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

OR014 DNA–04-12

U.S. Department of the Interior
Bureau of Land Management

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**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:** Timber Hill Fuels Reduction and Rangeland Restoration Treatments.
**Location of Proposed Action:** The project would consist of one treatment area of approximately 1,240 acres in the Timber Hill-Willow Valley area (see attached maps).

**Description of the Proposed Action:**

The Proposed Action would include the following array of potential treatments:

- Thinning (mechanically and/or manually) ponderosa pine and western juniper in the uplands. Thinning of ponderosa pine stands would be only in isolated and opportunistic areas where juniper thinning is also occurring.
- Yarding and removal of merchantable material & biomass
- Piling of slash - mechanically and manually
- Road Work – Brushing, Grading, Culvert Repairs
- Monitoring – pre- and post- treatment monitoring.

The overall objectives of the treatments are to address historically uncharacteristic fuels accumulations and arrangements, and to improve rangeland health on approximately 1,240 acres in the Timber Hill-Willow Valley Area. The primary treatment would be to remove encroaching western juniper that is competing with the native grasses, shrubs, residual pines, and other native vegetation. The older junipers would not be cut, and would be described and protected in contract language (see mitigation measures). These junipers also present a fuels hazard to desirable native vegetation. No treatment is proposed within Riparian reserves. Drainage meeting Riparian reserve criterion would be buffered by 150 feet.

Prior to implementing any treatments, the KFRA would review the Ecological Site Inventory data, Rangeland Health Assessments, and existing fuels conditions to determine what treatment or combination of treatments would result in the most effective reduction in fuels and desirable ecological response. For example, based upon the site specific condition, the most effective treatment might be to manually cut, then lop and scatter the juniper and other fuels in lieu of yarding. In other areas, based upon the specific site conditions, the juniper

and other material could be cut and yarded. In some areas the cut material could be cut, piled, and burned.

Regarding utilization of Juniper and small pine logs, there are two reasons for removing the material once it is cut. The first is to reduce the damage that would be incurred to the native grasses, shrubs, and pines if piles are lopped and scattered material were burned (either by a future wildfire or a prescribed fire) immediately adjacent to the residual desirable vegetation. The second is to utilize the material for a commercial product; firewood, posts, poles, biomass, or sawlogs. Demand for western juniper and biomass has increased as advances in wood technology allows some of the material to be utilized for new products. In many cases, areas where merchantable material is yarded and/or slash is burned would be seeded with native grass seed, or planted with bitterbrush and other native shrubs. Pre- and post-treatment monitoring (possibly by the treatment contractor) would also be a part of the project.

**Applicant (if any):** Not Applicable

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

Conformance with the existing KFRA Resource Management Plan and the Programmatic Fire EA is summarized below.

- Programmatic Fire EA, incorporated by reference to the KFRA RMP (page 4). This authorizes random selection of treatment blocks for fuels reduction, and results in our FTZ-numbered project areas. The KFRA can treat approximately 8,500 acres per year (250 acres for site preparation and silviculture; 740 acres for wildlife habitat enhancement; and up to 7,500 acres for prescribed fire for ecosystem enhancement, page 75) under random selection. Different fuel reduction treatments were analyzed including using prescribed fire, mechanical methods and manual methods.
- Potential Range Improvements by Allotment, Appendix H in KFRA RMP (pages H-65 to H-68). This table lists about 12,000 acres of juniper management/ reduction by allotment, to be done over the life of the RMP. It also states that "it is expected that during the life of the plan not all of the listed projects will be completed and that some not listed will be implemented."
- Timber Resources--Commercial Forest Products, in KFRA RMP (page 56). Up to 1,000 acres per year of juniper woodland could be harvested for commercial forest products.
- Wildlife habitat improvements for deer, elk, and antelope (KFRA RMP page 34). "Conduct thinnings of encroaching juniper to protect and improve forage areas for big game. These thinnings will protect older juniper and be designed to consider edge effect, escape cover, and proper unit size."

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

- Klamath Falls Resource Area Resource Management Plan and Environmental Impact Statement – September 1994.
- Fire Management EA 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?**

The proposed project consists of the same actions that were proposed and analyzed in the Final Klamath Falls Resource Area Management Plan and EIS (Final EIS). The treatments listed above and their impacts were anticipated in the development and analysis of the RMP.

**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?**

Under the Fuels Management Section in the Final Environmental Impact Statement (See Table 2-1, Pages 2-104 & 2-105) a range of fuels management alternatives were analyzed. Again this range included a number of alternatives. The preferred alternative lists 250 acres per year of prescribed burning for site preparation and silvicultural hazard reduction, 740 acres per year of prescribed burning for wildlife habitat and forage enhancement, and up to 7,500 acres per year of natural and/or artificial ignition prescribed fire for ecosystem enhancement.

Under the Livestock Grazing Section in the Final Environmental Impact Statement (See Table 2-1, Pages 2-102 & 2-103) a range of alternatives were analyzed. In regards to treating competing vegetation, alternatives ranged from No Action where no acres would be treated to the preferred alternative where 12,950 acres were proposed for treatment under the life of the RMP. The treatment for competing vegetation was primarily dealing with the encroachment of western juniper and its corresponding impact on rangeland health. Page H-69 of RMP states "*The majority of the Vegetation Control ("Veg Control") acres listed in tables (Appendix H tables) are for juniper management/reduction via cutting, although other vegetative conversion techniques, such as fire, may be used when consistent with Bureau policy and procedures. Vegetation manipulation of other vegetative types (such as big sagebrush or wedgeleaf ceanothus) may be done as part of some allotment vegetation control activities*."

Based upon implementing an array of different juniper management treatments the past 5-7 years, the KFRA has collected some valuable implementation monitoring data for predicting the potential response of different treatments based upon the ecological site inventory.

Some of the most common treatments implemented to date include:

- Mechanically cutting, piling, and leaving juniper
- Mechanically cutting, piling, and burning the piles
- Manually cutting, piling, and burning piles
- Mechanically cutting and yarding juniper for sawlog utilization
- Mechanically cutting and leaving the area open for firewood use.
- Planting and tubing treated sites with bitterbrush and mountain mahogany

Future juniper management treatments will consider this range of alternative treatments and potentially others as well.

**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?**

The analysis in the RMP is presently adequate. In addition, the results from the treatments implemented to date under the RMP support continuing an array of complementary fuels reduction and rangeland restoration treatments. The recently completed ecological site inventories and follow-up rangeland health assessments provide the baseline ecological data to design treatments corresponding to the site conditions. In addition, monitoring to date of implemented fuels reduction and rangeland restoration work has further defined and refined the treatments that are herein proposed to continue. A number of recommendations from the recently completed Gerber/Willow Valley Watershed Analysis affirm the necessity to continue implementing treatments similar to those proposed in this DNA. The new scientific literature that has been documented since the signing of the RMP (USDA Forest Service 1997, Proceedings of Western Juniper Forum, Bend, Oregon. S. Leavengood, and L. Swan eds. PNW-GTR-432.), as well as the implementation data collected to date, support continual active management of western juniper.

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

The analysis used in the existing RMP continues to be appropriate. In addition, the KFRA has inserted a number of fixed monitoring plots in treated and untreated areas to evaluate the response of the vegetation and soils to different treatments. The KFRA is using the Adaptive Management strategy as described on page 2-175 of the FEIS to modify treatment specifications based upon on-going implementation monitoring.

**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?**

The direct and indirect impacts of the rangeland restoration work that has been completed thus far are similar to those anticipated and analyzed in the RMP. Best Management Practices and Project Design Features specified in the RMP are incorporated into the implementation specifications of the project. The site-specific impacts associated with the proposed action are substantially unchanged from those that were anticipated in the RMP. The completion of the Ecological Site Inventories and the corresponding Rangeland Health Assessments have improved the specialist's ability to predict the responses of the different array of treatments from mechanically cutting and removal to manual cutting and burning. Monitoring results to date indicate that direct and indirect impacts vary based upon the initial ecological site condition. Sites are responding differently depending upon the initial vegetation present, the site potential, and the combination of treatments. New treatment proposals are sufficiently analyzed at the site specific level to assure objectives are met.

**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)?**

The cumulative impacts of the proposed treatments in this DNA were considered during the RMP analysis. Treatments were anticipated to occur under a combination of the Fuels Management Program, the Range Program, and the Timber/Juniper Woodland management program (See response in Section B). Approximately 1,000 acres per year of commercial harvest of juniper woodland was considered and analyzed. Of the approximately 18,000 acres of western juniper treated to date or under contract to be treated, approximately 550 (3%) acres of juniper has been yarded for commercial purposes and approximately 950 (5%) acres has been utilized for personal use firewood. To date, cumulative impacts from issuing personal use firewood permits have been minimal. The public response has been positive and the number of permits issued has increased two-fold since juniper management treatments have begun and made more firewood available.

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

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 various issues including juniper encroachment. In addition, the KFRA and the Fremont/Winema National Forest recently completed the Gerber/Willow Valley Watershed Analysis which thoroughly analyzes the existing condition of the area and includes management recommendations for the different sites.

Because of the on-going interest in juniper management, the KFRA has also worked with the scientific community, particularly Rick Miller of Oregon Statue University, in reviewing the recent literature in regards to juniper woodlands. This has helped in determining the proper treatment of the site to assure desirable vegetative responses.

Congress has recently authorized the BLM to develop Stewardship Contracts. This entails collaborating with other agencies, adjacent landowners, and the general public to implement an array of restoration work. This project may be implemented through the Gerber Stew Stewardship Contract.

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

| Name | Title | Resource Represented |
|---|---|---|
| Tim Canaday | Archaeologist | Archaeology |
| Michelle Durant | Archaeologist | Archaeology |
| Matt Broyles | Wildlife Biologist | Wildlife |
| 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. The following applicable mitigation measures must be incorporated and implemented.

- Prior to implementation, review the Ecological Site Inventory and Range Health Assessment to determine what treatment or combination of treatments is applicable for the specific site conditions.
- Follow Best Management Practices in KFRA RMP Final EIS Appendix D.
- All cultural sites will be buffered for avoidance protection.
- Avoid entering any spring areas – 150 foot buffers would be used along all drainages meeting Riparian Reserve criteria.
- Avoid disturbing healthy and concentrated areas of big sage, bitter brush, and mountain mahogany.
- Avoid disturbing *Silene nuda spp. insectivorous* sites.

- All vehicles and equipment will be cleaned off prior to operating on BLM lands. Removal of all dirt, grease, and plant parts that may carry noxious weed seeds or vegetative parts is required and may be accomplished with a pressure hose.
- Noxious weeds in the immediate area of mechanical operations shall be mowed to ground level prior to the start of project activities.
- All equipment and vehicles operating off of main roads shall be cleaned off prior to leaving the job site when the job site includes noxious weed populations. Removal of all dirt, grease, and plant parts that may carry noxious weed seeds or vegetative parts is required and may be accomplished with a pressure hose.
- Road graders used for road construction or maintenance would grade towards any known noxious weed infestations. If no good turn around area exists within one half mile that would allow the operator to grade towards the noxious weed infestation, then the operator would leave the material that is being moved within the boundaries of the noxious weed infestation.
- Any gates or fences damaged by the proposed operations would be repaired immediately.
- Older junipers are an important component of the landscape and are used by a variety of wildlife species. Older juniper would be described and protected in contract language. Juniper that is generally older than 130 - 150 years old would be reserved from cutting. They are usually found in rocky areas where vegetation is sparse and natural fire frequency is low. Some typical characteristics of older juniper are:
    * Crown is flat, rounded, broad at top, or irregular (as opposed to more pointed tops of younger trees)
    * Spike top
    * Numerous dead branches
    * Large diameter lower limbs
    * Trunk (and sometimes lower branches) have spirally-twisted bark, deep furrows
    * Hollow trunk

  It is rare for an older juniper to have all of the above features, but more commonly will have at least two or three. Also, older junipers are not always the largest trees; on drier, rocky sites, they can be short, stubby, gnarly trees.

**CONCLUSION**

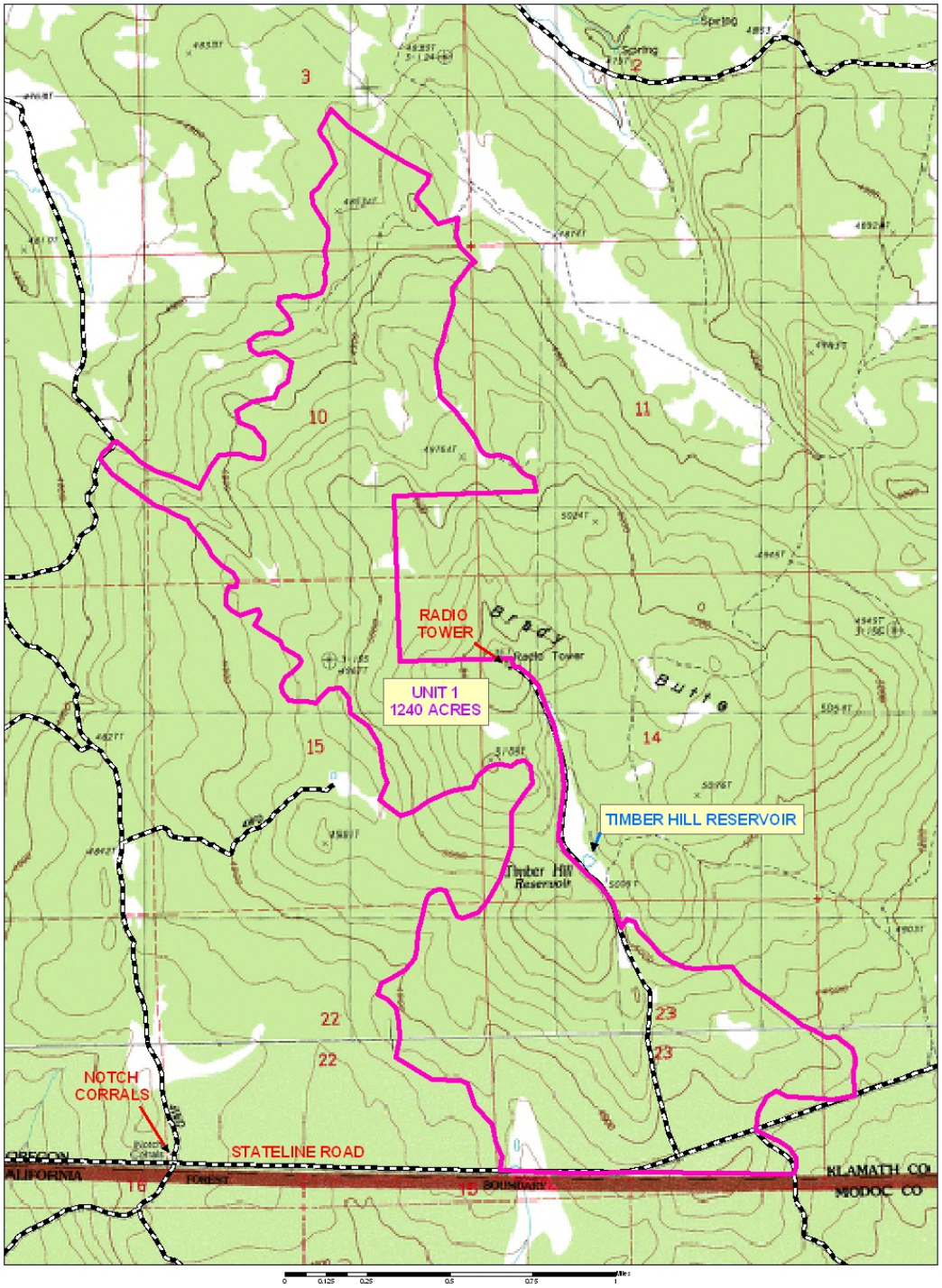
Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of NEPA.

Jon Raby, Manager
Klamath Falls Resource Area

9/30/04
Date

# TIMBER HILL
# JUNIPER REMOVAL UNIT

NORTH

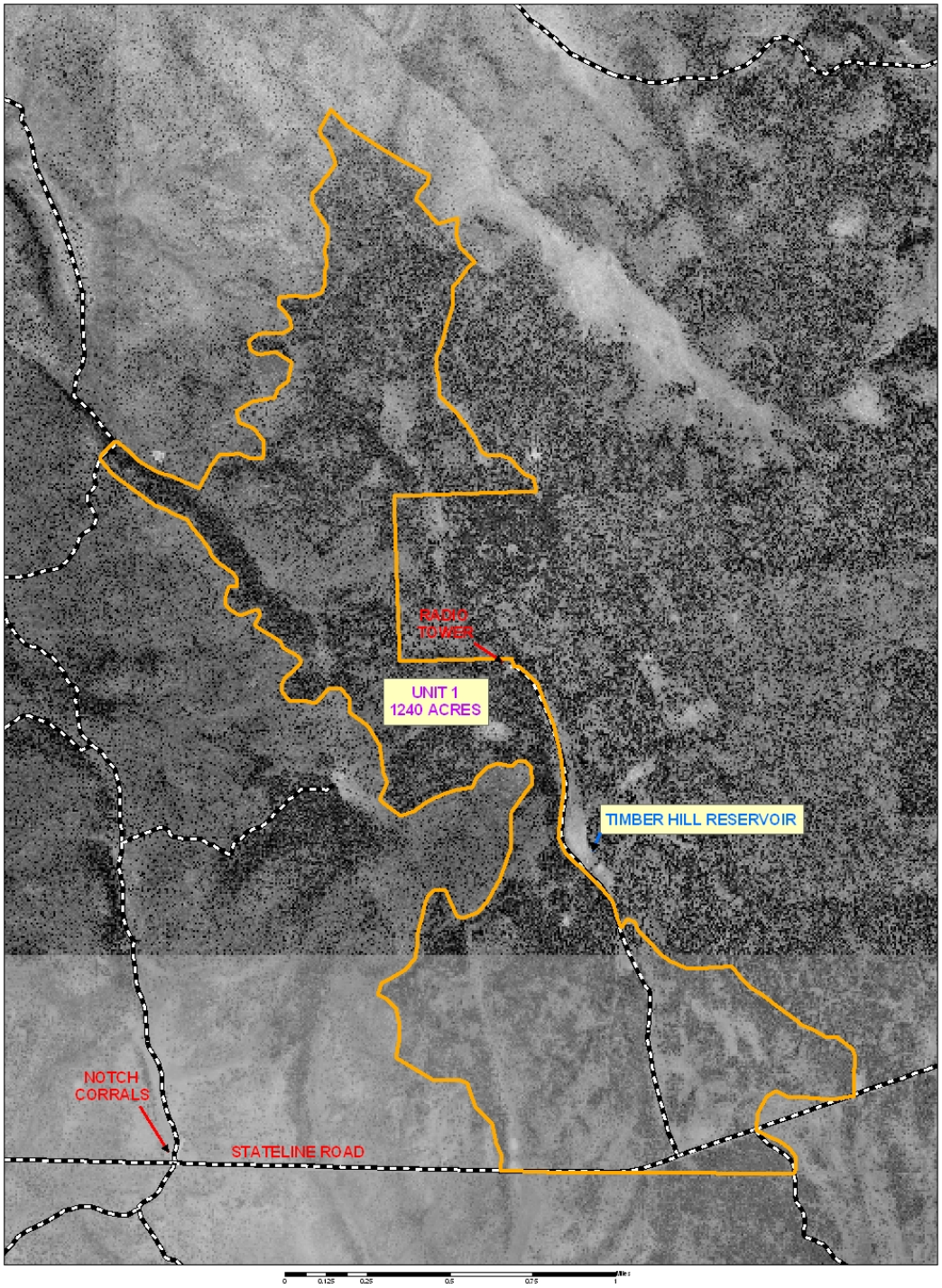



TREATMENT UNIT BOUNDARIES

MAIN ACCESS ROADS

# TIMBER HILL
# JUNIPER REMOVAL UNIT

NORTH




TREATMENT UNIT BOUNDARIES

MAIN ACCESS ROADS

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Prepared by: mhroyles
Current Date: 09/23/2004 07:55:44 AM
Last Modified: 9/23/2004 7:55:00 AM

**Klamath Falls Resource Area NEPA Document Routing Slip for Internal Review**

**Project Name:** TIMBER HILL JUNIPER SHEARING, YARDING, REMOVAL (DNA-04-12)
**Date Initiated:** 2/18/04

| Resource or Staff Responsible | Review Priority | Preliminary Review Date/Initials | Comments Attached/Incorporated | Final Review Date/Initials |
|---|---|---|---|---|
| **Manager:** Jon Raby | Last | | | JR 9/29/04 |
| **Branch Chief:** Barbara Ditman | Second to Last | | | |
| **Branch Chief:** Larry Frazier | Second to Last | | | |
| **Branch Chief:** Rod Johnson | Second to Last | | | |
| **Planner/EC:** Don Hoffheins, ~~Kathy Lindsey~~ | Third from Last 11 | 7/1/04 DKH | Incorporated | ~~9/24/04 DKH~~ 8/9/04 DKH |
| **Range:** Bill Lindsey, Dana Eckard | 7 | DJE 2/26/04 | | DJE 6/9/04 |
| **Wild Horses:** Tonya Pinckney | | | | |
| **Fire/Air Quality:** Joe Foran | 9 | JMF | | JMF ~~8/25/04~~ |
| **Silviculture:** Bill Johnson, Gabi Sommerauer | 10 ✓ | BJ 3/23/04 | in text | BJ 9/27/04 |
| **Timber:** Mike Bechdolt | 13 | MB 3/31/04 | See edited version | MB 9/28/04 |
| **Botany/ACEC//Noxious Weeds:** Lou Whiteaker | 8 | LW 2/26/04 | Surveyed 2002 - 2003. No special status plants or noxious weeds found. | LW 6/3/04 |
| **Soils:** | | | | |
| **Cultural:** Tim Canaday | 6 | TC 3/1/04 | Surveys are complete. 8 sites to be avoided | TC 3/1/04 |
| **Minerals/HazMat:** Tom Cottingham | | | | |
| **Lands/Realty:** Linda Younger | ✓ | | Note on Map | 8/25/04 |
| **Recreation/Visual/Wilderness:** Scott Senter | 5 | RSS 3/1/04 | NONE | RSS 3/1/04 |
| **Hydrology/Riparian:** Mike Turaski, Andy Hamilton | 4 | MRT 2/23 | IN TEXT | PW 8/18/04 same as others |
| **Wildlife/T&E:** ~~Steve Hayner~~ Mark Bragles | 10 | | | (Author) |
| **Fisheries/T&E:** Scott Snedaker | 2 | SS 2/25 | | 9/19/04 |
| **W/S Rivers:** Grant Weidenbach | | | | |
| **Engineering:** Brian McCarty | 1 | BM | Yes | BM 5/21 |
| **Survey/Manage:** Molly Juillerat | | | | |

| Clearances/Surveys | Needed | Done/Attached |
|---|---|---|
| Cultural | | TC 3/1/04 |
| Botanical | | LW 2/26/04 |
| T&E, BA & or Consultation | | |
| R-O-W Permits | | |

***This document will not sit on your desk for more than 8 hours.** Please check on calendar to make sure that the next person will be available to review the document.

****Some resource areas may not apply for all projects. If so, just mark "N/A" in "Review Priority" column.**