

**ATTACHMENT 1:**

**DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND DETERMINATION OF NEPA ADEQUACY  
(DNA)  
AUGUST, 2006 O&G LEASE SALE  
U.S. Department of the Interior  
Utah Bureau of Land Management**

---

This Worksheet is to be completed consistent with the "Guidelines for using the DNA Worksheet," located at the end of the worksheet. The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision. However, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

**A. BLM Office:** Moab Field Office (UT-060)

**Proposed Action Title/Type:** Parcels offered for the August, 2006 Oil & Gas Lease Sale

**Location of Proposed Action:** Various land parcels within Grand and San Juan Counties. Attachment 2 contains a legal description for each parcel to be offered.

**Description of the Proposed Action:** The Bureau of Land Management, Utah State Office, proposes to offer 60 parcels of public land in Grand and San Juan Counties for oil and gas leasing in a competitive lease sale to be held in August, 2006. This DNA addresses those parcels administered by the Moab Field Office. Attachment 2 lists all parcels recommended for leasing and includes special lease stipulations. The leases will be offered as Oil and Gas Category 1, open for leasing with standard stipulations, and Category 2, open for leasing with special stipulations. If any of the parcels are not taken by competitive bidding, then they may be taken by a non-competitive sale for two years after the competitive offer. A lease may be held for 10 years, after which the lease would expire unless oil or gas is produced in paying quantities. A producing lease would be held indefinitely by paying production.

A lessee's right to explore and drill for oil and gas, at some location on Category 1 and 2 leases, is implied by issuance of the lease. A lessee must submit an application for permit to drill (APD) to the BLM for approval including NEPA analysis. A lessee must possess a BLM approved APD prior to drilling. Following BLM's approval of an APD, a lessee may produce oil and gas from the approved well.

**B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans**

	Oil and Gas Environmental Analysis Record	Date Approved: 1976
	Oil and Gas Leasing Category Revision	Date Approved: September, 1982
LUP Name:*	Grand Resource Area RMP (Moab)	Date Approved: July, 1985
Other document:**	Oil & Gas Supplemental EA UT-060-89-025	Date Approved: December, 1988
	Canyon Rims Plan Amendment to Grand RMP, EA #062-01-144	Date Approved: September, 2003

\*List applicable LUPs (e.g., Resource Management Plans or applicable amendments)

\*\*List applicable activity, project, management, water quality restoration, or program plans.

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decision:

- Adopt the oil and gas category system...which will protect critical wildlife habitat, watersheds, and recreational use (Grand RMP, page 27).

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

List by name and date all applicable NEPA documents that cover the proposed action.

Oil and Gas Environmental Analysis Record, 1976

Draft Environmental Impact Statement (EIS), Grand Resource Area (March, 1983); this is part of the RMP.

Final Environmental Impact Statement (EIS), Grand Resource Area (December, 1983); this is part of the RMP.

Grand Resource Area RMP (July, 1985).

Oil & Gas Supplemental EA # UT-060-89-025 (December, 1988).

Canyon Rims EA # 062-01-144 (September 2003)

Legacy Energy EA # 062-98-117 (October 1998)

Relevance and Importance Evaluations of ACEC Nominations, August 2, 2004

Utah BLM Statewide Desert Bighorn Sheep Management Plan, September, 1986

Desert Bighorn Sheep Management Plan Moab District. September, 1987

Draft Programmatic T&E Species BAs (See Wildlife/TES Report)

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring reports):

Staff reviews were completed and are documented in the Interdisciplinary Team Review Record, and Staff Reports identified below.

<u>Staff Review</u>	<u>Date Completed</u>	<u>Final Revision</u>	<u>Specialist</u>
Cultural Resources	05-17-06	None	Donna Turnipseed
Wilderness	05-17-06	6-20-06	Bill Stevens
Wildlife	05-16-06	5-29-06	Pam Riddle
Lands	05-31-06	None	Marie McGann
VRM	05-30-06	None	Katie Stevens
ACEC's	05-05-06	6-28-06	Katie Stevens
Wild and Scenic Rivers	05-19-06	6-28-06	Marilyn Peterson
Paleontology	06-22-06	None	Frank Bain

#### **D. NEPA Adequacy Criteria**

**1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?**

**Yes for all parcels:**

**UT0806 – 266, 268, 270, 272, 273, 274, 275, 276, 277, 278, 279, 281, 282, 283, 284, 285, 286, 287, 288, 289, 294, 295, 296, 297, 298, 299, 300, 301, 302, 305, 306, 307, 320, 321, 322, 323, 343, 344, 345, 346, 347, 348, 349, 350, 360, 361, 362, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, and 382.**

Documentation of answer and explanation:

The current proposed action is substantially the same action as previously analyzed in the RMP. The parcels recommended for lease sale are located within a large area specifically analyzed in the RMP (see, for example, p. 17-19, 21, 23-26, 28, 30, 31).

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?**

**Yes for all parcels:**

**UT0806 – 266, 268, 270, 272, 273, 274, 275, 276, 277, 278, 279, 281, 282, 283, 284, 285, 286, 287, 288, 289, 294, 295, 296, 297, 298, 299, 300, 301, 302, 305, 306, 307, 320, 321, 322, 323, 343, 344, 345, 346, 347, 348, 349, 350, 360, 361, 362, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, and 382.**

Documentation of answer and explanation:

As explained in question 3 below, there are no new issues to address. Because there are no new issues to address, the range of alternatives is adequate. A range of alternatives from Full Production to No Action was analyzed in the EIS; Alternative C (Limited Protection), was selected as the RMP Decision; Part A of the Oil and Gas Supplemental EA, which described the level of oil and gas exploration and development in the Moab Field Office, also still applies.

**3. Is the existing analysis adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition (PFC) reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?**

**Yes for parcels:**

**UT0806 – 266\*, 268, 270, 272, 273, 274, 275, 276, 277, 278\*, 281, 282, 283\*, 284\*, 285\*, 294, 295, 296, 297, 301\*, 306\*, 320, 321, 322, 343\*, 344, 345, 346, 347, 348\*, 350\*, 360, 361, 362, 376\*, 377, 378\*, 379\*, and 382\*.**

**\* means parcel is partially deferred.**

Documentation of answer and explanation:

A review of the proposed action has been completed and is documented in the Interdisciplinary Team Analysis Record. Significant new information or a significant change in circumstances has not been identified by the BLM resource specialists; however, new information, none of which is significant is described below.

**Wilderness Characteristics**

Parcels UT0806 - 376, 378, and 379 are located in an area, Beaver Creek, the BLM re-inventoried in 1996-1999. The 1999 Utah Wilderness Inventory concluded that the inventory units associated with portions of these parcels possess naturalness, outstanding opportunities for solitude, primitive and unconfined recreation, and special features. None of the Beaver Creek unit is currently leased. Through the BLM evaluations, the parcel has been found to be likely to have wilderness characteristics. However, this is not considered to be significant new information because naturalness, primitive and unconfined recreation, and special features are adequately addressed in the NEPA record. The above characteristics have not changed since the 1985 RMP, suggesting NEPA adequacy regards these aspects of wilderness characteristics. There has been an important change in circumstances since the 1985 RMP. In 1999, the Grand County Council unanimously adopted a wilderness plan, which included recommending the lands in question in Beaver Creek for wilderness designation. The wilderness plan itself was incorporated by reference into the Grand County General Plan Update, approved in 2003 and published April 13, 2004. This information obviously was not available at the time of the drafting of the 1985 RMP. Offering those portions of the above-mentioned parcels that lie within the county's wilderness proposal would be inconsistent with the current County plan, a document relied upon by BLM in its current RMP revision process.

All other parcels have not had new information presented to the BLM concerning wilderness characteristics.

The Oil & Gas Supplemental EA (1988) specifically discusses the impacts of leasing on a number of resources relating to naturalness. The EA addresses the effects of leasing on wildlife, recreation, visual resources, vegetation, soil, and water quality.

## **ACEC's**

Parcels UT0806 – 268, 270, 272, 273, 274, 275, 276, 277, 281, 282, 294, 295, 296, 297, 320, 321, 322, 345, 347, and 377 are not located within potential ACEC's.

Portions of parcels 266, 278, and 348 are located within potential ACEC's. The portion of these parcels located outside of potential ACEC's that may be leased is described in Attachment 2.

On August 2, 2004, as part of the Moab RMP revision process, the MFO Manager signed the "Relevance and Importance Evaluation of Area of Critical Environmental Concern (ACEC) Nominations." None of the above listed parcels and partial parcels (as described in Attachment 2) are located within an ACEC. The standard lease terms and conditions and current stipulations specified in the Grand Resource Area RMP (1985) are sufficient for leasing at this time.

Parcels 343, 344, 346, 360, 361 and 362 are located the Cisco White Tailed Prairie Dog Complex Potential Area of Critical Environmental Concern, proposed in one or more alternatives of the draft Moab Field Office Resource Management Plan. The relevance and importance evaluation of this ACEC's were determined on August 2, 2004 (see "Relevance and Importance Evaluations of Area of Critical Environmental Concern (ACEC) Nominations"), with wildlife (white tailed prairie dogs) being the relevant and important value. The fact that wildlife is a relevant and important within a potential ACEC is new information. However, white tailed prairie dogs were addressed in existing NEPA documents. Thus, the existing NEPA analysis is adequate in regards to this relevant and important value, and although this is new information, it is not significant new information from a NEPA standpoint. The lease notice attached to the above-listed leases would conserve the habitat of the white tailed prairie dog by requiring modifications of the surface use plan of operations. With the addition of this lease notice, the relevant and important value identified for this Potential ACEC can be adequately protected, and consideration of the area for ACEC designation in the ongoing Moab Plan Revision would not be compromised.

## **Cultural Resources and Native American Consultation**

The cultural resources review and Native American consultation completed for this sale have not provided any new information or changed circumstances. Although compliance with Section 304 of the National Historic Preservation Act (NHPA) of 1966, as amended, prohibits disclosure of the description, location, and or land ownership of archaeological remains to the general public, the Moab Field Office Class I Inventory Report for the preliminary May Oil and Gas lease parcels adequately summarizes the presence and absence of archaeological inventories and archaeological sites located on each parcel.

On May 18, 2006, certified consultation letters were sent to the following Tribes: Zuni, Ute Indian Tribe, Hopi Tribe, Ute Mountain Ute Tribe, the Navajo Nation, Pueblo of Santa Clara, Pueblo of Zia, Pueblo of Laguna, Paiute Indian Tribe of Utah, and the Navajo Commission. The letter requested comments to be provided to the MFO within 30 days. One response was received from the Zuni Tribe. No other concerns pertaining to leasing of the parcels were received. Consultation is complete if tribal response presents no objections or if response is not received seven (7) days prior to the date of the proposed sale. Additional consultation will be conducted should site-specific use authorization requests for a lease be received.

The potential for oil and gas development does not affect any known National Register eligible properties. The Moab Field Office submitted a request for concurrence to the Utah State Historic Preservation Office. A concurrence reply was received on June 2, 2006.

## **Wildlife**

There is no new information nor changed circumstances concerning wildlife on Parcels UT0806 – 268, 270, 272, 273, 274, 275, 276, 277, 281, 282, 294, 295, 296, 297, 299, 320, 321, 322, 345, 347, and 377.

## **Federally Listed Threatened Species and Utah Sensitive Species**

New information and circumstances concerning Federally Listed Threatened Species have developed since the 1985 RMP. However, lease notices (see section F) have been prepared to inform the lessee that these species

and their habitat may be present on these leased lands. These species are: Mexican Spotted Owl, parcels 302, 307, 320, 323, 347, 348, 349, 350, 370, 371, 372, 373, 374, 375, 376, 378, 379, 380, 381, and 382. Southwestern Willow Flycatcher, parcels 270, 272, 273, 278, 279, 343, 344, 349, 360, 361, 362, 370, 371, 372, 373, 375, 378, 379, 380, and 382. Bald Eagle, parcels 270, 320, 323, 347, 348, 349, 350, 361, 375, 376, 379, 380, and 381. Endangered Fish of the Upper Colorado River Drainage Basin, parcels 266, 268, 270, 272, 348, and 349. Compliance with the Endangered Species Act would make this new information insignificant in regards to the analysis in the existing record because all operators would be required to comply with any stipulations developed to protect these species and their habitats as a result of consultation with the USFWS.

Utah Sensitive Species including the Golden Eagle, White Tailed Prairie Dog, Ferruginous Hawk, and Burrowing Owl when present on the above listed parcels are also protected by species specific lease notices.

### **Summary of New information and/or Circumstances**

There is no new information or circumstances that would render the existing environmental analysis inadequate at this time. The new information and/or circumstances described in this document are considered insignificant with regard to the analysis in the existing record.

#### **NO for parcels:**

**UT0806 – 266\*, 278\*, 279, 283\*, 284\*, 285\*, 286, 287, 288, 289, 298, 299, 300, 301\*, 302, 305, 306\*, 307, 323, 343\*, 348\*, 349, 350\*, 370, 371, 372, 373, 374, 375, 376\*, 378\*, 379\*, 380, 381, and 382\*.**

**\* means parcel is partially deferred.**

Documentation of answer and explanation:

#### **ACEC's**

Parcels UT0806 – 266\*, 278\*, 279\*, 298\*, 301\*, 305, 306\*, 307\*, 323\*, 348\*, 349\*, and 350\* are partially or totally within potential ACEC's. On August 2, 2004, as part of the Moab RMP revision process, the MFO Manager signed the "Relevance and Importance Evaluation of Area of Critical Environmental Concern (ACEC) Nominations. Leasing of these parcels would conflict with the new information on the relevance and importance of the listed values. The standard lease terms and conditions and current stipulations specified in the Grand Resource Area RMP (1985) are insufficient for leasing at this time. Current BLM policy (BLM Manual 1613.21 E) requires protection of values identified in potential ACEC's until signing of the RMP.

\* means parcel is or could be partially deferred.

#### **Wilderness**

The wilderness plan itself was incorporated by reference into the Grand County General Plan Update, approved in 2003 and published April 13, 2004. This information obviously was not available at the time of the drafting of the 1985 RMP. Offering those portions of the above-mentioned parcels that lie within the county's wilderness proposal would be inconsistent with the current County plan, a document relied upon by BLM in its current RMP revision process.

#### **Wildlife**

Parcels deferred for big game crucial winter habitat include all or portions of UT0806-266, 343, 370, 371, 372, 373, 374, 375, 378, 379, 380, 381, and 382. New information indicates that deer and elk winter range is located on these parcels and was not identified in the 1985 Grand RMP.

Parcels deferred for bighorn sheep lambing and migration includes all or portions of UT0806 -278, 283, 284, 285, 286, 287, 288, 289, 298, 299, 300, 301, 302, 306, 323, 348, 349, and 350. New information indicated crucial habitat is located on these parcels and was not identified in the 1985 Grand RMP.

No parcels were deferred because of the presence of Federally Listed Threatened Species or Utah Sensitive Species.

## Wild and Scenic Rivers

The 1985 Grand Resource Management Plan addressed Wild and Scenic Rivers with the following statement: “continued management of 65 miles of the Colorado and Dolores river study corridors as required under the Wild and Scenic Rivers Act;” Segment 4 of the Colorado River was not addressed as part of the river study corridor listed in the plan.

Eligible river segments include ¼ mile on both sides of the river measured from the high water line. Lease tract UT0806-349 lot 2 Section 20 is located next to segment 4 of the Colorado River. This segment was found to be eligible for National Wild and Scenic status and is classified as recreational. Outstandingly Remarkable Values to be protected include: scenery, recreation, wildlife, fish, cultural, geology, and ecology. Scenery and recreation are values potentially threatened by oil and gas leasing. Current stipulations allow no occupancy or other surface disturbance within ¼ mile of the channel centerline of the Colorado River.

### New Information

An eligibility study for the National Wild and Scenic Rivers System was completed August, 2004. The Bureau of Land Management (BLM) is required to protect the outstandingly remarkable values, and free-flowing character of the river segments found to be eligible in this study. The BLM manual 8351 part 32 C states: “...protective management shall be initiated by the authorized officer (Area/District Manager) as soon as eligibility is determined.”

#### **4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?**

##### **Yes for all parcels:**

**UT0806 – 266, 268, 270, 272, 273, 274, 275, 276, 277, 278, 279, 281, 282, 283, 284, 285, 286, 287, 288, 289, 294, 295, 296, 297, 298, 299, 300, 301, 302, 305, 306, 307, 320, 321, 322, 323, 343, 344, 345, 346, 347, 348, 349, 350, 360, 361, 362, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, and 382.**

##### Documentation of answer and explanation:

The methodology and approach used in the 1985 RMP/EIS are still appropriate for the current proposal to lease because the methods of extraction, and the land requirements for exploration and development, and their potential impacts, have not changed substantially since 1985. The basic analysis assumptions included in the RMP/EIS are still applicable to the current proposal to lease these tracts for oil and gas exploration and development.

The 1988 Implementation EA evaluates oil and gas leasing as directed and allowed under the 1985 Grand Resource Area RMP. In the EA and RMP, oil and gas leasing categories are designated for lands in the Resource Area. In the 1988 EA, a reasonable foreseeable development (RFD) scenario was analyzed for oil and gas exploration and development. The RFD estimated that a total of 248 wells would be drilled from 1989-95, which includes the lands encompassed by these parcels. Thus, the average number of wells drilled in any one year would be 248 divided by 6, or roughly 41 per year. The actual numbers of wells permitted in Grand County have turned out to be much fewer than projected. For example, only 33 wells were permitted from 1998-2002, for an average of less than seven per year, much lower than projected in the 1988 EA.

#### **5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Do the existing NEPA documents analyze impacts related to the current proposed action at a level of specificity appropriate to the proposal (plan level, programmatic level, project level)?**

##### **Yes for parcels:**

**UT0806 – 266\*, 268, 270, 272, 273, 274, 275, 276, 277, 278\*, 281, 282, 283\*, 284\*, 285\*, 294, 295, 296, 297, 301\*, 306\*, 320, 321, 322, 343\*, 344, 345, 346, 347, 348\*, 350\*, 360, 361, 362, 376\*, 377, 378\*, 379\*, and 382\*.**

**\* means parcel is partially deferred.**

Documentation of answer and explanation:

The RMP/EIS and the Oil and Gas Supplemental EA analyzed potential impacts from oil and gas leasing within the Grand Resource Area. Reasonably foreseeable impacts of exploration and development were analyzed, taking into account the known and inferred potential for occurrence and discovery of producible quantities of hydrocarbons. Possible mitigation measures are addressed in the EIS and EA. Leasing categories were established to meet management objectives for protecting certain resources/values in particular areas. Leasing the proposed parcels falls within the reasonably foreseeable development analysis for direct and indirect impacts contained in the Oil and Gas Supplemental EA. Such impacts are substantially unchanged from those identified in the existing NEPA documents. Site-specific impacts of leasing these parcels are mitigated by the stipulations found on p. A-20-21 of the RMP.

**NO for parcels:**

**UT0806 – 266\*, 278\*, 279, 283\*, 284\*, 285\*, 286, 287, 288, 289, 298, 299, 300, 301\*, 302, 305, 306\*, 307, 323, 343\*, 348\*, 349, 350\*, 370, 371, 372, 373, 374, 375, 376\*, 378\*, 379\*, 380, 381, and 382\*.**

**\* means parcel is partially deferred.**

Documentation of answer and explanation:

The above listed parcels are located within listed potential ACEC's, crucial elk and deer winter range, and crucial bighorn sheep lambing and migration corridors. Direct and indirect impacts have not been analyzed on the new information regarding the relevance and importance of the related resources. Leasing of these parcels may result in development on these lands during crucial winter range use by elk and deer, and may interfere with crucial bighorn lambing and migration. Disturbance from development activities may lead to displacement and mortality of these animals attempting to utilize their winter range, lambing grounds, and migration routes. Further NEPA analysis is required to determine the consequences of this sale, the effects of oil and gas development on crucial winter range use and the deer and elk herd that resides on these parcels and mitigation measures needed to protect the resources.

The standard lease terms and conditions and stipulations specified in the Grand RA RMP are insufficient for leasing at this time. Leasing these parcels would conflict with current BLM policy (BM1613, 21 E, and Section V. B. of BLM's Areas of Critical Environmental Concern Policy and Procedures Guidelines). Further NEPA analysis and RMP modification may be required in order to apply appropriate stipulations.

**6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?**

**Yes for parcels:**

**UT0806 – 266\*, 268, 270, 272, 273, 274, 275, 276, 277, 278\*, 281, 282, 283\*, 284\*, 285\*, 294, 295, 296, 297, 301\*, 306\*, 320, 321, 322, 343\*, 344, 345, 346, 347, 348\*, 350\*, 360, 361, 362, 376\*, 377, 378\*, 379\*, and 382\*.**

**\* means parcel is partially deferred.**

Documentation of answer and explanation:

As discussed in the answers to Items D.4 and D.5, above, the RMP EIS, 1988 EA and RFD addressed reasonable future oil and gas activity, This included analysis of the potential additive and cumulative impacts of oil and gas leasing for up to 248 wells per year in the field office area. Because the reasonably foreseeable level of oil and gas activity analyzed previously is still appropriate and additional connected, cumulative or similar actions are not anticipated to exceed the activity level analyzed, the potential cumulative impacts are substantially unchanged from those analyzed in the RMP EIS and EA.

**NO for parcels:**

**UT0806 – 266\*, 278\*, 279, 283\*, 284\*, 285\*, 286, 287, 288, 289, 298, 299, 300, 301\*, 302, 305, 306\*, 307, 323, 343\*, 348\*, 349, 350\*, 370, 371, 372, 373, 374, 375, 376\*, 378\*, 379\*, 380, 381, and 382\*.**

**\* means parcel is partially deferred.**

Documentation of answer and explanation:

Impacts to the various resources (scenic, cultural, wildlife, plants, and natural systems) in the potential ACEC's, crucial winter range, and bighorn sheep lambing and migration corridors are not fully analyzed in the RMP/EIS and the Oil and Gas Supplemental EA and will need further NEPA analysis so that the cumulative impacts to the various resources will be fully understood.

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

**Yes for all parcels:**

**UT0806 – 266, 268, 270, 272, 273, 274, 275, 276, 277, 278, 279, 281, 282, 283, 284, 285, 286, 287, 288, 289, 294, 295, 296, 297, 298, 299, 300, 301, 302, 305, 306, 307, 320, 321, 322, 323, 343, 344, 345, 346, 347, 348, 349, 350, 360, 361, 362, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, and 382.**

Documentation of answer and explanation:

The public involvement and interagency review procedures and findings made through the development of the Grand Resource Area RMP/EIS and Record of Decision and the Oil and Gas Supplemental EA are adequate for the proposed leasing of the parcels listed above. During the development of the RMP (1979 to 1982), news releases, Federal Register Notices and public meetings were held to obtain the public's input on the alternatives and level of development that was being proposed in the RMP. Additionally, information about this lease sale has been posted on the ENBB for public comment, and the NPS, DWR, FWS, and SHPO were all given the opportunity to comment on all parcels listed for the sale.

Responses were received from The Utah State Historic Preservation Office and they concur with the BLM that no historic properties will be affected; The United States Department of the Interior National Park Service met with the BLM and submitted a written request that parcels 294, 295, 296, 297, 298, 299, 300, 301, 305, 306, 307, 320, 321, 322, 323, 347, 349, and 350 be deferred on the basis of visual impacts to the surrounding viewshed from the park boundary. The BLM reviewed the NPS request and concurred on parcel 323, which is located in the viewshed of the Delicate Arch KOP. The BLM concluded that drilling activities in the other parcels could be shielded from the Arches National Park viewshed by topographic features. The United States Department of the Interior Fish and Wildlife Service concurred with all BLM T&E recommendations and lease notices; Only one Native American Tribe, the Zuni Pueblo, responded to the BLM and the Zuni's had no objections.

**Interdisciplinary Team Analysis:** Individuals conducting or participating in the preparation of this worksheet.

<b><u>Name</u></b>	<b><u>Title</u></b>	<b><u>Resource Represented</u></b>
Ann Marie Aubry	Hydrologist	Air quality, water quality and floodplains
Eric Jones	Petroleum Engineer	Oil and gas
Marie McGann	Land Law Examiner	Oil and gas
Marilyn Peterson	Outdoor Recreation Planner	Wild and Scenic Rivers
Pam Riddle	Wildlife Biologist	Wildlife
Bill Stevens	Outdoor Recreation Planner	Wilderness
Katie Stevens	Outdoor Recreation Planner	Recreation and VRM
Frank Bain	Geologist	Geology

Daryl Trotter	Environmental Protection Specialist	Vegetation, T&E plants, Riparian
Donna Turnipseed	Archaeologist	Archaeology/Consultation
Frank Bain	Geologist	Paleontology

**F. Mitigation Measures:**

Cultural – None

Riparian –

Little Grand Wash – Parcel 275

Salt Wash – Parcels 276, 277

Floy Wash – Parcel 281

Bartlett Wash – Parcel 301

Cottonwood Wash- Parcels 320, 321, 322

Dry Canyon – Parcel 345

UT-S-48 Lease stipulation

Wilderness – None

Visual – None

Recreation – None

Wild and Scenic Rivers – None

Paleontology – Parcels 272, 275, 276, 277, 278, 281, 284, 285, 306, 320, 321, 322, 376,378, 379, 382

Lease Notice UT-LN-21- High Potential Paleontological Resources

Wildlife -

Mexican Spotted Owl – Parcels 320, 347, 348, 350, 376, 378, 379, 382

Endangered Species Act Section 7 Consultation Stipulation (WOIM #2002-174)

Lease Notice T&E-06 Mexican spotted owl

Southwestern Willow Flycatcher – Parcels 270, 272, 273, 278, 343, 344, 360, 361, 362, 378, 379, 382

Endangered Species Act Section 7 Consultation Stipulation (WOIM #2002-174)

Lease Notice T&E-07-Southwestern Willow Flycatcher

Bald Eagle – Parcels 270, 320, 347, 348, 350, 361, 376, 379,

Endangered Species Act Section 7 Consultation Stipulation (WOIM #2002-174)

Lease Notice T&E-01-Bald Eagle

Endangered Fish of the Upper Colorado River Drainage Basin, parcels 266, 268, 270, 272, 348

Endangered Species Act Section 7 Consultation Stipulation (WOIM#2002-174)

Lease Notice T&E-03 – Endangered Fish of the Upper Colorado River Drainage Basin

Burrowing Owl – Parcels 266, 268, 270, 272, 273, 274, 275, 276, 277, 278, 281, 282, 283, 284, 285, 294, 295, 296, 297,299, 301, 306, 320, 321, 322, 343, 344, 345, 347, 348, 350, 360, 361, 362, 379

UT-LN-13 - Lease Notice - Burrowing Owl Habitat

Raptor Surveys – Parcels

UT-LN-33 - Lease Notice - Raptor Surveys 266, 268, 270, 272, 273, 274, 275, 276, 277, 278, 281, 282, 283,

284, 285, 294, 295, 296, 297, 299 ,301, 306, 320, 321, 322, 343, 344, 345, 347, 348, 350, 360, 361, 362, 379

Golden Eagle - Parcels 266, 268, 270, 272, 273, 274, 275, 276, 277, 278, 281, 282, 283, 284, 285, 294, 295, 296, 297,299, 301, 306, 320, 321, 322, 343, 344, 345, 347, 348, 350, 360, 361, 362, 379,

UT-LN-17 – Lease Notice - Golden Eagle

White Tailed Prairie Dog – Parcels 296, 297, 343, 344, 346, 360, 361, 362

UT-LN-53 – Lease Notice - White Tailed Prairie Dog Habitat

Ferruginous Hawk – Parcels 343, 344, 345, 360, 361, 362  
UT-LN-14 – Lease Notice - Ferruginous Hawk Habitat

Antelope Kidding – Parcels 266, 268, 270, 274, 343, 344, 345, 360, 361  
UT-LN-05 – Lease Notice Antelope Kidding

## **CONCLUSIONS**

Based on the review documented above, I conclude that:

- This proposal conforms to the applicable land use plan for “Yes” parcels.

### **Documentation of NEPA Adequacy**

- The existing NEPA documentation fully covers the proposed action and constitutes BLM’s compliance with the requirements of NEPA for “yes” parcels.
- The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered for “no” parcels.

/s/ Maggie Wyatt

\_\_\_\_\_  
Maggie Wyatt – Field Manager

6/30/06

\_\_\_\_\_  
Date