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

DNA–04-20

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. *(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:

Yarding and removal of cut juniper on the following Fuel Treatment Zones:

	Unit Acres	Estimated Acres To Be Yarded
▪ Campbell(213)	209 acres	105 acres
▪ North Lorella(126ABC)	226 acres	115 acres
▪ Swan Lake(225ABC)	706 acres	300 acres
▪ Van Meter	80 acres	80 acres
▪ Barnes Valley(110)	178 acres	80 acres(The rest has been burned
▪ Horton Rim 1	747 acres	500 acres
Total	**2,146 acres**	**1,278 acres**

Cutting, yarding, and removal of juniper in the following area:

▪ North Horse Camp Rim	75 acres	75 Acres

Location of Proposed Action: See attached map
Description of the Proposed Action:
For the Campbell, North Lorella, Swan Lake, Barnes Valley, Horton Rim 1, and Van Meter units, the project consists of yarding and removing juniper that was cut under a fuels service contract. The juniper was cut mechanically. A separate NEPA document has already been completed to address the impacts of the cutting treatment. This DNA addresses the yarding and removal of the material. Because only the commercial juniper will be yarded and removed, it is anticipated that about half of the area on each unit will be yarded with the exception of Van Meter where most of the cut material should get yarded.

For the North Horse Camp Rim unit, the treatment would consist of cutting, yarding and removing all juniper with the exception of any old growth juniper designated for retention. On the North Horse Camp Rim Unit, a hand treatment has already been implemented to treat the juniper less than 12"DBH. A separate NEPA document has already been completed to address the impacts of the earlier hand treatment of the smaller material. This DNA addresses the impacts of cutting, yarding, and removing the commercial juniper. It is anticipated that most of the 100 acres will be cut and yarded on the North Horse Camp Rim unit.

The objectives of juniper treatments are to remove the encroaching western juniper that is competing with the residual pine and to maintain and restore the sagebrush and bitterbrush vegetative communities. The KFRA has burned most of the residual juniper piles over the last 4-5 years and

followed up the burning with some planting of bitterbrush and then tubing the bitterbrush. With the increased demand for western juniper for firewood, posts, poles, sawlogs, fiber, and other needs, this DNA addresses the impacts of yarding and removing the material in lieu of burning.

Applicant (if any): Not Applicable

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

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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 2,000 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. This trend is slowly changing as demand increases. In 2004, a contractor developed a market for juniper chips and is chipping over 1,000 acres of cut juniper. Even with this increase in utilization, the amount of juniper woodlands harvested for commercial forest products in the KFRA during the first decade of the KFRA RMP is still well under that analyzed (up to 10,000 acres for the decade).

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

Fire Management Environmental Assessment – OR014-94-09

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 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 with the exception of the North Horse Camp Rim unit. In that unit, the juniper will be cut and yarded in one operation.

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 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?

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 of vegetative response from 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.

Five of the six proposed treatment areas (i.e. Campbell, Lorella, Van Meter, FTZ 110, and North Horse Camp Rim) are in grazing allotments for which the *Rangeland Health Standards Assessments* have been completed over the past several years. All of those *Assessments* noted that juniper encroachment or density increases (depending on what ecological site one is referring to) is an ever increasing and serious long-term condition problem. These *Assessments* affirmed the need for juniper treatment/control in order to maintain – or get back to - appropriate ecological conditions. The 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 broad scale pile burning (e.g. annual grass infestations).

Although two of the areas (Swan Lake and Horton Rim) have not had *Assessments* completed, recent Ecological Site Inventory or other field observations confirm that the same conclusions and likely management approach will be recommended for these areas once assessed as was indicated for the already assessed areas above.

And finally, two of the areas (North Horse Camp Rim and FTZ 110) are in a grazing allotment (Horsefly) that has been under section 7 (ESA) consultations 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 is consistent with the long term maintenance of appropriate late seral ecological conditions. This condition is implicitly required by the ongoing Biological Opinion for the area which requires the maintenance of (where currently appropriate) or movement towards elevated ecological conditions (where currently suppressed). This same concept can be directly extrapolated to all of the proposed project areas, even though they are not under consultation.

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.

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 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 contact. 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)?

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 2,000 acres of juniper have 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?

The KFRA has conducted a number of tours with the general public as well as interagency field trips 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.

Name	Title	Resource Represented
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.

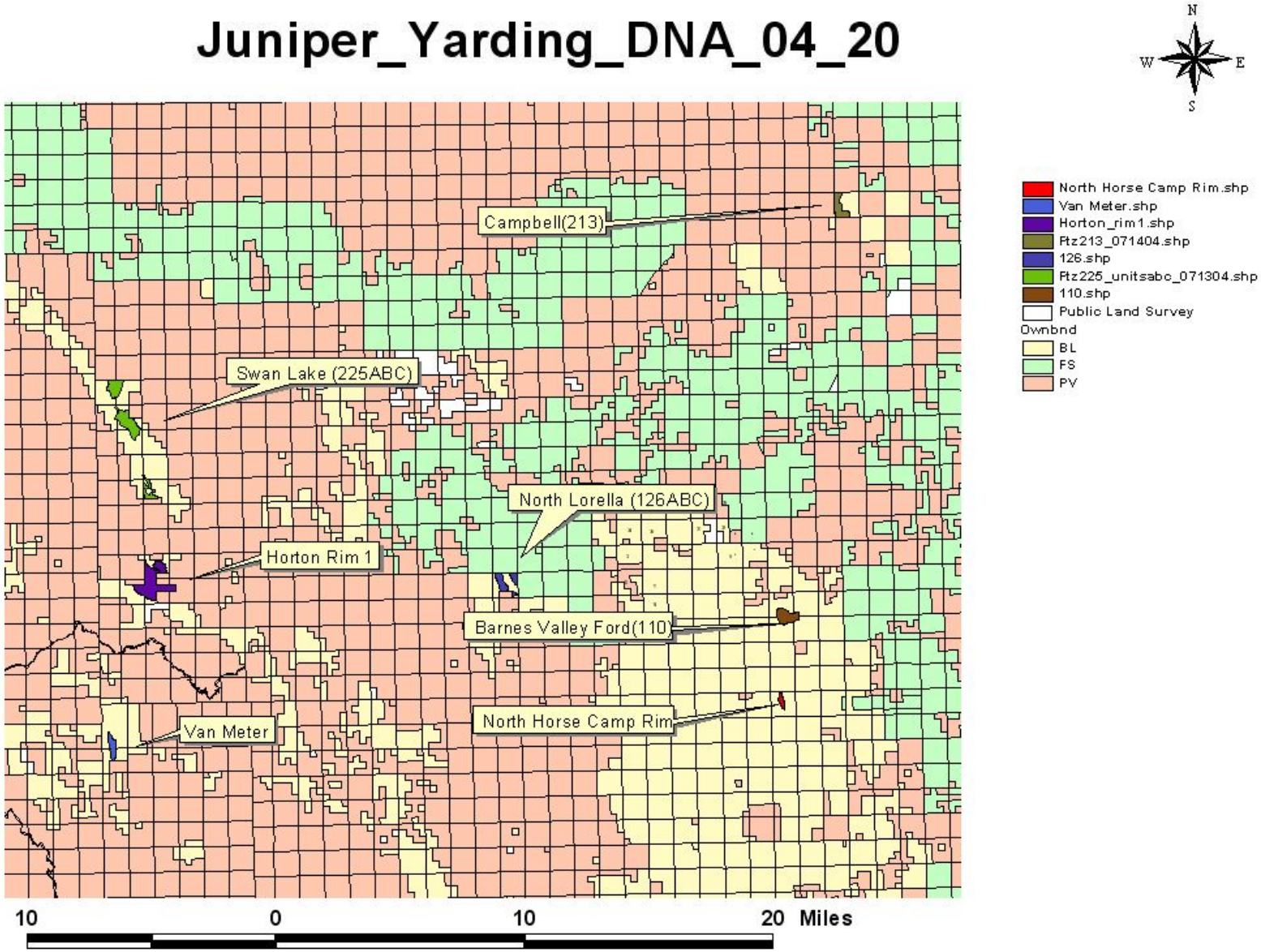
- Follow Best Management Practices in KFRA RMP Appendix D
- All cultural sites will be buffered for avoidance protection
- Avoid entering any spring areas – 150 foot buffers will be used along drainages and wet areas
- Avoid disturbing healthy and concentrated areas of big sage, bitter brush, and mountain mahogany
- Equipment will be washed prior to entering area
- Avoid disturbing noxious weed areas
- Any residual material that is not utilized will be piled as specified in the Fuel Management IDIQ contract.
- Standard log yarding stipulations will be incorporated into the permit including limiting skid trails to 150 feet apart and suspending buncher piles where feasible.
- On Unit FTZ 110, no yarding will occur within 320 feet of Barnes Valley Creek or below the rim that breaks into Barnes Valley Creek Canyon if it is further than 320 feet because most of the piles generated from the fuels treatments have been burned. This meets the PDFs/mitigation criteria for the consultation that was completed for the previous grazing and fire treatments.

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)

Jon Raby, Manager
Klamath Falls Resource Area

8/31/04
Date

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