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

**West Fork Smith River/Gold Creek, Mosetown Creek Phase II, Bum Creek/South Sisters Creek & South Sisters/Jeff Creek Phase II, Instream Structure Placements**

**DNA No. 17 to EA OR 125-98-09**

**A. BLM Office**: Coos Bay District, Umpqua Field Office Lease/Serial/Case File No. N A

**Proposed Actions Title/Type:** West Fork Smith River/Gold Creek, Mosetown Creek, Bum Creek/South Sisters Creek and South Sisters/Lower Jeff Creek Phase II Instream Structure Placements.

**Locations of Proposed Actions**:

West Fork Smith River/Gold Creek: Sec. 01, T. 20 S., R. 09 W., and Sec. 36, T. 19 S., R. 9 W., Will. Mer.
Mosetown Creek: Sec. 15, T. 21 S., R. 08 W., Will. Mer.
Bum Creek/South Sisters Creek: Sec's. 13 and 14, T. 20 S., R. 08 W., Will. Mer.
South Sisters/Jeff Creek Phase II: Sec. 14, 22, and 23, T. 20 S., R. 08 W., Will. Mer.

**Descriptions of the Proposed Actions:**

West Fork Smith River/Gold Creek: Habitat surveys indicate that the proposed project reaches contain inadequate amounts of large wood and the channels are simplified and dominated by large cobble and bedrock. Some limited salmonid spawning habitat exists, but there is little suitable wintering habitat for juvenile fish. This project would benefit chinook and coho salmon and steelhead trout, as well as sea-run and resident cutthroat trout. Instream structures to be placed include logs and boulders over approximately 1.50 miles of lower Gold Creek and the West Fork Smith River, of which .5 miles are on BLM-administered lands, and up to 1.0 miles on private lands owned by Roseburg Forest Products. The instream structures would be placed as individual logs, small complex log jams up to 3-10 logs, and boulder clusters/low head weirs. Adjacent alder that is not contributing to stream shade will also be placed to add to complexity in some of the log jams. Cooperators in the project include Roseburg Resources Company (RRC); the Smith River Watershed Council (SRWC); the US Fish & Wildlife Service, and the Oregon Department of Fish and Wildlife (ODFW).

The objectives of the project are to increase cover and channel complexity for fish, create pool habitat, retain channel substrate and add a filtering component to retain leaves, twigs, branches and fish carcasses.

Mosetown Creek: The proposed project reach on Mosetown Creek is along a BLM controlled road with a non-discretionary right-of-way to RRC on BLM-administered lands. During the

winter months of 2004, snow-break caused a significant number of conifer and alder to fall across the road and block access. Under this non-discretionary right-of-way agreement RRC has road maintenance responsibility and will clear the road of these trees in order to access their lands and haul timber. Trees will be placed in the stream channel at the expense of RRC, however they are likely to clear the road before the in-stream work period. The proposed project will use an excavator or other similar equipment to place up to 40 whole trees or logs 2 times the active channel width in length into the adjacent channel of Mosetown Creek in order to improve habitat conditions for fish and other aquatic and riparian species. Only existing down trees from on or over the road would be placed in the stream channel, and the work will occur during a time period approved by the ODFW.

Bum Creek/South Sisters Creek Instream Restoration Project: Cooperators in this project include the Coos Bay District BLM, the SRWC, ODFW, RRC, the Oregon Watershed Enhancement Board, and the US Fish & Wildlife Service. Additional funds were donated by the Joe Merchap Umpqua River Foundation and the Umpqua Basin Fisheries Enhancement Derby. ODFW habitat inventories indicate that the reaches proposed for placement of logs and boulders are currently rated as "poor" for both large woody debris and the number of key pieces of wood per 100 meters of stream. The project would entail the placement of up to 200 logs ranging from 40 – 45 feet in length, and 970 boulders up to 1.5 cubic yards in size over a distance of approximately 1.5 miles (about .5 miles is on private lands in section 14). Subsequent monitoring of the project will consist of habitat surveys in the first and ninth year, snorkeling in the first, third and ninth year, and photographs each year for five years following the project. The objectives of the project are to increase cover and channel complexity for fish, create pool habitat, retain channel substrate and add a filtering component to retain leaves, twigs, branches and fish carcasses.

South Sisters/Lower Jeff Creek Instream Restoration Phase II: Instream habitat surveys indicate that South Sisters Creek and Jeff Creek contain low amounts of large wood (3.1 to 7.5 pieces per 100 m.) and 47% of the channel is bedrock. Some salmonid spawning habitat exists above this reach, but juvenile fish that migrate into this reach have little suitable wintering habitat. This project, which would compliment adjacent in-stream restoration projects implemented in 1997, and a project to be completed in 2004, consists of placing approximately 150+ large logs and up to a thousand cubic yards of boulders. Adjacent alder that is not contributing to stream shade will also be placed to add to complexity in some of the log jams. Cooperators in the project are the same as those listed above for the West Fork Smith River project.

**B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans**

Coos Bay District Record of Decision and Resource Management Plan. Date Approved: May, 1995.

**The proposed action is in conformance with the applicable LUPs, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (Objectives, terms, and conditions).**

The Aquatic Conservation Strategy[1] (ACS) was developed to restore and maintain the ecological health of watersheds and aquatic ecosystems contained within them on public lands. The strategy would protect salmon and steelhead habitat on Federal lands managed by the Forest Service and the Bureau of Land Management within the range of Pacific Ocean anadromy (*Coos Bay District RMP* ROD, 1994, Standards and Guidelines, p B-9).

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

Large wood, root wad, boulder and whole alder tree placements are addressed in BLM EA OR125-98-09, West Fork Smith River Instream and Riparian Restoration (approved March 30, 1998).

On December 10, 2002, the Coos Bay District BLM received a Letter of Concurrence (LOC) from the U.S. Fish and Wildlife Service authorizing certain "Not Likely to Adversely Affect" activities (Ref. 1-1 5-03-I-006) affecting the marbled murrelet (*Brachyamphus marmoratus*), marbled murrelet critical habitat, the northern spotted owl (*Strix occidentalis caurina*), spotted owl critical habitat, and the bald eagle (*Haliaeetus leucocephalis*). On January 7, 2003, the Coos Bay District also received a Biological Opinion (BO) from the U.S. Fish and Wildlife Service authorizing certain "Likely to Adversely Affect activities (Ref # 1-15-03-F-040) affecting these same species. Instream restoration projects will be covered under either of these documents, depending on site-specific conditions.

On October 18, 2002, the Coos Bay District BLM received a Programmatic Biological Opinion from NOAA fisheries authorizing certain "Likely to Adversely Affect" activities (2002/00879) affecting Southern Oregon/ Northern California Coho Salmon, Oregon Coast Coho Salmon, and Oregon Coast Steelhead.

**D. NEPA Adequacy Criteria.**

**1. Are the current proposed actions substantially the same action (or is a part of that action) as previously analyzed?**

The proposed actions are not located at sites specifically identified in the EA, however, the design features and anticipated environmental consequences of the projects are essentially the same as those for sites analyzed in the existing NEPA document. The EA analyzed the placement of instream structures within the stream channel of the West Fork Smith River, and a broad range of affected environments and environmental consequences were analyzed. The ground-disturbing activities, impacts to water quality, project timing, and duration of work involved in the projects are essentially the same.

**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,**

[1] The appropriate landscape scale for evaluating the consistency of individual and groups of projects with the ACS is the watershed, corresponding with the 'fifth-field' hydrologic unit code as defined in the Federal Guide for Ecosystem Analysis at the Watershed Scale.

**resource values, and circumstances?**

The referenced EA contains a No Action and a Proposed Action alternative. The primary objective of the action is to maintain or restore natural habitat components within stream channels and riparian areas. The proposed action was deemed to be the most appropriate to ensure long-term viability. No additional environmental concerns, interests, or resource values are known to be present at the current proposed action sites that would prompt the formation of additional alternatives.

**3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian properly functioning conditions (PFC) reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent US 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'?**

No new information or circumstances are known which would affect the validity of the existing analysis. The listing status and consultation requirements for special status fish species is complex, and subject to change within short time periods. Therefore, a Coos Bay District fisheries biologist will need to assess the status of consultation requirements for each project prior to awarding contracts to begin work.

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

The methodology and analytical approach used in the EA are appropriate to the proposed actions. The instream structure placements were analyzed and implemented utilizing an interdisciplinary team of resource specialists. The extent and duration of the impacts of the projects are also expected to be similar to those analyzed in the EA.

**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?**

Based on review by an interdisciplinary team (listed below), the anticipated direct and indirect effects of the proposed actions are essentially the same as identified in the EA. While the existing NEPA document does not analyze the site-specific impacts of the current proposed action, the existing environmental factors, design features, and anticipated environmental consequences are expected to be the same or less.

**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)?**

All work associated with the projects will occur during low-flow conditions during the instream work period (as designated by the Oregon Department of Fish and Wildlife). The short-term and cumulative impacts would be essentially unchanged.

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

Comments received from the public, and issues/concerns developed by the interdisciplinary team were analyzed in the existing document. Other than the locations, the proposed projects are essentially the same as those analyzed in the EA.

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

| Name | Title | Resource Represented |
|---|---|---|
| John Chatt | Wildlife Biologist | Wildlife |
| Dan Van Slyke | Fisheries Biologist | Fisheries |
| John Colby | Hydrologist | Hydrology |
| Jennifer Sperling | Botanist | Botany |
| Scott Knowles | Natural Resource Specialist | Environmental Justice, Noxious Weeds, and Port Orford Cedar |
| Tim Votaw | HazMat Coordinator | Hazardous Materials |
| Tim Barnes | District Geologist | Geology, Soils, and Energy Development |
| Stephan Samuels | Archaeologist | Cultural Resources |

**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 to the requirements of NEPA.

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

**Approved By:**

Umpqua Field Office Manager: *s/s Ralph Thomas*_____ Date:_*5/11/2004*_
M. Elaine Raper