 56,885 animal unit months of livestock forage commensurate with meeting public land health standards.”

- 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):

REVIEW OF EXISTING NEPA DOCUMENTS:

List by name and date all existing National Environmental Policy Act (NEPA) documents that cover the proposed action.

Name of Document(s): DOI-BLM-CO-N040-2011-0053-EA, Grazing Permit Renewal on Pretti-Roberts allotment

Date Approved: March 24, 2011.

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

Name of Document: Land Health Assessment Evaluation and Determination for the Pretti-Roberts Allotment.

Date Approved: September 22, 2008

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?

Documentation of answer and explanation: Yes. The current Proposed Action was analyzed in the above mentioned Environmental Assessment. The proposed action is the same action analyzed in the existing document.

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?

Documentation of answer and explanation: Yes. The existing NEPA document analyzed the proposed action. No unresolved conflicts concerning alternative uses of available resources were identified through public scoping; therefore, other alternatives were not analyzed. The same applies to the current proposed action given current concerns, interests, and resource values.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and 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?

Documentation of answer and explanation: Yes. In 2008 the Land Health Assessment and Determination was completed. The allotment was not meeting Standard 3 for plant and animal communities. Cheatgrass is the dominant understory vegetation and sagebrush is old, decadent, and denser than expected. Livestock grazing was not determined to be a substantial causal factor. Utilization monitoring from 2009 and 2010 show little to no use.

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?

Documentation of answer and explanation: Yes. The current Proposed Action is the same as what was analyzed in the existing NEPA document. The direct, indirect and cumulative impacts would be the same as those identified in the existing NEPA document. The environmental assessment thoroughly reviewed the many specific environmental impacts including vegetation, water resources, air quality, wildlife, cultural, threatened and endangered species, wilderness, and riparian resources.

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

Documentation of answer and explanation: Yes. For the existing NEPA document, notices of public scoping were issued through Colorado BLM's internet web page seeking public comments on grazing permit/lease renewals. No comments specific to the proposed action were received.

INTERDISCIPLINARY REVIEW:

<i>Name</i>	<i>Title</i>	<i>Responsibility</i>
Isaac Pittman	Rangeland Management Specialist	NEPA Lead, Range Management
Carla DeYoung	Ecologist	ACEC, Vegetation, T/E/S Plants, Land Health Stds
Pauline Adams	Hydrologist	Air Quality, Water Quality, Soils, Riparian and Wetlands
Greg Wolfgang	Outdoor Recreation Planner	VRM, Recreation, Travel Management
Kimberly Miller	Outdoor Recreation Planner	Wild and Scenic Rivers, Wilderness, Recreation
Erin Leifeld	Archaeologist	Cultural Resources and Native American Concerns
Brian Hopkins /Sylvia Ringer	Wildlife Biologist	Migratory Birds, Terrestrial Wildlife, Aquatic Wildlife, T/E/S Terrestrial & Aquatic Wildlife
Monte Senor	Rangeland Management Specialist	Invasive, Non-native Species

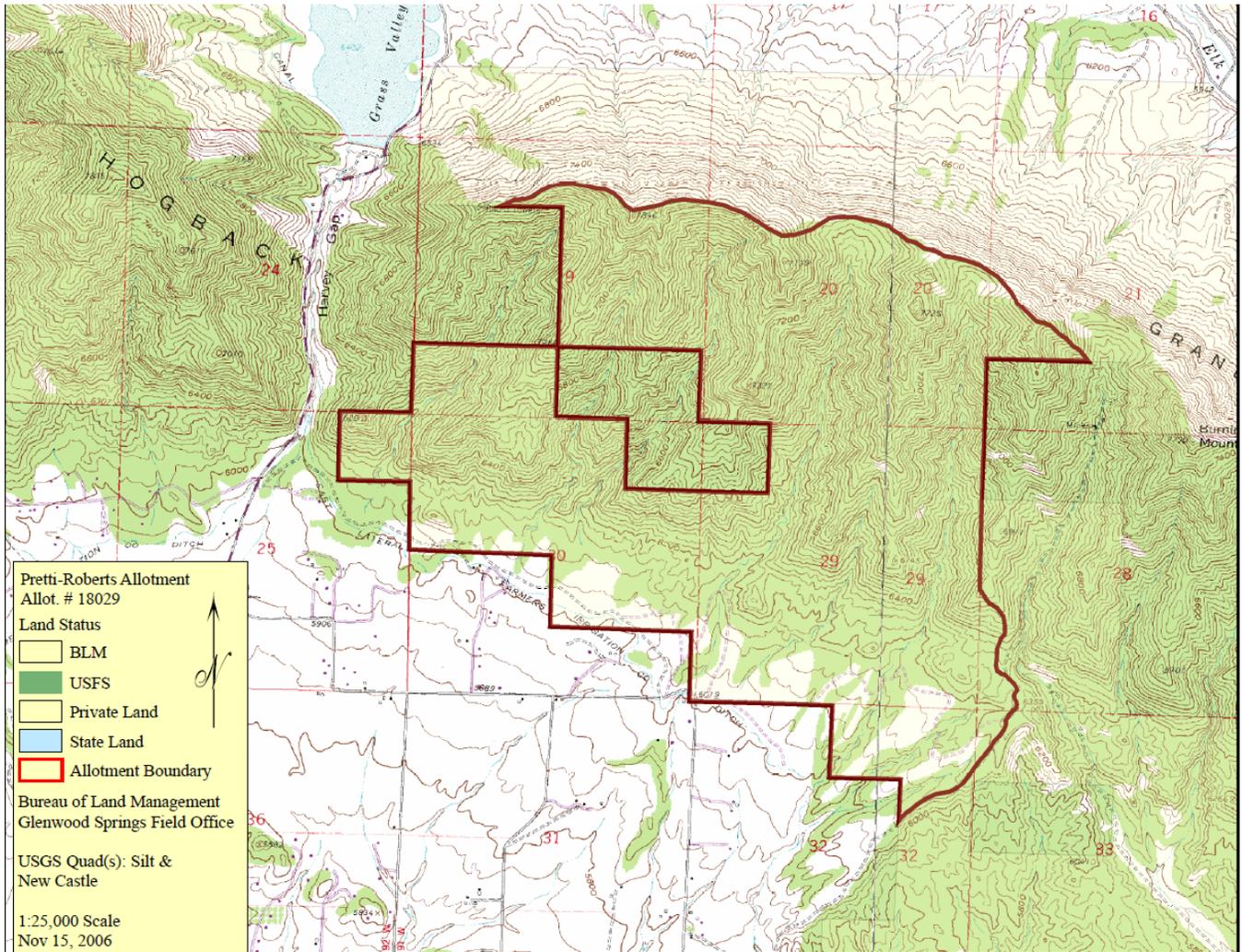
MITIGATION:

The "Other Terms and Conditions" identified in the proposed action are substantially the same mitigation measures that were approved in the existing NEPA document.

NAME OF PREPARER: Isaac Pittman

DATE: April 9, 2012

Appendix – Allotment Map

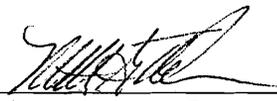


CONCLUSION

DOI-BLM-CO-N040-2012-0052-DNA

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 the NEPA.

SIGNATURE OF RESPONSIBLE OFFICIAL:


Supervisory Natural Resource Specialist

DATE SIGNED:

4-9-2012

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.