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

Twin Falls District
Jarbidge Field Office
2878 Addison Avenue East
Twin Falls, ID 83301

Worksheet
Determination of NEPA Adequacy (DNA)

NEPA No. ID-DOI-BLM-ID-T010-2016-0006-DNA

BLM Office: Jarbidge Field Office **Lease/Serial/Case File No.:** NA

Proposed Action Title/Type: Poison Butte Sagebrush Planting Project

Location of Proposed Action: The proposed planting area is located in the Jarbidge Field Office in south-central Idaho, about 75 miles southwest of Twin Falls. The planting area includes portions of the South Sheep, West Dishpan and Poison Butte pastures of the Poison Butte grazing allotment and contains about 4,700 acres. The planting area is displayed on Map 1.

Applicant (if any): N/A

A. Description of the Proposed Action

The proposed action is to hand plant approximately 142,000 Wyoming big sagebrush (*Artemisia tridenata* ssp. *wyomingensis*) seedlings over an area about 4,700 acres in size in fall (mid-October through mid-November) 2016. Additional planting could occur in subsequent years if needed to increase shrub density and age class diversity. The objective of the proposed action is to re-establish sagebrush cover that burned in the 2007 Murphy Complex Fire. Currently these areas are dominated by native and non-native perennial grasses, including bluebunch wheatgrass (*Pseudoroegneria spicata*), Idaho fescue (*Festuca idahoensis*), squirreltail (*Elymus elymoides*), Sandberg bluegrass (*Poa secunda*), and crested wheatgrass (*Agropyron cristatum*). This supplemental planting is proposed to accelerate recovery of breeding and winter habitats for sage-grouse (*Centrocercus urophasianus*) and other sagebrush-obligate wildlife, as well as crucial winter range and seasonal habitats for big game.

The proposed project area is within the Idaho Southern Conservation Area, a Priority Habitat Management Area (PHMA), and Sagebrush Focal Area (SFA) (Map 2) and currently classified as Type 1 restoration habitat. Type 1 restoration habitat is defined as areas dominated by perennial grass but lacking a shrub overstory. The proposed project would expand and connect key sagebrush habitats adjacent to project perimeters. The use of Wyoming big sagebrush is based on ecological site potential, pre-burn vegetation, and remnant sagebrush stands peripheral to the proposed project area.

Containerized or bare root shrub seedlings grown from government-furnished, locally adapted seed, would be hand-planted in fall. Holes would be dug using hand tools such as planting bars and hoe-dads, resulting in a disturbance area of about 3 inches in diameter. Shrub seedlings would be planted in patches of about 500-1,500 plants. Patches would generally be oriented in a north-south arrangement to facilitate natural dispersal of seed by wind. Shrub seedlings would be spaced 8 to 15 feet from each other, and placed at least 3 feet from existing, live mature or seedling shrubs, including rabbitbrush (*Ericameria nauseosa* or *Chrysothamnus viscidiflorus*). Shrubs could be placed less than 3 feet from dead sagebrush for sun and wind protection and to access soil nutrients and mycorrhizal fungi that are associated with areas under sagebrush canopies. Shrub seedlings would not be planted in areas with obvious existing populations of invasive plants (primarily cheatgrass, *Bromus tectorum*) or noxious weeds to reduce potential for competition or unintentional herbicide treatment. Seedlings would not be planted in slickspot microsites.

Project success would be based on plant survival in the short-term (3 years) and long-term (>5 years). Monitoring methods would include shrub survival transects, field observations, and photos. Baseline data would be collected during project implementation with establishment of four 300 foot monitoring transects, each with 50 seedlings planted at 6 foot intervals on alternating sides of the transect. Monitoring would commence the year after planting and occur annually for years 1 through 3, year 5, and subsequently at 5 year intervals.

Full-size vehicles would be restricted to existing roads. Limited temporary use of off-road vehicles such as utility terrain vehicles (UTVs) would be allowed to access remote planting locations. Limited use would be implemented in a manner such that tracks to and from planting locations would have low visibility and impacts to soils and vegetation would be minimal or negligible. This would include locating staging areas on rocky or otherwise hardened areas or on existing roads and using different routes for ingress and egress. Temporary travel corridors would be identified prior to implementation for specific planting locations. All vehicles and planting equipment would be power-washed prior to entering the proposed project area to minimize the potential for introduction of undesirable and/or invasive plants.

Planting would not occur within 0.25 mile of livestock water or mineral supplement locations, 50 feet from any two-track road or fenceline, or during muddy or saturated soil conditions. Planting would not occur in perennial, intermittent, or ephemeral drainages. Under agreement between the BLM and the State Historic Preservation Officer, a cultural resource inventory is not required for compliance with Section 106 of the National Historic Preservation Act for hand planting projects that avoid known historic properties and where probability for site occurrence is low. Known historic properties within the project area boundaries would be avoided and the Jarbidge Field Office Archeologist would be notified immediately if previously unrecorded artifacts are found during planting project implementation. Planting would occur adjacent to, but not in, the Bruneau-Jarbidge Rivers Wilderness. Fuels program specialists would be on-site to insure implementation of planting restrictions.

B. Land Use Plan (LUP) Conformance

Land Use Plan Name: Jarbidge Resource Management Plan (RMP)
Date Approved/Amended: September 2, 2015

The proposed action is located in Vegetation Management Area (VMA) C, which encompasses a vegetation band in the southern half of the field office area that is characterized by potential native plant communities dominated by Wyoming big sagebrush and bluebunch wheatgrass. The proposed action is in conformance with the Jarbidge Resource Management Plan, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (Goals, Objectives, and Management Actions). In addition, the proposed project area contains 62 acres of occupied slickspot peppergrass (*Lepidium papilliferum*) habitat and about 550 acres of potential habitat (Map 3). Applicable conservation measures for slickspot peppergrass (Jarbidge RMP, Appendix C, pp. A-121 – A-122) incorporated into the proposed action are listed below.

Upland Vegetation (pp. RMP-16 – RMP-21)

- **UV-G-1.** Manage upland vegetation communities to promote soil stability, water infiltration, nutrient cycling, and energy flow; provide habitat for sage-grouse and other sagebrush steppe obligates; and provide for multiple use.
- **UV-G-2.** Manage vegetation to restore the ability of the ecosystem to recover following a disturbance and reduce fragmentation of habitat for sage-grouse and other native species.
    - **UV-MA-12.** Restore approximately 33% of non-native perennial communities to native shrubland, focusing on sage-grouse habitat, big game winter range, and areas adjacent to native communities. Treat the remaining non-native perennial communities to introduce shrubs focusing on sage-grouse, bighorn sheep, and slickspot peppergrass habitat; natural succession of shrubs will also be allowed in non-native perennial communities.
    - **UV-MA-14.** Restore approximately 75% of native grassland communities to native shrubland. Treatments with focus on areas that will expand or connect native shrubland communities. Natural succession of shrubs will be allowed throughout native grassland communities.
    - **UV-MA-24.** The first priority for implementing vegetation treatments will be treatments identified for VMA D to improve sage-grouse habitat; the second priority will be treatments identified for VMA C to reconnect and expand habitat for sage-grouse. Opportunities for treatments outside these priority areas will also be considered.
    - **UV-MA-26.** Focus restoration treatments identified for each VMA on habitat for sage-grouse, slickspot peppergrass, other special status species, mule deer, and pronghorn.

Wildlife (pp. RMP-24)

- **WI-G-1.** Manage public lands to promote diverse, structured, resilient, and connected habitats for wildlife.
- **WI-O-1.** Maintain or improve wildlife habitat by managing uses and activites and actively restoring annual, non-native perennial, and native communities.

Special Status Species (pp. RMP-26 – RMP-28)

- **SS-G-1.** Manage public lands to contribute to the conservation and recovery of sage-grouse and other special status species.
- **SS-O-1.** Maintain or improve the quality and quantity of habitat for sage-grouse and other special status species by managing public land activities to sustain or benefit those species.
    - **SS-MA-19.** Maintain or improve the habitat for special status species by protecting and restoring their habitat, controlling noxiuous weeds and invasive plants, and minimizing direct habitat disturbance.
    - **SS-MA-20.** When designing seed mixes for vegetation treatments and surface-disturbing projects, consider the needs of special status species and their habitat in the project area.
    - **SS-MA-21.** Use seeding methods that minimize impacts to special status species populations.
    - **SS-MA-24.** Implement management actions described in the *Upland Vegetation* section to maintain or improve habitat for sage-grouse and other special status species. Upland vegetation management to benefit sage-grouse and other sagebrush-obligate special status species includes:
        - Restoring annual, non-native perennial, and non-native understory communities toward native;
        - Restoring native grassland communities to native shrublands; and
        - Introducing forbs and late-seral grasses to native shrubland communities.

Conservation Measures and Implementation Actions for Slickspot Peppergrass (Table C-1, pp. A-121 – A-122)

- BLM will promote diversity, richness, and health of native plant communities to support pollinators and habitat for slickspot peppertrass.
    - BLM will focus slickspot peppergrass habitat conservation and restoration efforts in or adjacent to occupied habitat to encourage connectivity among populations through the following measures:
        - Where habitat categories for slickspot peppergrass exist, BLM will conserve stands of sagebrush and native vegetation in making activity plan and project-level decision.
        - Vegetation treatment projects undertaken in habitat categories for slickspot peppergrass will be compatible with species habitat restoration objectives, as described below.
        - BLM will select and implement specific projects to restore habitat categories for slickspot peppergrass in degraded areas as funding allows, such as planting shrubs and forbs and controlling noxious weeds, within and adjacent to occupied habitat. Apply methods described below.
        - When conducting vegetation treatment projects, BLM will use seeding techniques that minimize soil disturbance such as minimum-till drills and rangeland drills equipped with depth bands, use native plant materials and seed during restoration activities, and select native forbs that benefit slickspot peppergrass insect pollinators.

- Restore wildlife habitat while promoting slickspot peppergrass conservation.
    - Any restoration efforts for wildlife within habitat categories for slickspot peppergrass will be compatible with the species' habitat requirements.

Land Use Plan Name: Approved Resource Management Plan Amendments (ARMPA) for the Great Basin Region, including the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah

Date Approved/Amended: September 21, 2015

The 2015 Jarbidge RMP was amended by the ARMPA. The proposed project area is within the Idaho and Southwestern Montana Subregional Planning Area, Northern Great Basin Greater Sage-grouse (GRSG) Population area, and Idaho Southern Conservation Area. The proposed project area also occurs in a Priority Habitat Management Area (PHMA) and Sagebrush Focal Area (SFA) (Map 2). The proposed action is in conformance with the Approved Resource Management Plan Amendments, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (Goals, Objectives, and Management Actions). In addition, applicable Required Design Features (Appendix C) are included in the proposed action.

Special Status Species (SSS) (p. 2-4 – 2-15)

- **Goal SSS 1:** Maintain and/or increase the abundance, distribution and connectivity of GRSG by conserving, enhancing and restoring GRSG habitat to maintain resilient poppulations by reducing, eliminating or minimizing threates to GRSG habitats.
- **Goal SSS 3:** Manage anthropogenic development and human disturbance to minimize the likelihood of adverse population level effects on GRSG.
- **Goal SSS 5:** Conserve, enhance, and restore the sagebrush ecosystem upon which GRSG populations depend in an effort to maintain and/or increase their abundance and distribution, in cooperation with other conservation partners.
- **Objective SSS 1:** Maintain or make progress toward all lands within PHMA and Important Habitat Management Areas (IHMA) (at least 70%) capable of producing sagebrush so there is a minimum of 15 percent sagebrush cover and conifers absent to uncommon within 1.86 miles of occupied leks.
    - **MD SSS 33:** Conduct implementation and project activities, including construction and short-term anthropogenic disturbances consistent with seasonal habitat restrictions described in **Appendix C.**
    - **MD SSS 36:** Incorporate appropriate conservation measures for slickspot peppergrass (*Lepidium papilliferum*) as described in the 2014 Conservation Agreement (as updated, amended or reauthorized) into implementation and project design within slickspot peppergrass habitat in the Jarbidge and Four Rivers Field Offices to avoid and minimize impacts on slickspot peppergrass.
    - **MD SSS 38:** Monitor the effectiveness of projects (e.g. fuel breaks, fuels treatments) until objectives have been met or until it is determined that objectives cannot be met, according to the monitoring schedule identified for project implementation.

Vegetation (VEG) (p. 2-16 – 2-17)

- **Objective VEG 1:** Reconnect and expand areas of higher native plant community integrity/rangeland health to increase the extent of high quality habitat and, where possible, to accommodate the future effects of climate change.
- **Objective VEG 2:** Increase the amount and functionality of seasonal habitats by:
    a. Increasing or enhancing canopy cover and average patch size of sagebrush.
    b. Increasing the amount, condition and connectivity of seasonal habitats.
    c. Protecting or improving GRSG migration/movement corridors.
    - **MD VEG 1:** Implement habitat rehabilitation or restoration projects in areas that have potential to improve GRSG habitat using a full array of treatment activities as appropriate, including chemical, mechanical and seeding treatments.
    - **MD VEG 2:** Implement vegetation rehabilitation or manipulation projects to enhance sagebrush cover or to promote diverse and healthy grass and forb understory to achieve the greatest improvement in GRSG habitat based on FIAT Assessments, HAF assessments, other vegetative assessment data and local, site specific factors that indicate sagebrush canopy cover or herbaceous conditions do not meet habitat management objectives (i.e. is minimal or exceeds optimal characteristics).

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

The applicable NEPA document is the Jarbidge Field Office (JFO) Programmatic Shrub Planting EA (EA # ID-210-2008-EA-359) and Decision Record signed February 2, 2012. The JFO Programmatic Shrub Planting EA analyzed the effects of hand and mechanical planting of shrub seedlings to mitigate loss of upland and riparian habitats due to recent and historic fire. The proposed action is consistent with the 2012 Biological Assessment for Programmatic Shrub Planting and U.S. Fish and Wildlife Service Concurrence Letter (01EIFW00-2012-I-0084) and the Biological and Conference Opinion for the Jarbidge Resource Management Plan (01EIF00-2015-F-0545).

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 type of activities explained in proposed action are within the scope of those described and analyzed in the JFO Programmatic Shrub Planting EA. The location of the proposed action is within the geographic extent of the Programmatic EA. The proposed action also includes design features contained within the Programmatic EA to reduce or eliminate the potential for impacts to sensitive resources, including special status species and cultural resources. The Programmatic EA estimated that approximately 25,000-50,000 shrubs would be planted over about 5,000 acres annually. Due to the extent of past fire and habitat loss, recent policy emphasis on sage-grouse habitat restoration, and funding available to address that priority, the proposed action is to plant

about 142,000 shrubs over about 4,700 acres, resulting in an average planting density of about 40 plants/acre. Impacts of the proposed action beyond those described in the Programmatic EA are not anticipated, other than to increase the density of shrub planting in the proposed project area. This is due to the use of hand planting methods and inclusion of design features to protect sensitive resources.

The impacts of limited, temporary, off-road travel to access planting locations would be considerably less than those described for mechanical planting, which was analyzed in the Programmatic EA. Design features for staging, ingress, and egress are included and impacts to soils and existing vegetation are anticipated to be minimal to negligible. Allowing this access would provide better dispersal of sagebrush patches within the proposed project area.

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, resource values, and circumstances?

Yes. The JFO Programmatic Shrub Planting EA considered two alternatives: the Proposed Action, which included planting upland shrubs utilizing hand and mechanical methods, and the No Action Alternative to not plant shrubs. Seeding of shrubs was considered as a method of establishment, but was not analyzed in detail because it would require reduction in existing vegetation cover, creating a need for additional treatment methods, including prescribed fire and possible chemical treatment.

The currently proposed project is consistent with the purpose and the need described in the Programmatic EA and Bureau policy regarding sage-grouse habitat restoration. The planting locations were identified in coordination with Idaho Department of Fish and Game to address both sage-grouse and big game habitat concerns.

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

Yes. The analysis contained in the JFO Programmatic Shrub Planting EA is still valid. No new information or changed circumstances were identified that would cause the BLM to consider a new or revised proposed action. The most recent lists of ESA listed, proposed and candidate species (http://www.fws.gov/endangered/index.html, accessed January 29, 2016) and BLM special status species (Instruction Memorandum ID-IB-2016-003, updated October 26, 2015) were reviewed. The proposed action would improve habitat for sagebrush-dependent special status species, including sage-grouse, Brewers sparrow (*Spizella breweri*), sage thrasher (*Oreoscoptes montanus*), and sagebrush sparrow (*Artemisiospiza nevadensis*), as well as slickspot peppergrass. In addition, information presented in the the 2012 Biological Assessment for Programmatic Shrub Planting remains valid.

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 JFO Programmatic Shrub Planting EA adequately analyzed the environmental effects that would result from implementation of the current proposed action. The analysis in the existing NEPA document continues to be current and accurate. Impacts from the proposed action are anticipated to be similar to or less than those described in the Programmatic EA.

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

Yes. This project was developed at the request of and in coordination with Idaho Department of Fish and Game. Development of the JFO Programmatic Shrub Planting EA included posting on the Idaho NEPA Register in March, 2008, and sending scoping letters to 18 members of the interested public on April 5, 2010. One comment was received via email on April 14, 2010, in response to scoping efforts. There was concern over lack of detailed information regarding where the shrubs would be planted, potential impacts of livestock grazing, and the spread of noxious weeds due to mechanical planting. These issues were addressed in the design features incorporated into the Programmatic EA, the Decision Record for the Programmatic EA, and the current proposed action.

The Bureau initiated tribal consultation at the March 24, 2011, Wings and Roots Meeting between the Twin Falls District and the Shoshone-Paiute Tribes. Comments were received from the Tribes at the April 28, 2011, meeting. The Tribes supported the shrub planting proposal because it would restore native shrubs. Consultation was concluded on April 28, 2011.

In addition, a Biological Assessment analyzing the potential impacts to ESA-listed species was submitted to the U.S. Fish and Wildlife Service on January 10, 2012. Concurrence for the determination that the proposed programmatic action is not likely to adversely affect ESA-listed species was received on January 27, 2012.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource	Agency Represented
Shane Wilson	Archaeologist/Park Ranger	Cultural Resources	BLM
Jim Klott	Wildlife Biologist	Wildlife	BLM
Michael Haney	Botanist	Special status plants	BLM
Tucker Porter	Rangeland Management Specialist	Livestock management	BLM
Dennis Newman	Regional Habitat Biologist	Wildlife	Idaho Department of Fish and Game
Eric Freeman	Regional Habitat Biologist	Wildlife and Volunteer coordination	Idaho Department of Fish and Game

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the 1987 Jarbidge RMP and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

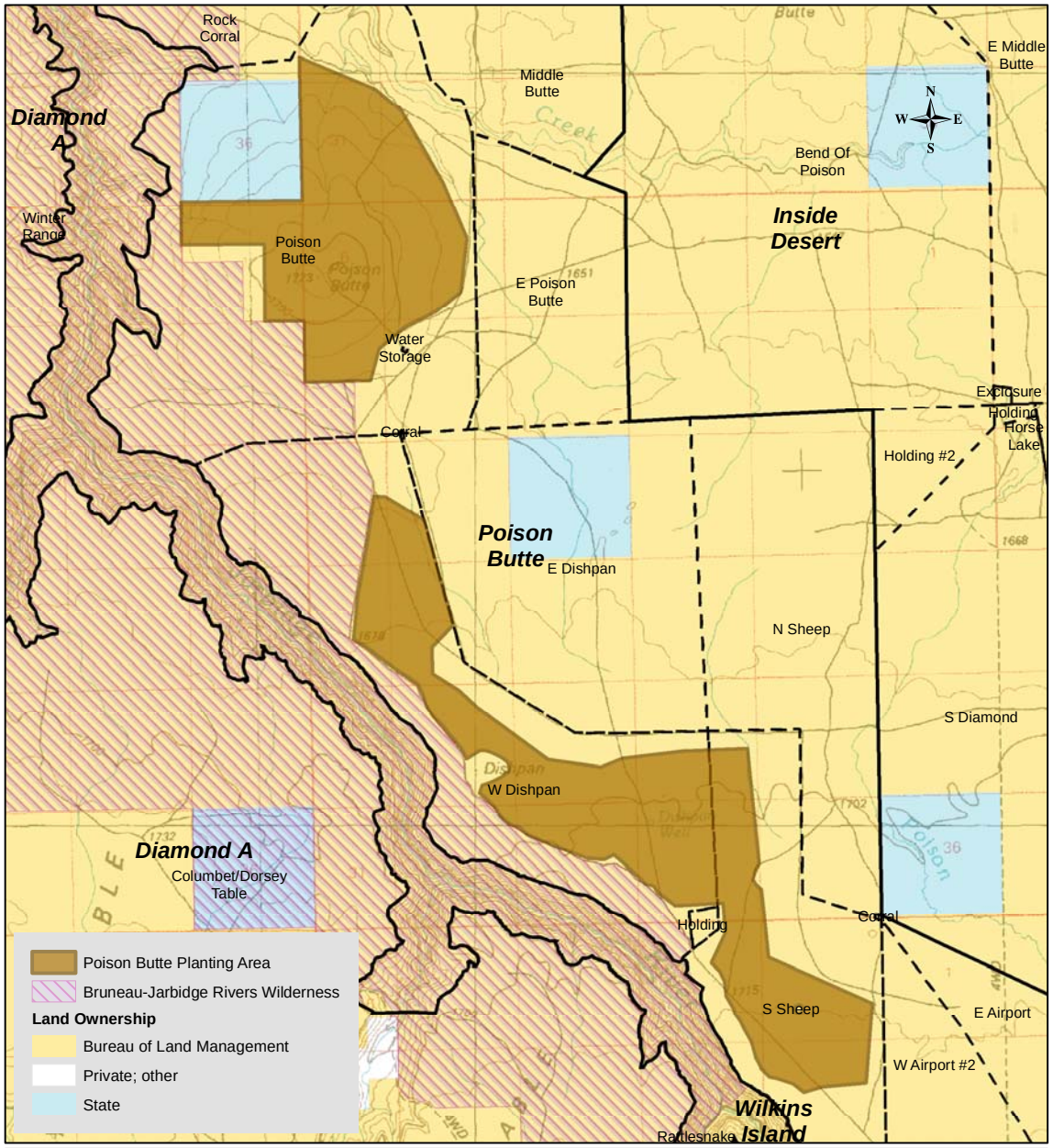
/s/ Julie Hilty 4/22/2016
Julie Hilty, Project Lead Date

/s/ Lisa Cresswell 4/26/3016
Lisa Cresswell, Planning and Environmental Coordinator Date

/s/ Elliot Traher 5/13/2016
Elliot Traher, Field Office Manager 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.

Map 1. Poison Butte Sagebrush Restoration
Bureau of Land Management, Jarbidge Field Office



The surface management status ("land ownership") should be used as a general guide only. Official land records, located at the Bureau of Land Management (BLM) and other offices, should be checked for up-to-date information concerning any specific tract of land.

Map Created: 2/12/2016

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Map Projection: NAD 1983 UTM Zone 11N

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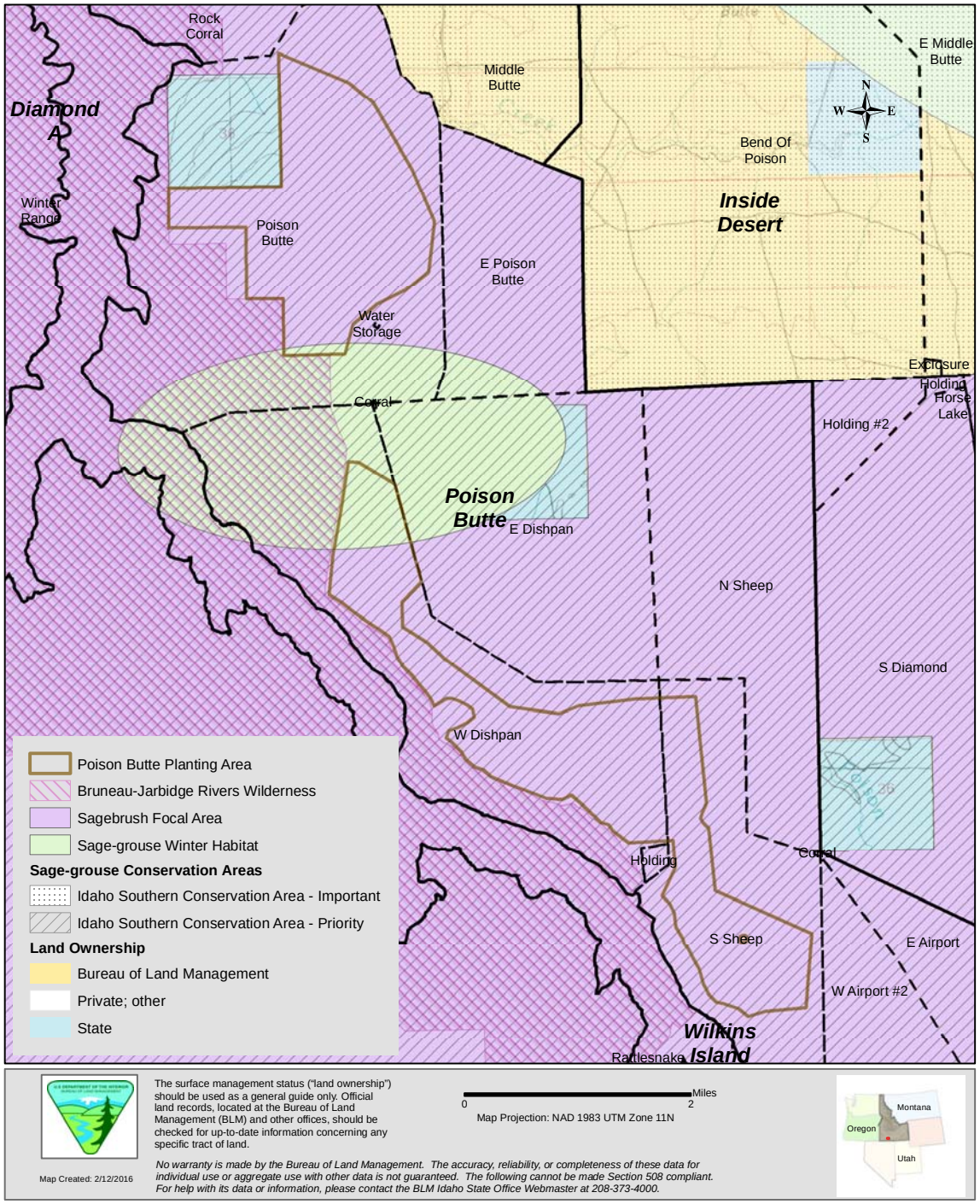
Map 2. Poison Butte Sagebrush Restoration
Sage-grouse Habitats
Bureau of Land Management, Jarbidge Field Office



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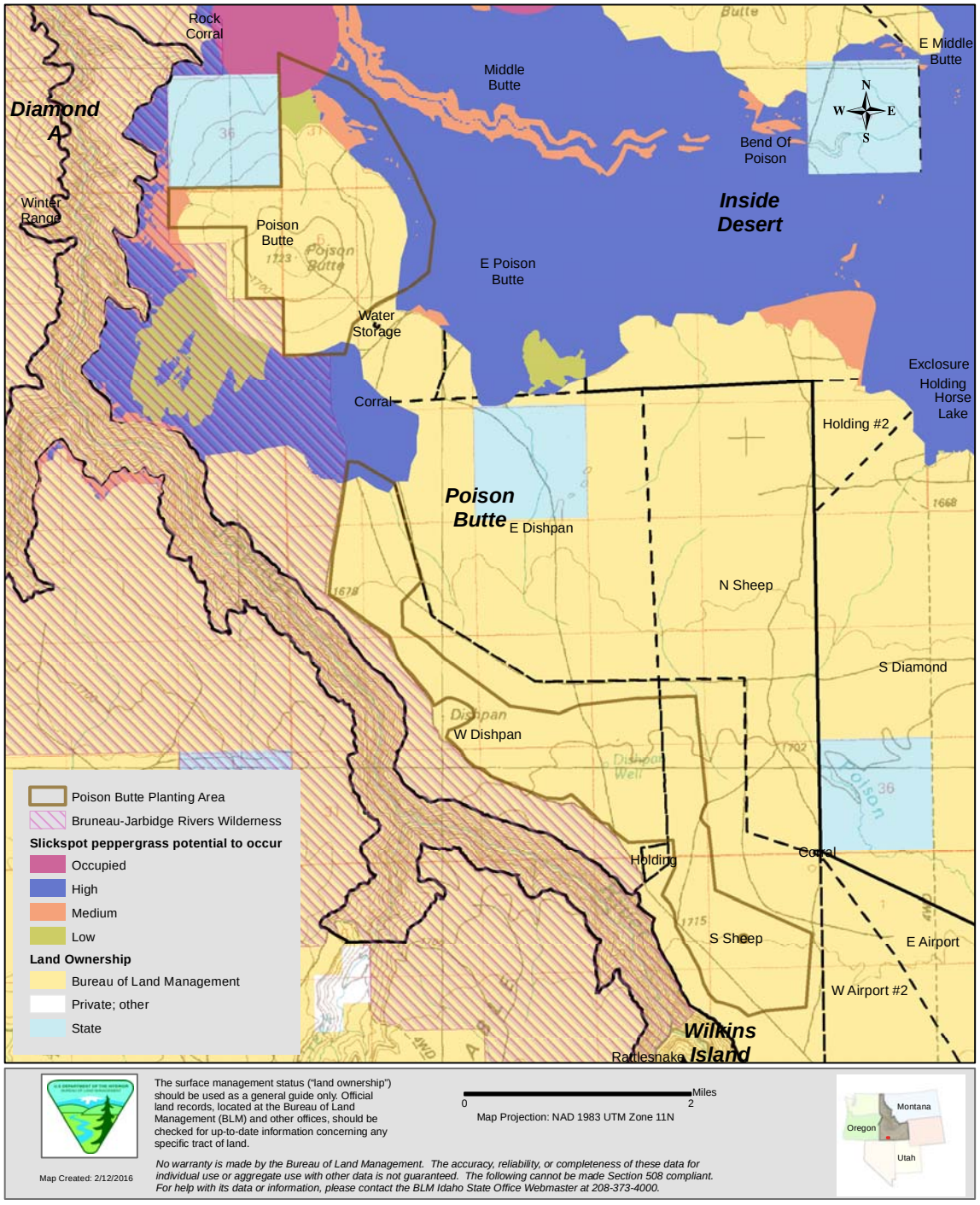
Map 3. Poison Butte Sagebrush Restoration
Slickspot Peppergrass Habitats
Bureau of Land Management, Jarbidge Field Office



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