Checklist for Determination of Existing NEPA Adequacy

Document Title: LOWER SANDS DRAW FALL 2013 PLANTING

Document Number: DOI-BLM-AZ-G010-2014-0002-DNA | **Case File Number: N/A**

Preparer Name and Title: Jony Cockman, Lead Natural Resource Specialist

Date Scoping Initiated: 10/28/13 | **Date Scoping CLOSED:**

Roberta Lopez (acting)
Thomas J. Schnell, AFM for Non-Renewable Resources

Tim Goodman - Jeff Conn
Biologist Assigned

RJ Estes (Acting)
Joe David, AFM for Renewable Resources

Joe David
NEPA Coord. Assigned

Scott C. Cooke
Scott C. Cooke, SFO Field Manager

Critical Elements and Other Issues	Specialists	Affected		Comments		Document Review Signature	Date
		Yes	No	Yes	No		
Air Quality*	Joe David TDG		✓		✓		10/30/13
ACECs*	Tom Schnell		✓		✓		10/29/13
Climate Change	Joe David TDG		✓		✓	Joneen S. Cockman	10/30/13
Cultural Resources*	Dan McGrew		✓		✓		10/29/13
Env. Jus. and Socioeconomics*	Tim Goodman		✓		✓		10/28/13
Floodplains*	Joe David TDG		✓		✓	Joneen S. Cockman	10/30/13
Hazardous Materials*	RJ Estes	✓	✓	✓	✓		10/26/13
Lands/Realty	Roberta Lopez		✓		✓		10/29/13
NEPA Maps	Sharisse Fisher TDG		✓		✓		10/30/13
Nonnative/Invasive Plants*	Dave Arthun		✓		✓	Joneen S. Cockman	10/30/13
Native American Rel.*	Dan McGrew		✓		✓		10/29/13
Prime/Unique Farmlands*	Appropriate RMS		✓		✓	Joneen S. Cockman	10/30/13
Range	Appropriate RMS		✓		✓		10/26/13
Soils	Appropriate RMS		✓		✓		10/26/13
Solid Waste*	RJ Estes		✓		✓		10/26/13
T&E Animal Species*	Tim Goodman		✓		✓		10/28/13
T&E Fish/Fisheries	Heidi Blasius		✓		✓		10/29/13
T&E Plant Species*	Tim Goodman		✓		✓		10/28/13
VRM*	Ron Peru		✓		✓		10/29/13
Water Quality (Grnd. & Srfc.)*	Joe David TDG		✓		✓	Joneen S. Cockman	10/30/13
Water Rights	Joe David TDG		✓		✓	Joneen S. Cockman	10/30/13
Wetlands/Riparian*	Joe David TDG		✓		✓	Joneen S. Cockman	10/30/13
Wild & Scenic River*	Tom Schnell		✓		✓		10/29/13
Wilderness*	Tom Schnell		✓		✓		10/29/13
Wilderness Characteristics	Tom Schnell		✓		✓		10/29/13
Wildlife	Tim Goodman		✓		✓		10/28/13

Other							

*required by law

Attachments:

Planning and Environmental Coordinator: _____ Date: 10/30/13

_____ Date: 10/30/13

Assistant Field Manager - Reviewed/Recommended

AZ-040-1790-2
(Rev. 08/02)

TDG Tim Goodman Acting AFOM for Joe David

Worksheet
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)
NEPA #: DOI-BLM-AZ-G010-2014-0002-DNA

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

Project Title/Type: LOWER SANDS DRAW FALL 2013 PLANTING

Location of Proposed Action: San Simon Valley, Sands Draw Exclosure, UTM 12S 652069 E 3596388

Description of the Proposed Action and any applicable mitigation measures:
Plantings would be arranged in clusters by species with subgroups of plantings in wet, moderate and dry areas. This would allow for testing across a moisture gradient as well as testing for tolerance of saline conditions. Plots range in size from small (5 ft. x 5 ft.) to large (30 ft. x 90 ft.) and reflect the spacing required between and among plants. For example, cottonwood requires a 30 ft. spacing distance so a large plot of 30 ft. by 90 ft. would have only three trees in it spaced at 30 foot intervals. The whole project area is approximately 66 acres. Actual disturbance from planting activities is estimated at 0.02 acres (Table 2). A total of twenty species have been selected for field trials (Table 1).

Table 1. Native Status of Plants

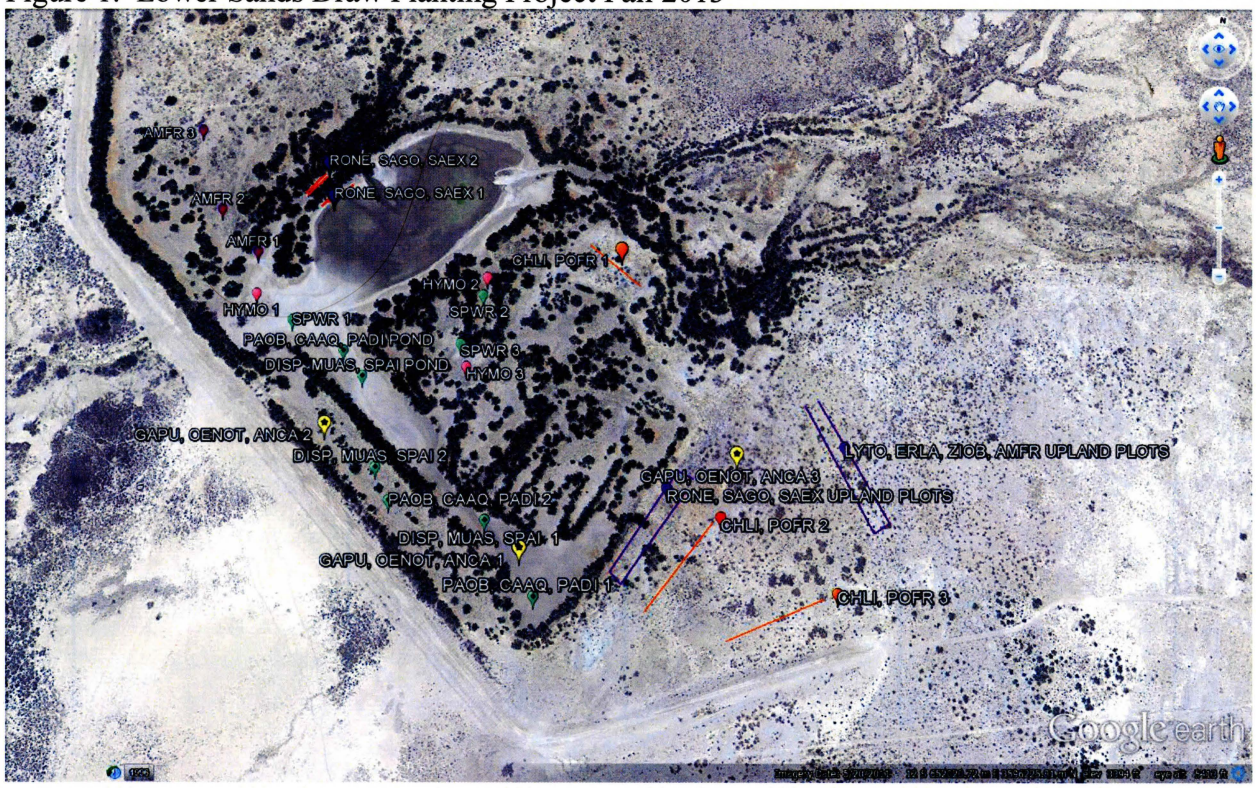
GROWTH FORM	SPECIES	ALT USDA NAME	USDA PLANTS (Local Area Distribution)
Forb	Gaillardia pulchella		All eastern AZ, All western NM
Forb	Oenothera spp.		AZ, NM
Forb	Anemopsis californica		Most of AZ including Graham and Cochise; most of NM including Grant and Hidalgo
Grass	Sporobolus wrightii		Graham, Cochise, Grant, Hidalgo
Grass	Distichlis spicata		Graham, Cochise, Grant
Grass	Muhlenbergia asperifolia		Cochise, All western NM
Grass	Sporobolus airoides		Graham, Cochise, All NM
Grass	Panicum obtusum		Graham, Cochise, Grant, Hidalgo
Grass	Paspalum spp.	Paspalum dilatatum or P. distichum	Graham, Cochise, Hidalgo
Grass/Sedge	Carex aquatilus		Cochise
Shrub	Amorpha frutescens	Amorpha fruticosa	Graham, Cochise, Grant, Hidalgo
Shrub	Lycium torreyi		surrounding counties AZ/NM
Shrub	Hymenoclea monogyra		Graham, Cochise, Hidalgo
Shrub	Brickelia laricifolia	Ericameria laricifolia	Graham, Cochise, Greenlee, Grant, Hidalgo
Shrub	Ziziphys obtosifolia		Most of AZ including Graham, Greenlee, Cochise; NM Hidalgo and Luna
Tree	Chilopsis linearis		Graham, Cochise, Grant, Hidalgo
Tree	Salix goodingii		All AZ, All western NM
Tree	Robinia neomexicana		All eastern AZ, All western NM
Tree	Salix exigua		All AZ, All western NM
Tree	Populus fremontii		All AZ, Grant and Hidalgo

Table 2. Actual Disturbance from Planting Activities in Acres						
	PLOT SIZE	NUM PLOTS	NUM IN PLOT	FT SPACING	CONTAINER SIZE	ACTUAL DISTURBANCE SURFACE SQ FT
SCATTER PLOTS						
Hymenoclea monogyra	20'x40'	3	8	10	5 GAL	96.00
Amorpha fruticosa	10'x50'	3	5	10	5 GAL	60.00
Chilopsis linearis	30'x90'	3	3	30	5 GAL	36.00
Populus fremontii	30'x90'	3	3	30	5 GAL	36.00
Robinia neomexicana	30'x90'	2	3	30	1 GAL	6.00
Salix goodingii	30'x90'	2	3	30	1 GAL	6.00
Salix exigua	30'x90'	2	3	30	1 GAL	6.00
Sporobolus wrightii	6'x9'	3	6	3	5 GAL	72.00
Gaillardia pulchella	6'x12'	3	8	3	1 GAL	24.00
Oenothera spp.	6'x12'	3	8	3	1 GAL	24.00
Anemopsis californica	6'x12'	3	8	3	1 GAL	24.00
Panicum obtusum	5'x5'	4	25	1	RL LINER	6.25
Carex aquatilus	5'x5'	4	25	1	RL LINER	6.25
Paspalum distichum	5'x5'	4	25	1	RL LINER	25.00
Distichlis spicata	5'x9'	2	45	1	RL LINER	5.63
Muhlenbergia asperifolia	5'x9'	2	45	1	RL LINER	5.63
Sporobolus airoides	5'x9'	2	45	1	RL LINER	5.63
POND PLOTS						
Distichlis spicata	5'x9'	2	45	1	RL LINER	5.63
Muhlenbergia asperifolia	5'x9'	2	45	1	RL LINER	5.63
Sporobolus airoides	5'x9'	2	45	1	RL LINER	5.63
Panicum obtusum	5'x5'	2	25	1	RL LINER	3.13
Carex aquatilus	5'x5'	2	25	1	RL LINER	3.13
Paspalum distichum	5'x5'	2	25	1	RL LINER	3.13
UPLAND PLOTS						
Lycium torreyi	10'x30'	5	3	10	5 GAL	60.00
Ericameria laricifolia	10'x30'	5	3	10	5 GAL	60.00
Ziziphys obtosifolia	10'x30'	3	3	10	1 GAL	9.00
Amorpha fruticosa	10'x30'	3	3	10	5 GAL	36.00
Robinia neomexicana	30'x90'	2	3	30	1 GAL	6.00
Salix goodingii	30'x90'	2	3	30	1 GAL	6.00
Salix exigua	30'x90'	2	3	30	5 GAL	24.00
			TOTAL DISTURBANCE FT SQ			671.63
			TOTAL DISTURBANCE ACRES			0.02
			SIZE OF PROJECT AREA ACRES			66.12

Access to the project area would be along an existing 2-track road. The BLM and college interns would also utilize the trail on top of the Sands Draw dike for UTV traffic. Most staging would take place on the southeast end of the Sands Draw dike in disturbed area (Figure 1). Plant materials and water jugs would be carried by UTV across the dike to the northern portion of the project area. The UTV would not leave the dike. From the north end of the dike, plant materials would be hand carried to their planting destination. Other plant materials would be carried by hand from the southeast staging area.

Actual planting would take place over the course of two days. The contract specialist would meet with BLM staff and BLM college interns from Eastern Arizona College for planning and logistics and some planting of materials on one day. The next day, the BLM and college interns would incorporate about 40 high school and middle school students in a planting exercise that includes mini-lectures and educational components. Leave No Trace ethics would be employed with proposed activities.

Figure 1. Lower Sands Draw Planting Project Fall 2013



The Lower Sands Draw dike and pond area is a highly disturbed area that has been scraped, bull dozed, dredged and otherwise manipulated to harvest soil to construct the dike. These activities went on in the 1950s. The entire area is highly disturbed and is currently occupied by large amounts of salt cedar. The fall 2013 project would take place inside of the existing disturbed area. No existing vegetation would be removed. Plant materials would be placed throughout the mosaic of existing vegetation. Plant materials and equipment would be hand carried to their planting destinations. The actual amount of ground disturbance is minimal, as depicted in Table 2. It is estimated at 0.02 acres out of a 66 acre project area. Mitigation to minimize disturbance is listed below.

- Holes for plants will be hand dug.
- Vehicular traffic will stay on existing 2-track with the exception of a UTV which will carry equipment across the Sands Draw dike.

- Equipment and plant materials will be hand carried from the staging areas at each end of the Sands Draw dike to the planting locations in the field.
- Plot size reflects the outer perimeter of a planting area. The only disturbance within this area will be the digging of holes for plant materials which will be spaced throughout.
- Plots will be interspersed along a moisture gradient among existing vegetation. There will be no removal of existing vegetation.
- All plant materials are native and have been tested for salt tolerance and their suitability for the Sands Draw wildlife exclosure.
- Youth and other personnel assisting in planting will be overseen by experienced BLM personnel and by contract specialists. Logistics and pre-planning will designed to eliminate unnecessary traffic and increase efficiency.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name: Safford RMP Date Approved: ROD Part I Sept. 1992 and ROD Part II July. 1994

☒ The proposed action is in conformance with the applicable LUPs because **it is specifically** provided for in the following LUP decisions:

Page 44, "Continue reseeding grasses and riparian vegetation on restored areas behind erosion control structures."

☒ The proposed action is in conformance with the LUP, even though **it is not specifically** provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

Page 33, "Manage priority wildlife species habitat (vegetation communities) or special features of that habitat (water, riparian vegetation, cliffs, etc.) to maintain or enhance population levels."

Page 33, "Focus management efforts on enhancing biological diversity."

Page 45, "Restore and maintain plant communities for wildlife, watershed condition, and livestock"

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

Sands Draw Aquatic Enhancement and Terrestrial Habitat Restoration, San Simon Valley (2009) DOI-BLM-AZ-GOIO-2009-0042

D. NEPA Adequacy Criteria

1. Is the proposed action substantially the same action (or is a part of that action) as previously analyzed? Yes

Documentation of answer and explanation:
The proposed action involves an action that is substantially the same as one of the components previously analyzed within the above-referenced EA. Just as the EA analyzed plantings of native species within the Sands Draw exclosure, this proposed action calls for the planting of native trees, shrubs and grasses at an area within the exclosure.

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

Documentation of answer and explanation:
Just as referenced within the EA, the proposed action here addresses a purpose and need correlated with the restoration of terrestrial habitat within the Sands Draw area. No other alternatives have been identified that would better meet the purpose and need identified within the referenced EA.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action? Yes

Documentation of answer and explanation:
The analysis within the existing EA provides a detailed consideration of any potential resource issues correlated with the planting of native species within the Sands Draw enclosure, including all current resource conditions.

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:
The direct, indirect, and cumulative effects identified within the referenced EA are exactly the same as those that may result from the current proposed action.

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:
The referenced EA involved public involvement and interagency review, consisting of both a public comment period on the draft EA and a field visit of the project location. All comments were addressed within the finalized analysis.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource/Agency Represented
Tom Schnell		Recreation, ACECs, Wilderness, Wilderness Characteristics
Dan McGrew		Cultural Resources
Tim Goodman		Wildlife, T&E Species, Environmental Justice, Socioeconomics
David Arthun		Nonnative/Invasive Plants
RJ Estes		Range, Soils, Solid Waste, Hazardous Materials
Roberta Lopez		Lands/Realty
Ron Peru		VRM
Sharisse Fisher		NEPA Maps
Joe David		Water Quality (Grnd. & Srfc.), Wetlands/Riparian, Water Rights, Floodplains, Air Quality, Climate Change

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 that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

Signature of Project Lead

for Joe David

Signature of NEPA Coordinator

10/31/13

Signature of Responsible Official

10/30/13

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.

DECISION RECORD

EA Number: DOI-BLM-AZ-G010-2014-0002-DNA

BLM Office: Safford Field Office

Decision: It is my decision to implement the proposed action, as described, which is to plant native trees, shrubs, and grasses within the Sands Draw enclosure as referenced within the attached DNA.

Alternatives Considered: There was one alternative to the proposed action that was considered in the referenced environmental assessment, a "No Action" alternative and two additional alternatives considered but not analyzed. The No Action Alternative and alternatives considered but not analyzed would not fulfill the purpose and need of the project.

Rational for Decision: The proposed action is specifically provided for in the Safford RMP. The DNA dated 10/31/13, prepared for the project, analyzed the potential impacts to the environment and the public should the proposed action be implemented. This action is not unique or unusual, and is essentially similar to other actions the Safford Field Office has implemented in the past. A Finding of No Significant Impacts (FONSI) has been signed; therefore, there are no significant impacts to the environment that would require an environmental impact statement. By selecting the proposed action, the Safford Field Office is implementing this portion of the Safford RMP.

Appeals:
This decision may be appealed under the procedures outlined in 43 CFR Part 4.

Scott P. Cooke 10/31/13

Field Manager Date

Attachments: Finding of No Significant Impact dated 10/31/13
NEPA#: DOI-BLM-AZ-G010-2014-0002-DNA

FINDING OF NO SIGNIFICANT IMPACT

EA Number: DOI-BLM-AZ-G010-2014-0002-DNA

BLM Office: Safford Field Office

Finding of No Significant Impact:

I have reviewed the determination of NEPA adequacy and land use conformance (DNA), # DOI-BLM-AZ-G010-2014-0002-DNA dated 10/31/13 that was prepared for the Sands Draw Fall Planting project, and have found through the DNA and referenced EA that there are no potentially significant environmental impacts caused by the proposed project. I have determined that the proposed action will not have any significant impacts on the human environment and that an EIS is not required. I have determined that the proposed action is in conformance with the Safford Resource Management Plan approved in Record of Decision dated Sept. 1992 (ROD Part I) and July 1994 (ROD Part II).

Scott Cooke 10/31/13

Field Manager Date