

Worksheet
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)
(OR090 – DNA-05-14)
Balboa Prescribed Burn

A. Description of the Proposed Action

The Proposed Action is to burn less than one acre in the Balboa unit located in Township 17S–R4W–Section 32, within the city limits of Eugene, Oregon. Prescribed burning involves the hand application of fire (via drip torches) to remove and control invasive woody plants, remove thatch, and invigorate native plant populations in wet prairie systems. Burns would be low-intensity and short duration, would occur after August to allow for the majority of plants to set, release seed, and begin to senesce. All burns would comply with BLM and State of Oregon regulations and protocols to minimize the possibility of lost control of the burn. Fire control/suppression would be accomplished with the use of pre-burn hose lays and fire retardant foam, and wet-lining the burn perimeter prior to and during the burn. An area 5 -10' wide would be mowed around the outside boundary of the burn area to help assure fire control. Fire vehicles would be restricted to adjacent non-native pasture vegetation. Trampling by burn staff would be discouraged to minimize impacts to the native prairie community.

Background

Two BLM Special Status plant species, all endemic to prairie habitats, occur at the Balboa unit. These species include the federally – listed Endangered Willamette daisy (*Erigeron decumbens*), and the Bureau Sensitive species white-topped aster (*Aster curtus*). Willamette Valley prairies evolved with fall-season fires. Presumably plants of these prairies are well adapted and potentially dependent upon the presence of fire for their continued healthy existence. Presently, the Balboa unit is being encroached by shrubs and trees. If succession of the prairie to woodland plant community is allowed to continue, native prairie plants would ultimately be extirpated. Continued use of prescribed fire would help control shrubs and tree as well as enhance the reproductive status of Willamette daisy (*Erigeron decumbens*) (Pendergrass 1994; Kaye 1996). Monitoring of the rare plants is conducted annually and the data is analyzed to determine the effects of fire.

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

LUP Name* Eugene District Record of Decision and Resource Management Plan
June 1995 Date Approved

Attachment 1-2

The Proposed Action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

The Eugene District RMP calls for implementing prescribed fire where needed and where possible to maintain or enhance special status plants, species habitat (pg. 55). The RMP (pg. 57) directs BLM to implement management actions/directions of the proposed RMP that are designed to enhance and maintain habitat for all endangered species in all Land Use Allocations. At page 72, the RMP states noxious weed and other non native pest plants will be controlled to maintain or restore Special Area values; at page 74, the RMP indicates emphasis would first be placed on using non chemical and other natural processes, including fire and manual removal methods, to control exotic or competing vegetation.

Other document – West Eugene Wetland Plan 1993, 2000

C. Identify the 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 -98-26 West Danebo Wetland Restoration

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 – Management Activities to Protect and Enhance Three Listed Species at Balboa, Oxbow West, Fir Butte, and Coble sites in the West Eugene Wetlands.
- Biological Assessment – Treatments to Enhance Rare Plant Populations at West Greenhill and the Long Tom ACEC.

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 Action is the same action previously analyzed in an Environment Analysis (EA-98-26). That action evaluated the effects of prescribed fire on less than 10 acres of the Balboa Unit. Resources within the proposed burn area are the same as those in the area covered by the existing EA.

Attachment 1-3

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 Environment Assessment analyzed an appropriate range of alternatives given the purpose and need for the project. Two alternative were analyzed, the Proposed Action Alternative A (prescribed fire) and Alternative B (no action). No additional concerns or circumstances have risen to require new alternatives.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances.

Yes – Research studies conducted by the U.S Army Corps of Engineers' Fisher Butte site revealed that Willamette daisy (*Erigeron decumbens*) increased its flower production and crown growth post burn year (1991). Ongoing research at Oxbow West (Tom Kaye, 1999) is examining the effects of prescribed fire, mowing, and weeding to the reproductive status of Willamette Daisy (*E. decumbens*). These findings are consistent with the effects analysis of the previous environmental analyses. In addition, the resources within the area identified for treatment under this Proposed Action are the same as the area treated under EA-98-26.

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 use of prescribed fire, ongoing study, and annual monitoring at the Balboa Unit continue to be appropriate to the restoration of this wetland prairie ecosystem.

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 sufficiently analyze site-specific impacts related to the current proposed action?

Yes – Impacts from the continued use of prescribed fire for native wetland habitat restoration would remain the same. The prescribed burning would occur within the same location as the previously analyzed in the EA-98-26 for the same purpose. There have been no changes in condition that would require new or additional analyses.

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 – The current action is similar, and unchanged from those analyzed in the existing NEPA documents for the Balboa unit (EA-98-26). No cumulative impacts are anticipated from the implementation of the Proposed Action beyond those already described in EA-98-26.

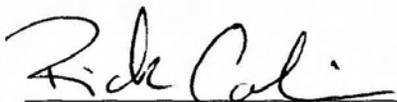
7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?

Yes - Availability of the EA and the project decision was advertised in the Eugene Register Guard, sent to interested persons on our EA mailing lists and coordinated with The Nature Conservancy. An informal consultation with the USFWS was completed for the original EA-98-26 in 2003.

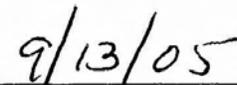
E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>
Sally Villegas	Natural Resource Specialist
Dharmika Henshel	Botanist
Nancy Ashlock	Fire Management Officer
Rick Colvin	Landscape Planner

Reviewed by:



NEPA Coordinator

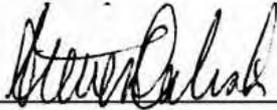


Date

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the Applicable land use plan and that the existing 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 and this box cannot be checked



Signature of the Responsible Official

14 Sept 05

Date

Finding of No Significant Impact/Decision Record

I have reviewed this Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA) (OR) (DNA-05-14) and have determined that the proposed action is in conformance with the approved land use plan (Eugene Record of Decision and Resource Management Plan, June 1995, as amended) and that no further environmental analysis is required.

On the basis of the information contained in the DNA Worksheet and the existing NEPA documents it references, and all other information available to me, it is my determination that implementation of the proposed action will not have significant environmental impacts beyond those already addressed in the environmental analysis (EA-98-26).

The BLM has made the determination that continued use of prescribed fire is required to help control shrubs and trees as well as enhance the reproductive status of Willamette daisy. Therefore, it is my decision to implement the project, as described, in the DNA Worksheet.

Authorized Official: 

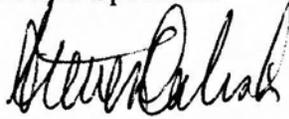
Steve Calish, Field Manager, Siuslaw Resource Area

Date: 14 Sept 05

Date: September 14, 2005

To: WEW Natural Resource Specialist

From: Field Manager



Subject: Determination of conformance with SSSP policy for Balboa Prescribed Burn within the Siuslaw Resource Area.

In accordance with BLM Special Status Species Program policy, I am providing documentation to affirm that I have considered actions contained within the Balboa Prescribed Burn DNA and information regarding species that appear on the SSSP list as of this date, and I have determined that implementation of the proposed management actions does not pose significant risk of moving SSSP species towards listing under the Endangered Species Act.

Findings. Through various procedures, including large scale habitat screens, smaller scale habitat screens, and site surveys, Resource Area botanists and biologists have determined that SSSP species either do not occur in the general project area, do not occur within the specific project activity sites, or are not susceptible to generally recognized survey protocols. Botany and wildlife findings are documented in your Prescribed fire in the WEWs and Special Status Species memo to me (September 12, 2005). The memo concludes with the observation that burning is the most beneficial tool to maintain populations of ephemeral taxa in prairies.

Determination. I am confident that the operations proposed for Balboa Prescribed Burn within the Siuslaw Resource Area will not pose the risk of driving SSSP species closer to listing under ESA.