

**WORKSHEET
DOCUMENTATION OF LAND USE PLAN CONFORMANCE
AND DETERMINATION OF NEPA ADEQUACY (DNA)**

U.S. Department of the Interior
Utah Bureau of Land Management (BLM)

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

BLM Office: Cedar City Field Office, DOI-BLM-UT-9100-2009-0011-DNA

Lease/Serial/Case File No: UTU-87286

Proposed Action Title/Type: July 14, 2009 Geothermal Resources Competitive Lease Sale

Location of Proposed Action: The one 228.04 acre parcel nominated is located in Iron County, Utah. *Appendix A* is a map of the parcel. *Appendix B* contains a legal description for the parcel.

Description of the Proposed Action: Nomination to lease for geothermal development for the lands encompassed by the one parcel was received by the BLM Utah State Office on April 27, 2009. The surface and mineral estate for the requested area is owned by the federal government and administered by the BLM, Cedar City Field Office.

The proposed action is consistent with federal environmental laws and regulations, Executive Orders, and Department of Interior and the BLM policies and is in compliance, to the maximum extent possible, with state laws and local and county ordinances. It is the policy of the BLM as derived from various laws, including the Geothermal Steam Act of 1970, as amended, and FLPMA, to make geothermal resources available for leasing and to encourage development of geothermal resources to meet national, regional, and local needs. As such, the proposed action would meet requirements of the Geothermal Steam Act of 1970, as well as, the Energy Policy Act of 2005.

The State of Utah energy policy (Utah Code §63-53b-301) states that “Utah will promote the development to renewable energy resources, including geothermal.” The Governor has developed a 10-point plan for economic development. Within the plan the Governor identified renewable energy as a key component of Utah’s economy. Utah’s Geothermal Resource Conservation Act and Rule 655-1 govern how high temperature geothermal resources are regulated in Utah. Iron County has a Geothermal Power Plant ordinance that allows placement and construction of geothermal power plants with a conditional use permit for areas zoned as Agriculture, Commercial, Light Industrial, Industrial and Industrial/Agriculture.

A lease for geothermal resources gives a lessee the right to drill and produce, subject to the lease terms, any special stipulations, other reasonable conditions, and following approval of Temperature Gradient (TG) holes or a Geothermal Drilling Permit (GDP). While processing the GDP, or when any surface disturbing activity may occur, the BLM reviews the adequacy of the current environmental analysis and reviews compliance with NEPA requirements. The BLM may conduct additional site-specific evaluations at that time and may require additional reasonable mitigation measures in the approval of a GDP, consistent with the lease terms and stipulations. Holders of geothermal leases are required to comply with all applicable federal, state, and local laws and regulations, including obtaining all necessary permits required, should lease development occur.

Geothermal operations following leasing would be managed under the regulations of 43 CFR §3200 and the Geothermal Resource Operational Orders (GROs). The GROs describe standard operating procedures, guidelines, and standards that must be followed for: exploratory operations; drilling, completion, and spacing of geothermal wells; plugging and abandonment of wells; and general environmental protection.

B. Land Use Plan (LUP) Conformance:

LUP Name: Cedar Beaver Garfield Antimony Resource Management Plan (CBGA RMP)

Date Approved: October 1, 1986

The proposed action is in conformance with the CBGA RMP because it is specifically provided for in the following decisions.

The Minerals section, on page 19 of the CBGA RMP, contains the stated objective to “provide maximum leasing opportunity for oil, gas, and geothermal exploration and development by utilizing the least restrictive leasing categories necessary to adequately protect sensitive resources.”

Page 1 of the Record of Decision on the Final CBGA RMP/Environmental Impact Statement (FRMP/FEIS) states, “The decision is to adopt and implement the management prescriptions presented in the FRMP/FEIS under the Planning Alternative.” On page M-4.14, the Planning Alternative of the FRMP/FEIS classifies the nominated parcel area as Open with Standard Stipulations (Category 1) for oil and gas leasing. Further, page 1 of the Record of Decision on the FRMP/FEIS states that “these [oil and gas] leasing categories will also be extended to geothermal leasing which has not been under the leasing category system.”

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action:

NEPA documents which cover these parcels include the CBGA RMP (approved October 1, 1986), Environmental Assessment UT-010-08-051 (Geothermal Leasing in the Fishlake National Forest, Cedar City and Fillmore BLM Field Offices, approved December 12, 2008), and the Resource Management Plan Amendments and Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States (approved December 17, 2008).

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?

CBGA RMP:

The new proposed action is a feature of this NEPA document, within the same analysis area. The new proposed action is consistent with the geothermal leasing objective (see above) stated within this NEPA document.

Environmental Assessment UT-010-08-051, Geothermal Leasing in the Fishlake National Forest, Cedar City and Fillmore BLM Field Offices:

The new proposed action is essentially similar to the Proposed Action alternative analyzed in this NEPA document. The new proposed action involves leasing a parcel which is substantially similar to, and located approximately 1 mile west of, parcel UT-GEO-004 (UTU086738) analyzed in this NEPA document (see Appendix A, page 72, for a legal description of the 480.00 acres parcel in Iron County).

The Resource Management Plan Amendments and Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States (RMPA/PEIS):

The new proposed action is a feature of this NEPA document, within the same analysis area. As stated on page 2-1 (and Appendix A, Table A-1, page A-6) of the Record of Decision, this NEPA document amends 114 land use plans, including the CBGA RMP to do the following:

- *Identify public lands that are administratively and legally closed or open to leasing, and under what conditions.*

- *Develop a comprehensive list of stipulations, BMPs, and procedures to serve as consistent guidance for future geothermal leasing and development on public and NFS lands.*
- *Provide a reasonably foreseeable development scenario for geothermal development on Federal lands (see Section 1.3.2 of this ROD for a description of the reasonably foreseeable development scenario).*

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?

CBGA RMP:

The range of alternatives analyzed in this NEPA document (the Continuation of Present Management Alternative, the Planning Alternative, the Production Alternative, and the Protection Alternative) is appropriate with respect to the new proposed action. No current environmental concerns, interests, or resource values have been identified which would require additional analysis beyond the analysis provided in this NEPA document.

Environmental Assessment UT-010-08-051, Geothermal Leasing in the Fishlake National Forest, Cedar City and Fillmore BLM Field Offices:

The range of alternatives analyzed in this NEPA document (the Change of Leasing Categories Requiring a Land Use Plan Amendment Alternative, the Leasing with No Surface Occupancy Alternative, the No Action Alternative, the Proposed Action Alternative, and the No Leasing Alternative) is appropriate with respect to the new proposed action. No environmental concerns, interests, or resource values have been identified in relation to the nominated parcel which are substantially dissimilar to parcel UT-GEO-004 (UTU086738) analyzed in this NEPA document, and which would require additional analysis beyond the analysis provided in this NEPA document.

The Resource Management Plan Amendments and Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States:

The range of alternatives analyzed in this NEPA document (the Continuation of Current Management Alternative, the Proposed Action and Amendments Alternative, and the Leasing Lands Near Transmission Lines Alternative) is appropriate with respect to the new proposed action. No current environmental concerns, interests, or resource values have been identified which would require additional analysis beyond the analysis provided in this NEPA document.

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?

CBGA RMP:

No new information or circumstances beyond what was carried forward and presented in EA UT-010-08-051 and the Programmatic Environmental Impact Statement (See Appendix C: ID Team Analysis Record Checklist) have been identified which would render the analysis contained in this NEPA document invalid, or which would substantially change the analysis of the new proposed action.

Environmental Assessment UT-010-08-051, Geothermal Leasing in the Fishlake National Forest, Cedar City and Fillmore BLM Field Offices:

No new information or circumstances (See Appendix C: ID Team Analysis Record Checklist) have been identified which would render the analysis contained in this NEPA document invalid, or which would substantially change the analysis of the new proposed action. No changes in conditions have occurred which would necessitate further analysis.

The Resource Management Plan Amendments and Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States:

No new information or circumstances (See Appendix C: ID Team Analysis Record Checklist) have been identified which would render the analysis contained in this NEPA document invalid, or which would substantially change the analysis of the new proposed action. No changes in conditions have occurred which would necessitate further analysis.

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?

CBGA RMP:

The direct, indirect, and cumulative effects that would result from implementation of the new proposed action are similar (both quantitatively and qualitatively) to those analyzed in this NEPA document. As previously noted, no changes in conditions have occurred which would necessitate further analysis or a change in category or stipulations. Additionally, the methods of geothermal energy production, the land requirements for exploration and development, and the types of potential impacts have not changed substantially since this NEPA document was prepared.

Environmental Assessment UT-010-08-051, Geothermal Leasing in the Fishlake National Forest, Cedar City and Fillmore BLM Field Offices:

The direct, indirect, and cumulative effects that would result from implementation of the new proposed action are similar (both quantitatively and qualitatively) to those analyzed in this NEPA document. As previously noted, no changes in conditions have occurred which would necessitate further analysis or a change in category or stipulations. Additionally, the methods of geothermal energy production, the land requirements for exploration and development, and the types of potential impacts have not changed substantially since this NEPA document was prepared.

The Resource Management Plan Amendments and Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States:

The direct, indirect, and cumulative effects that would result from implementation of the new proposed action are similar (both quantitatively and qualitatively) to those analyzed in this NEPA document. As previously noted, no changes in conditions have occurred which would necessitate further analysis or a change in category or stipulations. Additionally, the methods of geothermal energy production, the land requirements for exploration and development, and the types of potential impacts have not changed substantially since this NEPA document was prepared.

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

CBGA RMP:

The public involvement and interagency review associated with this NEPA document is adequate for the current proposed action.

Environmental Assessment UT-010-08-051, Geothermal Leasing in the Fishlake National Forest, Cedar City and Fillmore BLM Field Offices:

The public involvement and interagency review associated with this NEPA document is adequate for the current proposed action.

The Resource Management Plan Amendments and Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States:

The public involvement and interagency review associated with this NEPA document is adequate for the current proposed action.

E. Persons/Agencies/BLM Staff Consulted: See attached Interdisciplinary Team Analysis Record Checklist in *Appendix C*. Also refer to the aforementioned NEPA documents 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 NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

/s/ Chris Hite
Signature of Project Lead

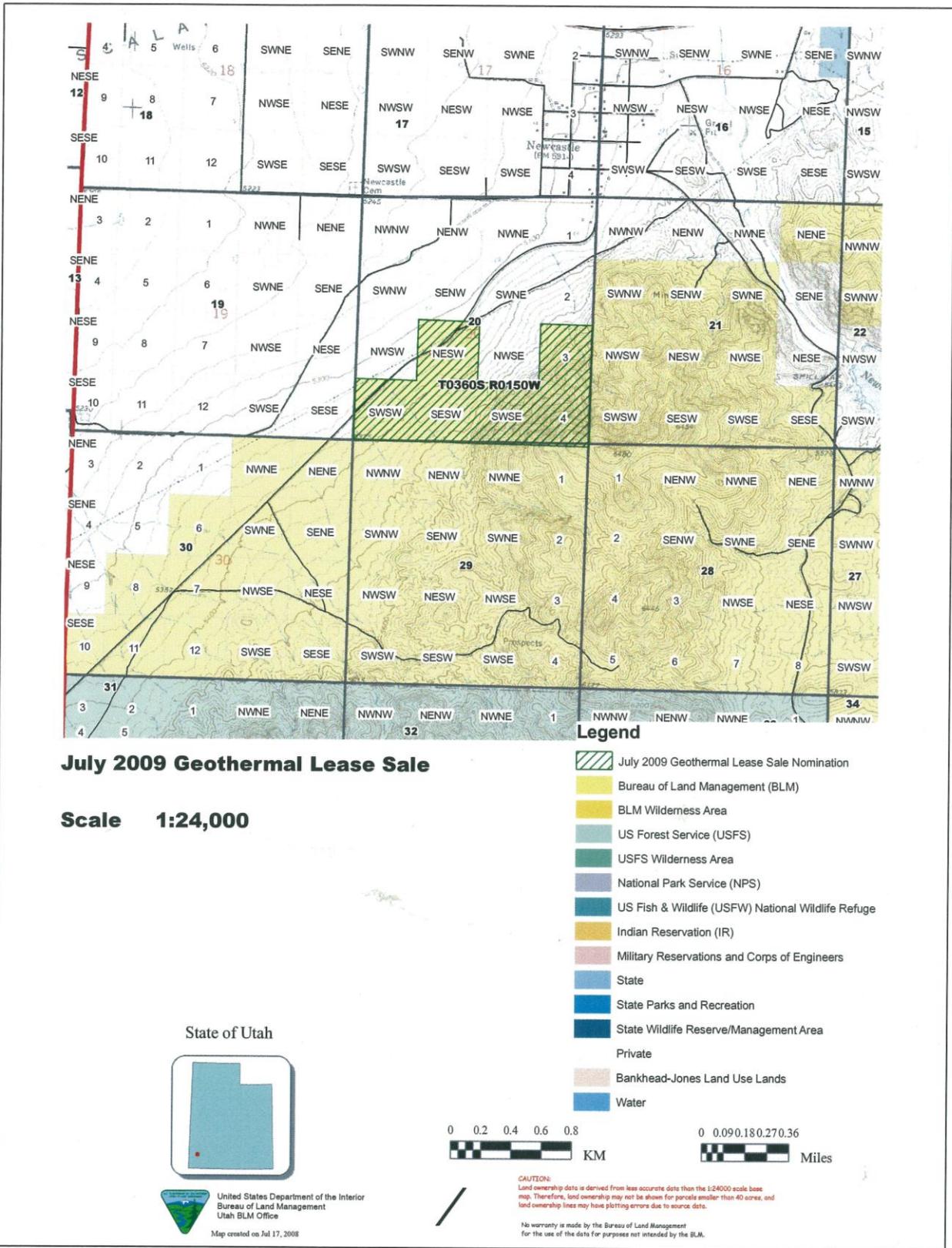
/s/ Gina Genouves
Signature of NEPA Coordinator

/s/ Randy Trujillo
Signature of the Responsible Official:

5/28/2009
Date

Note: The signed Conclusion of 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.

Appendix A: Map of Parcel



Appendix B: Legal Description of Parcel

UTU87286

T. 36 S., R. 15 W., Salt Lake Meridian

Sec. 20, Lots, 3, 4, NESW, S2SW, SWSE.

228.04 Acres

Iron County, Utah

Cedar City Field Office

Appendix C: ID TEAM ANALYSIS RECORD CHECKLIST

INTERDISCIPLINARY TEAM ANALYSIS RECORD CHECKLIST

Project Title: July 2009 Geothermal Lease Sale

NEPA Log Number: DOI-BLM-UT-9100-2009-0011-DNA

File/Serial Number:

Project Leader: Chris Hite

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for significant impact analyzed in detail in the EA; or identified in a DNA as requiring further analysis

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section C of the DNA form.

Determination	Resource	Rationale for Determination*	Signature	Date
CRITICAL ELEMENTS				
NC	Air Quality	Air quality adequately addressed in EA UT-010-08-051.	C. Egerton	05/11/09
NC	Areas of Critical Environmental Concern	There are no ACEC's in the field office management area	S.Roché	5/14/09
NC	Cultural Resources	We do have some existing inventory on this parcel, and there is very minor potential for encountering cultural resources in exploration/development. The Kern River Gas Pipe Line Corridors run thru the west portion, as does the corridor for the Intermountain Power Project (IPP) power line. Also, a ten-acre parcel for a proposed land exchange was inspected by Intersearch of Cedar City on the extreme NW corner of the parcel. No sites were found on or near the proposed lease. Several sites were surfaced by the big lines at the mouth of Pinto Creek, but they went away with distance to the SW (only 1 site was found over the next 3 miles). Further, some 200 + acres were inspected in three different projects in Secs. 29 and 30 just southwest of the tract. This covered country much more favorable-looking for sites than similarly located country (ecotone: valley margin/first treed slopes) of the project area. With no significant conflicts expected, SHPO compliance will be handled thru the information only track of the Protocol.	G. Dalley	5/29/09
NC	Environmental Justice	Environmental Justice adequately addressed in EA UT-010-08-051. No groups of concern would be affected.	C. Hite	5/27/09
NC	Farmlands (Prime or Unique)	Farmlands adequately addressed in EA UT-010-08-051.	C. Egerton	05/11/09
NC	Floodplains	Floodplains adequately addressed in EA UT-010-08-051.	C. Egerton	05/11/09

Determination	Resource	Rationale for Determination*	Signature	Date
NC	Invasive, Non-native Species	Invasives are adequately addressed in EA UT-010-08-051. Past experience with Kern River Gas Transmission Line, IPP power line and others has demonstrated this area is highly susceptible to invasion by noxious, non-native and other undesirable species when disturbed. A stipulation(s) to prevent the spread of invasive, non-native species will need to be developed prior to any geothermal development, which would include any needs for inventory, minimization of disturbance, pre-treatment, long term control, etc.	C. Egerton	05/11/09
NC	Native American Religious Concerns	The Paiute Indian Tribe of Utah and the appropriate band have reviewed the project and have no objection to the project going forward and request they be informed of any changes or updates to the project. See DNA, Appendix D for consultation record.	R. Tueller	05-29-09
NC	Threatened, Endangered or Candidate Plant Species	There are no TEC plant species within the Field Office.	R. Bonebrake	21 May 2009
NC	Threatened, Endangered or Candidate Animal Species	No impacts as long as the stipulations from the wildlife technical report are applied to this lease parcel.	R. Bonebrake	26 May 2009
NC	Wastes (hazardous or solid)	Solid and hazardous wastes adequately addressed in EA UT-010-08-051. Given the reasonably foreseeable development scenario for nearby UT-GEO-004 (UTU086738) included in EA UT-010-08-051, no solid or hazardous waste impacts could be expected.	C. Hite	5/27/09
NC	Water Quality (drinking/ground)	Water quality is adequately addressed in EA UT-010-08-051. State of the art drilling provisions will help to assure no groundwater contamination.	C. Egerton	05/11/09
NC	Wetlands/Riparian Zones	There are no wetland/riparian areas in this parcel	K. Wright	5.22.2009
NC	Wild and Scenic Rivers	There are no WSR's in the field office management area.	S.Roché	5/14/09
NC	Wilderness	WSA's either not present or adequately covered in the EA.	S.Roché	5/14/09

OTHER RESOURCES / CONCERNS**

NC	Rangeland Health Standards and Guidelines	Rangeland Health Standards and Guidelines are adequately addressed in EA UT-010-08-051.	K. Wright	5/27/09
NC	Livestock Grazing	Livestock grazing is adequately addressed in EA UT-010-08-051.	K. Wright	5.27.2009
NC	Woodland / Forestry	Woodland either not present or adequately addressed in EA UT-010-08-051.	C. Egerton	05/11/09
NC	Vegetation including Special Status Plant Species other than FWS candidate or listed species	SSS Plants: There are no SSS plants on the proposed parcel. Veg: Adequately addressed in EA UT-010-08-051.	R. Bonebrake K. Wright	21 May 2009 5.27.2009
NC	Fish and Wildlife Including Special Status Species other than FWS candidate or listed species eg. Migratory birds.	No impacts as long as the lease notices from the wildlife technical report are applied to this lease parcel.	R. Bonebrake	26 May 2009
NC	Soils	Soils adequately covered in EA UT-010-08-051.	C. Egerton	05/11/09
NC	Recreation	Recreation adequately covered in EA UT-010-08-051.	S.Roché	5/14/09
NC	Visual Resources	VRM adequately covered in EA UT-010-08-051.	S.Roché	5/14/09
NC	Geology / Mineral Resources/Energy Production	There are no existing minerals-related authorizations on this parcel.	C. Hite	5/27/09
NC	Paleontology	The surface geology of this parcel consists primarily of Quaternary Period alluvial plain sedimentary units, bounded by older Tertiary Period volcanics in the southeastern corner of the parcel. No paleontological resources are known to exist on the nominated parcel.	C. Hite	5/27/09
NC	Lands / Access	No impact on existing road as long as valid existing rights.	R. Wilson	5/28/09
NC	Fuels / Fire Management	Several years ago the BLM invested quite a bit of money to treat about half of this parcel by lopping and scattering the trees. The understory has responded well to the treatment. Any surface disturbance would increase the undesirable plant species such as the cholla cactus that occurs on the site. This can be observed on the adjacent private land.	M. Mendenhall	5/11/2009
NC	Socio-economics	Socio-economics adequately covered in EA UT-010-08-051.	C. Hite	5/27/09
NC	Wild Horses and Burros	The parcel is not within a wild horse herd management area (HMA). It is adjacent to the Chloride HMA, but is separated by a paved state highway and several fences. Wild horses do not occur on this parcel.	C. Hunter	5/11/09
NC	Wilderness characteristics	WC adequately covered in EA UT-010-08-051.	S.Roché	5/14/09

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
NEPA / Environmental Coordinator			
Authorized Officer			

Appendix D: Native American Religious Concerns Consultation Record

Project Response Letter/Declaration of Interest

BLM Field Office Cedar City Field Office

Project Name July 2009 Geothermal Lease Sale

BLM EA/CX/AD Number DOI-BLM-UT-CO10-2009-0055-DNA

First Contact _____

Date Sent _____ Date Response is Due _____

Project Lead Christie

The Paiute Indian Tribe of Utah and the appropriate Band have reviewed the project and have no objection to the project going forward. We would like to be informed of any changes or updates to the project.

____ The Paiute Indian Tribe of Utah and the appropriate Band have reviewed the project and have comments and/or concerns which are listed below.

Comments:

[Signature] 5/1/09 PAO/BLM
Name Date Title

Donna Martineau 5/29/09 Cultural Resources
Name Date Title

BLM Contact: Anne Stanworth (435) 865-3032
BLM Cedar City Office FAX Number: (435) 865-3032