

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

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

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.

A. Describe the Proposed Action

The proposed action is to allow the prescribed fire scheduled for a portion of the Frosty II timber sale area to move into and burn portions of the Old Baldy Research Natural Area. The treatment of the timber sale area with prescribed fire is covered under the Klamath Falls Resource Area Fire Management EA # OR-014-94-09 (approved 04/29/94), and is consistent with the Klamath Falls Resource Area Resource Management Plan and Environmental Impact Statement (September 1994). The timber sale area to be treated is adjacent to the RNA, and ground disturbing management actions would be required to prevent the fire from entering the RNA. The proposed action would eliminate additional ground disturbing activities adjacent to a designated RNA, thus reducing the potential for noxious weed invasion, and allow the fire to be introduced into the area as a natural ecosystem process which has been disrupted by fire suppression activities and fragmentation of the landscape.

B. Land Use Plan (LUP) Conformance

LUP Name*: Klamath Falls Resource Area Resource Management Plan and Environmental Impact Statement (KFRA RMP/EIS dated September 1994).

Date Approved: June 1995 via the Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary(KFRA ROD/RMP/RPS)

* List applicable LUPs (e.g., Resource Management Plans and activity, project, management, or program plans, or applicable amendments thereto)

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

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):

The KFRA RMP/EIS states the objectives for the Old Baldy RNA on page 2-38 as “Preserve, protect, or restore natural processes or system.” The RNA was designated to fill the southern Cascades chaparral plant community cell. Fire is an extremely important process in this community-type, and is at least partially responsible for maintenance of this community-type on this site. The KFRA RMP/EIS on page 3-24 also describes the importance of natural fire in the development and succession of plant communities in the resource area. The document goes on to describe how fire as a natural process has been disrupted by fire suppression and fragmentation of the landscape. Therefore, re-introduction of fire as a natural process into the RNA will help achieve the RMP/EIS objectives established for the RNA.

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.

Klamath Falls Resource Area Resource Management Plan and Environmental Impact Statement (KFRA RMP/EIS) dated September 1994 and approved via the June 1995 Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary (KFRA ROD/RMP/RPS). This is the overall plan for the Klamath Falls Resource Area.

Klamath Falls Resource Area Fire Management Environmental Assessment dated April 29, 1994 and approved via the June 1994 Record of Decision. This is a programmatic EA for both wildfire suppression and the application of prescribed fire in the resource area.

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

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?

Documentation of answer and explanation:

The proposed action is consistent with the objectives identified specifically for the Old Baldy RNA in the KFRA RMP/EIS Proposed Resource Management Plan, and affirmed and implemented by the KFRA ROD/RMP/RPS.

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?

Documentation of answer and explanation:

The proposed action lies within the range of various alternatives identified and analyzed in the KFRA RMP/EIS (numbers special areas and acres in special areas is summarized by alternative in Table S-1 “Comparisons of Allocations and Management by alternative,” pages 18-50). This array and range of alternatives include a No Action alternative and five other alternatives (A through E) which covered a span of management from a strong emphasis on commodities production (A) to a strong emphasis on resource protection/preservation (E), and the PRMP that emphasizes a balanced approach to producing an array of socially valuable products within the concept of ecosystem management. Since this plan is relatively recent, it is thought to adequately reflect “current environmental concerns, interests, and resource values.”

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

Documentation of answer and explanation:

The existing analysis in the KFRA RMP/EIS is still considered valid because it addresses current scientific knowledge concerning the role of fire as an historic natural process, and how prescribed fire mimicking this natural function is to be conducted on selected areas for ecosystem management when it established the objectives for the Old Baldy RNA.

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 KFRA RMP/EIS and subsequent KFRA ROD/RMP/RPS designated particular areas as ACEC's and ACEC/RNA's which warranted special management direction to maintain and protect relevant and important values, and established overall objectives for each area so designated. The development of the Proposed Resource

Management Plan in the KFRA RMP/EIS, as adjusted or affirmed by the KFRA ROD/RMP/RPS, meets NEPA standards for impact analysis. The methodology and analyses employed in the KFRA RMP/EIS, including the evaluations of potential ACEC's and ACEC/RNA's, are still considered valid as this planning effort is still relatively recent (June 1995) and considered up to date procedurally.

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?

Documentation of answer and explanation:

The proposed action is consistent with the KFRA RMP/EIS, as adjusted or affirmed by the KFRA ROD/RMP/RPS. The environmental consequences of designation of special areas were analyzed in Chapter 4 - Environmental Consequences (pages 4-1 through 4-143). The KFRA RMP/EIS also analyzed the impacts of fire as an historic natural process, and how prescribed fire mimicking this natural function is to be conducted on selected areas for ecosystem management as described in the KFRA Fire Management Environmental Assessment. Objectives were established specifically for the Old Baldy RNA in order to preserve, protect, or restore native species composition and ecological processes within the Southern Cascades chaparral plant community cell identified by the Oregon Natural Heritage Program.

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)?

Documentation of answer and explanation:

The proposed action as analyzed in the PRMP of the KFRA RMP/EIS, as affirmed or adjusted by the KFRA ROD/RMP/RPS, would not change analysis of cumulative impacts. Any cumulative impacts are the same as and within the parameters of those identified and accepted in that planning document.

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

Documentation of answer and explanation:

The KFRA RMP/EIS and KFRA ROD/RMP/RPS were distributed to all interested publics and other government agencies for review. Since the proposed action is

Guidelines for Using the DNA Worksheet and Evaluating the NEPA Adequacy Criteria

These guidelines supplement the policies contained in the Instruction Memorandum entitled "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy". During preparation of this worksheet, if you determine that one or more of the criteria are not met, you do not need to complete the Worksheet. If one or more of these criteria is not met, you may reject the proposal, or complete appropriate NEPA compliance (EA, EIS, Supplemental EIS, or CX if applicable) and plan amendments before proceeding with the proposed action. Documenting why the criterion (criteria) has (have) not been met may be beneficial in preparing new or supplemental NEPA documents, however.

Criterion 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 at a site specifically analyzed in an existing NEPA document? In the limited situations in which an existing NEPA document(s) can properly be relied upon without supplementation, explain whether and how the existing documents analyzed the proposed action (include page numbers). If there are differences between the actions included in existing documents and the proposed action, explain why they are not considered to be substantial.

Criterion 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? Explain whether the alternatives to the current proposed action that were analyzed in the existing NEPA documents and associated record constitute a reasonable range of alternatives with respect to the current proposed action, and if so, how. Identify how current issues and concerns were addressed within the range of alternatives in existing NEPA documents. If new alternatives are being proposed by the public to address current issues and concerns, and you conclude they do not need to be analyzed, explain why.

Criterion 3. Is the existing analysis valid in light of any new information or circumstances? New information or circumstances could include the following. If any of the listed items below are applicable, you need to determine whether it (they) constitute(s) new information or circumstances.

- a. New standards or goals for managing resources. Standards and goals include, but are not limited to: BLM's land health standards and guidelines, recovery plans for listed species prepared by the Fish and Wildlife Service or National Marine Fisheries Service, requirements contained in a biological opinion or conference report related to Section 7 of the Endangered Species Act, and the requirement to address disproportionate impacts on minority populations and low income communities (E.O. 12898).
- b. Changes in resource conditions within the affected area the existing NEPA analyses were conducted, e.g., changes in habitat condition and trend; listed, proposed, candidate, and Bureau designated sensitive species; water quality, including any identified impaired water bodies under Section 303 of the Clean Water Act; air quality; vegetation condition and trend; soil stability; visual quality; cultural resource condition; and wildlife population trend(s); etc.
- c. Changes of resource-related plans, policies, or programs of State and local governments, Indian tribes, or other federal agencies.
- d. Designations established in the affected area since the existing NEPA analysis and documentation was prepared. Designations include, but are not limited to wilderness, wilderness

study areas, National Natural Landmarks, National Conservation Areas, National Monuments, National Register properties, Areas of Critical Environmental Concern, and Research Natural Areas.

Criterion 4. Do the methodology and analytical approach used in the existing NEPA document continue to be appropriate for the proposed action? Explain how the methodologies and analytical approach used in the existing NEPA document are current and sufficient for supporting approval of the proposed action. If valid new technologies and methodologies (e.g. air quality modeling) exist, explain why it continues to be reasonable to rely on the method previously used.

Criterion 5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action? Review the impact analysis in the existing NEPA document(s). Explain how the direct and indirect impacts of the proposed action are analyzed in the existing NEPA documents, and would, or would not, differ from those identified in the existing NEPA document. Consider the effect new information or circumstances may have on the environmental impacts predicted in the existing NEPA document.

Criterion 6. Are the cumulative impacts that would result from implementation of the proposed action substantially unchanged from those identified in the existing NEPA document(s)? Would the current proposed action, if implemented, change the cumulative impact analysis? Consider the impacts analysis in existing NEPA documents, the effects of relevant activities that have been implemented since existing NEPA documents were completed and the effects of the current proposed action.

Criterion 7. Is the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action? Explain how the nature of public involvement in previous NEPA documents continues to be adequate and valid in light of current issues, concerns, views, and controversies.