

**U.S. Department of the Interior
Bureau of Land Management (BLM)
Twin Falls District
Jarbidge Field Office (FO)
2536 Kimberly Road
Twin Falls, ID 83301**

**Worksheet
Determination of NEPA Adequacy (DNA)**

NEPA No. DOI-BLM-ID-T010-2012-0005-DNA

BLM Office: Jarbidge Field Office

Lease/Serial/Case File No.: N/A

Proposed Action Title/Type: Big Draw Fire Sagebrush Planting

Location of Proposed Action: The 2010 Big Draw Fire (FP9M) is located in Owyhee County, about 30 miles south of Bruneau, Idaho. The proposed planting area is in the southern portion of the burned area, Township 09S, Range 07E, Sections 25-28 and 33-35 and Township 10S, Range 07E, Sections 2 and 3 (Maps 1 and 2).

A. Description of the Proposed Action:

The proposed action is to plant approximately 25,000 Wyoming big sagebrush (*Artemisia tridentata* ssp. *wyomingensis*) seedlings to re-establish shrub cover in an area burned by the Big Draw Fire in August, 2010 (Map 1). The proposed project would supplement treatments implemented under the Big Draw Fire (FP9M) Emergency Stabilization and Rehabilitation (ESR) plan. The Decision Record (NEPA No. DOI-BLM-ID-T010-2010-0010-DNA) for the ESR plan was signed August 20, 2010. Wyoming big sagebrush was aerially seeded in strips over the burned area in December, 2010, as part of the ESR treatments. Treatment monitoring performed in summer 2011 detected sagebrush seedlings primarily in open areas lacking perennial grass cover. However, seedlings were not detected in areas dominated by previously-established crested wheatgrass seedlings. This supplemental planting is proposed to re-establish Wyoming big sagebrush in areas where shrub seeding was not successful due to competition from existing plant cover.

The 2010 Big Draw Fire reduced or removed shrubs in areas used by sage-grouse adjacent to the lower Bruneau River Canyon. The proposed project area is currently classified as sage-grouse R1 restoration habitat. R1 habitat is defined as areas dominated by perennial grass but lacking a shrub overstory (Map 2). The proposed project area is adjacent to key habitat which consists of remaining shrub stands along the Bruneau River and Clover Creek canyon rims. The proposed project area is also within identified potential habitat for slickspot peppergrass (*Lepidium papilliferum*) and contains scattered slickspot microsites. Slickspot peppergrass plants were not detected during ESR project planning in 2010 or planting project planning in 2011.

Bare-root or containerized Wyoming big sagebrush seedlings would be hand-planted between mid-April and mid-May 2012. Holes would be dug using hand tools such as planting bars, resulting in a disturbance area of about 2-3 inches diameter. Shrub seedlings would be planted into areas dominated by crested wheatgrass and/or Sandberg bluegrass (*Poa secunda*) or other native perennial grasses. Shrub seedlings would not be planted in areas with obvious existing populations of invasive plants (primarily cheatgrass, *Bromus tectorum*) or noxious weeds to reduce potential for competition or unintentional herbicide treatment.

The identified planting area is about 1,800 acres. Shrub seedlings would be planted in patches of about 200-500 plants to facilitate future natural distribution by seed. Shrub seedlings would be spaced no closer than 3 feet apart, and placed at least 3 feet from existing, live mature or seedling sagebrush or rabbitbrush. Shrubs could be placed less than 3 feet from dead sagebrush for sun and wind protection and to access soil nutrients and mycorrhizal fungi that are associated with areas under sagebrush canopies.

Vehicles would be restricted to existing roads. Planting would not occur within 0.25 mile of livestock water or supplement locations, within 50 feet any road or fenceline (see Map 2 for exclusion zones), or during saturated soil conditions. Planting would not occur in slickspot microsites. Under agreement between the Bureau and the State Historic Preservation Officer, cultural resource inventory is not required for compliance with Section 106 of the National Historic Preservation Act for hand planting projects. However, the Jarbidge Field Office Archeologist would be notified immediately should artifacts be found during implementation of the planting project. The Jarbidge Field Office Fire Ecologist would be on-site the first day of planting to provide guidance to the contractor regarding planting restrictions.

B. Land Use Plan (LUP) Conformance

Land Use Plan Name: Jarbidge Resource Management Plan (RMP)

Date Approved/Amended: March 23, 1987

The proposed action is located in Multiple Use Areas 6 (Saylor Creek West) and 10 (Bruneau-Jarbidge-Sheep Creek). The proposed action is in conformance with the Jarbidge RMP because it is specifically provided for in the following LUP objectives and resource management guidelines:

- 1) Improve lands in poor ecological condition (pp. II-28, II-40).
- 2) Improve sage grouse nesting through seeding and rehabilitation. Maintain current upland game nesting and cover habitat (p. II-40).
- 3) Vegetative manipulation projects will be designed to minimize impacts and improve wildlife habitat by including a variety of palatable shrubs, forbs, and grass (p. II-82).
- 4) Manage all ecological sites on mule deer, pronghorn, elk, bighorn sheep, and sage-grouse habitat currently in fair or poor ecological condition, for good ecological condition (p. II-83).
- 5) Protect and enhance endangered, threatened and sensitive species habitats in order to maintain or enhance existing and potential populations within the planning area (p. II-83).

- 6) Manage all wildlife habitat within the resource area to provide a diversity of vegetation and habitats (p. II-83).

C. Identify the applicable National Environmental Policy Act (NEPA) document(s) and other related documents that cover the proposed action.

1. The applicable NEPA document is the Boise District and Jarbidge Field Office Normal Fire Emergency Stabilization and Rehabilitation Plan (NFRP) EA # ID-090-2004-050, approved May 12, 2005. The NFRP EA analyzed the effects of hand planting shrub seedlings within crucial big game winter range or other habitats where shrubs or trees provide a critical forage or habitat component and natural re-establishment within a reasonable time frame is not expected to occur.
 - a. The proposed action is consistent with the existing Endangered Species Act (ESA) Section 7 consultation for slickspot peppergrass. Specifically, the Confirmation of Conference Reports as Letters of Concurrence Following Listing of Slickspot Peppergrass—Southwest and Southcentral Idaho—Concurrence, dated December 15, 2009, referenced the Concurrence Memorandum dated September 13, 2006, for the Normal Fire Emergency Stabilization and Rehabilitation Plan Biological Assessment (BA) Addendum for the Boise District and the Jarbidge Field Office of the Twin Falls District. The U.S. Fish and Wildlife Service cited implementation of conservation measures for slickspot peppergrass, including planting shrubs in slickspot peppergrass habitat, as part of the rationale for concurrence (Concurrence Memorandum, p. 3).
2. The proposed action is consistent with current Bureau policy (Instruction Memorandum No. 2012-043) for enhancement and restoration of sage-grouse habitat, specifically:
 - a. Pursue a long-term objective to maintain resilient native plant communities. Choose native plant species outlined in the ecological site descriptions (ESDs), where available, to revegetate sites (IM 2012-043, p. 3).
 - b. In Emergency Stabilization and Burned Area Rehabilitation plans, prioritize revegetation projects to (1) maintain and enhance unburned intact sagebrush habitat when at risk from adjacent threats; (2) stabilize soils; (3) reestablish hydrologic function; (4) maintain and enhance biological integrity; (5) promote plant resiliency; (6) limit expansion or dominance of invasive species; and (7) reestablish native species (IM 2012-043, p. 3).

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?

Yes. The proposed action was one of the treatments analyzed in the NFRP EA. The location of the proposed action is within the geographic context of the NFRP EA.

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. The NFRP EA considered three alternatives: the Proposed Action; the No Action Alternative, which would have continued implementation of the 1987/1988 NFRPs; and an alternative not to implement ESR treatments. The final alternative was eliminated from detailed analysis because it was inconsistent with current BLM policy. The current proposed action is consistent with the goal stated in the NFRP “to emulate pre-fire ecosystem structure, function (including the re-establishment of the natural fire cycle), diversity, resiliency, and dynamics consistent with approved land management plans, or if that is infeasible, to restore a healthy, stable ecosystem in which native species are well represented.” The proposed action would address the need to restore sagebrush cover in areas where shrubs were removed by fire and where aerial seeding of sagebrush was unsuccessful due to competition from existing vegetation.

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

Yes. The analysis contained in the NFRP EA is still valid. No new information or changed circumstances were identified that would cause the BLM to consider a new or revised proposed action. The most recent list of Endangered Species Act listed, proposed and candidate species and BLM sensitive species for the Jarbidge Field Office was reviewed. The proposed project would improve habitat for sagebrush-dependent special status species, including sage-grouse, a candidate species, and slickspot peppergrass, which was listed as threatened under the Endangered Species Act in December, 2009. The burned area contains uninventoried slickspot peppergrass habitat. The prohibition for planting in slickspot microsites and limiting vehicle use to existing roads would eliminate impacts to slickspot peppergrass habitat. These conservation measures are consistent with the existing NFRP ESA Section 7 consultation.

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?

Yes. The NFRP EA adequately analyzed the environmental effects that would result from implementation of the new proposed action. The analysis in the existing NEPA document continues to be current and accurate.

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

Yes. Development of the NFRP EA included scoping letters sent to individuals, agencies, and organizations.

E. Persons/Agencies/BLM Staff Consulted

| Resource/Title | Name | Agency Represented |
|----------------------------------|------------------|---------------------------|
| Botanist | Thomas Stewart | BLM |
| Cultural Resources/Archeologist | Jeff Ross | BLM |
| Fire Use Specialist | Erik Valdez | BLM |
| Rangeland Management Specialist | Melissa Rutledge | BLM |
| Recreation Management Specialist | Max Yingst | BLM |
| Wildlife Biologist | Jim Klott | BLM |
| Wildlife Biologist | Brad Lowe | IDFG |

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the 1987 Jarbidge Resource Management Plan and that the existing NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of NEPA.

/s/ Julie Hilty
Julie Hilty, Project Lead

1/26/2012
Date

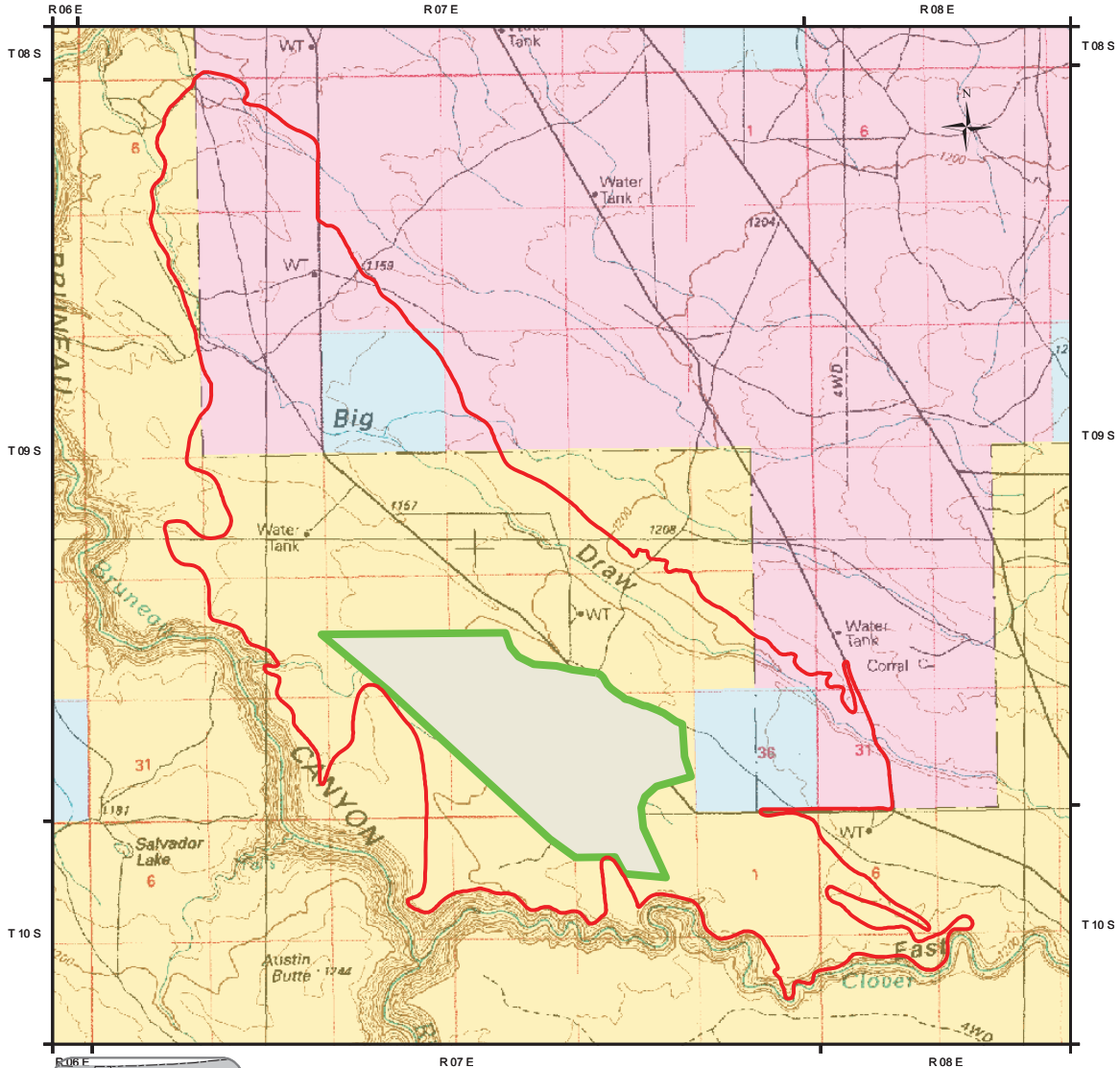
/s/ Jeff Ross
Jeff Ross, NEPA Coordinator

1/30/2012
Date

/s/ Brian Davis
Brian Davis, Field Office Manager

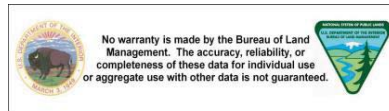
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MAP 1. PROPOSED SAGEBRUSH PLANTING AREA



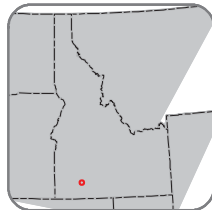
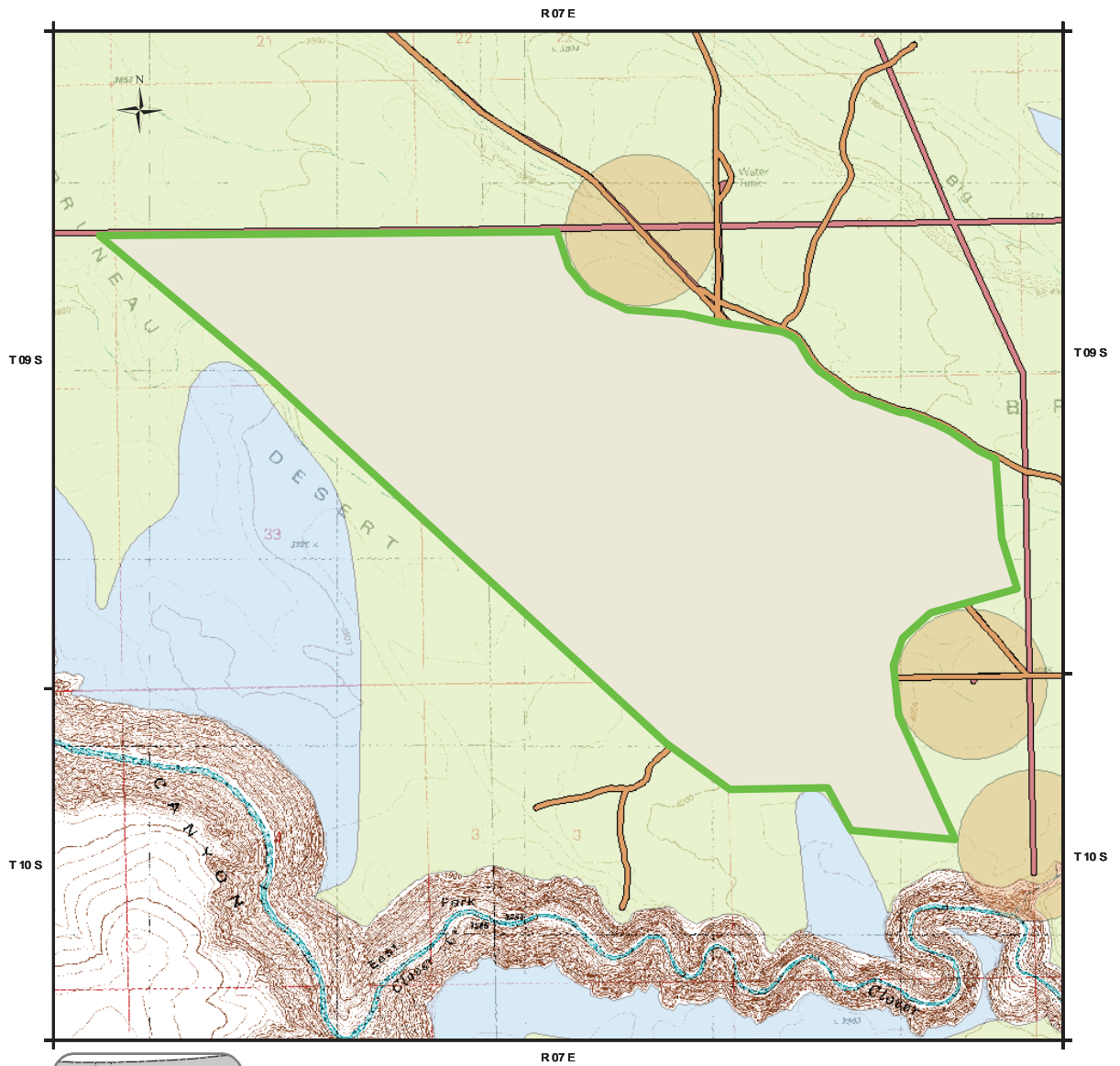
US Depart. of the Interior
Bureau of Land Management
Twin Falls District, Idaho

- Big Draw Fire perimeter
- Proposed sagebrush planting area
- Bureau of Land Management
- Military, Department of Defense
- State



Map Created on: January 12, 2012
Data Displayed in NAD 1983 UTM Zone 11N Projection
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Author: jibly


MAP 2. PROPOSED SAGEBRUSH PLANTING AREA WITH EXCLUSION ZONES




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| | |
|----------------------------|--|
| | Proposed sagebrush planting area |
| | Road (exclusion zone buffered 50 ft) |
| | Fences and pipelines (exclusion zone buffered 50 ft) |
| | Troughs (exclusion zone buffered 0.25 mile) |
| Sage-grouse Habitat | |
| | Key habitat |
| | R1 habitat |





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Map Created on: January 12, 2012
Data Displayed in NAD_1983_UTM_Zone_11N Projection
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Author: jhilty