

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-P040-2015-0006-DNA

Project/Lease/Serial/Case File #:

Applicant: None

Locations:

Black Rock Fire - North east of Clarno, OR in Township 7 South, Range 18 East, Sections 1, 12, 13, 24, 25, 27, 28, 34 and 35. Township 7 South, Range 19 East, Sections 6, 7, 18, 19, and 30.

Proposed Action Title: Black Rock Post-Fire Herbicide Treatments

Description of the Proposed Action: The BLM would apply the herbicide imazapic by aerial and ground-based methods to populations of the noxious weed medusahead rye (*Taeniatherum caput-medusae* (L.) Nevski), and the invasive non-native weeds cheatgrass (*Bromus tectorum* L.), and North Africa grass (*Ventenata dubia* (Leers.) Coss) on 2,300 acres of BLM administered lands affected by the Black Rock fire. This action was previously analyzed in the 2012 Brown Road, Razorback, and Hancock Complex Post-Fire Herbicide EA, #DOI-BLM-OR-P000-2012-0011-EA. Of the 2,300 total acres, 300 acres would be treated in the spring or fall of 2015 under Emergency Stabilization (ES) funding and the remaining 2,000 would be treated in the spring or fall of 2016 under Burned Area Rehabilitation (BAR) funding. Ground based and aerial methods would be used to apply imazapic at a rate of 0.09375 pounds of active ingredient (a.i.) per acre per year, equivalent to 6 ounces of Plateau, Panoramic 2SL, or Nufarm Imazapic 2SL. The BLM would follow all Project Design Features, Standard Operating Procedures, and Mitigation Measures specified in the 2012 Brown Road, Razorback, and Hancock Complex Post-Fire Herbicide EA (available on the internet at: <http://www.blm.gov/or/districts/prineville/plans/index.php>.)

B. Land Use Plan Conformance

Land Use Plan Name: Two Rivers RMP

Date approved (ROD): 1986

The proposed action is in conformance with the applicable plan, even though it is not specifically provided for, because it is clearly consistent with the following land use plan decisions (objectives, terms, conditions): "Provide forage to meet management objective numbers of the Oregon Department of Fish and Wildlife for deer and elk. Manage upland vegetation to achieve maximum wildlife habitat diversity. Manage all streams with fisheries or fisheries potential to achieve a good to excellent aquatic habitat condition." (Page 10)

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:

- 2012 Brown Road, Razorback, and Hancock Complex Post-Fire Herbicide EA, #DOI-BLM-OR-P000-2012-0011-EA
- 2010 Vegetation Treatments Using Herbicides on BLM Lands in Oregon FEIS
- 2007 Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States FEIS

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

- FY14 ESR Monitoring Reports – Brown Road (F9DU), Razorback (GB8K), Hancock (GB8C) (BLM Prineville District, September 2014)
- Brown Road, Razorback, and Hancock Complex Post-Fire Herbicide ESA No Effects Determination – Aquatic (BLM Prineville District, August 2014)

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 current proposed action is within the analysis area in the DOI-BLM-OR-P000-2012-0011-EA (hereafter EA) and is essentially similar to the proposed action analyzed in the EA. The EA analyzed the effects of applying “the herbicide imazapic ... to populations of the noxious weed Medusahead rye (*Taeniatherum caput-medusae* (L.) Nevski), and the invasive non-native grasses cheatgrass (*Bromus tectorum* L.), and North Africa grass (*Ventenata dubia* (Leers.) Coss) located within 32,714 acres of BLM administered lands affected by the Brown Road, Razorback, and Hancock Complex fires” (EA, pages 7-8). The proposed action is within the same analysis area as the Hancock Complex, “all BLM managed lands burned by the Brown Road, Razorback, and Hancock Complex fires of 2011, totaling 36,523 acres” (EA, page 17). Resource conditions are similar to what was analyzed in the existing EA.*

While the current proposed action is essentially similar to the proposed action analyzed in the EA, the current proposed action is different in that it would treat 300 acres in spring or fall of 2015 and 2,000 acres in the spring or fall of 2016, while the EA analyzed 10,459 acres of annual treatment. However, the effects of including 2,300 acres from the Black Fire would not exceed those previously disclosed in the existing EA, because the long-term acres treated would still be limited to the 32,714 acres analyzed in the existing EA. The 300 acres is outside the original

area of the Hancock fire analyzed in the EA; however, this area is adjacent and is ecologically similar. The 2,000 acres proposed for treatment in 2016 is within the original area analyzed under the Hancock EA. Ephemeral drainages are included in the current proposed action because post-treatment monitoring has shown that there is more Medusahead rye growth in these unsprayed areas than in the areas that were sprayed during the previous application, and this additional Medusahead rye growth is providing a seed source that needs to be treated in order to achieve the purpose of “control[ling] noxious and invasive non-native annual grasses using imazapic on BLM lands within the areas burned by the Brown Road, Razorback, and Hancock Complex fires” (EA, page 4). Lastly, imazapic will be applied at a rate of 0.09375 pounds of active ingredient per acre per year, equivalent to 6 ounces per acre per year of Plateau. The direct, indirect, and cumulative effects analyses in the existing EA were based upon this rate range of 4-6 ounces per acre per year of Plateau, yet were displayed incorrectly in the EA as 0.0313 – 0.0469 pounds of active ingredient per acre per year.

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 range of alternatives analyzed in the existing EA includes effects from the current proposed action. The current proposed action’s project design features and similarity to the EA’s proposed action ensure that the effects of the proposed action are within the range of effects analyzed in the EA. Included in the current proposed action is the additional stipulation that avoids areas of historic plant use by local tribes and “prevents potentially significant effects to Tribal members gathering of traditional plants and root crops” (EA, page 13). There are no new environmental concerns, interests, or resource values.

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 existing analyses in the EA are still valid. There have not been any new rangeland health standard assessments for this area. Additionally there have not been any new endangered species listings or new BLM sensitive species or their habitat within the areas analyzed in the EA since the creation of the EA.

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 that would result from implementation of the proposed action are similar to those analyzed in the existing EA (pages 10-24). Based upon post treatment monitoring (which has shown that there is more Medusahead rye growth in the non-treated areas), the buffers have been decreased along streams. The original buffers, as outlined in the EA, were extremely conservative and many swales and ephemeral drainages

that do not carry surface water were buffered. By including these areas, previously untreated seed sources of Medusahead rye would be treated. Also included in the Proposed Action is the Project Design Feature in the existing EA, which states that imazapic would not be applied via ground-based methods within 25 feet of riparian areas, nor aerially within 100 feet of riparian areas. Riparian areas are characterized by certain types of vegetation, soils, hydrology and fauna and require free or unbound water or conditions more moist than generally found in the area. This PDF results in a Determination of No Effects with regard to Mid-Columbia River summer steelhead and bull trout as well as Essential Fish Habitat for Chinook salmon. The addition of treating annual grasses on 300 acres outside the original Hancock fire would have similar effects to those identified in the EA due to the close proximity and similar ecological condition. The 2,000 acres of annual grasses that would be treated in 2016 are within areas previously identified under the proposed action for the Brown Road, Razorback and Hancock Post-fire Herbicide EA.

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

Yes. The BLM sought input through scoping letters to interested publics before and after the preparation of the EA. Additionally, the BLM posted the EA and subsequent decision to the BLM's public web site on October 2012 and January 2013 respectively and copies were mailed to agencies, local governments, organizations and interested public. The public involvement and interagency review associated with the existing EA is adequate for the current proposed action because there are no new interested publics or potentially affected neighbors since the original public involvement. The Confederated Tribes of Warm Springs would be provided a letter and map of the current proposed treatment and would be emailed prior to the application of imazapic, per the stipulation in the EA, "maps of proposed treatment areas would be provided to the Confederated Tribes of the Warm Springs Reservation of Oregon" (EA, page 13).

E. BLM Staff Consulted

<u>Name</u>	<u>Title/Resource represented</u>
Molly Galbraith	Team Lead, Natural Resource Specialist, ESR/Soils (detailed)
Sarah Canham	Botany, Weeds
Teal Purrington	Environmental Coordinator
Terry Holtzapple	Heritage
Cassandra Hummel	Wildlife
Jimmy Eisner	Fisheries
Mike McKay	Hydrology
Craig Obermiller	Range/Livestock Grazing

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

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

H. F. "Chip" Faver
H. F. "Chip" Faver
Field Manager, Central Oregon Resource Area

3.5.15
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: Molly Galbraith, Prineville Field Office, 3050 NE 3rd Street, Prineville, OR 97754, telephone (541) 416-6714.



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources and may be updated without notification.

Last Modified Date: 2/20/2015

Black Rock Fire H8PH

Herbicide Treatment Areas

