

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

OFFICE: Humboldt River Field Office, LLNVW01000

TRACKING NUMBER: **DOI-BLM-NV-W010-2014-0038-DNA**

CASEFILE/PROJECT NUMBER: Lucky Fire – H73H

PROPOSED ACTION TITLE/TYPE: Lucky Fire (H73H) Fire Emergency Stabilization
and Rehabilitation Plan

LOCATION/LEGAL DESCRIPTION:

Ground Seeding

T. 39 N., R. 40 E., sec. 20, 28, 32

Invasives Mgmt.

T. 39 N., R. 40 E., sec. 20, 28, 32

APPLICANT (if any): Bureau of Land Management (BLM)

Background Information on Fire

The Lucky Fire was ignited by lightning on 7/11/2014 and contained on 7/12/2014. There are no records of the Lucky Fire area having burned previously; however, several large fires have occurred recently in the general vicinity and have recovered to an ecology dominated by non-native invasive annual plants, particularly to cheatgrass. Due to the proximity of the Lucky Fire to cheatgrass monocultures, the low precipitation zone within which the fire lies, and the known presence of cheatgrass within the burned area, there is a substantial threat of cheatgrass invasion into this burned area within the next few years.

The fire occurred on a west-facing, fan piedmont. Therefore, moderate wind erosion will contribute to accelerated soil loss due to the loss of foliar shrub and grass cover. Almost all of the fire area is classified as year round range for pronghorn and the burned area is adjacent to crucial winter range for mule deer as defined by the Nevada Department of Wildlife. The area is also heavily utilized by assorted small mammals, migratory birds, and is near raptor nesting sites. The loss of shrub cover and nesting and foraging habitat has occurred as a result of the fire. The fire area is adjacent to the Eden Valley Population Management Unit for Greater Sage-Grouse.

The Lucky Fire burned along the west edge of the Hot Springs Mountains. The burned area is comprised of two soil map units, each containing two soil components. The two soil components are associated with three different ecological sites.

The possible rangeland ecological sites are: R024XY002NV, which is a loamy site receiving 5-8” of precipitation annually, R024XY005NV is a loamy soil site, and R024XY020NV is a droughty loam soil site, with both sites receiving 8-10” of precipitation annually.

Rangeland Ecological Site	The vegetation community in reference condition, is typically dominated by:
R024XY002NV	shadscale (<i>Atriplex confertifolia</i>), bud sagebrush (<i>Picrothamnus desertorum</i>) and Indian ricegrass (<i>Achnatherum hymenoides</i>).
R024XY005NV	Wyoming big sagebrush (<i>Artemisia tridentata ssp. wyomingensis</i>), Thurber’s needlegrass (<i>Achnatherum thurberianum</i>), and bluebunch wheatgrass (<i>Pseudoroegneria spicata</i>).
R024XY020NV	Wyoming big sagebrush, spiny hopsage (<i>Grayia spinosa</i>), and Thurber’s needlegrass.

The fire burned a total of 1,164 acres, with 705 acres of private lands burned, and 459 acres of BLM managed public lands burned within the Scott Springs and Eden Valley Grazing Allotments. It is estimated that closure to livestock use of the lands affected by the fire would reduce annual use in the Scott Springs and Eden Valley Grazing allotments by 23 Animal Use Months (AUMs).

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

Ground Seeding:

The BLM proposes to drill seed or broadcast seed and harrow a total of 459 acres of public land managed by BLM that was burned by the Lucky Fire. Seeding would occur in the fall or winter with a preference for application in fall or early winter. The project would be seeded based upon two different ecological sites, a loamy site with 5-8” precipitation and a loamy site with 8-10” precipitation annually. The loamy site 5-8” p.z. would be seeded with Lucky mix 1 and the loamy site 8-10” p.z. would be seeded with Lucky mix 2. (see table 1 and maps).

The project would be seeded with streambank wheatgrass-sodar (*Elymus lanceolatus ssp. lanceolatus*), Wyoming sagebrush, Indian ricegrass, crested wheatgrass, forage kochia, Rocky Mtn. beeplant (*Cleome serrulata*), shadscale saltbrush, and bluebunch wheatgrass. Sagebrush would be seeded separately using a small no till drill owned by the Winnemucca District, or broadcasted after the grass and forb species have been drilled. Seeding would be coordinated with a chemical control for invasive annual plant species to improve seeding efficacy. Non-native species would be utilized on the Loamy 5-8” p.z. at this lower elevation area. Historically on the Winnemucca District crested wheatgrass

(*Agropyron cristatum*) and Forage Kochia (*Bassia prostrata*) have displayed a higher success rate in the lower precipitation and elevation areas over native bluebunch wheatgrass and sagebrush. Forage Kochia and crested wheatgrass provide the best opportunity for soil ecology food webs, increase in protein for wildlife, and competition against weedy plant species. The loamy 8-10" p.z. would be targeted with native plant species.

As a result of a Class II inventory for cultural resources the project design was modified to avoid an existing National Register of Historic Places eligible site by a 30 meter buffer. The buffer area would be provided on crew maps at the time of implementation.

Table 1: Seed mixes proposed for the Lucky project.

Lucky Mix 1	Wyoming sagebrush	Indian ricegrass	shadscale	forage kochia	crested wheatgrass
Lucky Mix 2	Wyoming sagebrush	bluebunch wheatgrass	streambank wheatgrass	Rocky Mountain beeplant	

Objectives for ground seeding are as follows:

1. Obtain an average of 0.5 seeded species per meter² by the end of the third year following fire containment, which occurred on 07/12/2014.
2. Obtain 50% or greater perennial cover of the low potential perennial plant cover for the appropriate rangeland ecological site by the end of the third year following fire containment.
3. The ground seeding would result in lower abundance (density and cover) of invasive annual plant species and a higher abundance of desirable perennial plant species than the unseeded control areas.
4. Seeded species would be well established and reproducing.

Invasive Plants and Noxious Weeds Management:

Invasive species within the burned area boundary would be managed to limit further infestation through active treatment of previously existing and newly established infestations of noxious weeds. Up to 459 acres of noxious weed infestations would be treated annually during 2015, 2016, and 2017. Ground seeded areas would be treated with Plateau (Imazapic) herbicide to control annual invasive plants. Plateau treatment of ground seeded areas would be coordinated to promote germination and seedling establishment of native or selected non-native perennials. Application of Plateau would occur in conjunction with drill seeding operations and act as seed bed prep for the seeding treatment. Plateau would be applied at a rate of 2-4 oz./acre.

Located infestations, if any, would be treated with BLM approved herbicides as appropriate, and in compliance with BLM operating procedures and label requirements for BLM approved herbicides. Localized treatments may include one or more of the following chemicals depending on species present in project location:

Imazapyr
Glyphosate
2,4-D
Picloram
Dicamba
Metsulphuron methyl
Clorsulphuron

Herbicides would be applied by truck or ATV; herbicide may also be applied with crews utilizing backpack pumps to spray noxious weeds or annual invasive species. All infestations and treatments would be tracked in District GIS layers/shapefiles.

Environmental Protection Measures

The applicable design measures for this proposal are listed below. The existing NEPA documents are listed under section C.

All treatments identified will be in accordance with Instruction Memorandum IM-NV-2014-022 Revised Direction for Proposed Activities within Greater Sage-Grouse Habitat (July 2014), and WO-IM-2014-114 Sage Grouse Habitat and Wildland Fire Management (July 2014).

Ground Seeding

Drill Seeding Implementation

Drill seeding measures would adhere to the Normal Year Fire Rehabilitation Plan Environmental Assessment No.NV-020-04-21 (DR/FONSI 8/19/2004):

Drill seeding would be used on slopes of 0 to 25 percent. Drills would be run perpendicular to slopes to prevent the formation of rills and gullies. Drills would be run parallel to state and interstate highways to lessen the potential for wind erosion.

Cultural Resources

Applicable measures from the Paradise Fuelbreak Maintenance Project Environmental Assessment DOI-BLM-NV-WO10-2010-0009-EA (DR/FONSI 7/19/2010):

Only non-surface disturbing treatment measures such as mowing, chemical treatments, broadcast or aerial seeding would be undertaken where there are National Register of Historic Places (NRHP) eligible sites. Other surface disturbing treatment measures would avoid NRHP eligible sites by a 30 meter buffer.

Monitoring

All treatments would be monitored for efficacy and efficiency using established protocols and design features that are outlined in the Normal Year Fire Rehabilitation Plan Environmental Assessment No.NV-020-04-21 (DR/FONSI 8/19/2004). All vegetation treatments would be monitored

for effectiveness using point-intercept, gap intercept and frame density techniques modified from Monitoring Manual for Grasses, Shrublands, and Savanna Ecosystems (Herrick, et, al., 2005) techniques outlined in BLM Technical Reference 1734-4 (BLM 1996), to determine perennial cover, and density of seeded and non-seeded plant species during the three years following fire containment on these areas.

Invasive Plants and Noxious Weeds Management

Wildlife and Migratory Birds

Applicable measures from the Winnemucca Wildland Urban Interface (WUI) Fuels Treatment Project Environmental Assessment No.NV-WO10-2010-0011-EA (DR/FONSI 9/20/2010):

Application of herbicide would not occur within ¼ mile of any known sage grouse lek sites.

Applicable measures from the Holloway Fire ESR DNA DOI-BLM-NV-WO10-2013-0015-DNA (DR 12/27/2012):

During the raptor breeding season, January 1 through August 31, control of noxious weeds would be implemented or delayed in accordance with spatial and temporal recommendations defined in the Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances (USFWS 2002).

Control of noxious weeds would not be conducted within 0.6 miles of active Sage Grouse leks during lekking and nesting season from March 1st through June 30th. Greater Sage-Grouse nest and brood surveys in areas proposed for noxious weeds control efforts will be conducted no more than 10 days and no less than 3 days prior to initiation of disturbance. If active nests and/or broods are located, rehabilitation activities will be delayed until the grouse have voluntarily left the area.

Plateau herbicide application

Applicable measures from the Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012).

Plateau application rates (range of rates) and application would be subject to label restrictions and standard operating procedures (SOPs, See Appendix I in EA).

Herbicide applications not including Plateau

The use of all other herbicides listed would adhere to the environmental protection measures listed below from the Integrated Weed Management Environmental Assessment NV-020-02-19 (DR/FONSI 8/27/2002).

1. Standard safety procedures and standard operating procedures would be strictly followed.
2. Re-applications of the herbicide would not be less than the persistence factor identified for any product selected for use.

3. Ground applications of herbicides (including backpack and power sprayer) would be limited to spraying the target weeds and the surrounding ground for 10 feet. Backpack applications of liquids would occur only at low nozzle pressure and at ground level. Granular formulations would be applied by broadcast spreaders or by hand within 3.5' of the ground.
4. The BLM would notify the livestock grazing permittee(s) when herbicides are used on grazing allotments. Phenology of target species and multiple use objectives would also be considered.
5. No herbicide application would be conducted when rain (greater than 50% chance) is predicted within 24 hours of treatment. The BLM would use the Interagency Fire Dispatch Center for weather reports for rain predictions.
6. All herbicide spray solutions would be applied with a blue dye so that application sites are visible.

B. Land Use Plan (LUP) Conformance

LUP Name: Paradise-Denio Management Framework Plan (MFP)

Date Approved: 1982

*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:

The proposed treatments are in conformance with the Paradise-Denio Standard Operating Procedures, .45 Soil-Water-Air which states in part;

1. "Consider rehabilitating areas which have had protective vegetative cover destroyed by wildfire....." "Utilize seed and other watershed stabilization techniques as required."
2. "Increase existing forage by artificial methods wherever appropriate. Land treatment is defined as vegetation manipulation (i.e. plowing, burning, spraying and/or seeding).

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 (objective, terms, and conditions):

Paradise-Denio MFP (1982)

Although not specifically addressed, stabilization and rehabilitation treatments conform to wildlife and watershed objectives WL-1, which state in part; "Provide for improvement or maintenances of wildlife habitat in the planning area in order to assure

that sufficient quantity, quality and diversity of habitat exists to accommodate the needs of all species of wildlife...”

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

- Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012)
- Winnemucca Wildland Urban Interface Area Treatment Project Environmental Assessment, DOI-BLM-NV-WO10-0011-EA, (DR/FONSI 9/20/2010)
- Paradise Fuelbreak Maintenance Environmental Assessment No.: DOI-BLM-NV-WO10-2010-0009-EA (DR/FONSI 7/19/2010)
- Santa Rosa Fuelbreak Project Environmental Assessment No.: DOI-BLM-NV-WO10-2010-0003-EA (DR/FONSI 2/19/2010)
- Vegetation Treatment Using Herbicides on BLM Lands in Seventeen Western States Programmatic Final Environmental Impact Statement, 07/2007, (ROD 9/29/07)
- Normal Year Fire Rehabilitation Plan Environmental Assessment EA# NV-020-04-21, 06/2004, (DR/FONSI 8/19/04)
- Integrated Weed Management Environmental Assessment NV-020-02-19, 8/07/02, (DR/FONSI 8/27/02)
- Vegetation Treatment on BLM Lands in Thirteen Western States Environmental Impact Statement, 05/91, (ROD 8/91)

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- IM NV 2014-022 Revised Direction for Proposed Activities within Greater Sage-Grouse Habitat (July 2014)
- WO IM 2014-114 Sage-Grouse Habitat and Wildland Fire Management (July 2014)
- Holloway Fire ESR Determination of NEPA Adequacy DOI-BLM-NV-WO10-2013-0015-DNA (DR 12/27/2012)
- USFWS Biological Opinion for the Normal Year Fire Rehabilitation Plan (August 2004)
- A Report on National Greater Sage-Grouse Conservation Measures. Produced by: Sage-grouse National Technical Team, 12/21/2011 (pp 27)

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(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 Normal Fire Rehabilitation Plan EA-NV-020-04-21 (DR/FONSI 8/19/04), addresses the same treatments as proposed including broadcast seeding and harrowing. Control of noxious weeds is analyzed in the Normal Fire Rehabilitation Plan EA-NV-020-04-21 (DR/FONSI 8/19/04), Integrated Weed Management EA-NV-020-02-19 (DR/FONSI 8/27/02), and the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States EIS (ROD 9/29/07).

Imazapic is registered for use and analyzed at a national –level in the Vegetation Treatment Using Herbicides on BLM Lands in Seventeen Western States Programmatic Final Environmental Impact Statement, 07/2007, ROD 9/29/07. This level of study provided a broad regional analysis of Imazapic herbicide use on public land managed by the BLM.

The use of Imazapic herbicide to reduce the amount of annual plant species on BLM-administered public lands is analyzed in site-specific projects in the following EA's: Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012), Santa Rosa Cooperative Fuels Treatment Project DOI-BLM-NV-WO10-2010-0003-EA (DR/FONSI 2/19/2010), the Paradise Fuelbreak Maintenance DOI-BLM-NV-WO10-2010-0009-EA (DR/FONSI 7/19/2010), and the Winnemucca Wildland Urban Interface Area Treatment Project DOI-BLM-NV-WO10-2010-0011-EA (DR/FONSI 9/20/2010). The Lucky Fire project location is sufficiently similar to the site specific geographic conditions and resources analyzed in the existing referenced NEPA documents. The existing EA documents analyze Imazapic herbicide application on similar projects and similar vegetation communities and soils. The analysis includes similar application as Imazapic would be applied by machine application on the ground and used to remove and control the growth of annual species such as cheatgrass, tumble mustard, and Russian thistle.

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

Documentation of answer and explanation:

Yes, the range of alternatives analyzed in the existing NEPA documents are appropriate with respect to the current proposed action and current environmental concerns, interests, resource values and circumstances.

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?

Documentation of answer and explanation:

Yes, the existing analysis is adequate and there is no new information or circumstances regarding the current proposal that would necessitate new analysis. In April 2010, the

U.S. Fish and Wildlife Service (FWS) determined that the Greater Sage-Grouse warranted protection under the Endangered Species Act (ESA), but that listing the species was precluded by the need to address other, higher-priority species first. The FWS Greater Sage-Grouse decision placed the species on the candidate list for future regulatory action. Because of a court-ordered settlement, the FWS has until 2015 to make a final determination on listing the Greater Sage-Grouse under the ESA. BLM has developed draft guidance for the protection of Sage-Grouse habitats. BLM IM NV 2014-022 and WO IM 2012-114 provide guidance on how the BLM is to protect Greater Sage-Grouse habitat. There is no Greater Sage-Grouse habitat within the project area.

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 analytical approach used in the existing NEPA documents continues to be appropriate for the current proposed action.

5. Is 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 public involvement and interagency review associated with existing NEPA documents are adequate. In addition, coordination regarding planned ESR actions has occurred between the Winnemucca District Range Management Specialist and the affected permittees. The Scott Springs Allotment permittees were contacted in person on 8/25/2014. The Eden Valley Allotment permittees were contacted in the form of a phone call on 8/18/2014.

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E. Persons/Agencies/BLM Staff Consulted

Everett Bartz Supervisory RMS /s Everett 9/12/2014

Name /Title	Resource/Agency Represented	Signature/Date	Comments (Attach if more room is needed)
Wes Barry	Range Management Specialist	s/ Wes Barry 9/18/2014	
Rob Burton	Vegetation/Soils/Air Quality	s/ Rob Burton 9/27/2014	
Chris Powell	Cultural Resources	s/ Chris Powell 9/9/2014	
Pat Haynal	Cultural Resources (oversight)	s/ Pat Haynal 9/10/2014	Class II inventory needed – completed class II. PH 10/2 all eligible or unevaluated sites avoided.
John McCann	Hydrology/Riparian	s/ John McCann 8/21/2014	
Amanda DeForest	Wildlife	s/ Amanda DeForest 9/8/2014	
Greg Lynch	Fisheries	s/ Greg Lynch 9/3/2014	
Rob Bunkall	GIS	s/ Rob Bunkall 9/9/2014	
Eric Baxter	ESR Lead/Invasive Species/NAC	s/ Eric Baxter 9/19/2014	
Lynn Ricci	NEPA	s/ Lynn Ricci 10/22/2014	
Samantha Gooch	Wild Horse/Burro	s/ Samantha Gooch 9/3/2014	none
Zwaantje Rorex	Lands w/ Wilderness Characteristics/ WSA	s/ Zwaantje Rorex 9/8/2014	
Mark Williams	Fire/Fuels	s/ Mark Williams 9/10/2014	
Pat Haynal	Paleontology	s/ Pat Haynal 9/10/2014	

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

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' compliance with the requirements of the NEPA.

/s Eric Baxter
Signature of Project Lead

/s Lynn Ricci
Signature of NEPA Coordinator

/s James W Schroeder
Signature of the Responsible Official

10/23/2014
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.