

Here is the plan of development example from Module 2, in its entirety. Remember, the non-italicized text is what would go in your NEPA document. The italicized text provides explanation.

The proposed action is for the BLM to approve a Plan of Development for 100 oil and gas exploration wells and 50 miles of new road construction on BLM-administered land on an oil and gas lease in the Haven Unit.

Issues Analyzed in Detail (Chapter 1 of your NEPA document)

The following issue was identified for detailed analysis based on the criteria in the BLM NEPA Handbook, (BLM NEPA Handbook 6.4):

How would drilling oil and gas wells and associated construction activities affect crucial winter range for the Kittredge elk herd?

Geographic scope (*this could go in Chapter 1 or 3 of your NEPA document*)—The geographic scope for the analysis of this issue is the 3,000 acres of crucial winter range for the Kittredge elk herd, which is described in the RMP EIS (Chapter 3, p. 19).

Temporal scope (*this could go in Chapter 1 or 3 of your NEPA document*)—Although construction of well pads and associated access and utility corridors would be completed in two years, removal or disturbance of elk crucial winter range would continue until eventual completion of oil and gas production and subsequent reclamation of the well pads and access and utility corridors. Nevertheless, the temporal scope for analysis of this issue is limited to 10 years, because forecasting future actions that would have a cumulative effect on elk crucial winter range beyond 10 years would be speculative.

Affected Environment (Chapter 3 of your NEPA document)

Impact indicator: acres of crucial winter range for elk

This analysis is tiered to the RMP EIS, in which the current condition of Kittredge elk herd habitat (including the acreage in the Haven Unit) was analyzed. That analysis concluded that there are currently 100,000 acres of yearlong elk range for the Kittredge elk herd, of which 3,000 acres is crucial winter range (RMP EIS, Chapter 3, pp. 19-21). That analysis is incorporated here by reference. Of the 3,000 acres of crucial winter range for the Kittredge elk herd, 1,000 acres are within the Haven unit.

Cumulative Effects Analysis (Chapter 4 of your NEPA document)

Past actions—Past development of oil and gas wells within the analysis area has reduced the amount of crucial winter range for the Kittredge elk herd. The effects of past actions on crucial winter range were analyzed in the description of the affected environment in the RMP EIS, which concluded that past actions have reduced crucial winter range from 4,000 acres to the current level of 3,000 acres (Chapter 3, pp. 15-18). That analysis is incorporated here by reference.

Since the preparation of the RMP EIS analysis, 50 wells and the associated infrastructure have been developed in the adjacent Conner unit. This development was analyzed in the Conner Plan of Development Environmental Assessment (BLM 2007, pp. 18-21). That analysis concluded that the 50 wells and infrastructure resulted in the functional loss of 300 acres of crucial winter range. That analysis is incorporated here by reference.

Present actions—There are no other present actions affecting crucial winter range for the Kittredge elk herd.

Reasonably foreseeable actions—All the federal mineral estate within the Kittredge elk herd’s crucial winter range has been leased and there has been constant activity in the area; therefore, we feel that future applications for permit to drill oil and gas wells are likely in the Haven Unit and adjacent Conner Unit. The RMP EIS included a reasonably foreseeable future development scenario of 200 additional well locations and 100 miles of new roads in the Haven and Conner units within Kittredge elk crucial winter range. Although specific well and road locations cannot be foreseen at this time, they would result in the functional loss of 500 acres of crucial winter range for the Kittredge elk herd (RMP EIS, Chapter 4, pp. 298-300). That analysis is incorporated here by reference.

Direct and indirect effects of the proposed action and alternatives—Under the No Action Alternative, the BLM would not approve the Plan of Development so no new wells would be drilled and no associated infrastructure would be constructed in the Haven unit at this time.

Under Alternative A, the proposal originally submitted by the Philadelphia Oil and Gas Company (drilling 100 new wells and construction of 50 miles of new road), would result in the functional loss of 200 acres of crucial winter range for the Kittredge elk herd.

Under Alternative B, a modified proposal based on the operator and BLM working cooperatively to reduce environmental impacts (drilling 80 new wells and construction of 30 miles of new road), would result in the functional loss of 100 acres of crucial winter range for the Kittredge elk herd.

Combine the effects—

It might be helpful to have a map and/or a graphic similar to Figure 6.3 in the BLM NEPA Handbook to depict this information.

No Action

Baseline: 3,000 acres

past actions: 3,000 acres - 300 acres = 2,700 acres

present actions: (none)

future actions: 2,700 acres – 500 acres = 2,200 acres

proposed action: no loss of elk crucial winter range

cumulative effect: 2,200 acres of elk crucial winter range would remain (800 acres would be lost)

Alternative A

Baseline: 3,000 acres

past actions: 3,000 acres - 300 acres = 2,700 acres

present actions: (none)

future actions: 2,700 acres – 500 acres = 2,200 acres

proposed action: 2,200 acres - 200 acres = 2,000 acres

cumulative effect: 2,000 acres of elk crucial winter range would remain (1,000 acres would be lost)

Alternative B

Baseline: 3,000 acres

past actions: 3,000 acres - 300 acres = 2,700 acres

present actions: (none)

future actions: 2,700 acres – 500 acres = 2,200 acres

proposed action: 2,200 acres - 100 acres = 2,100 acres

cumulative effect: 2,100 acres of elk crucial winter range would remain (900 acres would be lost)

Describe the relationship of the cumulative effects to any thresholds—The cumulative effect of the No Action Alternative together with past and reasonably foreseeable actions would result in a 27% reduction in crucial winter range for the Kittredge elk herd from 3,000 acres to 2,200 acres.

The cumulative effect of Alternative A together with past and reasonably foreseeable actions would result in a 33% reduction in elk crucial winter range.

The cumulative effect of Alternative B together with past and reasonably foreseeable actions would result in a 30% reduction in elk crucial winter range.

The State Elk Management Plan identifies crucial winter range as an important factor affecting the population size of the Kittredge elk herd. Therefore, although other factors may affect the elk populations—including factors that cannot be predicted at this time (such as weather, disease, and predation)—it is highly probable that a reduction in the amount of crucial winter range would result in a concomitant reduction in the elk population. Neither the RMP nor the State Elk Management Plan provides any specific habitat or population targets for the Kittredge elk herd.

(In this example, this analytical conclusion would be evaluated in a finding of no significant impact with regards to this issue).