

## **Worksheet**

### **Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)**

U.S. Department of the Interior  
Bureau of Land Management (BLM)

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**A. BLM Office:** Vale District, Baker Resource Area  
**NEPA Log Number:** DOI-BLM-ORWA-V000-2016-0002-DNA  
**Lease/Serial/Case File No.** Lime Hill J0W7

**Proposed Action Title/Type:** Emergency Stabilization and Rehabilitation (ESR)

**Location of Proposed Action:** West of Interstate 84 near Huntington, Oregon (see attached map in Appendix A)

**Description of the Proposed Action: Full Implementation of Lime Hill Fire Emergency Stabilization and Rehabilitation Plan**

The Bureau of Land Management (BLM) by its own staff or through contract proposes to implement the Lime Hill Fire Emergency Stabilization and Burned Area Rehabilitation Plan. The plan includes noxious and invasive weed detection and treatments of up to 1,000 acres (see Appendix B: Weed Treatments). Herbicides include imazapic, chlorsulfuron, and clopyralid in addition to those listed in the Vale District Integrated Weed Control Plan (1989). In Snake River goldenweed habitat, the herbicides would be applied with ATVs with boom sprayers and with backpack sprayers, buffering 50 feet around identified goldenweed plants. Other areas would employ the same spray application methods, and also aerial application of imazapic in all areas which lack Snake River goldenweed. The plan also includes construction of approximately three miles of temporary fence, repair of existing fences within the fire, and potential ground seeding of approximately 310 acres and aerial seeding of approximately 200 acres. The seeding would only occur if desirable plants are not adequately establishing in imazapic- treated areas by the mid-summer following treatment. The ground seeding would consist of a seed mix of introduced grasses in the Benson Creek area where there is heavy infestation of annual grasses within a crested wheatgrass/intermediate wheatgrass seeding. The aerial seeding would be a native seed mix in the East Table Mountain area where Snake River goldenweed is present and annual grass infestations are more moderate to patchy. Aerial seeding would be followed by harrowing with ATVs on the flatter terrain to incorporate the seed into the soil. For the native seed mix, local native seed would be preferred if available. For cultural resources, tribes would be consulted about the project, and flag and avoid surveys would be completed before ground seedings are initiated.

**Applicant (if any):** None

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

Baker Resource Management Plan (RMP) Date Approved July 12, 1989  
Instruction Memorandum WO IM-2014-114, Sage-Grouse Habitat and Wildland Fire Management (2014).

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) and, if applicable, implementation plan decisions:

Livestock Grazing Management , pages 15 and 110.  
Soil, Water and Air Management, page 32.  
Fire Management, pages 40 and 41.  
Noxious Weed Control, page 50.

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

Vale District Normal Fire Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005)

Leslie Gulch Emergency Stabilization and Rehabilitation EA (2015)

The Buzzard Complex Fire Emergency Stabilization and Rehabilitation Environmental Assessment (2014)

Draft Environmental Impact Statement and Land Use Plan Amendments for the Boardman to Hemingway Transmission Line Project (2014)

Vale District Integrated Weed Control Plan EA (1989)

The Final EIS for Vegetation Treatments Using Herbicides on BLM Lands in Oregon (2010)

Oregon Greater Sage-Grouse Proposed RMP Amendment/Final EIS (2015)

**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?**

All of the proposed actions are analyzed in the Vale District Normal Fire Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005), which covers the area of the Lime Hill Fire. The specific use of the herbicides imazapic, chlorsulfuron, and clopyralid for a similar area (Saddle Draw) is analyzed in the Buzzard Complex Fire Emergency Stabilization and Rehabilitation Environmental Assessment (2014). The use of imazapic and chlorsulfuron in the presence of sensitive plant species, using a 50-foot buffer to protect such species from spraying, is analyzed in the Leslie Gulch Emergency Stabilization and Rehabilitation EA (2015). The geographic and resource conditions and the proposed actions for Lime Hill are sufficiently similar to those already analyzed for Leslie Gulch. Most of the

proposed seeding areas fall within the area analyzed in the Draft EIS and Land Use Plan Amendments for the Boardman to Hemingway Transmission Line Project, and the proposed transmission line would go directly over the seedings. Herbicide spraying is analyzed in the Final EIS for Vegetation Treatments Using Herbicides on BLM Lands in Oregon (2010) and the Vale District Integrated Weed Control Plan EA (1989).

**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, public interests, and resource values?**

The range of alternatives in the Vale District NFESRP, including no action and proposed action, remains appropriate for Lime Hill Fire and does not need to be expanded. There are no environmental concerns, interests, or resource values that would necessitate a broader range of alternatives.

The Buzzard Complex ESR EA included a very specific Purpose and Need. The Purpose and Need was primarily to stabilize Greater Sage-Grouse habitat, minimize threats to life and property, reduce soil loss, stabilize archaeological resources, reduce risk of noxious weed and annual grass infestation, and protect the area from livestock grazing until objectives were met. The Lime Hill Fire presents the same issues and needs as those described in the Buzzard ESR EA. Therefore, the same range of reasonable alternatives was appropriate.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and 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?**

The existing analyses are still valid and new information and new circumstances do not exist that would substantially change the analysis of the new proposed action. The Oregon Greater Sage-Grouse Proposed RMP Amendment/Final EIS (2015) was completed following the Buzzard Complex ESR EA, but it did not add anything new to the sage-grouse considerations already analyzed, and the proposed actions of Lime Hill ESR Plan are consistent with the requirements of the new EIS.

**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?**

The direct, indirect, and cumulative effects that would result from implementation of the new proposed action are similar (both quantitatively and qualitatively) to those analyzed in the NEPA documents cited.

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

The applicable NEPA analysis documents were reviewed by a diverse representation of public entities. This included Federal, state, local, and tribal governments as well as private entities and environmental advocacy groups. The notice of availability of the Environmental Analysis and opportunity to comment on the Buzzard ESR EA was sent to approximately 75 individuals, organizations, agencies, local governments, state governments, and federal governments, many of which are the identical interested or potentially affected publics for this ESR Plan.

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

The following team members conducted or participated in the preparation of this worksheet.

Brent Grasty	NEPA Compliance and Planning
Erin McConnell	Weeds Specialist
Melissa Yzquierdo Primus	Wildlife Biologist
John Rademacher	Supervisory Natural Resource Specialist
Craig Martell (preparer)	Rangeland Management Specialist
Katy Coddington	Archaeologist
John Quintela	Fisheries Biologist
Roger Ferriell	Botanist
Lori Wood	Field Manager

**CONCLUSION**

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

  
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Signature of Project Lead

  
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Signature of NEPA Coordinator

  
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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 Part 4 and the program-specific regulations.