U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management
Coos Bay District

Worksheet
Documentation of NEPA Adequacy (DNA)

BLM Office: Coos Bay District, Myrtlewood Field Office
Tracking No. DOI-BLM-OR-C040-2014-0003-DNA

Background:

Palmer Butte has been used as a communication site since the 1960s. Currently, this site has two microwave towers (US Coast Guard and Frontier) and one National Weather Service weather station. These facilities serve as critical infrastructure and communication links for the Oregon South Coast.

Vegetation maintenance has not been completed here in at least 10 years. Since that time, brush and trees have encroached in the cleared area and fuel loadings have now reached dangerous levels (see photos below). If a wildfire were to occur in the vicinity of the communication site, the results would range from costly damage to a functional loss of the communication equipment.

A. Description of the Proposed Action:

Proposed Action Title/Type: Palmer Butte Communication Site Maintenance/Hazard Fuel Reduction

Location / Legal Description: T. 40 S., R. 13 W., Section 10, NW 1/4 of the SE 1/4, Willamette Meridian, General Forest Management Area

Proposed Action:

The proposed action would reduce the hazardous fuel loading (predominantly Douglas fir and hairy manzanita) around the communication site to levels that will lower the likelihood of damage to critical infrastructure during a wildfire event. Trees and brush would be cut to a height not to exceed 1 foot within an area extending approximately 160 feet from buildings and infrastructure (see map below). This would result in approximately 3 acres surrounding the communication facilities with low vegetation that would only support relatively low flame lengths. In addition to clearing around the structures, removal of trees along 2,528 feet of the access road would be included. This roadside tree removal is necessary to allow for adequate equipment access and turn-around, as well as provide a location for decking logs.

Brush and tree species to be treated include Douglas fir, knobcone pine, hairy manzanita, chinquapin, rhododendron, tanoak, and huckleberry. Removal of trees would be accomplished through a small sale. Average diameter at breast height (dbh) of trees to be removed within the 3-acre treatment area is 10.9 inches. Average dbh of trees to be removed along the access road is 12.3 inches.

Resulting slash from the cutting activities would be piled and covered. Burning of piles would take place at a later date when conditions are favorable. All burning would be conducted in compliance with Oregon smoke management regulations.

Following treatment, the project area would be monitored annually in conformance with the Coos Bay District noxious weed program. For fire management purposes, periodic treatment of the site would be implemented to minimize hazardous fuel loads and keep potential fire behavior and intensity to manageable levels. Monitoring would be completed to evaluate effectiveness and to aid in determining the need for follow-up treatments. Future hazard fuel reduction activities at this location would occur on an as needed basis. It is estimated that treatment would be required every 5-8 years.

Design Features for the Proposed Action:
Project design features outlined in Blue Ridge Communications Site Fuels Reduction and Beam Path Maintenance EA, DOI-BLM-OR-C030-2010-0007-EA, pertinent to this proposed action are herein incorporated. Below are the more relevant project design features:

Harvest Methods

1. A skyline cable logging system would harvest in areas with road access, but otherwise unsuitable for ground-based systems (generally slopes greater than 35 percent).
2. All ground-based operations would occur only when soil moistures are below 25 percent.
3. Ground-based operations would require that equipment operates on existing slash so as not to expose mineral soil. Repeated passes over lateral trails would be kept to a minimum.
4. Within safety standards and to the extent possible, harvest trees would be directionally felled away from all posted boundaries, property lines or roads.

Noxious Weeds

1. To prevent the introduction and spread of noxious weeds during the contract period, all machinery and equipment would be washed prior to entering federal lands (all dirt and visible grease removed from vehicles). Washing of vehicles would not take place on public lands.
2. Vehicles and equipment would be required to stay on road and landing surfaces, except the equipment specifically designated to operate off roads and landings (e.g. mechanical harvesters).
3. To reduce the chance of noxious weeds becoming established, bare soil areas from landing and road renovation and decommissioning would be mulched and seeded with an approved native grass species and fertilized if deemed necessary.

Fuels Reduction Treatments - All Treatment Areas

Landing and Roadside Hazard Reduction:

- Logging slash within twenty feet each side of those roads within harvest areas would be machine piled.
- Landing and hazard reduction piles would be covered with 4 Mil black polyethylene plastic and burned during late fall or winter months. Piles would need to be located a sufficient distance (minimum 10 feet) from leave trees to limit scorch potential.

Slashing, Machine Piling and Burning

- Existing undesired vegetation would be slashed during or after tree removal.
- All vegetation and logging slash down to 1 inch diameter would be machine (or hand) piled.
- Piles would be covered with 4 Mil black polyethylene plastic and would be burned during late fall or winter months.
- Where appropriate, re-seeding, fertilizing, and mulching of burned areas or areas of exposed soils with a native mix of grass seed would occur.

Special Status Plants

A small population of a rare, Bureau Sensitive Special Status plant species, Howell's manzanita (Arctostaphylos hispidula), occurs at the communication site. In order to prevent this species from being damaged or destroyed some special precautions would be undertaken before, during, and after treatment at the site:

1. All Howell's manzanita plants in the project area would be flagged for easy identification before any vegetation is cut, removed, piled, or burned.
2. Vegetation cut adjacent to the Howell's manzanita would be removed in such a manner as to not disturb or destroy the existing Howell's manzanita plants.
3. If burn piles are constructed to dispose of slash, no piles would be constructed within 30 feet of any existing Howell's manzanita plants.
4. The project area would be revisited annually for at least five years post treatment to monitor the remaining Howell's manzanita plants.

B. Land Use Plan (LUP) Conformance

This project is consistent with the goals and objectives of, and is designed to conform to, the 1995 *Coos Bay District Resource Management Plan/Final Environmental Impact Statement* (USDI 1994) and it's *Record of Decision* (1994 ROD/RMP), as supplemented and amended.

The proposed action is in conformance with the applicable Land Use Plan because it is specifically provided for in the following Land Use Plan decisions:

<u>1995 Resource Management Plan (RMP) Objectives:</u>

"Reduce hazards through methods such as prescribed burning; mechanical or manual manipulation of forest vegetation and debris; removal of forest vegetation and debris; and combinations of these methods (p.76)."

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

2011 Blue Ridge Communication Site Beam Path Maintenance and Fuels Reduction EA (DOI-BLM-OR-C030-2010-0007-EA)

1995 Coos Bay District Record of Decision and Resource Management Plan

Final Supplemental Environmental Impact Statement on Management of Habitat for the Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl (i.e. Northwest Forest Plan [NFP]) and its Record of Decision as supplemented and amended.

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, project management plans, water quality restoration and monitoring report).

Biological Opinion Addressing Fiscal Years 2014 – 2018 Programmatic Suite of Activities for the Coos Bay District BLM (01EOFW00-2014-F-0163)

D. NEPA Adequacy Criteria.

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

The proposed action is similar to that analyzed in EA#DOI-BLM-OR-C030-2010-0007-EA. The geographic environment of the proposed unit is similar to that described in the EA; however the likelihood of fire occurrence, and the potential fire behavior, is higher in this location than at the Blue Ridge site.

The applicable portions of the project design features described in the EA would be incorporated into the proposed project. It is expected that the environmental consequences of this proposed action would be much less than those analyzed in the original NEPA document. The proposed action differs from the original EA in that the treatment area is smaller, no road renovation is proposed and no beam path clearing is proposed. In addition, the proposed action would not impact any riparian reserves and all activity would take place within the General Forest Management Area. Periodic maintenance of the clearing would be necessary as vegetation recovers. It is estimated that follow-up treatment would be required every 5-8 years.

The underlying management objectives for this proposed action are the same as the parent EA. Similar treatments have been completed for other communication sites throughout the district.

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?

The Beam Path EA contained a No Action and a Proposed Action alternative. Under the proposed action, the Beam Path EA analyzed 6 acres of fuels reduction clearing to modify the vegetative profile surrounding the site to lower the potential for disturbances such as high intensity fire or wind events that could damage the facilities and compromise critical communication services. The proposed action for this Palmer Butte project would conduct the same type of action to prevent interruption of critical communication services in southern Curry County.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Since the development of the Beam Path EA, the U.S. Fish and Wildlife Service finalized new Critical Habitat designations for the northern spotted owl in 2012. The Palmer Butte project area is not located in Critical Habitat for the owl or marbled murrelet. The most recent Special Status Species list was used when conducting surveys. No other changes have occurred that would invalidate the previous analysis.

No new information or circumstances are known which would affect the validity of the existing analysis. These lands do not function as suitable habitat for either the northern spotted owl or the marbled murrelet. Impacts to other wildlife species have been analyzed in the original EA. The habitat type that would be modified (tanoak, brush and knobcone pine stands) is common in the surrounding watersheds. The

relatively small size of the proposed action is not expected to impact any special status species, because of the amount of similar habitat that remains available. The proposed action complies with the Endangered Species Act and the OR/WA Special Status Species Policy.

Surveys conducted by a staff botanist indicate that no threatened or endangered plant species are in or near the project area. However, a Bureau Sensitive Special Status plant species, Howell's manzanita, has been located near the communication site. Any Howell's manzanita found within the project area would be protected from cutting and burning.

There are no streams present in the project area and there are no Riparian Reserves within the project boundary.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Based on review by an interdisciplinary team (listed below), the anticipated direct and indirect effects of the proposed actions are essentially the same or are less than what was identified in the EA. The anticipated cumulative impacts of the proposed action would be less than that analyzed by the Beam Path EA. The proposed action contains similar existing environmental factors and design features; therefore, the anticipated environmental consequences are expected to be the same.

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

The Beam Path EA was subject to multiple phases of public review. The general public was notified of the Beam Path Project through publication of the District's semi-annual Planning Update. Scoping notices were sent to adjacent landowners, agencies that have requested these documents, and other interested parties on the District NEPA mailing list. The scoping period for the proposed project ran between December 5, 2010 and January 3, 2011. No comments were received (EA p.6).

Subsequently, a public comment period for the Beam Path EA and preliminary FONSI was from July 18, 2011 to August 16, 2011. One comment was received but no response was necessary. A final FONSI was published on September 8, 2011.

In addition, this DNA will be available for public review and comment for a period of 15 days.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Agency/Resource Represented
Paul Rodriguez	Realty Specialist	Agreements
Julia Jackson	Safety and Occ. Health Specialist	Hazardous Materials
James Kirkpatrick	Forester	Weeds/POC/Silviculture
Tom Sill	Forester	Small Sale Administrator
James Heaney	Wildlife Biologist	Wildlife
Tim Rodenkirk	Botanist	Botany
Stephan Samuels	District Archaeologist	Cultural/Environmental Justice
Joanie Lawrence	Fuels Management Specialist	Project Lead
Racheal Jones	Environmental Protection Specialist	NEPA

Note: Refer to the EA for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

Conclusion: *(Note: If you found that one or more of these criteria is not met, you will not be able to check this box.*)

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

Signature of Project Lead ***/s/ Joanie Lawrence***

Signature of NEPA Coordinator ***/s/ Racheal Jones***

Signature of the Responsible Official ***/s/ Kathy Hoffine*** Date: ***October 20, 2014***

Photo 1. Palmer Butte looking north – current condition

Photo 2. Palmer Butte looking northwest – current condition

Palmer Butte Communication Site Project Map

Coos Bay District Comm Site — Paved Road

c:J Project Area Clearing — — Gravel Road

— Access Road Clearing — — Naturai/Unk Surface Road

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

In addition to the certification on the attached Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA) form (OR120-1792-1), the following resource specialists have reviewed this new project in light of the analysis made in the original Environmental Assessment:

Realty Specialist	Paul Rodriguez	/s/ Paul J. Rodriguez Signature	9/30/2014 Date
Hazardous Materials	Julia Jackson	/s/ Julia Jackson Signature	10/8/2014 Date
Weeds	James Kirkpatrick	/s/ James Kirkpatrick Signature	9/30/2014 Date
Silviculture	James Kirkpatrick	/s/ James Kirkpatrick Signature	9/30/2014 Date
Port-Orford-cedar	James Kirkpatrick	/s/ James Kirkpatrick Signature	9/30/2014 Date
Timber/Small Sales	Tom Sill	/s/ T M Sill Signature	10/1/2014 Date
Wildlife	James Heaney	/s/ James Heaney Signature	9/30/2014 Date
Botany	Tim Rodenkirk	/s/ Tim Rodenkirk Signature	10/1/2014 Date
Cultural	Stephan Samuels	/s/ Stephan Samuels Signature	10/1/2014 Date
Fuels	Joanie Lawrence	/s/ Joanie Lawrence Signature	9/30/2014 Date
Environmental Justice	Stephan Samuels	/s/ Stephan Samuels Signature	10/1/2014 Date
NEPA Coordinator	Racheal Jones	/s/ Racheal Jones Signature	10/7/2014 Date