

Worksheet

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior

Bureau of Land Management

OFFICE: Grand Canyon – Parashant National Monument
TRACKING NUMBER: DOI-BLM-AZ-A030-2010-0005-DNA
CASEFILE/PROJECT NUMBER: N/A
PROPOSED ACTION TITLE/TITLE: Mojave Plant Material Development for Revegetation
LOCATION/LEGAL DESCRIPTION: Pakoon Basin
APPLICANT (if any): N/A

A. Description of the Proposed Action and any applicable mitigation measures

The proposed project would provide the BLM and other land managers with research findings and a list of recommended candidate species suitable for investing further resources in for plant materials development for propagation for revegetation projects in southwestern arid lands. Specifically, this project would test the feasibility and likely effectiveness of 15 or more candidate species, identified in collaboration with BLM, for burned desert revegetation projects on the Grand-Canyon Parashant National Monument (GCPNM).

At one or more burn sites on the GCPNM, identified with BLM, an array of 6 meter × 6 meter monitoring plots would be established. The following treatments would be randomly assigned to different plots:

- (1) revegetation method: seed with the native seed mix in fall or in spring, or no seeding;
- (2) protection: use on-site burned shrub material for shelter, or no shelter;
- (3) weed control: exotic plants controlled through pulling and/or imazapic herbicide, or no control;
- (4) fencing for rodent exclusion, or no fencing

Each of these eight treatment combinations would be replicated eight times, for a total of 64 plots. Seed predation and herbivory are well recognized as affecting the potential for successful revegetation in desert ecosystems. As such, consideration would be given to rodent exclusion as well as to fencing plots to reduce herbivory, depending on a site inspection. Seed of 15 or more native perennial species would be collected locally at the GCPNM. The final species list would be based on earlier research of competition trials with red brome (S.R. Abella, manuscript in review), seed availability, and consultation with BLM. Seed would be collected when ripe, with subsequent seeding treatments. The establishment of the species would be compared by monitoring the plots for two years.

Data would be analyzed in a rigorous statistical framework and using multivariate ecological analytical techniques. A project biostatistician, a major contribution to this project, would help provide input on the experimental design and analysis approach in collaboration with BLM biologists and managers.

Consideration would be given to weather patterns and the findings of the study would be placed in the context of the weather conditions during the study period.

Proposed Requirements of Implementation:

If California condors are encountered while the proposed activity is underway, project personnel must notify the BLM wildlife team lead at (435) 688-3200. Project activities will be modified or delayed if those activities have adverse effects on condors.

No hazing or harassment of wildlife will be permitted.

To comply with Section 106 of NHPA, a cultural inventory has been completed for areas of potential ground disturbing activities.

All individuals handling tortoises must meet the FWS desert tortoise monitor or biologist qualifications requirements (see Appendix D). Permitting of these individuals may be done through application for a section 10(a)(1)(a) research and recovery permit, or through project-specific section 7 consultation.

Designate a field contact representative (FCR) who will have the authority to halt all non-emergency project activity should any danger to a listed species arise. Work will only resume after hazards to the listed species are removed.

Authorized biologists will act as biological monitors and be present during all construction activities for the protection of desert tortoises and other listed species. These biological monitors will be responsible for determining compliance with measures as defined in the biological opinion or other agreements between the project proponent and agencies.

Authorized activities will require monitoring of the desert tortoise population throughout the duration of the project. The appropriate level of monitoring will be developed in coordination with BLM and FWS. To ensure desired results are being achieved, minimization measures will be evaluated and, if necessary, section 7 consultation reinitiated.

Within DWMA/ACECs during the tortoise active season (March 15-October 15), set a 20 mph speed limit on BLM roads.

Uncontrolled domestic dogs will be prohibited from the project site and site access routes.

Use of firearms, except by law enforcement officers or licensed hunters during lawful hunting activities will be prohibited.

No standing water as a result of project operations will be permitted.

BLM shall submit annual reports as described in Reporting Requirements, below. Specifically for desert tortoises, the report shall briefly document for the previous calendar year actions taken to implement these terms and conditions, surface-disturbing activities authorized, the effectiveness of these terms and conditions at reducing take of desert tortoise, actual acreage of desert tortoise habitat disturbed, numbers of tortoises taken, including animals injured or killed, the number of desert tortoises excavated from burrows, the number of desert tortoises moved from construction sites, and information on individual desert tortoise encounters. The report shall make recommendations for modifying or refining these terms and conditions to enhance desert tortoise protection and reduce needless hardship on the BLM and users of public lands.

B. Land Use Plan (LUP) Conformance

The proposed action is in conformance with the Grand Canyon – Parashant National Monument Records of Decision and Resource Management Plan/General Management Plan (RMP), approved February 2008. The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

DFC-SR-01 Approved scientific research will contribute to management of natural and cultural resources and achieving Desired Future Conditions.

MA-SR-01 Permits will be required for approved scientific research to insure compatibility and reporting of results.

MA-VM-10 The Monument will be closed to the general commercial sale of vegetative products, except for the following situations:

On BLM-administered lands, the sale, collection, or use of vegetative materials (e.g. native seed, medicinals, landscape mulch, posts, fuel wood, etc.) will require a permit and may be authorized if tied to a clearly defined science-based research or restoration project, and the use will be consistent with achieving the DFCs and protecting Monument objects. Permits will be authorized only for those areas where resource management objectives have been developed.

The Pakoon Desert Wildlife Management Areas (DWMA) will be closed to the collection of vegetative materials.

Decision MA-VM-10 pertains to commercial sale of vegetative products, including commercial seed collectors. The collection of seed would be allowed under the conditions noted above. The proposed seed collection may be authorized and would require a permit.

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

List by name and date all applicable NEPA documents that cover the proposed action.

Environmental Assessment EA-AZ-130-2006-0008, July 2006
Burned Tortoise Habitat Restoration

Environmental Assessment EA-AZ-130-2008-031, September 2008
Bromus Research

Environmental Assessment DOI-BLM-UT-2010-003-EA, December 2009
MDI Research Plots

Categorical Exclusion: DOI-BLM-AZ-A030-2010-0001-CX, March 2010
Mojave Desert "Seeds of Success" Seed Collection

Categorical Exclusion: DOI-BLM-AZ-A030-2010-0003-CX, September 2010
Seed Bank Analysis in Burned and Unburned Critical Habitat for Mojave Desert Tortoise
List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

Biological Opinions: 2-21-05-F0772 for EA-AZ-130-2006-0008
22410-2002-F-0277-R1, November 7, 2007 for RMP February 2008
22410-2007-F-0463, November 7, 2007 for RMP February 2008

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)? **YES**

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)? **YES**

The project area is in the same analysis area as each of the referenced NEPA documents, except DOI-BLM-AZ-A030-2010-0003-CX, September 2010. And, the geographic and resource conditions are sufficiently similar to those in the CX, i.e. Mojave desert, same longitude, on north side of ridge vs. south side, same vegetation composition, same climate, and same soils.

If there are differences, can you explain why they are not substantial? **N/A**

Documentation of answer and explanation:

The seeding component of the Proposed Action is nearly identical to a component analyzed in EA-AZ-130-2006-0008, Burned Tortoise Habitat Restoration, which is "Aerial application of native, indigenous plant species seed (tested for pounds live seed [pls] and contaminants) on approximately 2,615 burned acres

prior to November 1, 2006. The only difference is that the seed would be applied manually instead of aurally.

The fencing component of the Proposed Action is identical to a component analyzed in EA-AZ-130-2006-0008, which is “Fence approximately 21 miles of burned area perimeter to prevent access by livestock or burros after October 15th, 2006 and before March 15th, 2007.”

The herbicide component of the Proposed Action is identical to a component analyzed in EA-AZ-130-2008-031, Brome Research, which is to determine local vegetative responses of imazapic relative to fire rehabilitation treatments on the Monument. Specifically the objectives of this research are to closely monitor the use of the imazapic to:

- a) Determine the extent to which Fall application of the pre-emergent herbicide imazapic suppresses non-native brome grasses relative to local differences in climate, soils, and fire and grazing history,*
- b) Evaluate the impact of imazapic on native Mojave Desert plant species that established from the seed mix applied in 2006, as well as on seed reserves that remain within the soil, and*
- c. Provide recommendations for the use of imazapic in the northeast Mojave Desert burned landscapes to maximize brome grass suppression and minimize negative impacts to native species.*

And, the two existing project areas are identical to that of the Proposed Action. All three project areas are within the Pakoon Basin of the Grand Canyon – Parashant National Monument.

The seed collection component of the Proposed Action is identical to a component analyzed in DOI-BLM-AZ-A030-2010-0001-CX, Mojave Desert “Seeds of Success” Seed Collection. Although the locations of these two components are not identical, they both occur in the Mojave Desert on the Arizona Strip District, and the geographic and resource conditions are sufficiently similar to those analyzed in the existing CX.

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**

Documentation of answer and explanation:

EA-AZ-130-2006-0008, Burned Tortoise Habitat Restoration, analyzed four alternatives.

EA-AZ-130-2008-031, September 2008, Bromus Research analyzed two alternatives.

DOI-BLM-UT-2010-003-EA, MDI Research Plots analyzed two alternatives.

Current environmental concerns, interests, and resource values are no different than when the NEPA documents were completed. The alternatives previously analyzed environmental concerns, interests, and resource values that remain current to the proposed action.

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)? **YES**

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:

There are no new circumstances or information that would substantially change the analysis of the new proposed action from the analyses completed in existing NEPA documents.

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**

Documentation of answer and explanation:

Because the proposed action is identical to action previously analyzed, the direct, indirect, and cumulative effects would be identical.

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

Documentation of answer and explanation:

Extensive public involvement and interagency review was completed for EA-AZ-130-2006-0008, Tortoise Habitat Restoration.

This EA was prepared by Grand Canyon - Parashant National Monument of the Bureau of Land Management, 345 E. Riverside Drive, St. George, Utah 84790. Phone (435-688-3345).

<i>Kathleen Harcksen</i>	<i>Team Lead & Writer/Editor</i>
<i>Scot Franklin</i>	<i>Wildlife, T&E Species, ACEC</i>
<i>Michelle Bailey & Tom Folks</i>	<i>Recreation, Visual Resources</i>
<i>Diana Hawks</i>	<i>Cultural Resources</i>
<i>Gloria Benson</i>	<i>Native American Concerns</i>
<i>Phil Seegmiller</i>	<i>Grazing Management</i>
<i>LD Walker</i>	<i>Noxious, exotic, invasive Weeds, Wild Horse and Burro</i>
<i>Bob Smith</i>	<i>Soil, Air and Water</i>

This EA was reviewed by:

<i>Michael Herder</i>	<i>Wildlife, T&E Species, ACEC</i>
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<i>John Herron</i>	<i>Cultural Resources</i>
<i>Hilary Boyd</i>	<i>Fire Ecologist</i>
<i>Laurie Ford</i>	<i>Lands and Realty</i>
<i>Ron Wadsworth</i>	<i>Law Enforcement</i>
<i>Ray Klein</i>	<i>NPS Law Enforcement</i>
<i>Dennis Curtis</i>	<i>Monument Manager</i>
<i>Brenda Smith</i>	<i>USFW, Section 7 Consultation</i>
<i>Leslie Defalco</i>	<i>USGS</i>
<i>Todd Esque</i>	<i>USGS</i>

The following agencies have been consulted with, or provided recommendations to this EA:

*Arizona Department of Game and Fish
Northern Arizona University
US Geological Survey
US Fish and Wildlife Service*

*Extensive public involvement and interagency review was completed for **EA-AZ-130-2008-031, Bromus Research**. This EA was prepared by staff of the Grand Canyon - Parashant National Monument of the Bureau of Land Management and National Park Service, 345 E. Riverside Drive, St. George, Utah 84790, phone (435-688-3345) - and Lake Mead National Recreation Area, 601 Nevada Way, Boulder City, Nevada 89005, phone (702-293-8906).*

The following persons contributed to the development of this analysis:

<i>Kathleen Harcksen, BLM</i>	<i>Team Lead, Writer/Editor: Vegetation, Monument Objects, T&E Species, Water Quality, Grazing, Visual Quality, Wilderness, Wilderness Characteristics, Soil, Air, and Water</i>
<i>Larry Stevens, GCWC</i>	<i>Ecology</i>
<i>Jeff Bradybaugh, NPS</i>	<i>NPS Monument Superintendent</i>
<i>Lesley Defalco, USGS</i>	<i>Principle Investigator</i>
<i>Susan Meyer, RMRS</i>	<i>Research Ecologist, Principle Investigator</i>

This EA was also reviewed by:

<i>John Herron, BLM</i>	<i>Cultural Resources</i>
<i>Laurie Ford, BLM</i>	<i>Lands and Realty</i>
<i>Linda Price, BLM</i>	<i>Standards for Rangeland Health</i>
<i>Lee Hughes, BLM</i>	<i>Riparian, Sensitive Plants</i>
<i>LD Walker, BLM</i>	<i>Noxious, exotic, invasive Weeds</i>
<i>Karen Jensen, BLM</i>	<i>Wildlife</i>
<i>Ron Wadsworth, BLM</i>	<i>Law Enforcement</i>
<i>Ray Klein, NPS</i>	<i>Law Enforcement</i>
<i>Jeff Bradybaugh, NPS</i>	<i>NPS Monument Superintendent</i>

<i>Tom Edgerton, BLM</i>	<i>BLM Monument Manager</i>
<i>Richard Spotts, BLM</i>	<i>Environmental Coordinator</i>
<i>Ted Cordery, BLM</i>	<i>State T&E Program Lead</i>
<i>Don Applegate, BLM</i>	<i>State Recreation Program Lead</i>
<i>Chris Horyza, BLM</i>	<i>State Planning and Environmental Coordinator</i>
<i>Lorraine Christian, BLM</i>	<i>AZ Strip District Field Manager</i>

The following agencies have been consulted with, or provided recommendations to this EA:

*Arizona Department of Game and Fish
USGS
USFS – Rocky Mountain Research Station
US Fish and Wildlife Service
US Bureau of Land Management
National Park Service
Kaibab Paiute Tribe*

The following persons or organizations provided public comment on EA-AZ-130-2008-031, Bromus Research:

*Sierra Club
Joe McGloin*

*Extensive public involvement and interagency review was completed for **DOI-BLM-UT-2010-003-EA, MDI Research Plots.***

The following persons contributed to the development of this analysis:

<i>Kim Leany, BLM</i>	<i>Vegetation, Greenhouse Gas Emissions</i>
<i>Bob Douglas, BLM</i>	<i>Wildlife, Special Status Species</i>

This EA was also reviewed by:

<i>Todd Esque, USGS</i>	<i>Research Proposal</i>
<i>Leslie Defalco, USGS</i>	<i>Research Proposal</i>
<i>Blair Waldron, ARS</i>	<i>Research Proposal</i>
<i>D. Corry, BLM</i>	<i>Air Quality</i>
<i>D. Kiel, BLM</i>	<i>Areas of Critical Environmental Concern,</i>
<i>G. McEwen, BLM</i>	<i>Cultural Resources</i>
<i>Greg Thayn, BLM</i>	<i>Environmental Coordinator</i>

The following agencies have been consulted with, or provided recommendations to this EA:

USGS
US Fish and Wildlife Service

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

Signature of the Responsible Official: _____ Date: _____

Scott Sticha
(acting) GCPNM Monument Manager

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 other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4.