

Interim
Documentation of Land Use Plan Conformance and NEPA Adequacy
(DNA)
Long Tom ACEC
U.S. Department of the Interior Bureau of Land Management

A. Describe the Proposed Action

The Long Tom Area of Critical Environmental Concern (ACEC) was established in 1984 by the Eugene District, Bureau of Land Management (BLM) to protect an example of native Willamette Valley wetland prairie. Three BLM Special Status plant species, all endemic to prairie habitats, occur at the Long Tom ACEC. These species include the Federally-listed Endangered Bradshaw's lomatium (*Lomatium bradshawii*), and Bureau Assessment species shaggy horkelia (*Horkelia congesta*), and timwort (*Cicendia quadrangularis*). The proposed action (use of a prescribed burn in the fall of 2000 to enhance this wetland habitat) is in conformance with the "Eugene District Record of Decision and Resource Management Plan" (May 1995) and also helps meet recovery objectives identified in the Recovery plan for *Lomatium bradshawii*. The prescribed burning was analyzed in EA-95-27 and previous EAs..

Background

Willamette Valley prairies evolved with fall-season fires and presumably plants of these prairies are well-adapted and potentially dependent upon the presence of fire for their continued healthy existence. Presently, the Long Tom prairie is being encroached by shrubs and trees. If succession of the prairie to a woodland plant community is allowed to continue, native prairie plants would ultimately be extirpated. Prescribed burns at the Long Tom ACEC during 1988, 1990, 1992, 1996 and 1998 have successfully killed shrubs and seedling and sapling trees (refer to EA-88-15, EA-90-36, EA-92-49 and EA-95-27). Past studies also indicate that prescribed burning has enhanced the reproductive status of *Lomatium bradshawii* (refer to EA-92-49 and "Life, Death and Fire: Demography of *Lomatium bradshawii* in a Dynamic Environment" by Caswell and Kaye, 1996). Monitoring of *L. bradshawii* at Long Tom has been conducted during the Spring of 1997, 1998, 1999 and 2000. For those 4 years the total number of *L. bradshawii* individuals has stayed fairly constant; increases in the population of approximately 10% were seen in years immediately following burning (1997 and 1999). Shrub and tree densities are again increasing since the last prescribed burn. Continued use of prescribed burning would help control shrub and tree invasion.

The project encompasses 6.1 acres on the east side of the Long Tom canal.

B. Land Use Plan (LUP) Conformance

LUP Name* Eugene District Record of Decision and Resource Management Plan
Date Approved : May 1995

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

The Eugene District Record of Decision and Resource Management Plan calls for implementing prescribed fire where needed and where possible to maintain or enhance special status plant species habitat (page 52). The ROD (page 57) directs BLM to implement management actions/directions of the proposed RMP that are designed to enhance and maintain habitat for all endangered species in all Land Use Allocations and to comply with implementing those actions identified in the 1993 Recovery Plan for Bradshaw's lomatium. At page 67 the ROD directs BLM to preserve, protect and restore native plant species composition and ecological processes of biological communities in ACEC. The ROD (page 69) indicate the Long Tom ACEC has had extensive research on the use of prescribed fire for management of the native grassland and the associated special status plant species which occur on this tract. At page 72 the ROD states noxious weed and other nonnative pest plants will be controlled to maintain or restore Special Area values and at page 74 indicates emphasis would first be placed on using nonchemical and other natural processes, including fire and manual removal methods, to control exotic or competing vegetation, etc.

G 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):

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

EA-88-15

EA-90-36

EA-92-49

EA-95-27

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document?

Yes. The prescribed burning at Long Tom ACEC was analyzed in EA-95-27 and EA's previous to that.

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?

Yes, the Environmental Assessment analyzed an appropriate range of alternatives given the purpose and need for the project. Three alternative were analyzed including the proposed (with prescribed fire), Alternative B (no prescribed fire but other manual treatments), and Alternative C (No Action).

3. Is the existing analysis valid in light of any new information or circumstances?

Yes. Studies at other sites indicate that prescribed burning has enhanced the reproductive status of *Lomatium bradshawii* (refer to EA-92-49 and “Life, Death and Fire: Demography of *Lomatium bradshawii* in a Dynamic Environment” by Caswell and Kaye, 1996). Monitoring of *L. bradshawii* at Long Tom has been conducted during the Spring of 1997, 1998, 1999 and 2000. For those 4 years the total number of *L. bradshawii* individuals has stayed fairly constant; increases in the population of approximately 10% were seen in years immediately following burning (1997 and 1999). These findings are consistent with the effects analysis of the previous environmental analyses.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Yes, the use prescribed fire, ongoing study, and annual monitoring at the Long Tom ACEC continue to be appropriate to the restoration of this wetland prairie ecosystem.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?

Yes. Impacts from the continued use of prescribed fire for native wetland habitat restoration would remain the same. The prescribed burning would occur within the same location as the previous restoration burns and for the same purposes.

6. Are the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)?

Yes, or less as soil disturbance treatments of Proposed Action (EA-95-27) are not proposed for implementation in fall of 2000.

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

Yes. Availability of the EA and project decision was advertised in the Eugene Register Guard, sent to interested persons on our EA mailing lists, and coordinated with The Nature Conservancy, Berry Botanic Gardens, Oregon Dept. of Agriculture-Conservation Biology Program and consultation with

the USFWS was completed.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the NEPA analysis and preparation of this worksheet.

<u>Name</u>	<u>Title</u>
<u>Ryan Turner</u>	<u>Botanist</u>
<u>Jeanne Ponzetti</u>	<u>Botanist</u>
<u>Nancy Ashlock</u>	<u>Fire Management Officer</u>
<u>Nancy Wogan</u>	<u>Botanist</u>
<u>Gary Hoppe</u>	<u>Planning & Environmental Coordinator</u>

Conclusion

: 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's compliance with the requirements of NEPA

/S/ Diana Bus
Signature of the Responsible Official

8-1-00
Date

**United States Department of the Interior
Bureau of Land Management, Eugene District Office
DECISION RECORD**

Decision and Rationale

Based on the information presented in the previous Environmental Assessment No. OR090-95-27, the previous Finding of No Significant Impact (FONSI), and the current Long Tom ACEC Documentation of Land Use Plan Conformance and NEPA Adequacy, my decision is to continue with the proposed action, described as Alternative A.

It is my decision to implement this project because it will result in the enhancement and restoration of wetlands; control of competing woody plant species; and provide valuable information regarding best management practices for maintenance and restoration of native wetland prairies. Alternative A best meets the objectives of the proposed action. This project may continue to help determine if fire is critical to the maintenance of native Willamette Valley prairie communities only if prescribed fire treatments are included in the project.

Prescribed fire would be conducted in a manner consistent with State and local smoke management regulations, and in accordance with approved burn plans. This action would occur in late August or September, when the clay soils of the prairie are dry and hard, and can support fire-fighting equipment and personnel. Fire control equipment, personnel and vehicles would be carefully managed to avoid impacts to the native prairie communities. Fire control/suppression will be accomplished with preburn hose lays and wet-lining. Abundant water is available for fire suppression from the Long Tom River canal which constitutes the western boundary of the ACEC.

Administrative Review Opportunities

The decision to implement this project may be appealed to the Office of Hearings and Appeals, Office of the Secretary, U.S. Department of the Interior, in accordance with the regulations contained in 43 CFR Part 4. If an appeal is taken, the notice of appeal must be filed in this office within 30 days of the publication of the notice of this decision in the Eugene Register-Guard for transmittal to the Board. A copy of the notice of appeal and any statement of reasons, written arguments, or briefs must also be served upon the Regional Solicitor, Pacific Northwest Region, U.S. Department of the Interior, 500 NE Multnomah Street, Suite 607, Portland, Oregon, 97323, within the same time frame. In taking an appeal, there must be strict compliance with the regulations. In accordance with 43 CFR4.21, an appellant has the right to petition the Office of Hearing and Appeals to stay the implementation of the decision; however, an appellant must show standing and present reasons for requesting a stay of the decision. The petition for stay must be filed together with a timely notice of appeal (43 CFR

4.21(a)(2)).

Approved by: /S/ Diana Bus
Field Manager, Coast Range Resource Area

Date: 8-1-00