

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

OFFICE: *BLM Nevada-Winnemucca District*

TRACKING NUMBER: *DOI-BLM-NV-W010-2014-0021-DNA*

CASEFILE/PROJECT NUMBER: Santa Rosa Medusahead Control

PROPOSED ACTION TITLE: *Santa Rosa Medusahead and Invasive Annual Control*

LOCATION/LEGAL DESCRIPTION:

Public lands managed by the BLM within T47N R34E, T47N R35E, T47N R36E, T47N R38E, 47N R39E, T47N R40E, T47N R41E, T46N R34E, T46N R35E, T46N R36E, T46N R37E, T46N R38E, T46N R39E, T45N R34E, T45N R35E, T45N R36E, T45N R37E, T45N R38E, T45N R39E, T44N R35E, T44N R36E, T44N R38E, T44N R37E, T43N R37E, T43N R38E, T43N R39E, T43N R40E, T42N R37E, T42N R38E, T42N R39E, T42N R40E, T42N R41E, T41N R37E, T41N R38E, T41N R39E, T41N R40E, T41N R41E, T40N R40E, T40N R37E.

USGS 24k Quad name: McConnell Peak, McDermitt, South of McDermitt, White Rock Canyon, Willow Creek Ranch, Santa Rosa Peak, Orovada, Mullinix Creek, Spring City, Little Poverty, Paradise Valley, Five Fingers, Andorno Ranch, Paradise Well, Mud Spring Canyon, Willow Point, Hot Springs Peak, Odell Mtn, Cordero, Hoppin Peaks, Sentinel Rock, Jordan Meadow, Jordan Meadow NW, Washburn Basin, Jordan Meadow Mountain, Thacker Pass, Calavera Canyon, Disaster Peak.

APPLICANT (if any):

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

The BLM along with the Paradise Valley Weed Control District (PVWCD), US Department of Agriculture-Natural Resource Conservation Service (USDA-NRCS), Nevada Department of Agriculture (NDA), and Nevada Department of Conservation and Natural Resources (DCNR) are proposing to treat Medusahead rye and other invasive annual grasses on BLM managed public lands in and around the Santa Rosa Range in order to reduce fine fuels and decrease the risk of further infestation. The project would treat up to 3,000 acres annually with the BLM-approved herbicide, Imazapic at a rate of 8 oz/acre for three years. Any re-treatments of the same ground would be included as part of the annual 3,000 acre ceiling. Imazapic is applied as a pre-emergent herbicide to control non-native, invasive annual plant species and is known to have a low toxicity to

fish and other aquatic organisms.

“Accidental direct spray (of Imazapic) and spill scenarios generally pose no risk to fish or aquatic invertebrates when imazapic is applied at either the typical or maximum application rate. Risk assessments show fish and aquatic invertebrates are not at risk from off-site drift or surface runoff of imazapic”¹

Annual treatments would include treatment of newly discovered infestations of Medusahead rye as well as maintenance treatments occurring within existing populations where historic management with herbicides has already occurred. Imazapic is a pre and post-emergent herbicide that effectively targets annual grasses and annual broadleaf weeds, with minimal effect to non-target perennial grasses, forbs, and shrubs. The principle target species would be Medusahead rye, which often occurs in mixed stands with other invasive annual plant species such as cheatgrass. Prior to each aerial application of herbicide, treatment areas would be identified in GIS to accurately direct the applicators. Application methods may include: truck or ATV with a boom-mounted sprayer, hand treatment utilizing backpack, hand pumps, or ATV-mounted hand-sprayer, or by aircraft. Treatments would occur within the area delineated for potential treatment to control the spread of Medusahead rye. Application of Imazapic would be subject to approved Standard Operating Procedures (SOPs), compliance with all federal and state laws and regulations to the maximum extent possible, compliance with all BLM direction, and would include buffer zones to protect resources. Project inspection, monitoring, herbicide storage and mixing requirements, and restrictions based on weather are also proposed as described below. Broadcast seeding of native plant species without concurrent soil disturbance would potentially occur as a management action within areas infested by Medusahead rye or other invasive annuals.

Approved SOPs: Application Methods and Requirements:

The following measures from the Paradise Valley Medusahead Treatment DNA, DOI-BLM-NV-WO10-0200-DNA (DR 10/7/2011):

Only the BLM-approved herbicide, Imazapic, would be used on this project. Imazapic would principally be applied by aircraft on targets within the defined treatment areas. Application rates of herbicide would be according to label specifications. Prior to aerial application of herbicide, GIS shape files would be prepared identifying specific flight routes. Treatment flight strips would not exceed ¼ mile in width.

Herbicide application would be done by a State Licensed Herbicide Applicator using standard, approved application techniques.

Dyes would be added to herbicide when applying herbicide by land application methods.

Drift cards would be placed to monitor for possible herbicide drift outside of established buffer zones.

Imazapic would typically be applied during the fall, within an approximate application

¹ BLM (2007). Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States, Vol. 1, p. 4-84.

window beginning September 15th, and ending February 28th.

Herbicide would not be applied to areas where livestock are present. Herbicide application rates would be less than the threshold identified on product labels requiring grazing restriction.

Excepting OHVs, vehicles would not be utilized in areas where the shrub ecology is intact.

Grazing permittees would be notified at least 1 week prior to any aerial application of herbicides.

Any and all herbicide treatments would follow BLM procedures outlined in BLM Handbook H-9011-1 (Chemical Pest Control), and manuals 1112 (Safety), 9011 (Chemical Pest Control), and 9015 (Integrated Weed Management), and would meet or exceed state label standards. Treatments would comply with the United States Environmental Protection Agency (USEPA) label.

BLM procedures and methods would be followed as set forth on the Vegetation Treatments on BLM Lands in Thirteen Western States EIS 05/91, (ROD 8/91); Vegetation Treatments Using Herbicide on BLM Lands in Seventeen Western States EIS 07/2007, (ROD 9/29/07), and Winnemucca Integrated Weed Management EA NV-020-02-19(DR/FONSI 8/27/02).

Re-application of any herbicide would be less than the persistence factor identified for the herbicide.

Buffer Zones:

Current buffer zones were developed with consultation and coordination with the Nevada Department of Wildlife (NDOW) and the US Fish and Wildlife Service. No application of BLM approved herbicides by truck or ATV broadcast sprayer would occur within fifty feet from any existing open water sources (Creeks, springs, wet meadows, cattle troughs, lakes, and ponds). Application of Imazapic by backpack sprayer would not occur within 10 feet of any existing open water source. No application of Imazapic by truck, backpack, or ATV would occur within fifty feet of Lahontan cutthroat trout streams. Additional buffers required when applying herbicide by aircraft would include no application within 150 feet from any existing open water sources (creeks, springs, wet meadows, cattle troughs, lakes, and ponds). No application of herbicide would occur within 300 feet of Lahontan cutthroat trout streams when applied by aircraft. Twenty foot buffer zones would be required on edges of all treated areas when herbicides are applied by aircraft to reduce the potential for drift onto non-treatment areas. All label-specific requirements would be adhered to, including the avoidance of areas where groundwater is expected at five feet or less below ground surface.

No application of herbicide by aircraft would occur within 400 feet of known pygmy

rabbit burrows.

Project Inspection:

A BLM approved Project Inspector (PI) would be on site within the project area at all times while the herbicide is being applied and would be responsible for ensuring that the treatment is applied as directed. Chemical label directions would be followed.

Storage and Mixing of Herbicide:

No hazardous materials would be stored or disposed of on-site. Fuel, oil, and grease needed for equipment maintenance during the working period would be stored on site where no leakage or spillage could contaminate the ground. Any spilled materials would be immediately cleaned up and disposed of. The BLM PI would be notified of the spill. No equipment maintenance, rinsing, or mixing of chemicals would be performed within 50 feet any stream channel or waters. Herbicides would not be stored at the project sites. Product label directions and Material Safety Data Sheets (MSDS) would be available on-site for reference in case of spill or exposure. All unused herbicides or empty containers would be disposed of by the licensed herbicide applicator in accordance with the USEPA label at an approved disposal site.

Weather Restrictions:

Wind velocities for herbicide applications would be 6 mph or less for aerial application and 10 mph or less for ATV or truck application in all instances to reduce drift potential. Herbicide application would not occur during precipitation events. It may occur before or after precipitation events according to label directions.

The following measures from the Montana Mountains Cooperative Fuels Treatment EA, DOI-BLM-NV-WO10-2011-0005-EA (DR and FONSI 8/2/2012):

No herbicide application to control Medusahead rye would occur within the migratory bird breeding season (March 1 – August 31).

The following measures are specific to this proposal:

Grazing permittees would be notified at least one week prior to any aerial application of herbicides.

Monitoring:

All herbicide applications would be monitored annually to determine the effectiveness of treatments. Implementation monitoring would also occur in order to ensure that projects are implemented according to BLM specifications.

B. Land Use Plan (LUP) Conformance

LUP Name* Paradise-Denio MFP Date Approved 1982

Other document _____ Date Approved _____

Other document _____ Date Approved _____

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

The proposed actions are in conformance with the applicable LUP because it is specifically provided for the following LUP decisions:

Paradise-Denio MFP (1982)

Standard Operating Procedure ---.46(4) Soil-Water-Air—When carrying out large-scale crested wheatgrass seedings or herbicidal spray projects, wildlife areas to be given special consideration include.....Mitigating measure; “making no disturbed area wider than ¼ mile.”

The proposed action in is 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)

Range Management MFPIII Decision RM 2.1 P.D. : All vegetation manipulations in sage-grouse habitat will be done in accordance with the guidance supplied by the Nevada Department of Wildlife.

Wildlife MFPII Decision WL-1.21 P.D.: Maintain and improve habitat for sensitive, protected, threatened, and endangered species listed on the U.S. Fish and Wildlife Service Endangered and Threatened List, BLM-Nevada Department of Wildlife Sensitive Species List and those existing Federal and State laws and regulations.

Wildlife MFPIII Decision WL-1.28 and Standard Operating Procedure --.46 (1) Protect Sage-Grouse strutting grounds and give proper consideration to other Sage-Grouse habitat by accepting as guidance Nevada Department of Wildlife’s Guidelines for Vegetal Control Programs in Sage-Grouse Habitat in Nevada.

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

- Santa Rosa Fuelbreak Project Environmental Assessment, DOI-BLM-NV-WO10-2010-0003-EA, (DR and FONSI 02/19/2010) (2nd DR 5/24/2010).
- Paradise Fuelbreak Maintenance Environmental Assessment, DOI-BLM-NV-WO10-0009-EA, (DR and FONSI 07/19/2010).
- Montana Mountains Cooperative Fuels Treatment Project Environmental Assessment, DOI-BLM-NV-WO10-2011-0005-EA, (DR and FONSI 08/02/2012).
- Integrated Weed Management Environmental Assessment NV-020-02-19, 8/07/02, (DR and FONSI 8/27/02).
- Vegetation Treatment Using Herbicides on BLM Lands in Seventeen Western States Programmatic Final Environmental Impact Statement, 07/2007, (ROD 9/29/07).
- 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).

- Santa Rosa and Paradise Fuelbreak Herbicide Treatment Method Determination of NEPA Adequacy, DOI-BLM-NV-WO10-2011-0002-DNA, (DR 11/23/2010).
- Paradise Valley Medusahead Treatment Determination of NEPA Adequacy, DOI-BLM-NV-WO10-2011-0200-DNA, (DR 10/07/2011).
- Biological Opinion for the Santa Rosa Mountains Fuelbreak Project No: 2009-FA-0107.
- Biological Opinion for the Paradise Valley Medusahead Treatment Determination of NEPA Adequacy No: 2011-I-0420.
- Biological Opinion for the Montana Mountains Cooperative Fuels Treatment Project No: 2012-I-0134.
- Santa Rosa Medusahead and Invasive Annual Control Project, Informal Consultation No: 2014-I-0024.
- Paradise Greenstrip Maintenance Project, Informal Consultation No: 84320-2010-I-0358.
- Paradise Valley Medusahead Treatment, Informal Consultation No: 2011-I-0420.
- IM NV 2014-022 Revised Direction for Proposed Activities within Greater Sage-Grouse Habitat (July 2014).
- 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:

The range of alternatives analyzed in the existing NEPA documents is appropriate with respect to the proposed action. The decisions based on the previous EA's and DNA were completed in February, July, and November of 2010, so the information is recent and up to date.

Yes, the range of alternatives analyzed in the existing NEPA documents is appropriate with respect to the proposed action. The decisions based on the previous EA's and DNA were completed in February, July, and November of 2010, so the information is recent and up to date.

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. Application of Imazapic by aircraft is analyzed in the Paradise Valley Medusahead Treatment DNA, DOI-BLM-NV-WO10-0200-DNA (DR and FONSI 10/7/2011).

The use of Imazapic herbicide to reduce the amount of invasive annual plants on public land managed by the Winnemucca BLM District is analyzed in the following EA's: 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). The location of the proposed action is within the geographic area analyzed in the EA's and involves the very same resources. These documents provide the analysis needed as the project is within the same geographic area and is sufficiently similar. There would be no new impacts that would need further analysis. The Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012), analyzes Imazapic herbicide to reduce the amount of invasive annual plants on public land managed by the Winnemucca BLM District. Although the site specific geographic location analyzed is different, the project location is sufficiently similar to the site specific geographic conditions and resources analyzed in the EA.

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:

The range of alternatives analyzed in the existing NEPA documents is appropriate with respect to the proposed action. The decisions based on previous EAs and DNA were

completed in February, July, and November of 2010, and in 2012, so the information is recent and up to date.

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. Recent BLM NV State Office guidance (IM-NV-2011-044) related to Greater Sage Grouse has designated specific habitat in Nevada as Preliminary Priority Habitat (PPH) and Preliminary General Habitat (PGH) if it meets specified criteria for breeding habitat. Any project that falls within PPH or PGH must include additional correspondence and evaluation steps, including coordination and review by the Nevada Department of Wildlife (NDOW). The Santa Rosa Medusahead and Invasive Annual Control activities falls within PPH and PGH; correspondence with the NV State Office and NDOW was initiated and the proposed action was reviewed and approved by NDOW and BLM Wildlife Biologists. Based on this process, we can reasonably conclude that the recent Greater Sage Grouse guidance would not substantially change the analysis of this proposed action.

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

The direct, indirect and cumulative effects from the proposed action are similar and remain unchanged from those identified in the existing NEPA documents. The new proposed actions have been analyzed by the existing NEPA documents, including effects from application of herbicides.

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, public involvement and interagency review for the existing NEPA documents was adequate.

Scoping letters for both the Santa Rosa and Paradise EAs were sent out on May 15th, 2009, and March 24th, 2010, respectively. Letters requesting public input for both Preliminary EAs were sent out for Santa Rosa on January 10th, 2010 and Paradise on May 28th, 2010, respectively. Two public comments were received for the Santa Rosa preliminary EA. One in support and other included numerous comments. The BLM addressed the comments received in the final EA.

The scoping letter for the Paradise Valley Medusahead DNA was sent out on August 23, 2011. Scoping letters for the Montana Mountains Cooperative Fuels Project were sent on September 30, 2011.

An informal consultation was completed with United State of Fish and Wildlife Service on October 24, 2014. There has been coordination with Nevada Department of Wildlife regarding the Santa Rosa Medusahead and Invasive Annual Control project in the form of meetings, phone calls, and emails to discuss affected resources and restoration priorities. The project was fully supported by all parties involved.

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E. Persons/Agencies/BLM Staff Consulted

Name /Title	Resource/Agency Represented	Signature/Date	Comments (Attach if more room is needed)
Eric Baxter	Project Lead/Invasive Species	s/ Eric Baxter 9/26/2014	
Greg Lynch	Fisheries	s/ Greg Lynch 10/24/2014	USFWS consultation completed
John McCann	Hydrology	s/ John McCann 9/25/2014	
Margaret Adam	Wildlife	s/ Margaret Adams 9/15/2014	
Pat Haynal	Archaeology/Paleontology	s/ Pat Haynal 9/16/2014	
Rob Burton	Vegetation/Soils	s/ Rob Burton 9/29/2014	
Wes Barry	Range Management	s/ Wes Barry 9/26/2014	
Zwaantje Rorex	Wilderness/Lands with Wilderness Characteristics	s/ Zwaantje Rorex 9/26/2014	
Lynn Ricci	NEPA Coordinator	s/ Lynn Ricci 11/3/2014	

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 11/13/2014
Signature of the Responsible Official 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 5003.1(b) and the program-specific regulations.