Worksheet
Determination of NEPA Adequacy (DNA)

U.S Department of the Interior, Bureau of Land Management

A. Background

BLM Office: **Prineville** NEPA Log #: DOI-BLM-OR-P060-2008-0125

Project/Lease/Serial/Case File #:
Applicant: **Janice Madden**
Location:
T16S R17E Sec 35, 36
T16S R18E Sec 31
T17S R17E Sec 1, 2, 3, 10, 11, 12, 13, 14, 15, 24
T17S R18E Sec 5, 6, 7, 8, 17, 18
15 miles southeast of Prineville

Proposed Action Title/Type: **Sanford Creek Prescribed Burn (Alkali Butte Planning area)**

Description of the Proposed Action and any applicable mitigation measures:
Conduct a prescribed burn on 30-60% of a 6,928 acre unit of BLM land. Burning will be done in a mosaic pattern with a maximum patch size of 250 acres. In addition a minimal amount of trees will be felled around the perimeter of the burn boundary, limited to trees that pose a threat for throwing embers outside the control line. Hand ignition in combination with aerial ignition will be used.
Black lining (burning of the vegetation directly adjacent to the control line) will occur in the spring (if weather allows or early fall). The interior portion of the project will be implemented in the early fall.

Purpose of and Need for Action: Restore and maintain ecosystems consistent with land management uses and historic fire regimes through wildland fire use, prescribed fire, and other methods. Reduce areas of high fuel loading that may contribute to extreme fire behavior. In the wildland urban interface, live and dead vegetation will be managed so that a wildland fire would burn with fire behavior where firefighters can be safe and successful in suppression efforts under hot, dry summer weather conditions. Treatments will be designed for human safety while still considering recreation opportunities, wildlife habitat and corridors, visual quality, air and water quality, and public access.

B. Land Use Plan Conformance

Land Use Plan Name: **Upper Deschutes Record of Decision and Resource Management Plan**
Date approved (ROD): September 2005

The proposed action is in conformance with the applicable plan because it is specifically provided for in the following land use plan decisions:

According to the Fire/Fuels Management, Section, Goals and Vision, the goals and objectives for the project area are to "…provide for protection of Communities at Risk from the undesired effects of wildland fire, while assisting in the attainment of other management goals. Safety of the public and the fire fighters is the first priority in planning fuels management activities, while recognizing the role of wildland fire as an essential ecological process and natural change event." (page 23 Upper Deschutes Record of Decision and Resource Management Plan)

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

The following NEPA documents cover the proposed action:
Upper Deschutes Resource Management Plan and Final Environmental Impact Statement (January 2005)
High Desert Prescribed Burn EA# OR-050-98-005

The following other documentation is relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report):

None

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?

- The proposed action is a feature of Alternative 1 of the **High Desert Prescribed Burn EA**.

"This alternative would result in prescribed burning multiple units (to be identified, and surveyed before treatment) within the High Desert. Fire would be reintroduced for several reasons including juniper reduction, aspen regeneration, weed reduction, riparian enhancement and to improve forb and grass cover." – (page 5 High Desert Prescribed Burn EA)

- This project is within the same analysis area and the geographic and resource conditions are sufficiently similar to those analyzed in the High Desert Prescribed Burn EA - (Map 1 High Desert Prescribed Burn EA)
- The proposed action is a feature of Objective FF – 4 of the **Upper Deschutes Resource Management Plan and Final Environmental Impact Statement.**

"In the wildland urban interface, live and dead vegetation will be managed so that a wildland fire would burn with fire behavior where firefighters can be safe and successful in suppression efforts under hot, dry summer weather conditions. Treatments will be designed for human safety while still considering recreation opportunities, wildlife habitat and corridors, visual quality, air and water quality, and public access." - (page 38 Volume 3 Upper Deschutes Resource Management Plan and Final Environmental Impact Statement)

- This project is within the same analysis area and the geographic and resource conditions are sufficiently similar to those analyzed in the Upper Deschutes Resource Management Plan. - (FEIS map 1 Upper Deschutes Resource Management Plan and Final Environmental Impact Statement)

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes, the alternatives analyzed in the High Desert Prescribed Burn Project EA considered a range of alternatives adequate for the type and scale of treatment proposed at this time.

- Alternative 1 – Proposed Action (prescribed burn)
- Alternative 2 – No Action; (no prescribed burning)
- Alternative 3 – Chaining to control shrubs and trees and release herbaceous species. This alternative was considered but eliminated from detailed analysis in the EA. This alternative was eliminated from detailed analysis because "…chaining is less economically efficient than burning and is not a natural process in the ecosystem." - (page 6-7 High Desert Prescribed Burn EA)
- Alternative 4 – Wait for natural fire starts to burn to proposed area. This alternative was eliminated from consideration "…because natural fire would be unlikely to achieve the stated objectives in a reasonable amount of time…" - (page 7 High Desert Prescribed Burn EA)

Yes, the alternatives analyzed in the Upper Deschutes Resource Management Plan and Final Environmental Impact Statement considered a range of alternatives adequate for type and scale of the treatment proposed at this time.

- A brief summary of the alternatives considered in detail can be found in the Upper Deschutes Resource Management Plan and Final Environmental Impact Statement pages xxvii – xxix of Volume 1. This includes the Environmentally Preferred Alternative – "Alternative 7 provides the widest range of beneficial uses of the environment and balance of population and resource use, because if provides for a mix of uses across the planning area in a manner that will mitigate adverse impacts of those uses." - (page 9 Upper Deschutes Record of Decision and Resource Management Plan)

3. Is the existing analysis valid in light of any new information or circumstances (such as rangeland health standard assessment, recent endangered species listings, updated lists of BLM sensitive species)? Can you reasonably conclude that all new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. The Upper Deschutes FEIS analyzed the effects of … "Restore and maintain ecosystems consistent with with land uses and historic fire regimes through wildland fire use, prescribed fire, and other methods." - (page 37 Volume 3 Upper Deschutes Resource Management Plan and Final Environmental Impact Statement) This approach is appropriate for the current proposed action, as no new information has become available, and conditions in the project area have not changed. The current interdisciplinary team has reviewed the proposed action and did not provide new information not already considered in the existing analysis. The current proposed action has been designed to address known concerns including effects to special status plant and animal species, wilderness characteristics, recreation and visual resources. A wilderness characteristic update was completed in 2009 for the Sanford Creek; OR-056-005. This inventory determined that no wilderness characteristic values were found in this inventory unit, which includes the project area proposed for prescribed burning. The Wilderness Characteristic Update inventory for the Sanford Creek Unit is on file in the Prineville District Office.

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(s)?

Yes, the direct, indirect and cumulative effects of the proposed action are similar to those analyzed in the High Desert Prescribed Burn EA. Section IV of the EA (page 15 – 23) covers the Environmental Consequences of Alternative 1. This includes the impacts on; Vegetation, Livestock Grazing Management, Wildlife, Special Status Species, Soils and Water, Noxious Weeds, Cultural and Paleontological Resources, Visual Resource Management, Recreation, Natural Areas, Air Quality, and Wetland and Riparian Areas.

- Additionally Section VII of the EA (page 23) discuses the Residual Impacts. "It is not known exactly what the cumulative impacts of multiple prescribed burns would be. However, since fire is a natural occurring event in the High Desert, it is thought that prescribed fire conducted at low-intensities in a mosaic pattern should not add any major impact to the area." - (page 23 High Desert Prescribed Burn EA)

Yes, the direct, indirect and cumulative effects of the proposed action are similar to those analyzed in the Upper Deschutes Resource Management Plan and Final Environmental Impact Statement. "All alternatives would have fire effects, either from wildland fires or managed prescribed fires. Fire activity that would occur within the planning area includes human and lighting-caused unplanned ignitions, broadcast burns, jackpot burns, and pile burning. All alternatives and all fire events would have similar burn effects, with differences only in the amount of acres involved, intensities, and timing of events." - (page 156 Volume 2 Upper Deschutes Resource Management Plan and Final Environmental Impact Statement)

- A summary of the effects included can be found on pages 156-157 of the Volume 2 Upper Deschutes Resource Management Plan and Final Environmental Impact Statement.

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

Yes. Many of the individuals/organizations on our current "interested publics" list are the same as those on the mailing list for the RMP/EIS referenced above. A notice regarding the proposed action was included in the spring 2008 and 2009 Prineville District Schedule of Proposed Actions, published quarterly on the internet. A copy of this DNA is/will be posted on the Prineville District internet page.
For detailed information regarding the "Public Involvement in the Planning Process", see pages 11-13 of the Upper Deschutes Record of Decision and Resource Management Plan.

E. Persons/Agencies/BLM Staff consulted

Cultural/Historic- Steve Christy	Range-Don Zalunardo
Wildlife-Cassandra Hummel	Special Status Plants-JoAnne Armson
Fire/fuels-Janice Madden	Recreation/Visuals/Wilderness-Berry Phelps
Assistant Field Manager-Bill Dean	Environmental Coordinator-Teal Purrington

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

Signature

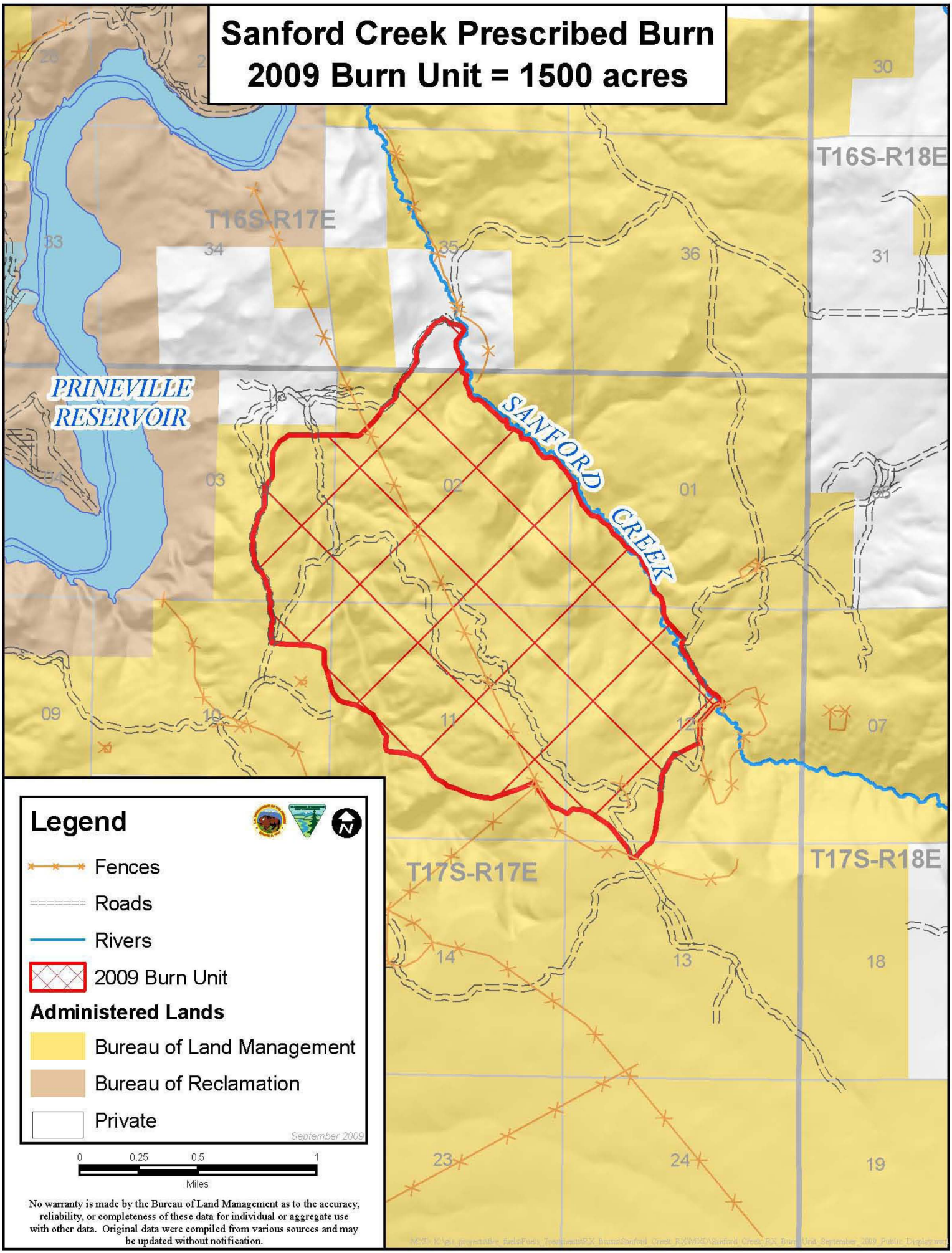
Responsible official: /S/ Michelle McSwain, Acting for Molly Brown — Sept. 3, 2009 Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program specific regulations.

Contact Person

For additional information concerning this review, contact: Janice Madden, Fuels Specialist, telephone 541-416-6575. Acting for Nancy Wiggins Fuels Specialist, Prineville Field Office, 3050 NE 3rd Street, Prineville, OR 97754, telephone 541-416-6423, Nancy_Wiggins@blm.gov.

Sanford Creek Prescribed Burn
2009 Burn Unit = 1500 acres



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