

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management
Coos Bay District

Worksheet
Documentation of NEPA Adequacy (DNA)

BLM Office: Coos Bay District

Tracking No. DOI-BLM-OR-C030-2009-0008-DNA
Original NEPA document: EA OR 120-98-25

A. Description of the Proposed Action:

Proposed Action Title/Type: 2009 noxious weed removal and Habitat Improvement

Location / Legal Description: Sections 24 and 26, T.25 S., R.13 W., Willamette Meridian. The proposed treatment area is located immediately adjacent to and east of the 1998 Habitat Restoration Area (West) on the North Spit (see map). It occurs as a long thin strip between the foredune road and the wetlands within the ACEC and is west of all designated trails.

Proposed Action: This proposal would use an excavator and chainsaws, to cut, pull and hand-pile the woody noxious weed vegetation within the North Spit Area of Critical Environment Concern (ACEC) directly adjacent to the 1998 Habitat Restoration Area (HRA) on the Coos Bay North Spit. Removal of native woody vegetation would also occur from the excavator since these species are occasionally intermixed as a minor component of the noxious weed stands. After piling is completed, fuels are appropriately dried and burn conditions are met, the piles would be hand ignited and burned to reduce their materials. The North Spit of Coos Bay is one of the most important western snowy plover (plover) breeding sites remaining on the Oregon coast. Maintenance of improved ecological condition by reducing and controlling woody noxious weed populations is crucial to the management of the ACEC and complies with the needs for the recovery of the plover. This action is for the management of woody vegetation in areas adjacent to the nesting areas of the plover. This proposal is **not** to expand nesting habitat for the plover and includes no ground leveling of land forms. Although incidental pulling of some grasses such as European beachgrass (*Ammophila arenaria*) would occur, this is **not** the target action.

Description of Proposed Action: The proposed action is to reduce Scotch broom (*Cytisus scoparius*), and small areas of Sitka spruce (*Picea sitchensis*). Some native shrubs are scattered within select areas of the proposed project area (see maps) and they would also be removed. Up to 25 acres would be treated through this project to the extent of available funding. Targeted spruce trees currently provide perches for predatory birds and denning sites for ground mammals seeking to prey on plovers. Based on aerial photos and historic records the area proposed for treatment was absent of woody vegetation, and was open sand dune prior to the 1930s. The area where the project would occur is administered by the Coos Bay District Bureau of Land Management (BLM).

In treating the area a contract would be let to have an excavator and chainsaw crew pull and cut woody vegetation and pile the material for burning. Pulling and cutting of vegetation would occur as soon as possible in the spring and summer of 2009. Piles would be created within the vegetation treatment area, east of the foredune road. Burning the piled vegetation would occur when conditions are appropriate to fit the fire plan during 2009. The prescribed burn would use hand ignition torches to burn piled materials. Some minor burning of European beach grass is expected to occur around the areas of the piles; however this action is not intended to reduce the amount of grasses or to extend the adjacent nesting habitat for the plover. Burning would be allowed to continue to the point where piled materials would be largely consumed. After pile burning is complete any residual wood would be scattered, buried or moved to obstruct recreational vehicles from leaving designated roads.

A key design feature for this project proposal is to maintain the current condition of the wetland habitats adjacent to the treatment area in conformance with the "Final North Spit Plan, an update to the Coos Bay Shorelands Plan of 1995" and other associated land use plans. Some of the small wetland areas have conifer trees on their edges. No damage to the wetland habitat would occur from this project including the removal of conifer trees. The net effect of treating the project area would be to both reduce the current level of woody noxious weeds and potential predator habitat along the edge of the HRA.

The excavator and all other project vehicles and personnel would be able to access the work site using the existing foredune road on the North Spit. No new roads would be constructed.

Future maintenance may occur on this project area, but is not specifically analyzed in this document. Follow-up treatments may include hand-pulling and backpack herbicide application to maintain the reduced noxious weed condition. The mechanical work for this project is proposed to be done during the snowy plover breeding season (15 March to 15 September), with burning of vegetation piles to occur after September 15.

In conversations with plover specialists and with Laura Todd – U.S. Fish and Wildlife Service, this action is considered a “no affect” on plovers. The timing of heavy equipment use is considered too early to have any disturbance effect on fledging plovers. Furthermore the proposed project is sufficiently distant from any historic nesting sites; and the plover would not be affected by noise generated by the equipment. The proposal would not occur within the critical habitat area of the plover, so there would “no affect” on this Threatened species.

B. Conformance with Applicable Land Use Plan: This proposed action is in compliance with the District Record of Decision and Resource Management Plan, Coos Bay District December 2008, hereby incorporated by reference. It is also in conformance with the Final North Spit Plan December 2006 (Plan), an update to the Coos Bay Shorelands Plan of 1995, also incorporated by reference.

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

Manage BLM special status animal species to maintain or restore populations and habitat consistent with species conservation requirements (Record of Decision and Resource Management Plan, Dec. 2008, page 60 and Coos Bay Record of Decision and Resource Management Plan, May 1995, pages 36 and 72).

Implement conservation and cooperative plans, strategies, and agreements for special status animal species (Record of Decision and Resource Management Plan, Dec. 2008, page 60 and Coos Bay Record of Decision and Resource Management Plan, May 1995, pages 36 and 72).

Implement the following actions for the management of western snowy plover (Record of Decision and Resource Management Plan, Dec. 2008, page 60 and Coos Bay Record of Decision and Resource Management Plan, May 1995, pages 36 and 72):

- Control measures will be implemented if invasive plant species are creating a loss of suitable nesting habitat.
- Measures will be implemented for supporting coastal dune processes to sustain suitable western snowy plover nesting habitat.

- The proposed action is in conformance with the applicable LUPs, even though it is not specifically provided for, because it is clearly consistent with the following RMP decisions (Objectives, terms, and conditions):

Implement activities as necessary to maintain or restore important and relevant values (see appendix D-Areas of critical environmental concern, Record of Decision and Resource Management Plan, Dec. 2008, pages 39-40 and Coos Bay Record of Decision and Resource Management Plan, May 1995, pages 36 and 72).

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.

EA OR 120-98-25 signed Aug. 22, 2006

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, and monitoring report).

Final North Spit Plan December 2006 (Plan), an update to the Coos Bay Shorelands Plan of 1995.

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)? The current proposed action (DNA) is nearly identical to the “North Spit Snowy Plover Habitat Enhancement/Restoration” analyzed in EA # OR125-98-25 except that it is not being done to create new Western Snowy Plover (plover) nesting habitat, it proposes the use of an excavator and chainsaws rather than the use of a bull dozer and does not propose the expansion of the critical habitat area.

Documentation of answer and explanation: Original EA # OR120-98-25 analyzed:

- The original EA proposal was designed to enhance/restore habitat for the Western Snowy Plover through the reduction of European beachgrass, Scotch broom, Sitka spruce, and shore pine using fire and bulldozers.
- The analysis was for the expansion of nesting habitat for plovers.
- The project was to be implemented outside of the nesting closed season because it was located within the nesting area.

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?

- The specific sites for DOI-BLM-OR-C030 2009-0008-DNA was essentially analyzed in the original EA except that the project would not occur within the plover nesting area.; however, the sites are essentially similar to those analyzed; being that they are in similar terrain and contain similar noxious weed conditions and are located in the same legal township and range. The proposed project would occur adjacent to rather than within the plover nesting area. Site specific analysis in a new EA would not cause the formation of any new alternatives or mitigation measures.

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?

Yes

Documentation of answer and explanation:

- The proposed action would reduce noxious woody weeds and other woody vegetation within the ACEC prior to the ripening of another seed crop for the target species.
- Actions would be completed prior to plover fledgling use of adjacent habitats.
- Roosting and cover habitat for predators of the plover would be reduced adjacent to the nesting area.

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

Documentation of answer and explanation:

- Current literature and research continue to support the need to remove noxious weed populations to restore native/native like habitat conditions.
- Reduction of predator habitats would correspond to the actions of Wildlife Service’s hunting/trapping actions to manage predators in and around the plover nesting areas.

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 direct affects include the reduction of brushy vegetation which is primarily invasive species, ill suited for providing wildlife (big game and songbird) habitats.

Indirect effects include the release of smoke from the pile burning process. Smoke emissions are managed by the State of Oregon and is somewhat controlled by wind directions and wind speed.

The cumulative effect would be to enhance the ACEC ecological condition by reducing woody noxious weed concentrations and by reducing perching/roosting, hiding, escape cover or denning areas for ground predators which can affect the success of the Western snowy plover nesting in adjacent habitats.

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

Yes – The U.S. Fish and Wildlife Service has been contacted specifically about this proposal (pers. Comm. Laura Todd) and comments of support were provided. Biologists from ORNHC were also involved with discussions and they also provided positive input.

Documentation of answer and explanation:

- Personal and telephone communication with USFWS and the plover survey biologists have clearly supported this proposal.

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

| <u>Name</u> | <u>Title</u> |
|-----------------|-----------------------------------|
| Kip Wright | Wildlife Biologist T & E Wildlife |
| Jenny Sperling | Botanist |
| Steven Samuels | Archaeologist |
| Jeanne Standley | Dist. Noxious weed coordinator |
| Nancy Zepf | Recreation |
| Dan Van Slyke | Fisheries Biologist |

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

Conclusion: (Note: If you found that one or more of these criteria is not met, you will not be able to check this box.)

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 constitute BLM's compliance with the requirements of the NEPA.

Signature of Project Lead _____ /s/ Stephen Langenstein

Signature of NEPA Coordinator _____ /s/ Steven Fowler

Signature of the Responsible Official: _____ /s/ Dennis Turowski Date: 6/15/2009
Dennis Turowski – Field Manager

**Specialist Review of Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
For DOI-BLM-OR-C030-2009-0008-DNA**

In addition to the certification on the attached Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA) form (OR120-1792-1), the following resource specialists have reviewed this new project in light of the analysis made in the original Environmental Assessment:

| | | | |
|-----------------------|--|--------------------------|---------------------|
| Noxious Weeds | <u>Scott Knowles</u> <u>Jeanne Standley</u> | <u>Jeanne Standley</u> | <u>4/13/09</u> |
| | | Signature | Date |
| T, E, SSSP Wildlife | <u>Steve Langenstien</u> | <u>Steve Langenstien</u> | <u>13 May 2009</u> |
| | | Signature | Date |
| T, E, SSSP Botany | <u>Jenny Sperling</u> | <u>Jenny Sperling</u> | <u>29 Apr. 2009</u> |
| | | Signature | Date |
| Cultural | <u>Stephan Samuels</u> | <u>Stephan Samuels</u> | <u>5-6-09</u> |
| | | Signature | Date |
| Soils/Geology | <u>Tim Barnes</u> | <u>Tim Barnes</u> | <u>5-6-09</u> |
| | | Signature | Date |
| Hydrology | <u>John Colby</u> | <u>John Colby</u> | <u>6/2/09</u> |
| | | Signature | Date |
| * Recreation | <u>Nancy Zepf</u> | <u>Nancy Zepf</u> | <u>5/4/09</u> |
| | | Signature | Date |
| | <u>Bill Elam</u> | <u>William A. Elam</u> | <u>5/4/09</u> |
| | | Signature | Date |
| Environmental Justice | <u>Scott Knowles</u> <u>Stephan Samuels</u> | <u>Stephan Samuels</u> | <u>05/14/09</u> |
| | | Signature | Date |

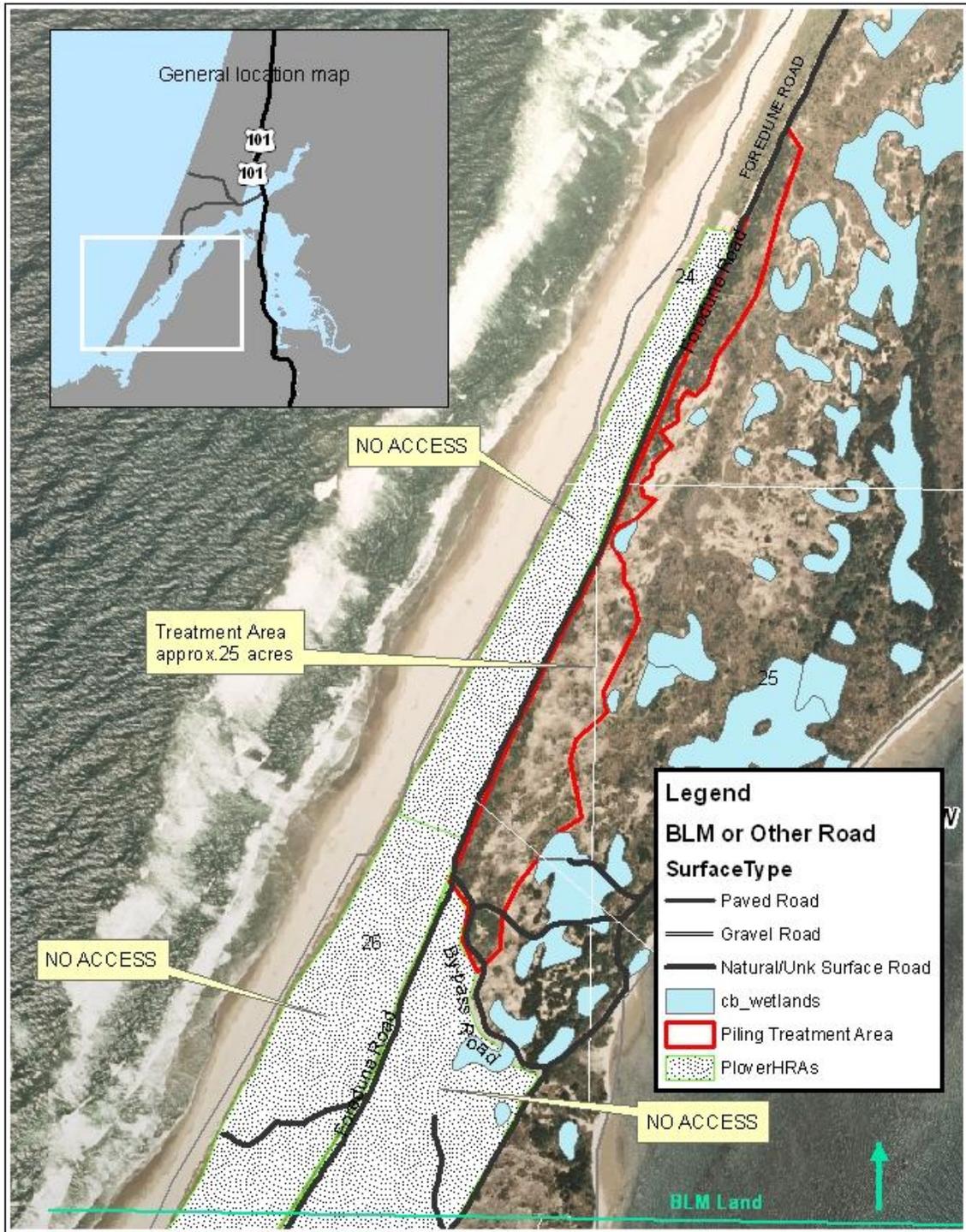
* The last paragraph p. should cite the NS plan of 2006??

Mat Paul Garrison

sig

05/14/09
Date

Coos Bay North Spit



MAP 1

2009 Noxious Weed Removal Control

