DNA WORKSHEET
ID-110-2007-DNA-3513

Worksheet
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

Note: This Worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled, "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy" transmitting this Worksheet and the "Guidelines for using the DNA Worksheet," located at the end of the Worksheet. (Note: 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.)

A. BLM Office: Snake River Birds of Prey National Conservation Area (NCA)
Lease/Serial/Case File No.: DNQ4 & DNN8
Proposed Action Title/Type: Bruneau Arm Complex/Stuck Fire BAR Plan
Location of Proposed Action: Bruneau Arm Allotment, T5S, R5E, Sec. 20, 21, 23…27, & 34…36, T5S R6E Sec. 1 and 17…19.
Description of the Proposed Action:
Pre-planting Chemical Fallowing: Herbicide would be aerially applied to 1,965 acres to reduce competition from invasive annual grasses and forbs, and prepare site for seeding.
Ground Seeding: Native and non-native perennial grasses would be drill seeded over 1,686 acres.
Aerial Seeding: A native perennial shrub (144 acres), and a native grass and shrub perennial seed mix (261 acres) would be aerial broadcast in the fall of 2007 over selected sites within the burn area. The perennial seed mix comprised of a native grass and shrub would be aerially broadcast in the fall of 2008 (1,659 acres) over the drill seeding area. In the fall of 2008 forage kochia would be aerial applied over one site (586 acres) that had been pre-treated with herbicide, and a small area (27acres) that would have been pre-treated with herbicide and drill seeded..
Noxious Weeds: The 3,227 acre burned area would be surveyed for the presence of noxious species, and appropriate control measures would be initiated.
Soil Stabilization: Straw wattles (10) would be placed in a major drainage to slow runoff and trap sediment. These sediment traps would impede sediment transport into C. J. Strike Reservoir during severe rainstorms or heavy spring runoff.
Fence Repair: The 5.5 miles of allotment management fence damaged by the fire would be repaired and/or replaced for the effective control of livestock grazing distribution and exclusion of livestock from treatment areas.
Livestock Closure: The 3,227 acre burned area would be closed to livestock grazing until monitoring results show rehabilitation objectives have been met.
Monitoring: Monitoring to determine the effectiveness of treatments would be conducted from initiation of their implementation through 2010.

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

LUP Name: Snake River Birds of Prey NCA Management Plan Date Approved: 1995
LUP Name: Bruneau-Kuna Management Framework Plan Date Approved: 1983

The proposed action is in conformance with the LUPs, and although not directly addressed in the Bruneau Kuna Management Framework Plan (MFP), it is consistent with LUP decision objectives. The Snake River Birds of Prey NCA Management Plan (NCAMP) provides for and addresses "Fire Rehabilitation Management Actions" in a general non-treatment specific manner.
The Proposed Action is consistent with the following objectives stated in the Bruneau Kuna MFP:

WS-1.1 Manage all watersheds to achieve stable conditions and, where feasible/economical, strive for maintaining or establishing good perennial vegetation cover.
WL-3.2 b. Subject to IMP guidelines, manipulate vegetation to achieve a 60/40 ratio of forage to cover, using fire as the primary tool, making use of good soils, retaining interconnecting cover to provide for adequate hiding and thermal cover, and including a mixture of palatable, shrubs, forbs, and grasses in any revegetation projects.

The General Fire Rehabilitation Objectives of the NCAMP are:

1. Establish perennial species to minimize soil erosion and invasion by annual plant species.
2. Reestablish shrub and herbaceous species to maintain and improve raptor prey species.

Pre-planting Chemical Fallowing: The application of herbicides to control competitive annuals, although not directly addressed, is consistent with the NCAMP. Herbicide would be aerially applied to reduce competition from annual grasses and forbs, and prepare the site for drill seeding. Herbicide application is consistent with NCAMP, Fire Management, Management Actions, *Rehabilitation* 11) a. "Use fire, biological and mechanical controls, or a combination of these to reduce or eliminate intense weed competition and improve seedling establishment."
Ground Seeding: The drill seeding of a non-native perennial grass is consistent with NCAMP, Fire Management, Management Actions, *Rehabilitation* 11) c." Where soil, moisture, or other habitat conditions have changed to the point where native plants cannot be reestablished, or where seeds of native species are not available or are too expensive, plant exotic vegetation that meets the density, structure, diversity, and nutritional needs of the prey species."
Aerial Seeding: The aerial broadcast seeding of perennial native and non-native species is consistent with NCAMP, General Fire Rehabilitation Objectives 1 and 2 which specify the use of perennials, and the reestablishment of shrub and herbaceous species. The NCAMP also states under Fire Rehabilitation, p. 57, "The selection of plant materials is based on resource objectives, availability, site adaptability, and cost. Native species are used whenever possible."

The aerial seeding would be consistent with NCAMP, Fire Management, Management Actions, *Rehabilitation* 11) c. "Where soil, moisture, or other habitat conditions have changed to the point where native plants cannot be reestablished, or where seeds of native species are not available or are too expensive, plant exotic vegetation that meets the density, structure, diversity, and nutritional needs of the prey species."

Noxious Weeds: The survey of the burned area for the presence of noxious species, and their control is consistent with NCAMP, Noxious Weeds, p.22, "Keys to preventing noxious weed invasion are: 1) to eliminate small populations as they are discovered before they have the opportunity to increase, and 2) to improve the ecological condition of the NCA to reduce the availability of suitable invasion sites."

Soil Stabilization: Straw wattles would be placed in a major drainage to slow runoff and trap sediment. These sediment traps would impede sediment transport into C. J. Strike Reservoir during severe rainstorms or heavy spring runoff. This treatment is consistent with NCAMP, Management Actions, Special Status Wildlife Species Management, 24) support the improvement of water quality in the Snake River.

Fence Repair: The repair of fire damaged fence to manage livestock and exclude them from the treatment area is consistent with NCAMP, Fire Management, Management Actions, *Rehabilitation* 12) "Unless otherwise directed by the BLM authorized officer, fence reseeded or transplanted sites to exclude livestock grazing and/or military training activities for time periods sufficient to establish seedlings, but for at least two growing seasons."

Livestock Closure: Closure of the burned area to livestock grazing until monitoring results show rehabilitation objectives have been met is consistent with NCAMP, Fire Management, Management Actions, *Rehabilitation* 12) "Unless otherwise directed by the BLM authorized officer, fence reseeded or transplanted sites to exclude livestock grazing and/or military training activities for time periods sufficient to establish seedlings, but for at least two growing seasons."

Monitoring: Although not directly addressed, the monitoring of fire rehabilitation treatments to access effectiveness is consistent with NCAMP, Research, Inventories, Studies, and Monitoring, Management Actions, *Monitoring*, 1) "Develop an overall monitoring plan for the NCA that address the specific needs described in this plan and integrates monitoring requirements for all resources."

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.

- Normal Fire Emergency Stabilization and Rehabilitation Plan Environmental Assessment (NFRP EA), EA # ID-090-2004-050, approved May 12, 2005.
- Noxious and Invasive Weed Treatment for the Boise District and Jarbidge Field Offices Environmental Assessment (NIWT EA), ID-100-2005-EA-265.
- United States Department of Interior (USDI) Bureau of Land Management (BLM), Final Environmental Impact Statement, Vegetation Treatment on BLM Lands in Thirteen

Western States, 1991.

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 the report).

- Biological Assessment of Normal Fire Emergency Stabilization and Rehabilitation Plan for Boise District Office and Jarbidge Field Office, Twin Falls District, Bureau of Land Management, Idaho, approved February 9, 2005.

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, the proposed Burned Area Rehabilitation (BAR) Plan for the Bruneau Arm Complex/Stuck Fire is a typical proposal to mitigate effects of wildfires in the Boise District. Rehabilitation treatments proposed in the BAR Plan are standard methods and procedures that have been regularly implemented within the District's fire rehabilitation program and which were accordingly considered and analyzed by the NFRP EA, pp 9-30 (Seeding and Planting, Noxious and Invasive Weed Treatments, Protective Fences, Livestock and Wild Horse Management, and Monitoring).

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, and resource values, and circumstances?**

   Yes, the range of alternatives analyzed in the NFRP EA, are appropriate with respect to the current proposed BAR Plan, given the existing environmental situation or circumstances. The range of alternatives analyzed in the NFRP EA considered all treatments proposed in the current BAR Plan.

3. **Is the existing analysis adequate and are the conclusions 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, the NFRP EA analysis is adequate and having been recently prepared (2005) it

considers present circumstances. There are no new circumstances that would be considered significant and the existing NEPA analysis is adequate.

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

   Yes, the methodology and analytical approach used in the existing NEPA document is appropriate because it provides for the implementation of treatment actions that have a high probability of resulting in the successful cost effective rehabilitation of a major portion of the rangelands burned in the fire, and are consistent with CEQ (43 CFR 1500) and BLM (Departmental Manual 516, Handbook 1790-1, Handbook 1742-1) requirements and guidelines, which are the current requirements and guidelines for the development of a programmatic EA.

5. **Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?**

   Yes, the impacts are substantially unchanged, and the types of impacts relating to the proposed BAR Plan were sufficiently analyzed. There are no unique site specific impacts resulting from the implementation of the BAR Plan or the individual rehabilitation treatments. The direct and indirect impacts of the BAR Plan are identified and addressed in the NFRP EA, IV Environmental Consequences, B. Proposed Action by resources affected, pp 60-75 (Soils, Water, Floodplains/Wetland/Riparian Zones, Air, Vegetation, Terrestrial Wildlife, Aquatic Wildlife, Recreation, Special Management Areas, Visual Resources, Cultural Resources, and Grazing Management).

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, reasonably foreseeable cumulative impacts of past, present, and future actions, including the currently proposed BAR Plan, are substantially unchanged from those analyzed in the NFRP EA, IV Environmental Consequences, C. Cumulative Impacts.

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

   Yes, public involvement and interagency review were appropriately conducted in conjunction with the NFRP EA. The DNA and BAR Plan will be posted on the BLM NEPA web page and will be available to the public along with other pertinent documents. In addition, contacts were made with all allotment grazing permittees.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the NEPA analysis and preparation of this worksheet.

Name	Title	Resource Represented
Mike Barnum	Team Leader Rangeland Mgt Spec	Rangeland Management
Mark Steiger	Botanist	Vegetation
Dean Shaw	Archaeologist	Cultural Resources
Mary Jones	Natural Resource Specialist	Environmental Coordination
Jack LaRocco	Natural Resource Specialist	Environmental Coordination

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

No specific mitigating measures were identified in the Bruneau Kuna MFP or in the NFRP EA that would apply to the Bruneau Arm Complex/Stuck Fire (DNQ4 & DN8) BAR Plan.

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 NEPA

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made.

/s/ John Sullivan — 9/24/2007

Signature of the Responsible Official — Date