

# Determination of NEPA Adequacy (DNA)

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

OFFICE: Upper Missouri River Breaks National Monument LLMTL07000

TRACKING NUMBER: DOI-BLM MT-MTL070-2014-0002-DNA

PROPOSED ACTION TITLE/TYPE: Continuation of Herbicide Use for Invasive Plant Management

LOCATION/LEGAL DESCRIPTION: All BLM lands managed by the Upper Missouri River Breaks National Monument (UMRBNM)

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

The BLM proposes to continue the use of herbicides in concert with other treatment types (biological, cultural, physical) to manage invasive plants. The herbicides that will be used have been evaluated and analyzed in the Vegetation Treatment on BLM Lands in 17 Western States (September 2007). As part of this effort, these chemicals have been re-assessed for potential risk. These chemicals will be applied within the label restrictions, under guidance from BLM handbook 9011, and with consideration of site specific characteristics to minimize non target impacts. The Field Office Programmatic EA (MT-066-08-08) incorporates the list of approved herbicides for application on BLM administered lands, Standard Operating Procedures (SOPs), and the mitigation measures set forth in the Record of Decision for the Vegetation Treatments on BLM Lands in 17 Western States Programmatic EIS.

The nature of herbicide applications will normally be spot spraying with a backpack or ATV/UTV mounted sprayer with a handgun. In some instances, broad jet sprayers mounted on an ATV/UTV will be used on larger infestations. These actions may also be done with sprayer mounted in pickup trucks. Some areas will be treated aerially by fixed wing or helicopter. Other herbicide delivery options include the use of rope wick applicators, broadcast granules and cut stump applications.

## B. Land Use Plan (LUP) Conformance

LUP Name\*: UMRBNM RMP

Date Approved 2008

Other document: Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic EIS

Date Approved 2007

Other document: the Implementation of Integrated Weed Management (IWM) in the UMRBNM (MT-066-08-08)

Date Approved 2008

- ✓ The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

UMRBNM RMP - Record of Decision, December 2008: page 46, Vegetation – Noxious and Invasive Plants. *The management of noxious and invasive plants will continue as prescribed in the Upper Missouri River Breaks National Monument: Guidelines for Integrated Weed management (BLM 2001) and its subsequent updates. This weed management plan was developed to conform to the Montana Weed Management Plan (2001, 2005, 2008), and provides guidelines for the prevention, containment and eradication of invasive and noxious plants, and for the coordination of BLM, state, county and private weed management efforts. The Integrated Weed Management Plan will be updated on a periodic basis as a result of monitoring data or when new national or state plans are developed.*

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

Record of Decision, December 2008: page 46, Vegetation – Noxious and Invasive Plants. *The management of noxious and invasive plants will continue as prescribed in the Upper Missouri River Breaks National Monument: Guidelines for Integrated Weed management (BLM 2001) and its subsequent updates. This weed management plan was developed to conform to the Montana Weed Management Plan (2001, 2005, 2008), and provides guidelines for the prevention, containment and eradication of invasive and noxious plants, and for the coordination of BLM, state, county and private weed management efforts. The Integrated Weed Management Plan will be updated on a periodic basis as a result of monitoring data or when new national or state plans are developed.*

Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States – Record of Decision, September 2007: page 2-1. *The decisions is to: 1) approve the herbicide active ingredients assessed and analyzed under the Preferred Alternative in the PEIS for use on public lands administered by the BLM in 17 western states, including Alaska, and 2) approve the use of the scientific assessment protocol to guide the analytical methodology for consideration of the use or non-use of herbicides by BLM. These decisions are supported by herbicide treatment standard operation procedures (SOPs) and mitigation measures to ensure that the natural and human environment are protected during implementation of herbicide treatments. This ROD makes no decisions regarding the number of acres to be treated.*

Implementation of Integrated Weed Management (IWM) in the Upper Missouri River Breaks National Monument (MT- 66-08-08) – Finding of No Significant Impact, Feb. 2008: *It is my decision to authorize the implementation of integrated weed management including all approved methods (chemical, biological, physical, and cultural) of treatment as described in the proposed action alternative in the Implementation of Integrated Weed Management (IWM) in the Upper Missouri River Breaks National Monument Environmental Assessment MT066-08-08. This decision is contingent on meeting all stipulations and monitoring requirements listed in the Vegetation Treatments on BLM Lands in 17 Western States Final PEIS and Record of Decision.*

#### **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 action is the same action as analyzed in the Implementation of Integrated Weed Management (IWM) in the UMRBNM (EA-MT-066-08-08). This action is needed to renew Pesticide Use Proposals for the UMRBNM.

**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, all reasonable alternatives, including a No Action alternative were analyzed.

**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?**

YES, there are no new circumstances that would require a substantial change in the analysis needed to conduct the proposed action. Mitigations and SOPs set forth in EA MT-066-08-08 and taken from the Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States PEIS are designed to eliminate and reduce effects on the natural and human environment.

**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, BLM's NEPA responsibilities are being met, and the methodology and analytical approach are fully adequate. Direct, indirect, and cumulative effects are essentially the same as analyzed by EA-MT-066-08-08.

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

Yes, public and interagency review solicited during the preparation of the Vegetation Treatment Using Herbicides on BLM Lands in 17 Western States PEIS is fully adequate for the current proposed action. In addition the MT Dept of Agriculture and County Weed Districts were asked for their participation in the development of EA- MT- 066-08-08.

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

Ben Hileman	Rangeland Management Specialist	Range Resources
Tom Darrington	Rangeland Management Specialist	Range Resources
Mark Schaefer	Outdoor Recreation Planner	Recreation/Special Management Designations/VRM
Jody Peters	Wildlife Biologist	Wildlife/T&E/Migratory birds/Fisheries
Zane Fulbright	Archaeologist	Archaeology and Paleontology
Josh Sorlie	Soil Scientist	Soils
Chad Krause	Hydrologist	Floodplains, Water Quality, Wetland and Riparian Areas
Dan Brunkhorst	NEPA Coordinator	NEPA/Environmental Review
Kenneth Kever	Natural Resource Specialist	Noxious & Invasive Species/Project Lead

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.

### **F. Mitigation Measures**

The ROD for the Vegetation Treatment Using Herbicides on BLM Lands in 17 Western States PEIS and its Appendix B can be found at: [http://www.blm.gov/wo/st/en/prog/more/veg\\_eis.html](http://www.blm.gov/wo/st/en/prog/more/veg_eis.html). Mitigation measures are outlined in the ROD on the table starting on page 2-4. Appendix B outlines BLM's Standard Operating Procedures.

The Most recent list of approved herbicides and adjuvants can be found at the following web addresses or by typing "blm approved herbicide list" or "blm approved adjuvant list" in a search engine:

<http://www.blm.gov/pgdata/etc/medialib/blm/wy/programs/invasiveplants/docs.Par.98139.File.dat/ApprovedHerbicideFormulations.pdf>

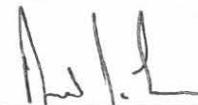
<http://www.blm.gov/pgdata/etc/medialib/blm/wy/programs/invasiveplants/docs.Par.44006.File.dat/ApprovedAdjuvants.pdf>

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

 1-24-2014  
\_\_\_\_\_  
Signature of Project Lead

 2.4.14  
\_\_\_\_\_  
Signature of NEPA Coordinator

 2/5/2014  
\_\_\_\_\_  
Signature of the Responsible Official: 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. A Decision Document may be required (if the Decision Document for the previously-completed action does not apply), consistent with program requirements.

