

**Determination of NEPA Adequacy (DNA)**  
**900 Fire Emergency Stabilization Herbicide Treatment**  
**#DOI-BLM-ID-T030-2016-0002-DNA**  
**Bureau of Land Management**  
**Idaho State Office**  
**Twin Falls District**  
**Shoshone Field Office**

**900 FIRE BACKGROUND INFORMATION**

<b>Fire Name</b>	900
<b>Fire Number</b>	J1N4
<b>District/Field Office</b>	Twin Falls/Shoshone
<b>Admin Number</b>	LLIDT03000
<b>State</b>	Idaho
<b>County(s)</b>	Lincoln
<b>Ignition Date/Cause</b>	8/14/2015
<b>Date Contained</b>	8/14/2015

<b>Jurisdiction</b>	<b>Acres</b>
<b>BLM</b>	2,268
<i>State</i>	0
<i>Private</i>	0
<i>Other (Historic Waters)</i>	0
<b>Total Acres</b>	2,268

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

**Proposed Action Title/Type:** 900 Fire Emergency Stabilization (ES) Herbicide Treatment

**Location of Proposed Action:**

<b>Meridian</b>	<b>Township</b>	<b>Range</b>	<b>Affected Sections</b>
Boise	T6S	R17E	Various

**Description of the Proposed Action:** The proposed action is to implement an aerial herbicide treatment with Roundup® (*Glyphosate*) on the 900 fire to control an extensive fall germination of annual vegetation, primarily cheatgrass. The 900 fire burned approximately 2,268 acres in the Sand Butte Allotment. An Emergency Stabilization (ES) and Burned Area Rehabilitation (BAR) plan was developed and approved for the 900 fire and prescribed a 1,315 acre drill seeding to stabilize a predominately annual vegetation plant community. The drill seeding is composed of a perennial grass, forb and shrub mix.

The proposal is to aerial spray *Glyphosate* on the 1,315 acre drill seeding area (See attached treatment map) at the rate of 16 ounces/acre to control a fall germination of cheatgrass. The early germination and establishment of cheatgrass on the proposed drill seeding area threatens the long-term establishment of perennial vegetation and stabilization of the soil and plant community.

**Applicant (if any):** N/A

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

The applicable land use plan for the ES project is the 1985 Monument Resource Management Plan.

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions.

**Monument Resource Management Plan, 1985**

The Monument RMP states that lands administered by the BLM in this area will be managed in order to:

1. Maintain or improve wildlife habitat for crucial mule deer winter range;
2. Improve poor or fair condition rangeland;
3. Maintain, improve, protect, and restore watershed conditions; and
4. Control the spread of noxious weeds on public lands and eradicate them where possible and economically feasible.

**C. Identify applicable NEPA document(s) and other related documents that cover the proposed action.**

The proposed action is addressed in the following NEPA documents.

1. Vegetation Treatments Using Herbicides on BLM lands in the 17 Western States Programmatic EIS. September 29, 2007.
2. Shoshone District EA for Noxious Weed Control (EA# ID-050-EA-92031), 1992.
3. Twin Falls District Programmatic Emergency Stabilization and Rehabilitation Plan (PESRP) (DOI-BLM-ID-T000-2011-0001-EA). October 31, 2013.
4. Resource Management Plan Amendment for the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, September 2015.

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

1. Biological Assessment for the Twin Falls District PESRP and U.S. Fish and Wildlife Concurrence, #01EIFW00-2013-I-0204.

**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?**

Yes, the proposed action is a feature of the proposed action outlined in the 2013 PESRP.

**Documentation of answer and explanation:** An interdisciplinary resource team review of the proposed herbicide treatment has revealed that the resource values, concerns, stabilization and rehabilitation needs are essentially the same as those analyzed in the 2013 PESRP and best meet the wildlife, watershed, and soil objectives in the Monument RMP. The primary purpose of the herbicide treatment is to reduce exotic annual vegetation on the drill seeding area and assure that the pre-existing native plants and proposed seeded plants are given the best chance to recover, maximize growth, and provide a source of live and litter ground cover for the protection of the soil resource.

**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, and resource values, and circumstances?**

Yes, the range of alternatives in the existing NEPA documents is appropriate considering the current proposed action.

**Documentation of answer and explanation:** The range of alternatives analyzed in the PESRP EA is appropriate with respect to the proposed ES activity. Two alternatives to the proposed action were analyzed in the PESRP EA. They included an alternative action that would not implement ES and BAR treatments, but was eliminated from detailed

analysis because it was not consistent with BLM policy, and the No Action Alternative which would have continued to use the existing NFRPs. The current proposal follows the PESRP proposed action with the overall objective of stabilizing and rehabilitating the burned area to its previous native and/or seeded condition in the shortest time frame to enhance and protect the watershed, soil, wildlife habitat, and livestock forage values of the area.

**3. Is the existing analysis adequate and are the conclusions adequate 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 the proposed action?**

Yes, the existing analysis is still valid.

**Documentation of answer and explanation:** The PESRP was approved on October 31, 2013. No new information that would change the proposed action or invalidate the analysis contained in the PESRP has been identified. During the interdisciplinary review, team members consulted the most recent list of Threatened and Endangered species (August 11, 2014) and BLM sensitive species for the Shoshone Field Office.

**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, the direct, indirect, and cumulative effects that would result from the ES project are similar to those analyzed in the 2013 PESRP EA.

**Documentation of answer and explanation:** The proposed action would result primarily in impacts to vegetation (annual exotic) and soils. These impacts were considered in the PESRP on pages 78-82 and 87-96. With enhanced native vegetation recovery and seeding establishment the area susceptible to wind erosion would be reduced.

The PESRP adequately analyzed the action proposed in the ES action and it is anticipated that the cumulative impacts of the actions are not substantially different as analyzed in the PESRP. Therefore, there will not be any additional cumulative effects to consider under the plan.

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

Yes, the public involvement and interagency review of the PESRP is adequate for the current proposed actions.

**Documentation of answer and explanation:** Scoping letters informing the public of the purpose and need for action were sent to interested publics including organizations, and federal and state agencies beginning in March of 2007. The public and other agencies included interest from ranchers, academia, conservation groups, the Tribes, Idaho Department of Fish and Game, and ESA consultation with the USFWS.

The ES action with the Decision Record would be posted on the BLM ePlanning NEPA website and is available upon request.

**E. Interdisciplinary Analysis:** Team members conducting or participating in the NEPA analysis and preparation of this worksheet.

<b>Name</b>	<b>Title</b>	<b>Resource Represented</b>
Joe Russell	Fire Ecologist	Fuels
Scott Uhrig	Fire Rehabilitation Specialist	Operations
Joanna Tjaden	Range Management Specialist	Range
Lisa Cresswell	Archaeologist/NEPA Coordinator	Cultural/NEPA
Gary Wright	Wildlife Biologist	Wildlife

**F. Mitigation Measures:**

The burned areas will be managed to keep livestock from grazing until seeding and natural recovery objectives are met. The seed treatment areas will be monitored and managed to keep livestock from grazing for a minimum of two grazing seasons to allow for recovery and maximum production of the newly seeded plants. Burn areas not drill seeded will be monitored for natural recovery prior to allowing resumption of livestock grazing. Cultural resource inventories have been completed prior to ground disturbing (drill seeding) to avoid any potential adverse effects to significant cultural sites.

**CONCLUSION**

Based on the review documented above, I conclude that this proposal conforms to the Monument RMP and that the NEPA documentation fully covers the proposed action and constitutes BLMs compliance with the requirements of NEPA.

  
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Joe Russell  
Project Lead

10/21/2015  
Date

  
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Lisa Cresswell  
NEPA Coordinator

10/21/2015  
Date

  
\_\_\_\_\_  
Codie Martin  
Shoshone Field Office Manager

10/22/15  
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.

# 900 Fire ES and BAR Treatments

