

Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

FIELD OFFICE: Stillwater Field Office (NVC01000)

NEPA NUMBER: DOI-BLM-NV-C010-2014-0007-DNA

CASEFILE PROJECT NUMBER:

PROPOSED ACTION TITLE/TYPE: Pesticide Use Proposals (2014, 2015 & 2016)

LOCATION: Stillwater Field Office (Lyon, Mineral, Nye, and Churchill Counties)

APPLICANT (if any): Bureau of Land Management

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

As part of an integrated pest management (IPM) strategy, it has been necessary to treat noxious weeds and invasive plant species on the Stillwater Field Office with herbicides. Although cultural, biological, physical and mechanical methods must be considered for a successful IPM program, the use of chemicals is often the most beneficial and cost-effective for prevention and control of weeds.

Before applying any chemical on public lands, a Pesticide Use Proposal (PUP) must be completed and signed for each type of herbicide that will be applied. The PUP's for all herbicides commonly applied on lands in the Stillwater Field Office expire at the end of 2013; therefore, the proposed action is to complete a PUP for each type of herbicide that is expected to be applied in the Stillwater Field Office for the years 2014, 2015, and 2016. Each PUP would be submitted to the Nevada State Office weed coordinator and would specify the most appropriate herbicide for the site and noxious weed species, as well as the application rate of the herbicide. Any herbicide selection and application would be in conformance with the Final Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (EIS) and Record of Decision (ROD) and the Carson City Noxious Weed Treatment Plan and Environmental Assessment (EA-NV-030-0814).

Prior to any herbicide application on public lands, coordination and consultation would occur with the Stillwater Field Office interdisciplinary team to ensure that there would be no impacts to sensitive plant species or edible/medicinal plants that may be present in the area of treatment.

B. Land Use Plan (LUP) Conformance

LUP Name* Carson City Field Office Consolidated Resource Management Plan

Date Approved: May 9, 2001

**List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)*

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions: n/a

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):

Section 1 - SOP-1 Standard Operating Procedures Common to All

3. "Application of herbicides on proposed treatment areas will be in accordance with procedures established in Bureau Manual 9011 and 9015 and the Final Environmental Impact Statement and Record of Decision, Vegetation Treatments on Bureau of Land Management Lands in Thirteen Western States (1991)."

Section 2 – LSG-8 Standard Operating Procedures

5. "Application of herbicides such as 2,4-D on treatment areas to reduce sagebrush and other plant species would be in accordance with procedures established in Bureau Manual 9222 and other applicable regulations, laws, and court orders to ensure non-impairment of other than target species."

Section 4 – WLD-8 Standard Operating Procedures

15. "Brush control by herbicides, prescribed burning, or by mechanical means will be in accordance with the Memorandum of Understanding between the Nevada Division of Wildlife and the Bureau of Land Management. The procedures specify, among other things, that vegetation control measures will be prohibited on sage grouse breeding complexes, wintering grounds, or within 100 yards of a stream or meadow.

. . . All vegetation management actions in Nevada will conform with decisions in the Final Environmental Impact Statement on Vegetation Treatments on BLM Lands in Thirteen Western States and Record of Decision (1991)."

Section 5 - SWA-4 Standard Operating Procedures

7. "In order to insure watershed health, control or elimination of noxious weeds on both upland and riparian areas will be in cooperation with local, state, and other federal agencies, as well as private groups or other interested parties."

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.

Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (EIS) and Record of Decision (ROD) (September 2007)

Carson City Noxious Weed Treatment Plan and Environmental Assessment (April 2008)

BLM Manual 9011 – Chemical Pest Control

BLM Manual 9015 – Integrated Weed Management

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?

Documentation of answer and explanation:

Yes. The proposed action, completing Pesticide Use Proposals for each type of herbicide that is expected to be applied in the Stillwater Field Office for the years 2014, 2015, and 2016, would allow the Field Office to continue to control and eradicate noxious weeds on public lands. The small difference in the existing environmental assessment is the project boundary. The Noxious Weed Treatment Plan and EA included the entire Carson City Field Office; however, these PUP's will pertain to the Stillwater Field Office only.

Although the 2008 EA did not list all of the herbicides that were to be applied, to include Habitat, PUP's were approved for these chemicals for the years 2008, 2009, and 2010. Appendix 2 of the Noxious Weed Treatment Plan and EA included Table 2-3, "Herbicides Approved and Proposed for Use on Public Lands," listing Habitat and the many other herbicides available to the Stillwater Field Office for the treatment of weeds. Attached is the updated list of herbicides approved for use on BLM lands.

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?

Documentation of answer and explanation:

Yes. The PUP's must be renewed in order for the Stillwater Field Office to carry out the preferred alternative, which is to control and eradicate noxious weeds.

3. Is the existing analysis valid in light of any new information or circumstances (such as, range-land 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?

Documentation of answer and explanation:

The proposed action is to renew the PUP's for the appropriate herbicides that would be applied to weeds within the Stillwater Field Office. The existing analysis is still valid as it adheres to the standard operating procedures, mitigation and best management practices as outlined in the Final Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic EIS. As before, sensitive areas, to include riparian areas, BLM-sensitive species, sage grouse habitat, and any endangered species listings, would be avoided or treated with the most suitable IPM control methods for the particular situation.

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?

Documentation of answer and explanation:

Yes. The effects would be similar to those analyzed in the Noxious Weed Treatment Plan and EA. Although this document only includes the Stillwater Field Office, it is highly likely that herbicide use would also continue in the Sierra Front Field Office; therefore, the amount of herbicide applied over the whole Carson City District would not change by a significant amount.

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

Documentation of answer and explanation:

Yes. The proposed action is a feature of the preferred alternative in the existing Noxious Weed Treatment Plan and EA (ROD signed April 2008) and Final Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic EIS (ROD signed September 2007). Eight Native American tribes were consulted during the preparation of the EA, along with seven Cooperative Weed Management Areas. In writing and analyzing the EIS, the BLM consulted with several federal agencies (U.S. Forest Service, U.S. Fish & Wildlife Service, State Historic Preservation Officers), non-governmental organizations (Resource Advisory Councils, Western Governors' Association, National Association of Counties), and state/county entities.

E. Persons/Agencies/BLM Staff Consulted

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Angelica Rose <i>AR 1/6/14</i>	Planning and Environmental Coordinator	BLM
Chris Kula <i>CK 1/6/14</i>	Wildlife Biologist	BLM
Linda Appel <i>LA 1/7/14</i>	Wild Horse and Burro Specialist; Rangeland Mgt Specialist	BLM
Chelsy Simerson <i>CS 1/6/14</i>	Rangeland Management Specialist	BLM
Dan Westermeyer <i>DW 1/6/14</i>	Outdoor Recreation Planner	BLM
Jason Wright	Archaeologist	BLM
Jill Devaurs <i>JD 1/6/14</i>	Land Law Examiner/Weed Coordinator	BLM
Kristin Bauer <i>KB 1/6/14</i>	Archaeologist	

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 NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

Jill Devaurs

 Signature of Project Lead

Scott Rose

 Signature of NEPA Coordinator

Kristin Bauer

 Signature of Responsible Official

Date 1/28/2014

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.

[Approved Herbicides - All Documents](#)