

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

**Worksheet**  
**Documentation of NEPA Adequacy (DNA)**

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**BLM Office:** Coos Bay District, Umpqua Field Office      **Tracking No.** DOI-BLM-OR-C030-2011-0009-DNA

**Applicant (if any):** Coos Watershed Association

**A. Description of the Proposed Action:** The Coos Watershed Association proposes to restore fish habitat through increasing stream channel complexity by adding logs to Wren Smith Creek, a tributary of Daniels Creek.

**Proposed Action Title/Type:** Wren Smith Creek Large Wood Placement Project

**Location / Legal Description:** Wren Smith Creek – T. 26 S., R. 12 W., sections 13 & 14.

**Proposed Action:**

The proposed action is to place 90 tree pieces along 0.8 miles of Wren Smith Creek and its tributaries to improve fish habitat within the upper Daniels Creek sub-basin (reaches 2 & 3; see attached map). It is expected that the in-stream wood placements would occur between July and September 2011 and the willow wall installation and planting during winter 2011-12.

Wren Smith Creek is a low gradient stream (<3%) with a small-to-medium-sized active channel (13 to 16 feet). The project includes configuring trees with attached root wads and cut log in jams consisting of 3-5 key pieces per site. The pieces would be placed with an excavator and cable yarder on the properties of Lone Rock Timber, Greg McUne and BLM. Additional efforts would be made to stabilize banks through the installation of bio-engineered willow walls and planting of native trees and shrubs. Sections of stream along reaches 1 & 2 have experienced high flows and undercut banks that are eroding and dumping sediment into the water. Bio-engineered willow walls would be installed along 210 feet of reach to provide bank structure and support by trapping sediment, deflecting high flows away from the bank and slowing downstream water velocity. This is especially useful during winter when salmon are seeking refuge from high flows in side tributaries and pools. Native riparian trees and shrubs would also be planted to help stabilize the top edge of the bank and provide future shade and woody debris.

The project proponents would obtain trees from a private timber operator who would harvest hazard trees off-site. This includes the acquisition of an estimated 25-30 Douglas fir trees (16" to 24" DBH) and 3-4 Sitka Spruce trees (36" DBH) to provide approximately 74 pieces of wood (32-50 feet in length). Contractors would cut trees and leave those trees in place for the equipment to place in the channel or the contractor would yard the trees from the road. The contractor would use a self-loader to stage a portion of these logs closer to placement sites on BLM and private lands. The project would also include up to 16 Douglas fir trees with root wads (40-50 feet long with 24-25" DBH) pulled off-site by the contractor. Larger diameter (24"+) logs and pull trees would be placed at the lower end of the wood placements (reach 2) to aid in the retention of wood from upstream locations. Pieces would be keyed on riparian trees, stacked to reduce mobility and placed strategically to maximize the amount of wood that is within the active channel of the stream. In reach 3, large wood would be placed below stream crossings to trap sediment and create backwater refugia for salmon. Willow cuttings would be harvested from on-site sources and native trees and shrubs would be obtained from a local nursery.

The BLM would complete botanical surveys (currently ongoing) for special status lichens, bryophytes and vascular plant species on the BLM lands within the project area prior to any tree cutting or log placement. Tree cutting and log placement activities would avoid any special status plant sites (found during surveys) such that the species remains undisturbed and persists on the site.

Project implementation would follow seasonal and daily timing restrictions to prevent disturbance to nesting northern

spotted owls and marbled murrelets. Disruptive activities would not be allowed March to August 5, after which, daily timing restrictions of two hours after sunrise and two hours before sunset from August 6 through September 15 would be implemented

Review of the inventory of cultural sites revealed that no known sites are present in the vicinity of the project area. Due to the relatively narrow terraces between the road and the actual stream, undiscovered sites are not expected at this location. If the BLM finds historical sites or objects of cultural value in subsequent surveys, the project proponents would design implementation to avoid and buffer these sites to protect them from damage. In addition, if the BLM finds any objects or sites of possible cultural value such as historical or prehistoric ruins, fossils or artifacts, all activities in the vicinity would immediately be suspended and the Authorized Officer would be notified of the findings. Operations would resume at the discovery site upon receipt of written instructions and authorization by the Authorized Officer.

This proposal is substantially similar to the proposed action of the Paradise EA (OR 125-05-06). Project implementation would follow applicable Best Management Practices, Management Requirements and Mitigation Measures listed on pages 11-13 of the EA. As the project proponents obtained federal funding from Title II of the Secure Rural Schools legislation, this NEPA analysis would cover log placements on BLM and private land.

## **B. Land Use Plan (LUP) Conformance**

The BLM developed this project under the management direction of the *1995 Coos Bay District Record of Decision and Resource Management Plan* (1995 ROD/RMP). The analysis supporting this decision tiers to the *Final Coos Bay District Proposed Resource Management Plan/Environmental Impact Statement* (USDI 1994). This 1995 *Record of Decision* is also supported by, and consistent with, the *1994 Final Supplemental Environmental Impact Statement (FSEIS) on Management of Habitat for Late Successional and Old Growth Forest Related Species Within the Range of the Northern Spotted Owl* and its associated *Record of Decision* (USDA/USDI 1994).

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

- Design and implement watershed restoration projects in a manner that promotes long-term ecological integrity of ecosystems, conserves the genetic integrity of native species and attains the Aquatic Conservation Strategy objectives (p.17).
- Design and implement fish habitat restoration and enhancement activities in a manner that contributes to attainment of Aquatic Conservation Strategy objectives (p.30).

The Coos Bay District is also aware of the decision by the United States District Court for the District of Columbia in *Douglas Timber Operators et al. v. Salazar* on March 31, 2011 to vacate and remand the Secretary of the Interior's July 16, 2009 decision to withdraw the Western Oregon Plan Revisions ROD. This project was evaluated for consistency with both the 1995 RMP and the 2008 ROD and RMP; accordingly, this project is consistent with the Coos Bay District's 1995 RMP and the 2008 ROD/RMP.

## **C. Identify 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.

- Environmental Assessment for the Paradise Creek Watershed Restoration Project. EA#OR125-05-06 (USDI 2005).

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 and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Aquatic Habitat Restoration Activities in Oregon and Washington, CY 2007-2012 (ARBO)

2008/03507 National Marine Fisheries Service (USDC 2008)

- Biological Opinion and Letter of Concurrence for Programmatic Aquatic Habitat Restoration Activities in Oregon and Washington (ARBO) 8330.F0055(07) United States Fish and Wildlife Service (USDI 2007)
- Coos Watershed Daniels Creek Lowland Assessment (Coos WA, 2008)
- South Fork Coos Watershed Analysis, (USDI 2001)

#### **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 Wren Smith Creek project is the same as the action alternative analyzed in the Paradise EA. Contractors would place logs by the same means in similar stream channels and in similar configurations as those in the Paradise Creek watershed restoration project. The design features and anticipated environmental consequences of the proposed Wren Smith Creek project are essentially the same as those analyzed in the Paradise EA. While the EA addresses streambank erosion as a result of the wood placements, it does not specifically address mitigating current bank erosion through the installation of bio-engineered structures. Willow walls provide a 'soft' erosion control technique at the toe of the bank, this would cause the least amount of disturbance compared to bank re-sloping or rip-rap installation.

The proposed project is not within the same analysis area as analyzed in the Paradise EA. However, the proposed treatment reaches in the Wren Smith Creek watershed are similar to those found in the Paradise Creek watershed. The reaches are lacking large wood and have simplified channels. Fish species found in the Daniels Creek sub-basin are also found in Paradise Creek watershed and include chinook, coho, steelhead, cutthroat and lamprey.

**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 range of alternatives analyzed was appropriate with respect to the Wren Smith Creek project. The only alternatives considered in the Paradise EA were the action and no-action alternatives. The current environmental concerns, interests and resource values have not changed.

**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 Paradise EA, there have been legal changes that have resulted in the re-instatement of portions of the Survey & Manage program. The BLM is operating under the October 11, 2006, Court stipulation that allowed certain projects to go forward while the legal issues of the case are being resolved. The following exemption allows this project to go forward without conducting pre-ground disturbing surveys for Survey & Manage species: "Riparian and stream improvement projects where the riparian work is riparian planting, obtaining material for placing in-stream, and the stream improvement work is the placement of large wood, channel and floodplain reconstruction, or removal of channel diversions."

While the Paradise EA action area is out of the range of Port-Orford Cedar, staff specialists have included an analysis of POC and the Risk Assessment Key as required by the 2005 EIS.

When the BLM prepared the EA in 2005, there was no requirement to show compliance with the Aquatic Conservation Strategy. For this project to comply with the RMP, staff specialists have now included an analysis of the effects of the Wren Smith in-stream project on each ACS Objective in the analysis file.

**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?**

The analysis of direct and indirect impacts starts on page 22 of the Paradise EA. The Paradise EA contains analysis of the effects of log placements by the same methods in this proposed action. The outcome of the Paradise Creek project demonstrated that the prescribed management practices, management requirements and mitigation measures in the EA achieved the desired objectives. The project proponents would apply these same practices, requirements and measures to the Wren Smith Creek project.

Based on review by an interdisciplinary team (listed below), the anticipated direct and indirect effects of the proposed Wren Smith Creek project are essentially the same as identified in the Paradise EA. The EA included a broad discussion of the cumulative effects of implementing this action, particularly in regards to salmon recovery.

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

The original NEPA document underwent public scoping; one question was asked and answered. There were no comments on the EA or FONSI. There was no appeal of the Decision. Finally, this project will undergo a 15-day protest period.

**E. Persons/Agencies/BLM Staff Consulted**

<u>Name</u>	<u>Title</u>	<u>Agency/Resource Represented</u>
Aimee Hoefs	Env. Protection Specialist	NEPA/Team Lead
Stephanie Messerle	Fish Biologist	Fisheries
Larry Standley	Hydrologist	Hydrology
Tim Rodenkirk	Botanist	Botany
Jim Heaney	Wildlife Biologist	Wildlife
Stephan Samuels	Archaeologist	Cultural/EJ
Paul Gammon	Env. Protection Specialist	Hazardous Materials
Jim Kirkpatrick	Forester	POC/Weeds
Jered Bowman	Forester	Forestry

Note: Refer to the EA/EIS 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/ Nick Scheidt (Coos Watershed Association)

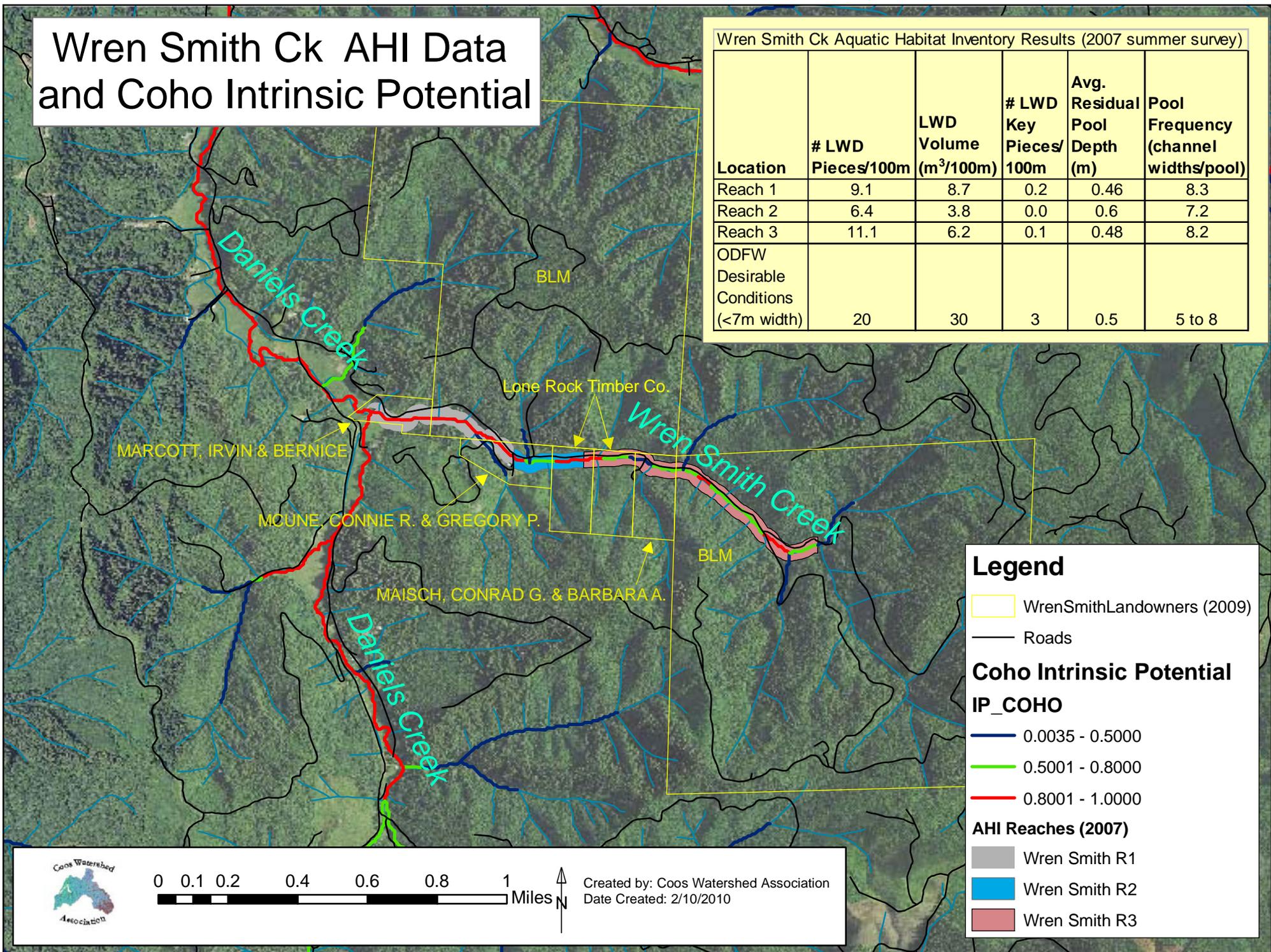
Signature of NEPA Coordinator \_\_\_\_\_ /s/ Steven D. Fowler

Signature of the Responsible Official: \_\_\_\_\_ /s/ A. Dennis Turowski Date: 7/14/2011

# Wren Smith Ck AHI Data and Coho Intrinsic Potential

Wren Smith Ck Aquatic Habitat Inventory Results (2007 summer survey)

Location	# LWD Pieces/100m	LWD Volume (m <sup>3</sup> /100m)	# LWD Key Pieces/100m	Avg. Residual Pool Depth (m)	Pool Frequency (channel widths/pool)
Reach 1	9.1	8.7	0.2	0.46	8.3
Reach 2	6.4	3.8	0.0	0.6	7.2
Reach 3	11.1	6.2	0.1	0.48	8.2
ODFW Desirable Conditions (<7m width)	20	30	3	0.5	5 to 8



**Legend**

- WrenSmithLandowners (2009)
- Roads

**Coho Intrinsic Potential**  
IP\_COHO

- 0.0035 - 0.5000
- 0.5001 - 0.8000
- 0.8001 - 1.0000

**AHI Reaches (2007)**

- Wren Smith R1
- Wren Smith R2
- Wren Smith R3

Coos Watershed Association

0 0.1 0.2 0.4 0.6 0.8 1 Miles

Created by: Coos Watershed Association  
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