

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

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: Klamath Falls Resource Area

Case File No.: DNA-OR-014-03-12

Proposed Action Title/Type: Gerber/Willow Valley Riparian Conifer Treatments

Location of Proposed Action:

Pitch Log Creek	Township 39S, Ranges 14E and 15E
Ben Hall Creek	Township 38S, Range 13E
Wildhorse Creek	Township 41S, Ranges 14E and 14.5E
Antelope Creek	Townships 40S and 41S, Range 14.5E
East Branch Lost River	Township 41S, Range 14E

Description of the Proposed Action:

The proposed action would focus on removing encroaching conifers (primarily western juniper, but ponderosa pine in some units) from riparian areas and adjacent uplands. Western juniper and some small-diameter (<6” dbh) ponderosa pines would be removed from streamside areas by hand-felling, piling, and burning. In the Pitch Log Creek and Ben Hall Creek units, ponderosa pine less than 6” DBH will be thinned. On alluvial terraces adjacent to the stream channel, pines less than 6” DBH will be cut, except for marked leave trees. On slopes above alluvial terraces (both inside and outside of riparian reserves), pines less than 6” DBH will be thinned to an average 16’ x 16’ spacing.

The objectives of these treatments are to maintain and restore the condition of riparian vegetation, maintain and restore the hydrologic function of floodplain/terrace soils, and enhance the vigor of ponderosa pine communities adjacent to riparian areas. The total area of proposed treatment units is approximately 1600 acres (see attached maps). Project design features would vary between units.

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

Name/Date of Plans:

- Klamath Falls Resource Area Record of Decision and Resource Management Plan (KFRA ROD/RMP) (June 1995).
- Final Klamath Falls Resource Area Management Plan and EIS (KFRA EIS) (September 1994).

Other documents:

- Interior Columbia Basin Ecosystem Management Project (ICBEMP) (December 2000). The science findings of this planning effort were utilized in developing the proposed action.
- Gerber/Willow Valley Watershed Analysis (July 2003).
- Juniper Control: Suggested Area Selection Criteria (December 2001).
- Interim Water Quality Restoration Plan for Lands Administered by the BLM in the Gerber Reservoir Watershed and the Oregon Portion of the Upper Lost River Watershed (August 2003). This document describes how the BLM will address water quality impairments in the “Gerber Block”.

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

Not applicable.

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) and, if applicable, implementation plan decisions:

The KFRA ROD/RMP and the KFRA EIS both provide guidance on managing riparian areas.

Recognizing the ecological value of riparian areas (given the marked contrast with vegetation types associated with upland areas), the BLM is committed to maintaining and improving riparian conditions on public land (KFRA EIS page 3-33). On pages 3-34 and 3-36, the KFRA EIS describes the BLM’s “general goal of achieving advanced ecological status [in riparian areas]” and outlines the process of using “site-specific activity plans” to “determine the most desirable riparian-wetland plant community for meeting management objectives.” Ben Hall Creek, Pitch Log Creek, Antelope Creek, the East Branch of the Lost River, and Wildhorse Creek were all identified as having potential for restoration activities designed to improve riparian condition (KFRA EIS page 3-36). The analysis of environmental consequences in the KFRA FEIS concluded that riparian conditions would improve, due in part to the emphasis on managing riparian areas to obtain “properly functioning condition (KFRA EIS page 4-22).”

In the KFRA ROD/RMP, the description of land use allocations includes direction to “manage range and riparian-wetland areas in the Gerber Block for a mosaic of native plant communities (page 27).” The management direction for the Water and Soils program emphasizes the “rehabilitation and maintenance of riparian-wetland areas”, with the “overall objective [of achieving] advanced ecological status (page 29).”

The proposed treatments would enhance the extent, diversity, and condition of riparian plant communities by removing vegetation that has encroached into streamside areas. Treatments on adjacent valley slopes would maintain and enhance the condition, vigor, and function (shade, large woody debris, habitat, etc.) of ponderosa pines, and would facilitate future use of prescribed fire.

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 Record of Decision and Resource Management Plan (KFRA ROD/RMP) (June 1995).
- Final Klamath Falls Resource Area Management Plan and EIS (KFRA EIS) (September 1994).
- Klamath Falls Resource Area Fire Management EA #OR-014-94-09 (June 1994).

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

- Gerber/Willow Valley Watershed Analysis (July 2003) (included or summarized within this document are the Range Health Standard Assessments for the grazing allotments within which treatment units are located).
- Biological and Conference Opinions on Horsefly, Dry Prairie, and Pitchlog Grazing Allotments (May 1995).
- Biological Assessment for the Prescribed Fire and Hazard Fuels Reduction Program within the Lakeview District, Klamath Falls Resource Area (Draft) (June 2002)

D. NEPA Adequacy Criteria

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

As discussed above, the proposed action is consistent with the KFRA ROD/RMP and the recommendations in the Gerber/Willow Valley watershed analysis. The proposed treatments and methods are consistent with the goals and objectives for riparian area management.

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?

The KFRA ROD/RMP, to which this document is tiered, analyzed a broad range of alternatives. Since the KFRA ROD/RMP is fairly recent, it is thought to adequately reflect “current environmental concerns, interests, resource values, and circumstances.”

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?

Yes, all standards and guidelines for sensitive species, riparian areas, and rangeland health standards are current and consistent with the existing analysis.

The effects of BLM grazing management on shortnose suckers has been under Endangered Species Act consultation since 1994 for three grazing allotments within the area covered by the proposed action (Horsefly, Dry Prairie, and Pitchlog allotments; Pitch Log Creek, Wildhorse Creek, and Ben Hall Creek are located within these allotments). The Biological Opinion for these allotments discussed the importance of riparian vegetation in providing stream shading and bank stability. The proposed action would enhance riparian vegetation.

Rangeland Health Standard Assessments have been completed for all of the allotments within which the proposed action would occur. The assessments analyzed and affirmed the need for juniper treatment in order to maintain appropriate ecological conditions.

The recently completed Gerber/Willow Valley watershed analysis provided management recommendations for riparian areas, including the following: “To limit direct wetland loss, the priority treatment areas are areas along playas, wetlands and meadows, where conifers are encroaching on to riparian areas. Forest management is needed to limit the encroachment of woodland and forest trees on to wetland and riparian plant communities. Along riparian areas cultural practices should focus on promoting riparian forest of cottonwood or aspen or relevant riparian plant species.”

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 analysis in the KFRA EIS and the KFRA ROD/RMP is appropriate to the proposed action. The riparian areas associated with proposed treatment units were identified as potential restoration areas in the KFRA EIS. The rationale for treatment presented in the KFRA EIS was elaborated upon in the Gerber/Willow Valley watershed analysis.

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 KFRA EIS described the extent and consequences of juniper encroachment (page S-3) as well as specific and general direction on juniper treatment, riparian management, and silviculture. Impacts to rangelands, wildlife habitat, riparian areas, water quality, and other resources were analyzed in the KFRA EIS. The project design features (PDFs) developed for each treatment unit address and mitigate potential detrimental impacts of project implementation.

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 proposed action would not change the cumulative effects analysis that was conducted during development of the KFRA ROD/RMP. Implementation of appropriate PDFs would help ensure that any adverse cumulative effects within the scope of those identified in the KFRA EIS.

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

The KFRA ROD/RMP and EIS were distributed to all interested individuals and agencies. Updates (Quarterly Planning Updates and Annual Program Summaries) provide information regarding planned, ongoing, and completed projects, and allow for adequate public involvement. In addition, during preparation of this document and supporting information, the BLM engaged in discussions with the US Fish and Wildlife Service (informal consultation), the Gerber/Willow Valley Coordinated Resource Management Plan group (development of the Gerber/Willow Valley watershed analysis), and the Oregon Department of Environmental Quality.

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>
Mike Turaski	Hydrologist	Hydrology, Riparian
Scott Snedaker	Fisheries Biologist	Fisheries
Andy Hamilton	Fisheries Biologist	Fisheries, Riparian
Gayle Sitter	Wildlife Biologist	Wildlife Habitat
Steve Hayner	Wildlife Biologist	Wildlife Habitat
Rob Roninger	Wildlife Biologist	Wildlife Habitat
Bill Lindsey	Rangeland Management Specialist	Rangelands
Mike Cutler	Botanist	Soils
Marv Strom	Fuels Management Specialist	Fuels
Bill Johnson	Silviculturist	Forestry
Tim Canaday	Archaeologist	Cultural Resources

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.

- Treatments may include the entire width of the riparian reserve. No cut areas may be designated near cultural sites, raptor nest trees, special status species, etc.
- Limbs and boughs would be piled for burning at a later date; the boles of cut trees larger than 6” DBH would be left on the ground. In units with lower densities of juniper trees, use of lop and scatter would be appropriate (if lop and scatter is used, limbs and slash would be pulled back at least 10 feet from stream banks).
- No piling would occur within 50 feet of streambanks, except in special circumstances (such as narrow canyons). In all cases, no piling would occur within 10 feet of streambanks.
- Piles would be burned during periods with soil moisture sufficient to prevent long-term damage to soils and vegetation. To protect soils and vegetation, some piles may be left unburned in areas with relatively low fuel loading.
- Piles will be located to avoid damage to residual trees during pile burning.
- No piling would occur in wetland areas and areas associated with springs.
- Cottonwood, aspen, willow species, or other high priority species may be present and should not be damaged.

- Ponderosa pine larger than 6" DBH will be reserved from cutting. Some small-diameter pines located near roads could be reserved from cutting to avoid effects to visual resources.
- Old growth trees will be reserved from cutting and should not be damaged. Old growth trees will be identified based on characteristic growth forms that will be described in contract language.
- No snags would be cut, unless needed to meet Aquatic Conservation Strategy objectives.
- In select units, some trees may be marked for directional felling into the stream channel. These sites will be selected and reviewed by fisheries and hydrology staff.
- In select units, some planting of native grasses, shrubs, and trees may occur.
- In select units that have very dense stands of juniper, it may be necessary to implement juniper removal in two or more stages. Treatments would be spaced over a multi-year period to allow a gradual reduction in juniper densities and to avoid creating excessive numbers of hand piles.
- No chainsaw refueling would occur within 50 feet of stream channels (measured from the edge of the active channel).
- Vehicle use within riparian areas (including alluvial terraces) will be limited to designated existing roads during project implementation.
- Required cultural and botanical surveys will be completed prior to any ground disturbance. All sites located will be managed to minimize detrimental impacts.
- All vehicles and equipment (including chainsaws) 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.

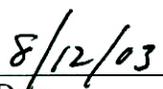
CONCLUSION

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.

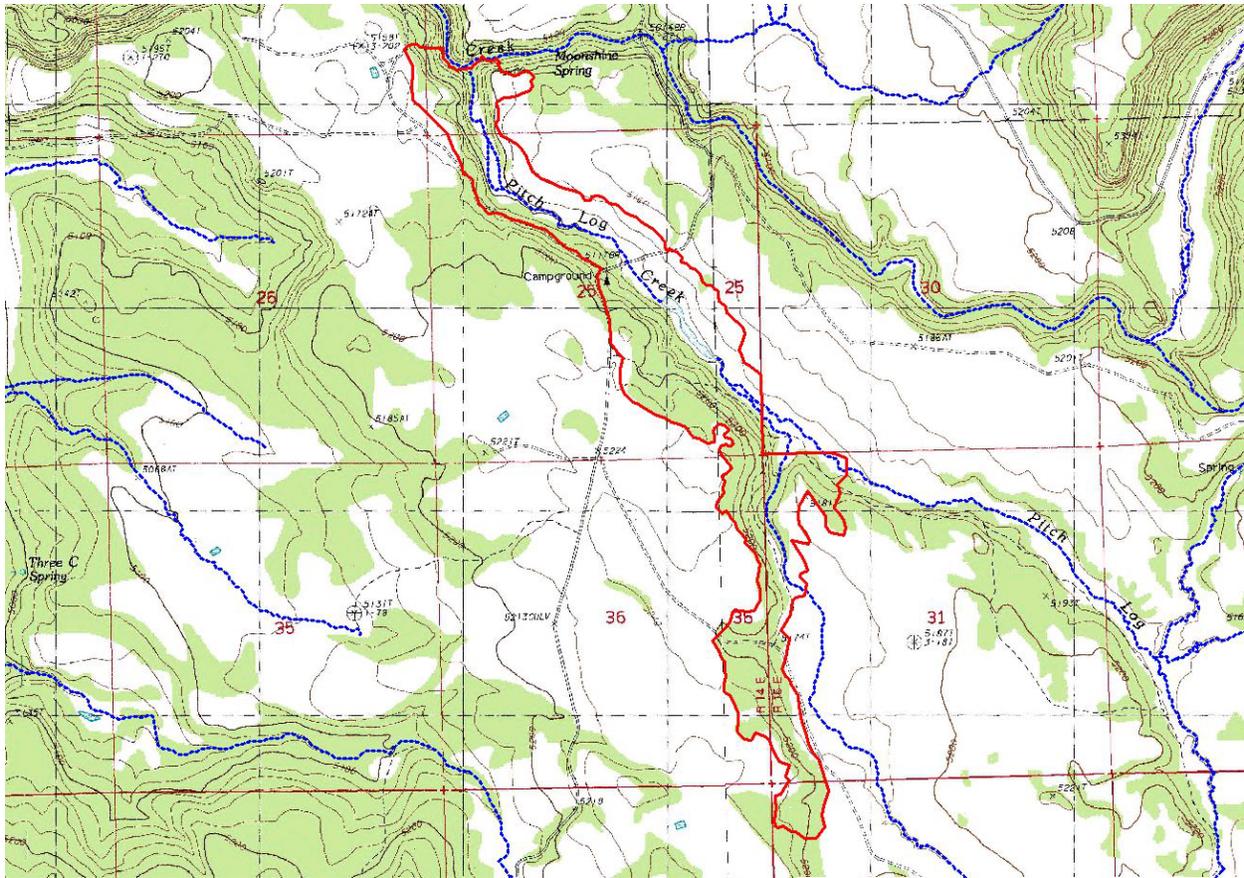
(Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked)



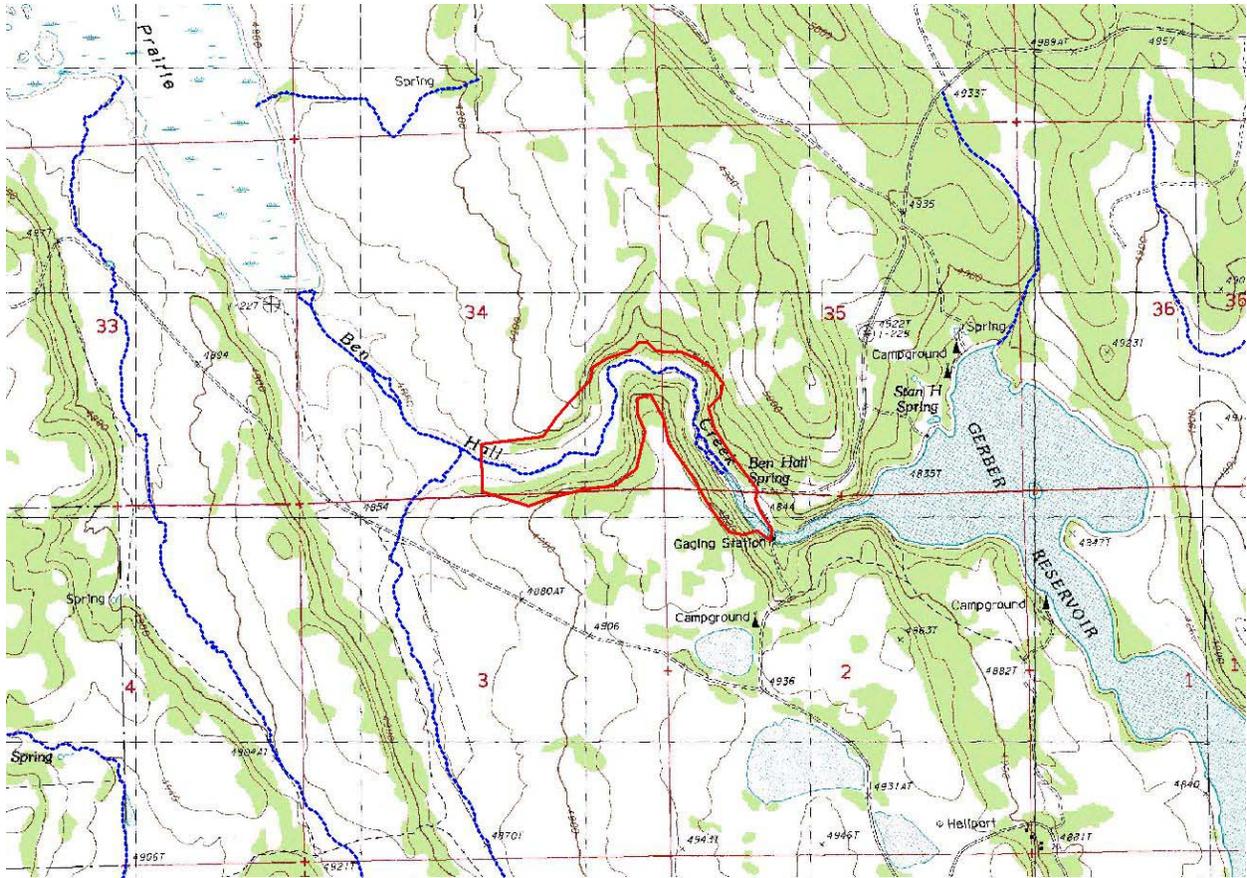
 Signature of the Responsible Official



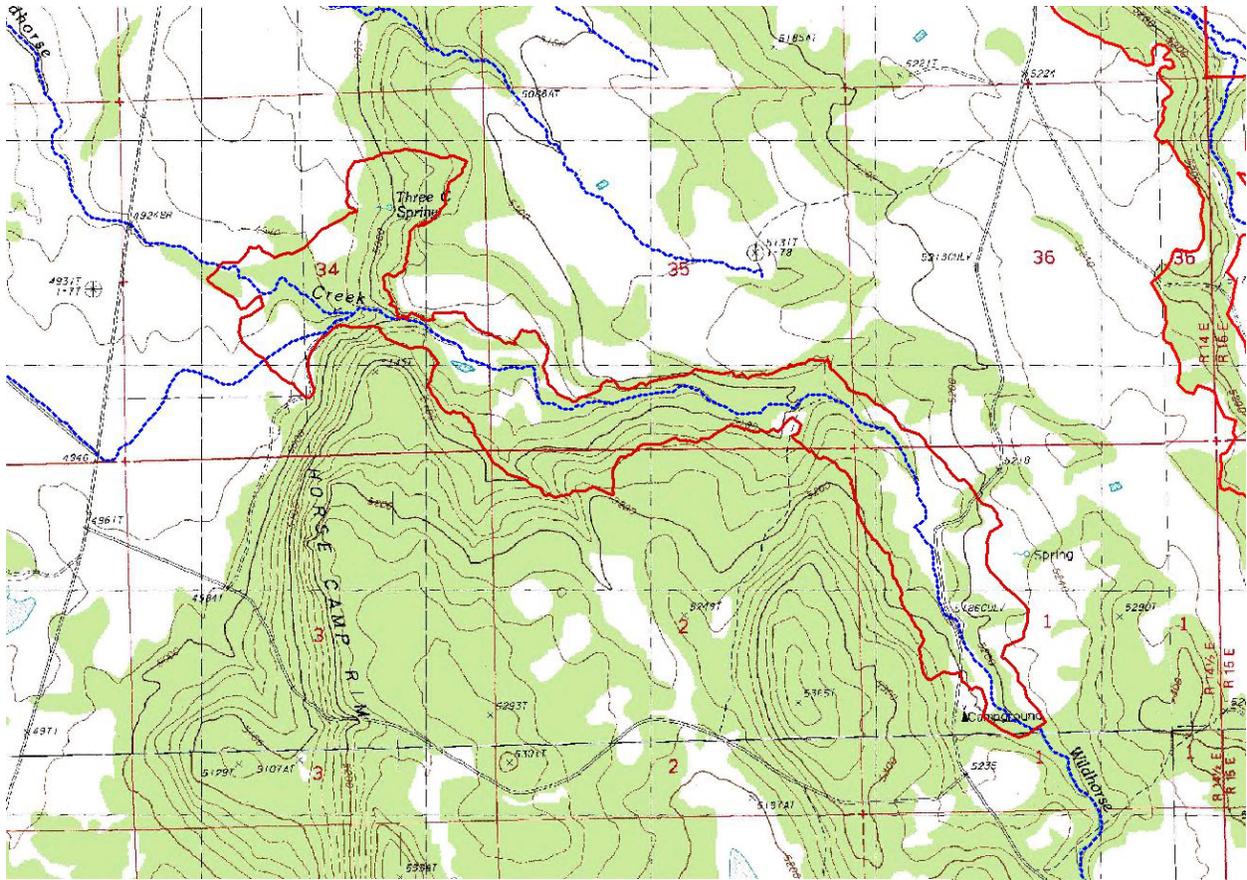
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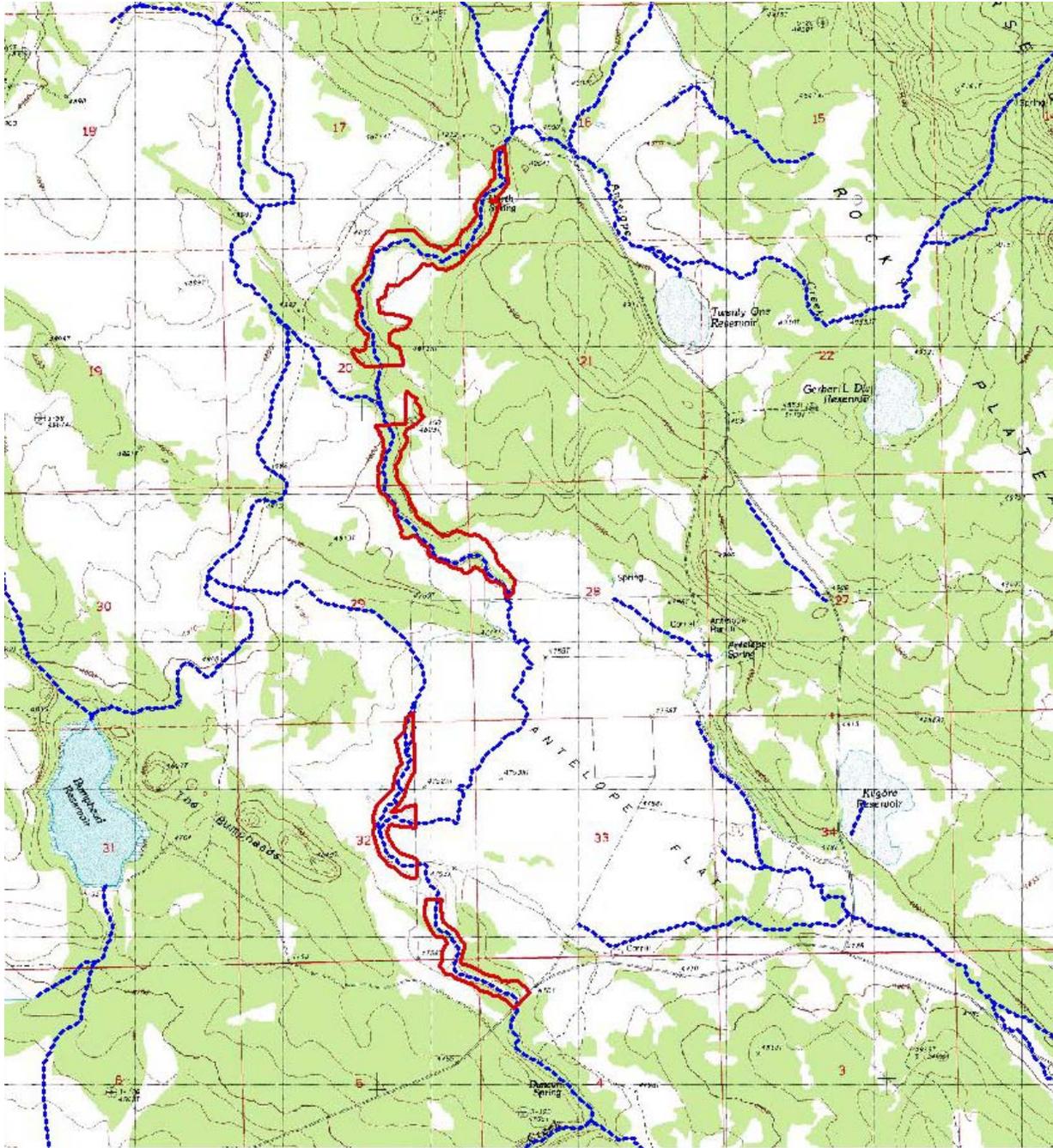
Map 1. Pitch Log Creek treatment units (322 acres).



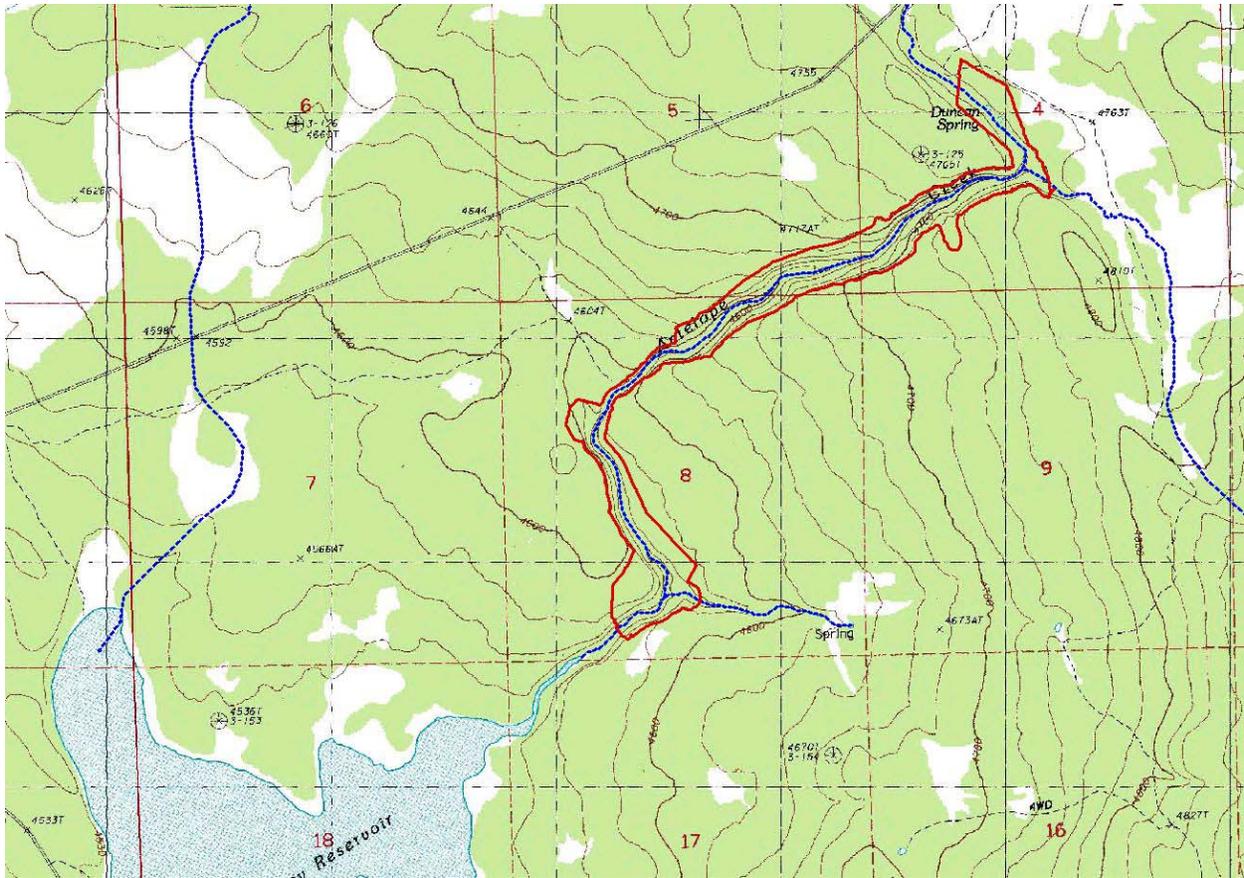
Map 2. Ben Hall Creek treatment unit (68 acres).



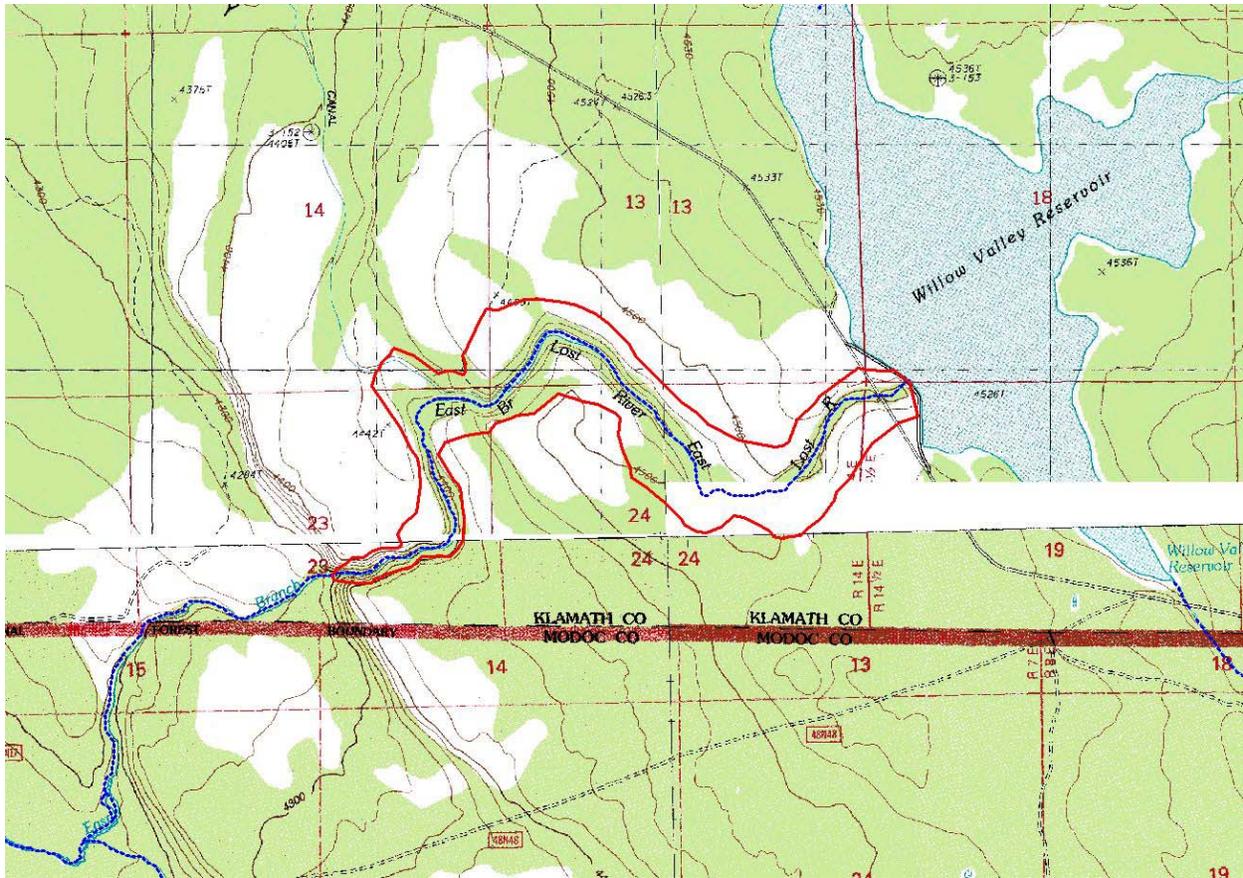
Map 3. Wildhorse Creek treatment unit (455 acres).



Map 4. Upper Antelope Creek treatment units (219 acres).



Map 5. Duncan Riparian treatment unit (152 acres).



Map 6. East Branch Lost River treatment unit (281 acres).



Photo 1. Juniper encroachment in the Duncan Riparian treatment unit.



Photo 2. Juniper encroachment adjacent to the East Branch of the Lost River.



Photo 3. Establishment of ponderosa pine on the former floodplain adjacent to Ben Hall Creek.

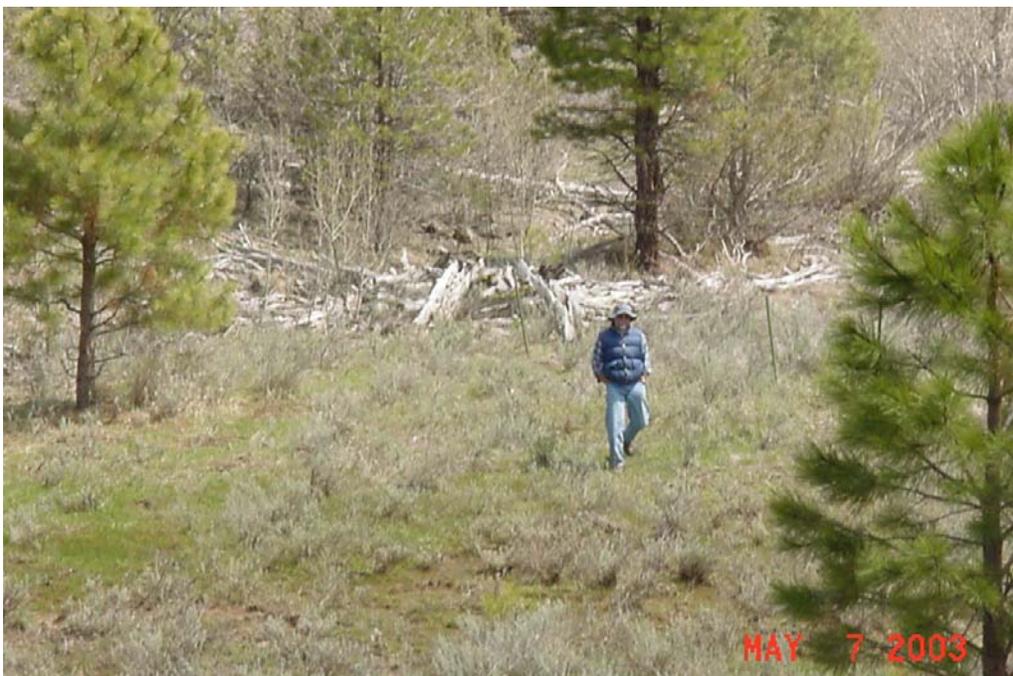


Photo 4. Ponderosa pine encroachment into an aspen stand on the former floodplain of Pitch Log Creek.

Clamath Falls Resource Area NEPA Document Routing Slip for Internal Review

Project No. CONIFER
 Date Initiated 5/12/2003 FERBER/WILLOW VALEED RIPARIAN FURTHER TREATMENTS

Resource or Staff Responsible	Review Priority	Preliminary Review Date/Initials	Comments Attached/Incorporated	Final Review Date/Initials
Manager: Feri Raml <i>Fou Raml</i>	Last			<i>FR</i> 8/12/03
Branch Chief: Barbara Ditman	Second to Last			
Branch Chief: Larry Frazier	Second to Last	<i>see comments 27 7/7</i>	<i>good job</i>	<i>LF</i> 7/31
Branch Chief: Mel Crockett	Second to Last			<i>MC</i> 7/31
Planner/EC: Don Hoffheins, Kathy Lindsey	Third from Last	<i>KL 6/9-03</i> <i>KL</i> 5/14	<i>work w/ individual specialists re: comments</i>	<i>KL</i> 7/14
Range: Bill Lindsey, Dana Eckard				
Wild Horses: Tonya Pinckney	N/A			<i>JWP</i> 4/24
Fire/Air Quality: Joe Foran		<i>JWF</i>		
Silviculture: Bill Johnson, Gabi Sommerauer		<i>6-18 BJ</i>	<i>(in text)</i>	<i>BJ</i> 7/24/03
Timber: Mike Bechdolt	N/A			
Botany/ACEC/Noxious Weeds: Lou Whiteaker		<i>7/19/03 LW</i>	<i>all areas surveyed some noxious weeds to avoid spreading</i>	<i>LW</i> 7/29/03
Soils: Jannice & Mike Cutler				
Cultural: Tim Canaday		<i>TC</i> 6/19	<i>Nearly all units have been surveyed - Numerous sites to be avoided.</i>	<i>TC</i> 7/28/03
Minerals/HazMat: Tom Cottingham	N/A			
Lands/Realty: Linda Younger	N/A			
Recreation/Visual/Wilderness: Scott Senter		<i>VSS</i> 5/14		<i>VSS</i> 7/22/03
Hydrology/Riparian: Mike Turaski, Andy Hamilton		<i>ATH</i> 5/12		<i>MRT</i> 7/30
Wildlife/T&E: Gayle Sitter		<i>GS</i> 6/12		<i>GS</i> 6/12
Fisheries/T&E: Scott Snedaker		<i>SS</i> 4/18		<i>SS</i> 7/30
W/S Rivers: Grant Weidenbach	N/A			
Engineering: Brian McCarty	N/A			
Survey/Manage: Molly Juillerat	N/A			
Clearances/Surveys	Needed	Done/Attached	*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.	
Cultural		<i>nearly all done - rest schedule for 5/14/03</i>	**Some resource areas may not apply for all projects. If so, just mark "N/A" in "Review Priority" column.	
Botanical		<i>Done</i> 7/09/03		
T&E, BA & or Consultation		<i>SL</i> 6/12/03		
R-O-W Permits				

This summer. Numerous sites to be avoided during treatment.
TC 6/19/03

Surveys will be completed and sites flagged for avoidance prior to project implementation.

TC 7/28/03

