

**U.S. Department of the Interior
Bureau of Land Management (BLM)**

Twin Falls District
Jarbidge Field Office
2536 Kimberly Road
Twin Falls, ID 83301

**Worksheet
Determination of NEPA Adequacy (DNA)**

NEPA No. DOI-BLM-ID-T010-2013-0019-DNA

BLM Office: Jarbidge Field Office. **Lease/Serial/Case File No.:** N/A.

Proposed Action Title/Type: Browns Gulch (HQ5G) Emergency Stabilization and Burned Area Rehabilitation (ES&BAR) Plan.

Location of Proposed Action: The Browns Gulch Fire is located in Owyhee County, Idaho, and covers portions of Township 06S, Range 08E, Sections 1, 2, 10-15, 21-25. The burned area contains portions of the Lower Saylor Creek and West Saylor Creek livestock grazing allotments.

Applicant (if any): N/A.

A. Description of the Proposed Action

The proposed action is to implement the Browns Gulch ES&BAR plan as prescribed by the Boise District and Jarbidge Field Office Normal Fire Emergency Stabilization and Rehabilitation Plan and Environmental Assessment (EA, #ID-090-2004-050), approved May 12, 2005. Treatments and associated design features and monitoring are detailed in the Browns Gulch Fire (HQ5G) ES&BAR plan. The proposed action consists of the following treatments:

- Broadcast and harrow about 110 acres with a native/non-native grass seed mix in fall 2013.
- Inventory and treat 4,125 acres for noxious weeds for 3 years.
- Repair or replace up to 3.5 mile of burned livestock management fence.
- Close the burned area to livestock grazing until ES&BAR objectives have been met.

B. Land Use Plan (LUP) Conformance

Land Use Plan Name: Jarbidge Resource Management Plan (RMP).

Date Approved/Amended: March 23, 1987.

The proposed action is in conformance with the Jarbidge RMP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives) for the Saylor Creek West Multiple Use Area (MUA-6) (p. II-28):

- Improve lands in poor ecological condition.
- Maintain existing ecological improvements.
- Manage big game habitat to support mule deer. Maintain present levels of upland game nesting and cover habitat.
- Protect and manage the Sand Point Paleontologic Area.

In addition, the proposed action addresses the following RMP Resource Management Guidelines:

- Terrestrial Wildlife (pp. II-83 – II-84)
 - Manage all wildlife habitat within the resource area to provide a diversity of vegetation and habitats.
- Fire Management (p. II-89):
 - All grazing licenses issued that include areas recently burned and/or seeded will include a statement concerning the amount of rest needed in the seedings or burned area. Normally two years of rest will be necessary to protect these areas. This rested area may include remnant stands of desirable species that survived the fire.
 - Seedings will include appropriate seed mixtures to replace wildlife habitat that is burned.
- Control of Noxious Weeds (p. II-94):
 - BLM will control the spread of noxious weeds on public lands where possible, where economically feasible, and to the extent that funds are prioritized for that purpose.

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

The treatments outlined in this plan are also consistent the following NEPA documents:

- Decision Record for the Boise District Office and Jarbidge Field Office Normal Fire Emergency Stabilization and Rehabilitation Plan (NFRP) and Environmental Assessment (EA, #ID-090-2004-050), approved May 12, 2005. The Browns Gulch ES&BAR project meets the following treatment criteria outlined in the NFRP (p. 10):
 - Areas where the soil is susceptible to accelerated erosion either because of soil characteristics, steep topography, or recurrent high winds.
 - Areas where perennial grasses, shrubs, and forbs have been depleted and cannot reasonably be expected to provide soil and watershed protection within two years after a wildland fire.
 - Areas where noxious weeds or exotic annual grasses may readily invade and become established following a wildland fire.
 - Areas that contain significant and fragile cultural resources.
 - Areas where ESR is necessary to meet land use plan objectives.

The NFRP contains analysis of treatment types included in the proposed action, including ground seeding (pp. 10-14), noxious and invasive weed treatments (pp. 14-16), livestock management fence repair (p. 19), and livestock grazing closure (p. 19).

- Decision Record for the Noxious and Invasive Weed Treatment EA (#ID100-2005-EA-265) for the Boise District and Jarbidge Field Office, approved January 25, 2007. This EA analyzed chemical, mechanical, and biological control methods for managing noxious and invasive weeds. The Noxious and Invasive Weed Treatment EA also includes general design features that would be applied in the proposed action for protection of sensitive resources (pp. 7-11).
- Record of Decision (ROD) for the Programmatic Environmental Impact Statement for Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States, approved September 29, 2007. Appendix B of the ROD includes a list of standard operating procedures that would be used for vegetation treatments using herbicides.

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 proposed treatments included in the Browns Gulch ES&BAR plan were analyzed in the Boise District and Jarbidge Field Office NFRP and Noxious and Invasive Weed Treatment EAs. All treatment types meet the criteria listed on page 10 of the NFRP for protection and treatment of burned areas (see section C above). Treatments contain design features that are consistent with existing land use plan and program-specific conservation measures.

The proposed action is contained in the applicable geographic analysis area for the NEPA documents listed above. Resource conditions are also within the range considered in the pertinent NEPA documents.

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

Yes. The alternatives analyzed in the existing NEPA documents are appropriate to the proposed action. Two other alternatives were analyzed in the NFRP EA. These included a No Action alternative that would have continued implementation of the 1987/1988 NFRPs, and an alternative to not implement ES&BAR treatments. The latter alternative was eliminated because it is inconsistent with BLM policy. The current proposed action is intended to protect soils, vegetation, and the Oregon National Historic Trail within the burned area from degradation and is appropriate relative to the existing analysis and resource conditions.

In addition to the selected alternative, four other alternatives were considered in the Noxious and Invasive Weed Treatment EA. These included a No Action alternative that would have continued

implementing the 1998 weed control program, an alternative that considered not using herbicides, an alternative that considered not treating weeds, and an alternative limited to treating juniper and sagebrush. The noxious weed treatments proposed in the Browns Gulch ES&BAR plan are consistent with the selected alternative and are appropriate given existing resource conditions.

3. Is the existing analysis valid in light of any new information or circumstances (such as rangeland health standard assessment, recent endangered species listings, or 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. The existing analyses contained in the NEPA documents listed in section C continue to be valid because no new information or changed circumstances have been identified that would cause the BLM to consider a new or revised proposed action. During the interdisciplinary review, team members consulted the most recent list of Threatened and Endangered species (see <http://www.fws.gov/idaho/Species.htm>, accessed July 22, 2013) and BLM sensitive species (http://www.blm.gov/style/medialib/blm/id/wildlife/sensitive_species.Par.71825.File.dat/Sensitive_Species_list_for_WEBSITE_508.pdf, accessed July 22, 2013) for the Jarbidge Field 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?

Yes. The NEPA documents listed in section C above adequately analyzed the environmental effects that would result from implementation of the treatments proposed in the Browns Gulch ES&BAR plan. No new treatment types have been identified that will deviate from those analyzed in these documents. The direct, indirect, and cumulative effects analyses contained in the existing documents continue to be current and accurate.

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

Yes. The public involvement and interagency review of the existing NEPA documents is adequate for the current proposed action. Scoping letters were sent to interested publics, including individuals, organizations, and federal and state agencies, as summarized in the table below. In addition, government-to-government consultations were performed with the Shoshone-Paiute Tribes of the Duck Valley Reservation and the Shoshone-Bannock Tribes of Fort Hall, and ESA Section 7 consultations were performed for these programmatic documents.

NEPA Document	Number of Scoping Letters	Date of Scoping
NFRP EA	1,077	October 2003
Noxious and Invasive Weed Treatment EA	102	April 2003

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource/Agency Represented
Julie Hilty	Team Lead/Fire Ecologist	ES&BAR/Fuels/BLM
Scott Uhrig	Fire Rehabilitation Specialist	Operations/BLM
Jeff Ross	Archaeologist	Cultural Resources/BLM
Dan Strickler	Rangeland Management Specialist	Range/BLM
Krystle Pehrson	NEPA Coordinator, Rangeland Management Specialist	NEPA/Range/BLM
Michael Haney	Wildlife Biologist	Wildlife/BLM
Darek Elverud	Fisheries Biologist	Fisheries/BLM
Mark Fleming	Regional Wildlife Habitat Manager	Wildlife/Idaho Department of Fish and Game

CONCLUSION

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


9.4.2013

 Julie Hilty, Project Lead Date


9/4/13

 Krystle Pehrson, NEPA Coordinator Date


9/5/13

 Brian W. Davis, Field Office Manager 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.