

**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-W010-2014-0037-DNA**

CASEFILE/PROJECT NUMBER: Callaghan- H64G

PROPOSED ACTION TITLE/TYPE: Callaghan (H64G) Fire Emergency Stabilization  
and Rehabilitation Plan

LOCATION/LEGAL DESCRIPTION:

*Ground Seeding*

T. 35 N., R. 38 E., sec. 8, 10

*Seedling Planting*

T. 35 N., R. 38 E., sec. 8, 10

*Invasives Mgmt.*

T. 35 N., R. 38 E., sec. 8, 10

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

**Background Information on Fire**

The Callaghan Fire was ignited by human cause on 6/22/2014 and contained on 6/22/2014. The Callaghan Fire burned in close proximity to the urban center of Winnemucca and Grass Valley. The fire burned a total of 399 acres, with 69 acres of BLM managed public lands and 330 acres of private lands. The fire area is comprised of one soil map unit containing two soil components as defined by Natural Resources Conservation Service. The soil map unit is moderate to highly erosive to both water and wind events which present a high risk to human life and safety in adjacent residential areas. These risks include potential degradation of air quality from blowing dust and ash, potential for flood events that could threaten residential and commercial properties, and other public safety issues. The two soil components are associated with two different rangeland ecological sites. The possible rangeland ecological sites are R024XY020NV, a droughty loam soil site, and R024XY005NV, a loamy soil site. Both sites receive 8-10" of precipitation annually.

Rangeland Ecological Site	The vegetation community in reference condition, is typically dominated by:
R024XY020NV	Wyoming big sagebrush ( <i>Artemisia tridentata ssp. wyomingensis</i> ), Thurber's needlegrass ( <i>Achnatherum thurberianum</i> ), and Indian ricegrass ( <i>Achnatherum hymenoides</i> ).
R024XY005NV	Wyoming big sagebrush ( <i>A. tridentata ssp. wyomingensis</i> ), Thurber's needlegrass ( <i>A. thurberianum</i> ), and bluebunch wheatgrass ( <i>Pseudoroegneria spicata</i> ).

100% of the fire area was classified as year-round pronghorn and mule deer crucial winter habitat as defined by the Nevada Department of Wildlife. A portion of the land burned is in the Sonoma Population Management Unit (PMU) for Greater Sage-Grouse. There is no Greater Sage-Grouse Preliminary Priority Habitat or Preliminary General Habitat (PPH/PGH) within the project area.

The entire area impacted by the Callaghan Fire has been affected by fires in the past. Approximately 90% of the area was burned in 1985 and 100% of the fire area burned again by the Thomas Fire in 2007. The Callaghan Fire area on BLM land west of privately owned land was drill seeded in 2007. The area on BLM land east of privately owned land was aerially seeded in 2007. The fire occurred in the Thomas Creek Grazing Allotment.

**A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.** The possible rangeland ecological sites are R024XY020NV, a droughty loam soil site, and R024XY005NV, a loamy soil site. Both sites receive 8-10” of precipitation annually.

Ground Seeding:

The BLM proposes to drill seed or broadcast and harrow seed a total of 69 acres of the public land managed by BLM that was burned by the Callaghan Fire. Seeding would occur in the fall or winter with a preference for application in late fall or early winter. The project would be seeded with Sandberg bluegrass (*Poa secunda*), streambank wheatgrass-sodar (*Elymus lanceolatus ssp. lanceolatus*), Wyoming sagebrush (*A. tridentata ssp. wyomingensis*), fourwing saltbrush (*Atriplex canescens*), Indian ricegrass (*A. hymenoides*), Sherman big bluegrass (*Poa ampla*), crested wheatgrass (*Agropyron cristatum*), forage kochia (*Bassia prostrata*). 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. The project would be seeded based upon two different ecological sites, a droughty loam soil site and a loamy soil site. The droughty loam site would be seeded with Callaghan Mix 1 and the loamy soil site would be seeded with Callaghan Mix 2. (see table 1 and maps).

Table 1: Seed mixes proposed for the Callaghan project.

Callaghan Mix 1	Wyoming sagebrush	Indian ricegrass	fourwing saltbrush	streambank wheatgrass			
Callaghan Mix 2	Wyoming sagebrush	Sandberg bluegrass	squirrel tail	forage kochia	Sherman big bluegrass	crested wheatgrass	fourwing saltbrush

Objectives for ground seeding are as follows:

1. Obtain an average of 3 sagebrush plants per meter<sup>2</sup> by the end of the third year following fire containment, which occurred on 06/22/2014.
2. Obtain 50% or greater perennial cover of the low potential perennial plant cover for the appropriate 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.

Seedling Planting:

The BLM proposes to install 7,590 Wyoming sagebrush (*A. tridentata ssp. wyomingensis*) plants, utilizing hand-planting strategy (hoe-dad or auger planting) intermittently across 69 acres of public land managed by BLM. The plantings may temporarily disrupt the soil but are necessary in order to restore valued ecological habitat. Planting would aim to occur before March 1st and if the project is unable to occur before then the project lead would coordinate with Winnemucca BLM wildlife biologists to ensure the least disruption for the migratory birds breeding season. Project would be utilizing containerized or bare-root seedlings. Seedlings would be planted at an approximate spacing of 20'x20'.

Objectives for seedling planting are as follows:

1. Obtain a survival rate of planted seedlings exceeding 60% by the end of the fiscal year 2017.
2. The seedling planting 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.
3. Seedlings would be well established and are reproducing.

Invasive Plants and Noxious Weeds Management:

Manage invasive species within the fire-affected area to limit further infestation through active treatment of previously existing and newly established infestations of noxious weeds. Up to 69 acres of noxious weed infestations would be treated annually during 2015, 2016, and 2017. Treat ground seeded areas with Plateau (Imazapic) herbicide to control annual invasive plants in year one. Coordinate Plateau treatment with ground seeding activities to advantage 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.

In addition to the Plateau application, 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  
Imazapic

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.

#### *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.

### Seedling Planting

#### *Wildlife and Migratory Birds*

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

No hand planting activities will be conducted within 0.6 miles of Sage Grouse lek sites during the sage-grouse lekking and nesting seasons from March 1<sup>st</sup> through June 30<sup>th</sup>. Greater Sage-Grouse nest and brood surveys in areas proposed for hand planting 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.

### 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/FONSI 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 1<sup>st</sup> through June 30<sup>th</sup>. 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\* Sonoma-Gerlach 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 in conformance with the applicable LUP because it is specifically provided for the following LUP decisions:**

The proposed treatments are in conformance with the Sonoma-Gerlach MFP, .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):**

**Sonoma-Gerlach 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 maintenance 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.**

- Holloway Fire Emergency Stabilization and Rehabilitation Plans Environment Assessment, DOI-BLM-OR-B060-2013-0003-EA (DR/FONSI 3/1/2013)
- 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 proposed treatments including drill seeding. 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 Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States EIS (ROD 9/29/07). The use of Imazapic herbicide to reduce the amount of annual plant species on public land managed by the Winnemucca BLM District is analyzed in the Winnemucca Wildland Urban Interface Area Treatment Project EA, DOI-BLM-NV-WO10-0011-EA (DR/FONSI 9/20/2010). The location of the proposed action is within the geographic area analyzed in the EA and involves the very same resources.

Seedling planting has been analyzed in the Holloway Fire Emergency Stabilization and Rehabilitation Plans Environmental Assessment DOI-BLM-OR-BO60-2013-0003-EA (DR/FONSI 3/1/2013). Although the site specific geographic location analyzed is different, the geographic conditions and resources are sufficiently similar to the existing referenced EA document. The EA analyzes hand planting on similar vegetation communities and soils. The hand planting of seedlings would not leave depressions or ruts, compact the soils, or trample or compress vegetation. The analysis shows no effect of concern in the same resources being evaluated under this proposal. There would be no new impacts that would need further analysis.

**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 2012-043 and IM 2012-044 provide guidance on how the BLM is to protect sage grouse habitat. There is no 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, public involvement and interagency review associated with existing NEPA documents are adequate. In addition, coordination regarding the planned Callaghan Fire ESR actions occurred between the Winnemucca District Range Management Specialist and the affected permittee in the form of a phone conversation on 9/22/2014.

**DOI-BLM-NV-W010-2014-0037-DNA**

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

<b>Name /Title</b>	<b>Resource/Agency Represented</b>	<b>Signature/Date</b>	<b>Comments (Attach if more room is needed)</b>
Wes Barry	Range Management Specialist	/s Wes Barry 9/15/2014	
Rob Burton	Vegetation/Soils/Air Quality	/s Rob Burton 9/9/2014	
Chris Powell	Cultural Resources	/s Chris Powell 9/9/2014	
Pat Haynal	Cultural Resources (oversight)	/s Pat Haynal 9/9/2014	Thomas Fire inventoried in 2007, no new cultural
John McCann	Hydrology/Riparian	/s John McCann 9/19/2014	
Amanda DeForest	Wildlife	/s Amanda DeForest 9/19/2014	
Greg Lynch	Fisheries	/s Greg Lynch 9/4/2014	
Rob Bunkall	GIS	/s Rob Bunkall 9/17/2014	
Eric Baxter	ESR Lead/Invasive Species/NAC	/s Eric Baxter 10/22/2014	
Lynn Ricci	NEPA	/s Lynn Ricci 10/22/2014	
Samantha Gooch	Wild Horse/Burro	/s Samantha Gooch 9/22/2014	none
Zwaantje Rorex	Lands w/ Wilderness Characteristics/ WSA	/s Zwaantje Rorex 9/11/2014	
Mark Williams	Fire/Fuels	/s Mark Williams 9/22/2014	none
Pat Haynal	Paleontology	/s Pat Haynal 9/24/2014	none

Everett Bartz, SRMS, /s Everett Bartz, see my notes. -MR

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

10/28/2014  
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.

+