

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT - ALTURAS FIELD OFFICE

**DETERMINATION OF NEPA ADEQUACY (DNA)**

**A. Background**

BLM Office: Alturas Field Office LLCAN02000

NEPA File No.: DOI-BLM-CA-N020-2011-0017-DNA

Proposed Action Title/Type: Alturas Field Office Integrated Weed Management Program Pesticide Use Proposal renewal - March 2011 - December 2013.

Location of Proposed Action: Alturas Field Office Cooperative Weed Management Area (CWMA) Lands.

Description of Proposed Action: The proposed action is to renew the Alturas Field Office Pesticide Use Proposal (PUP) for the next three years. The renewed PUP will allow the Alturas Field Office to maintain, control or eradicate known and newly discovered populations of noxious weeds within the 504,235 acres of BLM lands within the Alturas Field Office. Weed control will be accomplished with a combination of manual, mechanical, chemical, grazing management practices, bio-control, and prescribed fire treatments. Current known locations of noxious weeds are shown in the maps in Attachment 3.

In 2009, the BLM treated 520 sites for 259 acres and in 2010, 858 sites for 267 acres treated on BLM lands within the Alturas Field CWMA. The areas infested with noxious weeds are located on scattered sites throughout Modoc County and parts of Lassen, Shasta and Siskiyou counties. The weed populations vary in size from one plant on one square foot to several million plants of Medusahead on several thousand acres on the Likely Tablelands. The BLM proposes to authorize the Modoc, Lassen, Shasta and Siskiyou County Department of Agriculture spray crews to control some of these weed populations on BLM land under the terms of the existing Interagency Agreements. Infestation sites will also be treated by BLM's and the Pit River Tribe spray crews under the direct supervision of a BLM Certified Weed Coordinators/Specialist or Technician.

Chemical treatment methods include the use of backpack sprayers, ATV/UTV mounted power sprayer, truck mounted power sprayer, or helicopter applications depending on county funding. As stated on page 2-13 under Herbicide Modes of Action and Treatment Methods of the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States PEIS, the treatments correspond to ground applications by hand, vehicle-mounted sprayer, and aerial application by helicopters or fixed-wing aircraft respectively. The chemicals would either be in liquid or granular form. The proposed maximum herbicide application rates are attached to the current Pesticide Use Proposal. All personnel including, county, state, private contractors and federal employees applying restricted use herbicides will be a Certified Pesticide Applicators or be under the direct supervision of one.

Chemicals can be used alone or in tank mixtures. If two or more different chemicals of the formulations

are approved as a tank mixture on one or more of the labels, or have written recommendations for a tank mixture from a University, College of Agriculture, Cooperative Extension Service or the State Department of Agriculture, then it is permissible to tank mix these chemicals for a spray program. As part of the proposed action, monitoring of application may be done by adding colorant to the tank mix. The colorant is approved for use with herbicide and will help obtain a uniform coverage. This colorant is water soluble, breaks down in sunlight, and washes away with water. Using colorant will reduce the chances of under and over application and will help detect and manage drift. Using a colorant will also reduce the risk to non-target species as a result of over application of herbicide and assure treatment of target species.

The Environmental Protection Agency (EPA) and the California Department of Pesticide Regulations currently registers all herbicides approved for use on California lands managed by the BLM. All chemical applications would only take place in accordance with the manufactures label. Attachment 1 gives the specific herbicides approved for application on BLM lands as of September 30, 2010.

The Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States, June 2007 (17 Western States PEIS) analyzed the herbicides (by trade names) addressed in EA #CA320-07-13. The analyses included application methods, degradation of the herbicides, and risks to humans, wildlife, and aquatic organisms.

## **B. Land Use Plan Conformance**

This action conforms to the Alturas Resource Management Plan (RMP) and Record of Decision (ROD), approved on April 17, 2008 because it is specifically provided for or is clearly consistent with the RMP objectives and decisions.

### **2.18 Noxious Weeds and Invasive Species**

#### **2.18.2 Goal**

Minimize the likelihood of introducing new species of noxious weeds and other invasive species and, where this has already occurred, prevent weeds from becoming established. In areas where noxious weeds are established, maintained areas where infestations have been adequately controlled. Institute measures to substantially decrease the area and density of infestation where weeds have not passed an ecological threshold for site rehabilitation (e.g., cheatgrass and medusahead.)

#### **2.18.3 Objective**

Apply recognized and proven IWM practices throughout the planning area to control the introduction and proliferation of noxious weeds and other undesirable invasive plants. The area and density of established populations will be reduced to acceptable levels. Maintain plant communities in such manner as to remain free of noxious weeds wherever possible. Where weeds are prevalent over a large area, use broad-scale IWM strategies to control infestations.

## **C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the Proposed Action.**

1. Vegetation Treatments Using Herbicide on Bureau of Land Management Lands in 17 Western States Programmatic EIS (PEIS), (June 2007)

2. Integrated Weed Management Program Bureau of Land Management Lands Alturas, Eagle Lake and Surprise Field Offices, (April 2007)
3. 2007, Adoption of the Alturas Field Office Resource Management Plan 2007 Revision on Lost River, shortnose and Modoc suckers and their proposed critical habitat, Shasta crayfish, bald eagle, northern spotted owl, slender Orcutt grass, soldier meadow cinquefoil, Oregon spotted frog and Western yellow-billed cuckoo, Reply 1-10-07-I0055.
4. 2009, Biological Assessment for the Sage Steppe Ecosystem Restoration Strategy BLM and USDA Forest Service on Modoc, shortnose, Lost River and Warner suckers and their proposed critical habitat, Shasta crayfish, northern spotted owl, Carson wandering skipper and slender Orcutt grass.
5. Partners Against Weeds, Action Plan for BLM, 1996
6. BLM – Alturas FO Noxious Weed Prevention Schedule, Feb 1999
7. Approved Standards for Rangeland Health and Guidelines for Livestock Grazing Management on BLM-Administered Lands in Northeastern California and Northwestern Nevada (July, 2000)

### **Regulatory Authorities**

The BLM utilizes several regulatory authorities in controlling noxious weeds:

- Food, Drug and Cosmetic Act (1938) and Miller Act Amendment to the Act
- Carson-Foley Act of 1968
- The Federal Insecticide, Fungicide and Rodenticide Act (1972) as Amended (1988)
- Federal Noxious Weed Act of 1974 and Amendment of November 28, 1990
- Federal Land Policy and Management Act of 1976
- Public Rangelands Improvement Act of 1978
- California Interagency Memorandum of Understanding, Undesirable Plants, 1995

### **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 documents(s)? If there are differences, can you explain why they are not substantial?**

As stated in EA #CA320-07-13, the proposed action is a continuation of the “Integrated Weed Management Program on Bureau of Land Management Lands in the Alturas Field Office, California Lands Portion” since 2007. The proposed action is to maintain, control or eradicate known and newly discovered populations of noxious weeds within the 503,045 acres of BLM lands administered by the Alturas Field Office. In three separate acquisitions the Alturas Field Office has acquired an additional 1,190 acres and now includes 504,235 acres. Weed control will be accomplished with a combination of manual, mechanical, chemical, grazing management practices, bio-control, and prescribed fire treatments.

**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?**

The range of alternatives analyzed in EA #CA320-07-13 the “Integrated Weed Management Program on Bureau of Land Management lands in the Alturas Field Office, California Lands Portion” analyzed 3 alternatives (Integrated Weed Management, Control with All Methods except Herbicides, and No Action) alternatives. All 3 alternatives are still appropriate in respect to the current proposed action and current environmental concerns, interests, resource values and circumstances for the Alturas Field Office area.

**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 new information and new circumstances would not substantially change the analysis of the new Proposed Action?**

EA #CA320-07-13, analysis of the environmental consequences is still valid and no new information or circumstances that are applicable and significant to the proposed action needs of further analysis.

**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?**

The methodologies and analytical approaches used in EA #CA320-07-13 are still appropriate for supporting the approval of the proposed action. Cumulative impacts were also analyzed in the EA for the Integrated Weed Management Program for the Alturas Field Office.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the new Proposed Action?**

All of the Critical Elements and the impact analysis addressed in EA #CA320-07-13 are still valid and specific to the proposed action. No new information or circumstances have been identified and the proposed action has not changed since 2007.

Agencies and Individuals Consulted During the 2007 EA Process:

Sierra Club Legal Foundation  
California Department of Fish and Game, Alturas – Redding - Wendel  
Steve Shoenig, California Department of Food and Agriculture  
Carrie Pirosko, California Department of Food and Agriculture  
Joe Moreo, Modoc County Department of Agriculture  
Kenneth Smith, Lassen County Department of Agriculture  
Mary Pfeiffer, Shasta County Department of Agriculture  
Patrick Griffen, Siskiyou County Department of Agriculture  
Karl Bishop, Plumas/Sierra County Department of Agriculture  
Jacob Sigg, California Native Plant Society  
University California Cooperative Extension, Modoc – Lassen - Shasta – Siskiyou counties  
Dan Marcum, Shasta County Farm Advisor  
Johanna Wald, Natural Resources Defense Council

State Clearing House, California  
 California Regional Water Quality Control Board, Central Valley – North Coast – Lahontan regions  
 Californias for Alternatives to Toxics  
 United States Forest Service, Modoc – Lassen – Klamath National Forest  
 Todd DeGarmo, Fort Bidwell Indian Reservation  
 Ross Montgomery and Sharon Elmore, Pit River Tribe  
 Belinda Brown, Hewise Band  
 Chas Gonzales, Hammawi Band  
 Marisha Waneo, Cedarville Rancheria  
 Wendy Del Rosa, Alturas Rancheria  
 Susanville Rancheria  
 Allen Foremen, Klamath Tribes  
 U.S Fish and Wildlife Service, Klamath Falls FWO  
 Northwest Great Basin Association  
 Modoc Land Use Committee  
 Modoc Cattleman’s Association  
 California Basket Weavers Association  
 California Wilderness Coalition  
 The Wilderness Society

**E. Persons/Agencies/BLM Staff Consulted**

**2007 – BLM Staff Consulted on original EA**

<b><u>Name</u></b>	<b><u>Title</u></b>	<b><u>Resource/Agency Represented</u></b>
Mike Dolan	Botanist	Alturas Field Office
Cheryl Foster-Curley	Archaeologist	Alturas Field Office
Paul Schmidt	Wildlife Biologist	Alturas Field Office
Alan Uchida	Watershed Specialist	Surprise Field Office
Lynette Sullivan	Noxious Weed Technician	Surprise Field Office
Elias Flores	Wildlife/Fishery Biologist	Surprise Field Office
Penni Borghi	Archaeologist/Recreation/WSA	Surprise Field Office
Garth Jeffers	Fire Management Officer	Surprise Field Office
Carolyn Gibbs	Botanist	Eagle Lake Field Office
Josh Gibbs	Noxious Weed Technician	Eagle Lake Field Office
Melissa Nelson	Wildlife Biologist	Eagle Lake Field Office
Sharynn Blood	Archeologist	Eagle Lake Field Office
Duane Jackson	Outdoor Recreation Planner	Eagle Lake Field Office
Jerry Wheeless	Fire Management Officer	Eagle Lake Field Office
Timothy Wakefield	Sup. RMS	Eagle Lake Field Office

**2011 Alturas Field Office Staff Consulted on DNA**

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Alan M. Uchida	RMS/Noxious Weed Coordinator	Alturas Field Office
Michael P. Dolan	Botanist	Alturas Field Office
Arlene D. Kosic	Wildlife Biologist	Alturas Field Office
Claude F. Singleton	Outdoor Rec. Planner	Alturas Field Office
David J. Scott	Archaeologist	Alturas Field Office
Peter W. Hall	Forester	Alturas Field Office
Albert Savage	Fuels Specialist	Alturas Field Office
Emily S. Jennings	Realty/NEPA Coordinator	Alturas Field Office

**D. Conclusion**

- 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 constitute BLM's compliance with the requirements of the NEPA.

Note: If you found that one or more of these criteria is not met, you will not be able to check this box.

/s/ Alan Uchidaa  
Signature of Project Lead

3/29/2011  
Date

/s/ Emily Jennings  
Signature of NEPA Coordinator

3/29/2011  
Date

/s/ Timothy Burke  
Signature of the Responsible Official

3/30/2011  
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.