

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

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

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**BLM Office:** Coos Bay District, Umpqua Field Office

**Tracking No.** DOI-BLM-OR-C030-2009-0009-DNA  
**Original NEPA document:** EA OR 125-06-10

**A. Description of the Proposed Action:**

**Proposed Action Title/Type:** 2009 North Spit Shell hash placement/Western Snowy plover nesting habitat improvement

**Location / Legal Description:** Sections 26, T.25 S., R.13 W., Willamette Meridian.

**Proposed Action:** This proposal is for the improvement of western snowy plover nesting and brood rearing habitat by placing oyster shell (shell hash) within the "Habitat Restoration Areas" (HRAs) located on the Coos Bay North Spit managed by the Coos Bay District Bureau of Land Management. There are approximately 71.6 acres of BLM administered plover habitat within the HRAs, with an additional 104.5 acres of HRA under the administration of the Army Core of Engineers cooperatively managed by BLM.

In 2008 approximately three acres of Army Corp administered land was treated with 300 cu.yds of shell hash after the fall season disking of the area to control European beachgrass (*Ammophila arenaria*). In 2009 it is proposed to treat up to eight acres of BLM administered land within the 1995 HRA with between 200 and 300 cubic yards of shell distributing the shell with a rear discharge spreader, and to refresh up to eight acres shell habitat within the 1998 (east) HRA with the remaining shell material for a total of up to 16 acres of habitat. Work is planned to be completed between September 15 and October 15, 2009

While various methods may be used to spread the shell material to meter out the desired amount of shell per acre, this proposed action intends to utilize a rear discharge manure spreader pulled by a tractor. This equipment can best meter out the desired level of shell thickness on the ground. Depending on if a shell spoil area is to be "refreshed", or if new shell is placed within the HRA on sand, the amount of shell per acre may vary from approximately 25 cubic yards per acre, to approximately 100 cubic yards per acre. "Refreshing" an area is to spread a thin layer or amount of shell on an area previously covered with shell material. New habitat improvement will be on the BLM portion of the HRA while refreshing of dredge spoil areas on the 1998 (east) HRA.

This project would be implemented outside of the nesting season for the western snowy plover (March 15 to September 15), and would be done after the plowing/disking treat scheduled for each year. Equipment would be washed before and after the use on the North Spit to manage for noxious weed seed movement.

**B. Land Use Plan (LUP) Conformance**

This proposed action is in compliance with the Coos Bay District's *2008 Record of Decision and Resource Management Plan* (2008 ROD/RMP). In addition, this project fully complies with the management objectives, actions, and direction of the resource management plan in place prior to December 30, 2008, which was the 1995 RMP, as amended. 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 (page 60).

Implement conservation and cooperative plans, strategies, and agreements for special status animal species (page 60).

Implement the following actions for the management of western snowy plover (page 60):

- Measures will be implemented for supporting coastal dune processes to sustain suitable western snowy plover nesting habitat.

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

EA OR125-06-10 - North Spit plover Habitat Improvement, signed April 4, 2006, addresses the placement of shell material on the North Spit within the HRAs for restoring nesting habitat.

**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?**

Yes, the new proposed action is essentially the same as that which was analyzed in EA OR125-06-10. The main difference is in how the shell will be dispersed. In the past a front end loader was used with subsequent hand spreading using rakes and shovels. The current proposal would use a manure spreader if available. The new project is within the same analysis area, since the first project did not completely cover the Critical Habit Unit (CHU). This proposal likely won't have sufficient shell material to treat the entire CHU in 2009, but subsequent treatments are expected to occur in future years.

**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, there are few other known ways which could be proposed to improve the habitat for this species of bird. Current anecdotal observations suggest that oyster shell may assist in inhibiting growth of European beach grass. If true, this action would enhance the semi-annual treatments for the reduction of beach grass by plowing and disking at the same time that this treatment is improving nesting cover for the plover.

**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, the existing analysis is the most current, and results from previous treatments demonstrate that this habitat treatment is successful in providing improved habitat to shorebirds including the western snowy plover.

**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. No adverse impacts are associated with the Proposed Action. In regards to the Critical Elements listed above, several beneficial impacts would occur. Enhancing habitat for the Western snowy plover, a threatened species, is in keeping with special status species management objectives for the North Spit ACEC. The plover would benefit from an increase in nesting substrate associated with higher nest productivity. Furthermore, shelled areas appear to discourage dense re-growth of European beachgrass thus eliminating competition for resources with the pink sand verbena, a plant considered sensitive by the BLM and listed as endangered by the State of Oregon.

No impacts to fisheries resources or waterways would result from the Proposed Action.



**Specialist Review of Documentation of Land Use Plan Conformance and NEPA Adequacy (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:

Hazardous Materials	<u>PAUL Gammun</u>	<u>Paul Gammun</u>	<u>05/13/09</u>
		Signature	Date
Noxious Weeds	<u>Scott Knowles</u>	<u>[Signature]</u>	<u>05/11/09</u>
		Signature	Date
T, E, SSSP Wildlife	<u>Steve Langenstein</u>	<u>[Signature]</u>	
		Signature	Date
T, E, SSSP Fish	_____	_____	_____
		Signature	Date
T, E, SSSP Botany	<u>Jennie Sperling</u>	<u>Jennie Sperling</u>	<u>5-11-09</u>
		Signature	Date
Cultural	<u>Stephan Samuels</u>	<u>[Signature]</u>	<u>5/13/09</u>
		Signature	Date
Soils/Geology	<u>Tim Barnes</u>	<u>[Signature]</u>	<u>5/11/09</u>
		Signature	Date
Hydrology	<u>John Colby</u>	<u>[Signature]</u>	<u>5/11/09</u>
		Signature	Date
Forestry/Silviculture	_____	_____	_____
		Signature	Date
Port Orford Cedar	_____	_____	_____
		Signature	Date
Recreation	<u>Nancy Zepf</u>	<u>Nancy Zepf</u>	<u>5/11/09</u>
		Signature	Date
		Signature	Date
Engineering	_____	_____	_____
		Signature	Date
Environmental Justice	<u>Scott Knowles</u> <del>Stephan Samuels</del>	<u>[Signature]</u>	<u>05/11/09</u>
		Signature	Date
Energy Development	<u>Tim Barnes</u>	<u>[Signature]</u>	<u>5/11/09</u>
		Signature	Date

United States Department of Interior  
Bureau of Land Management  
Coos Bay District

**Decision Record for DOI-BLM-OR-CO030-2009-0009-DNA**

**Decision:**

It is my decision to implement the 2009 North Spit Shell hash placement as proposed. The design features and actions of this project and the anticipated environmental consequences are essentially the same as those analyzed in the existing NEPA document.

**Decision Rationale:**

The proposed action has been reviewed by Resource Area Staff and appropriate project Design Features as specified will be incorporated into the proposal. Based on this review, I have determined that the proposed action is adequately analyzed in the existing NEPA document EA OR125-2006-10 and is in conformance with the Coos Bay RMP and no further analysis is required.

**Signature of Authorizing Official:**

/s/ Dennis Turowski

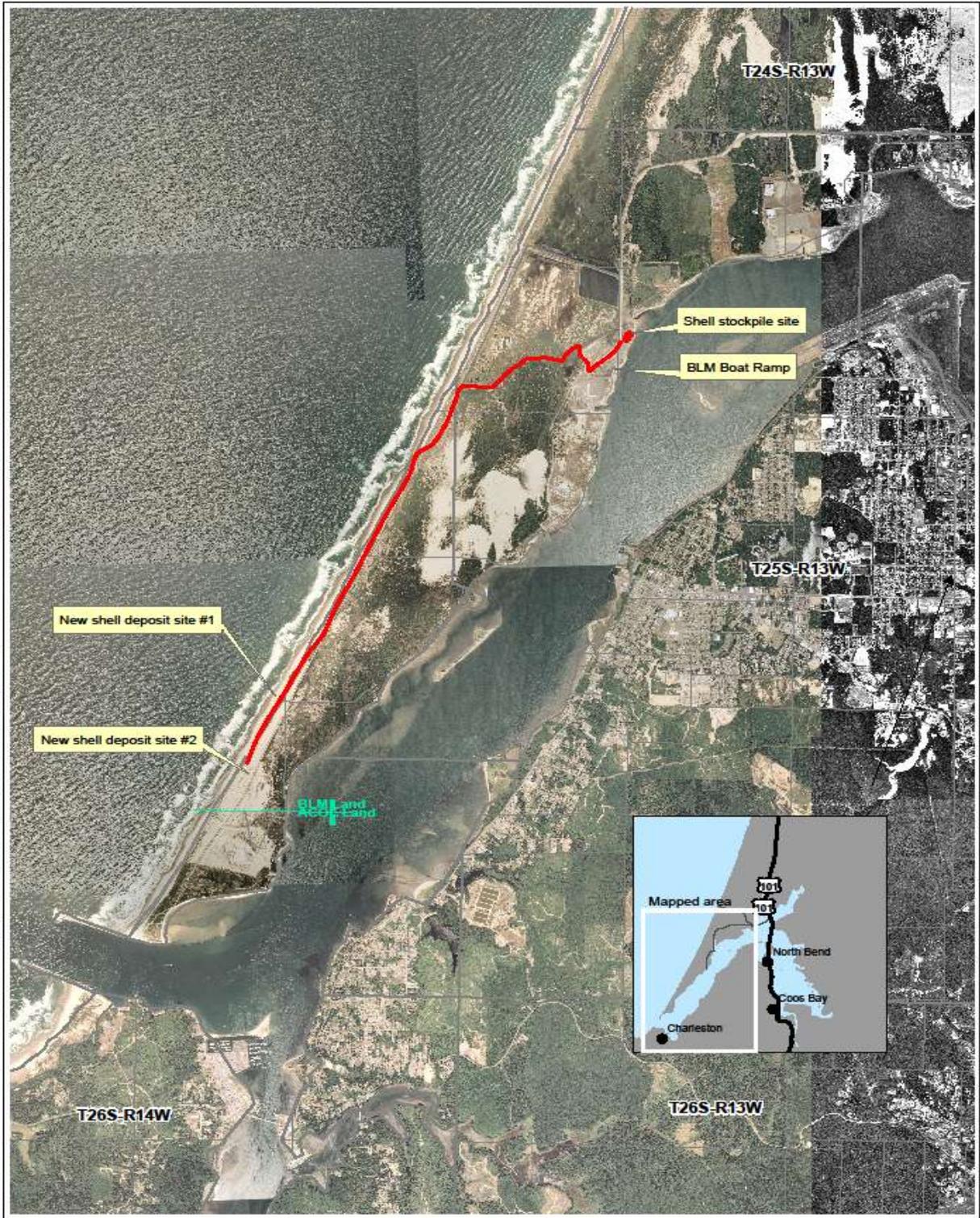
Dennis Turowski – Umpqua Field Manager

6/10/09

Date

**Administrative Remedies:**

Notice of the decision to be made on this action will be posted on the District internet website. The action is subject to protest under 43 CFR sections 4.450-2. A decision in response to a protest is subject to appeal to the Interior Board of Land Appeals under 43 CFR part 4.



**Legend**

- N\_Spit\_shell\_stockpile\_sites/haul route
- Township
- Section

Specific site location for  
 moving oyster shell from the stockpile north of the boat ramp  
 to a new stockpile within the 1998 HRA east  
 BLM North Spit  
 September 2009

