

Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA) DNA-03-16

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

Note: This worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy" transmitting this worksheet and the "Guidelines for Using the DNA Worksheet" located at the end of the worksheet. (Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision.)

A. BLM Office: Lakeview District/ Klamath Falls Resource Area

Lease/Serial/Case File No. NA

Proposed Action Title/Type: Ben Hall 1&2, Gerber Potholes, Schnipps, and FTZ 95_71 Yarding and removal of Juniper

Location of Proposed Action: Ben Hall Creek, Gerber Potholes, Schnipps Valley, FTZ – 95_71

Description of the Proposed Action: The project consists of yarding and removing the cut juniper in these areas similar to what occurred on the Boundary Springs Area. The juniper was mechanically sheared in the summer of 2002. The objectives of the initial treatment were to remove the encroaching western juniper that was competing with the residual pine and to maintain and restore the sagebrush and bitterbrush shrub component. There is presently too much down juniper to burn without threatening the residual pines. By removing the juniper, most of the fuel loading will be reduced. The down juniper will be yarded to landings and loaded on trucks.

Applicant (if any): Not Applicable

B. Conformance with one or more of the following Land Use Plans (LUPs) and/or Related Subordinate Implementation Plans:

Klamath Falls Resource Area RMP June 1995 – Page 56 –

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

"Up to 1,000 acres per year of juniper woodland could be harvested for commercial forest products."

Although there has been a considerable amount of juniper woodlands treated under the Programmatic Fire EA and the Range Improvement allotments discussed in Appendix H in the KFRA RMP, to date, less than 1,000 acres of juniper has been "harvested" for commercial forest products. Most of the juniper treatments to date have consisted primarily of cutting and burning the material. Only a small percentage has been yarded and utilized with the exception of public firewood areas.

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

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

Klamath Falls Resource Area Resource Management Plan and Environmental Impact Statement – September 1994

D. NEPA Adequacy Criteria**1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?**

Documentation of answer and explanation:

The proposed project is substantially the same action that was proposed in the RMP. Some previous yarding of juniper has been done under earlier EAs or CXs tiered to the RMP and/or the Programmatic Fire EA. This project is specifically a DNA to yard the down juniper that has already been cut.

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?

Documentation of answer and explanation:

The KFRA RMP Environmental Impact Statement analyzed an array of alternatives including no action, cutting and leave lay, cutting and burning, and utilization for firewood and miscellaneous products. The alternative for utilization (actually yarding and removing the material) that was analyzed in the RMP has just recently been applicable due to an increased demand for juniper in log form.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Documentation of answer and explanation:

The analysis in the RMP is presently adequate. The RMP allowed for up to 1,000 acres per year. Anticipated impacts from the proposed action have not changed. Monitoring to date on some areas that have had similar treatments indicate that impacts are within those anticipated in the EIS. Inventories for cultural and special status plants are up-to-date and sites that were identified in the initial surveys are reflagged for protection.

The Gerber Block was Ecological Site Inventoried (ESI) in 1997-1998. This rangeland vegetation survey classified the vegetation types and ecological condition of all the BLM (and most private) lands in the area. The ESI information was utilized in the completion of Rangeland Health Standards Assessments for all the grazing allotments in the Gerber Block over the past 4 years. Every one of the Assessments affirmed the need for juniper treatment/control in order to maintain appropriate ecological conditions in all the areas juniper potential sites - which makes up the overwhelming majority of the Gerber Block. Careful removal of the existing down material can assist this process by opening up more surface area for proper ecological plant succession and help avoid some of the negative effects of broadscale pile burning (i.e. annual infestations).

Three grazing allotments within the area covered by the proposed action - Horsefly, Dry Prairie, and Pitchlog - have been under Section 7 (ESA) consultation since 1994, relative to the

endangered shortnose sucker. This consultation process has continually affirmed the necessity of maintaining late seral upland vegetation conditions as critical for the survival and well-being of the sucker. The removal of the non-old growth juniper from upland sites in the Gerber Block is consistent with the longterm maintenance of appropriate ecological conditions. This condition is implicitly required by the ongoing Biological Opinions for the area which requires the maintenance (where currently appropriate) or movement towards (where currently ecologically suppressed) elevated ecological status.

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

Documentation of answer and explanation:

The analysis used in the existing RMP continues to be appropriate.

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 sufficiently analyze site-specific impacts related to the current proposed action?

Documentation of answer and explanation:

The direct and indirect impacts of the proposed juniper yarding are unchanged from those initially analyzed in the RMP. Best Management Practices and Project Design Features proposed in the RMP are incorporated into the implementation provisions of the contract. The site-specific impacts associated with the proposed action are substantially unchanged to those that were considered in the RMP.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Documentation of answer and explanation:

The cumulative impacts were considered during the RMP analysis. As mentioned previously, approximately 1,000 acres per year of commercial woodland harvest was considered. To date, less than 1,000 acres of juniper has been yarded for commercial purposes other than for firewood. Presently the cumulative impacts are significantly less than what was anticipated because less than 10% of the woodlands that have received some form of restoration work have had the material removed for commercial purposes.

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

Documentation of answer and explanation:

The KFRA has conducted a number of tours with the general public as well as interagency reviews to review the fuels and range restoration work that has been completed to date. In addition, there have been a number of newspaper articles discussing the juniper encroachment issue on both private and federal lands and the benefit of treating the juniper to maintain the historic rangeland plant communities. The KFRA has worked closely with local groups not only for cutting the juniper, but also replanting the treated sites with native plants such as sage brush,

bitter brush, and mountain mahogany. The KFRA has had a number of meetings through the Gerber Coordinated Resource Management Plan (CRMP) Team to discuss an array of issues including juniper encroachment. Congress has recently authorized the BLM to develop Stewardship Contracts, working with other agencies, adjacent landowners, and the general public to implement restoration work.

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

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Tim Canaday	Archaeologist	Archaeology
Michelle Durant	Archaeologist	Archaeology
Steve Hayner	Biologist	Wildlife Biologist
Joe Foran	Fuel Mgt. Specialist	Fuels Management
Lou Whitaker	Botanist	Botany
Bill Johnson	Silviculturist	Forest/Woodland Mgt.
Bill Lindsey	Range Mgt. Specialist	Range Management
Mike Bechdolt	Timber Manager	Forest Management
Don Hoffheins	NEPA Planner	NEPA / Planning
Scott Snedaker	Fisheries Biologist	Fisheries

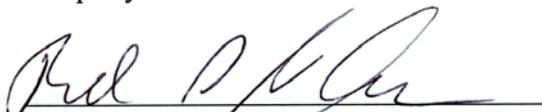
F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

- Follow Best Management Practices In KFRA RMP Appendix D
- All cultural sites will be buffered for avoidance protection
- Avoid entering any spring areas – 150 foot buffers will be used along drainages and wet areas
- Avoid disturbing healthy and concentrated areas of big sage, bitter brush, and mountain mahogany
- Avoid disturbing *Silene nuda* spp. *insectivorous*. sites.
- Equipment will be washed prior to entering area
- Avoid disturbing noxious weed areas

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.

(Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked)


 Rod Johnson, Manager
 Klamath Falls Resource Area

08/01/03
 Date