

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
EUGENE DISTRICT OFFICE

DETERMINATION OF NEPA ADEQUACY (DNA) WORKSHEET

OFFICE: Eugene District

TRACKING NUMBER: DOI-BLM-OR-E050-2015-0006-DNA

CASEFILE/PROJECT NUMBER:

PROJECT NAME: South Ridge Project

LOCATION/LLEGAL DESCRIPTION: Township 18W, Range 4S, Section 3 (Wild Iris Ridge North); Township 18W, Range 4S, Sections 13 and 24 (South Eugene Meadows); Township 18W, Range 3S, Sections 15, 16, 21, 22, and 23 (Suzanne Arlie Park)

APPLICANT:

A. Description of Proposed Action and any applicable mitigation measures

The Eugene District BLM proposes to provide funding to the City of Eugene to accomplish habitat management goals for restoration of native plant communities and fuels management in the southern limits of the City of Eugene and the adjoining wildland-urban interface, in the Long Tom watershed, southern Willamette Valley. Ground-disturbing activities to be implemented by this funding include the following:

The activities proposed for funding are vegetation treatments on public (City) lands in the South Ridgeline area of Eugene, Oregon. The planned work would occur on up to 381 acres within three City of Eugene sites: Suzanne Arlie Park (288 acres), South Eugene Meadows (76 acres), and Wild Iris Ridge (17 acres).

The habitat restoration and management work would focus on controlling woody vegetation encroachment (shrubs and trees). Total project actions would include mowing (approximately 66 acres); mastication (approximately 210 acres); hand thinning, piling, and burning (approximately 80 acres); hand thinning without piling and burning (less than 1 acre); and mechanical thinning and forwarding (approximately 24 acres).

Habitats treated will be upland prairie (approximately 8 acres), shrubland (approximately 136 acres), savanna (approximately 21 acres), oak woodland (approximately 103 acres), conifer forest (approximately 31 acres), mixed oak/fir (approximately 67 acres), mixed conifer/maple (approximately 2 acres), and a power line right-of-way (approximately 12 acres).

By site, habitats and management work are as follows:

Wild Iris Ridge

Action Proposed	Habitat	Acres
hand thin only	upland prairie	0.3
mechanical thin	oak woodland	4
	mixed oak/fir	12

South Eugene Meadows

Action Proposed	Habitat	Acres
hand thin, pile, burn	conifer forest	31
	mixed oak/fir	39
	oak woodland	4
	savanna	2

Suzanne Arlie Park

Action Proposed	Habitat	Acres
hand thin, pile, burn	oak woodland	4
masticate	mixed conifer/maple	2
	mixed oak/fir	15
	oak woodland	87
	savanna	16
	shrubland	85
	upland prairie	5
mechanical thin	mixed oak/fir	1
	oak woodland	4
	savanna	3
mow	powerline ROW	12
	shrubland	51
	upland prairie	3

A description of the specific acres, actions, existing vegetation/habitats, and maps with project location are included for each site (Attachment A). The non-NEPA documents identified in Part C include additional project details, including project design features and mitigations for cultural and riparian resources and would be adhered to as part of this implementation.

B. Land Use Plan (LUP) Conformance

Applicable LUP: Eugene District Record of Decision and Resource Management Plan (RMP), as amended. Date Approved: June 1995

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:

The City of Eugene lands where actions are proposed are non-federal lands located within the boundary of the BLM Eugene District, Siuslaw Resource Area. These actions on City lands within the LUP boundary are in conformance with the LUP because it is clearly consistent with management specifically provided for under the LUP:

“Conserve native plant and animal communities. Promote the recovery of adversely affected populations. Enhance biological resources for human values through the use of native species for ecosystem restoration, species recovery or other actions involving plant, fish, and wildlife introductions on the District. Identify and implement actions to mitigate resource damage, promote wildlife habitat, reestablish or enhance populations and communities to maintain native biological diversity,” (p. 39).

“Study, maintain, or restore community structure, species composition, and ecological processes of special status plant and animal habitat,” (p. 52).

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

The existing NEPA analysis to which this DNA tiers is the West Eugene Wetlands Final Environmental Impact Statement (FEIS)¹.

Additional non-NEPA documents used to validate habitat conditions and actions proposed on this landscape include:

- South Eugene Meadows Management Plan. June 2013. City of Eugene. Parks and Open Space Division. 152 pp.
- Wild Iris Ridge Management Plan. October 2008. City of Eugene. Parks and Open Space Division. 60 pp.
- Suzanne Arlie Park Species Lists. 2009. Vascular Plant List, Fungi List, Wildlife Species Lists for the East Ridgeline Extension. Salix Associates. 11 pp.

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 new actions proposed for funding are essentially similar to an alternative (modified Alternative 2A) in the FEIS. Modified Alternative 2A analyzed habitat restoration and fuels management utilizing manual (including the actions proposed for funding of hand thinning, piling, and pile burning) and mechanical (including the actions proposed for funding of mowing, thinning, masticating (e.g., cutting and forwarding), and low-pressure mechanized piling).

This work is outside of the FEIS analysis area, but the geographic and resource conditions are sufficiently similar to those analyzed in the FEIS. Specifically, the farthest parcel is less than 5.5 miles from the analysis area boundary, and is comprised of ecosystems and habitats analyzed under the FEIS for the actions proposed. The habitat conditions for each City parcel on which actions are propose for funding are included in Attachment A. The descriptions of habitat conditions within the FEIS analysis area are presented by Issue in Chapter 3 (*How would BLM management actions affect the restoration of native plant communities?* (pp. 71-74); *How would BLM management actions contribute to meeting the recovery objectives described in the recovery plan for ESA-listed species?* (pp. 75-86); *How would BLM management actions affect BLM sensitive and strategic plant and animal species?* (pp. 87-100)).

- 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

The range of alternatives analyzed in the existing NEPA document is appropriate with respect to the new proposed action, given the current environmental concerns, interests, and resource values. The actions proposed would implement the same activities analyzed under the range of alternatives in the FEIS. The FEIS considered seven alternatives, which addressed and analyzed outcomes to a range of eleven issues identified from current environmental concerns, interests, and resource values. In addition to these issues presented in detail, the FEIS considered thirteen issues that were not presented in detail. The analysis was conducted in 2014.

The actions proposed for funding would occur in habitats considered through the range of analysis to accomplish habitat restoration goals and fuels management objectives; no conditions were found that were not within the scope of conditions analyzed. The Interagency Special Status/Sensitive Species Program lists (<http://www.fs.fed.us/r6/sfpnw/issssp/agency-policy/>) of

¹ November 2014. Eugene District BLM. 297 pp. Available: <http://www.blm.gov/or/districts/eugene/plans/files/wew-final-eis.pdf>.

documented and suspected listed or sensitive status species was reviewed, and none of the listed species are known at the project sites. Surveys have been conducted at each site by botanists/ecologists with extensive knowledge of the local flora and fauna, to detect occurrences of rare plants and animals. No listed plant species were found in the project areas at Wild Iris Ridge North or at Suzanne Arlie Park. One patch of the federally threatened Kincaid's lupine (*Lupinus oreganus*) is known at South Eugene Meadows², but it is outside of the project action area and would not be traversed by any equipment or field crews associated with this project.

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?

Yes, the existing analysis is still valid in consideration of new information or circumstances. The analysis reviewed by this DNA was conducted in November 2014. There is no new information relevant to the actions proposed, or the scope of geographic and resource conditions considered.

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 direct, indirect, and cumulative effects that would result from the implementation of the actions proposed for funding are qualitatively the same, and quantitatively similar within habitats that would be managed. The acres of each ecosystem and habitat are at different levels than present within the analysis area: there are fewer acres of upland prairie/savanna and more acres of oak/fir/conifer habitats. However, it is the application and effect of the management that is key for considering, both of which are within the scope analyzed under the FEIS.

The actions by habitat proposed for funding include:

Habitats and Activities	Sum of Acres
conifer forest: hand thin, pile, burn	31
mixed conifer/maple: masticate	2
mixed oak/fir	67
hand thin, pile, burn	39
masticate	15
mechanical thin	12
oak woodland	103
hand thin, pile, burn	7
masticate	87
mechanical thin	9
powerline ROW: mow	12
savanna	21
hand thin, pile, burn	2
masticate	16
mechanical thin	3
shrubland	136
masticate	85
mow	51
upland prairie	8
hand thin, no pile, no burn	less than 1
masticate	5
mow	3

² The location has been mapped using Global Positioning Systems (GPS), the patch is marked for protection in the field, and it is already under a regular monitoring regime implemented by the City of Eugene.

The FEIS analyzed effects to habitat restoration and fuels management for each of these activities and determined that these actions would contribute to management that maintained and restored native habitats. These actions are within the scope considered in method and manner for the application of management on these habitats (see Chapter 4 analysis of the following Issues: *How would BLM management actions affect the restoration of native plant communities?* (pp. 126-139); *How would BLM management actions contribute to meeting the recovery objectives described in the recovery plan for ESA-listed species?* (pp. 140-157); *How would BLM management actions affect BLM sensitive and strategic plant and animal species?* (pp. 158-171)). The area where actions proposed for funding does not include any listed species or critical habitats, but the analysis of these issues in the FEIS analyze habitat conditions relevant to this work. Additional analysis consideration for fuels management is presented as an issue considered, but not presented in detail (*How would BLM management affect fire risk and hazard?* (p. 17)).

This project would substantially improve the quality of habitats on the sites where the treatments occur. Habitat conditions for threatened and endangered species, special status species, and common species using these habitats would improve after the treatments are completed.

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

Extensive public involvement occurred with the existing NEPA document and is adequate for the current proposed action. The EIS formal scoping period started with printing of the Notice of Intent in the Federal Register on June 8, 2011, and concluded on July 8, 2011. In addition, the BLM sent a scoping letter to 49 individuals, organizations, and agencies that have an interest in BLM management within this planning area. On June 22, 2011, the Eugene Register-Guard newspaper published a news story on the West Eugene Wetlands RMP scoping process and provided contact information for scoping comments.

The BLM received thirteen comments during the formal scoping period and one comment after the close of the formal scoping period. Agencies and organizations providing comments included: the Environmental Protection Agency, the City of Eugene Parks and Open Space Division, the Long Tom Watershed Council, the North American Butterfly Association, Institute for Applied Ecology, The Nature Conservancy, Oregon Wild, and Friends of Eugene. Other comments were from individuals. The BLM received a comment letter after the close of the formal scoping period from the U.S. Army Corps of Engineers.

The BLM prepared a scoping report, which summarizes the results of scoping including a summary of the issues raised. The scoping report and scoping comments are available at: <http://www.blm.gov/or/districts/eugene/plans/eugenermp.php>.

The BLM received more than 80 comments on the DEIS during a 3-month comment period. Agencies and organizations providing comments included: the Environmental Protection Agency, the City of Eugene Parks and Open Space Division, the Long Tom Watershed Council, the North American Butterfly Association, Institute for Applied Ecology, The Nature Conservancy, Oregon Wild, and Friends of Eugene. Other comments were from individuals. The response to comments on comments received on the DEIS are included as Appendix G in the FEIS.

The FEIS was released in November 2014. On November 21, 2014, a Federal Register notice was published announcing the beginning of a 30-day protest period for the Proposed RMP. This protest period ended December 22, 2014, with no protests received.

E. Persons/Agencies /BLM Staff Consulted

<u>Name</u>	<u>Title</u>	<u>Resource</u>	<u>Agency Represented</u>
Emily Steel	Restoration Ecologist	Botany/Wildlife/Soils	City of Eugene
Trevor Taylor	Natural Areas Restoration Team Supervisor	Botany/Wildlife/Soils	City of Eugene
Bruce Newhouse	Principal Ecologist	Botany/Wildlife	Salix Associates, Inc.
Bernadette Graham- Hudson	Fish and Wildlife Operations and Policy Analyst	Management Plan Review and Approval	Oregon Department of Fish and Wildlife
Dorie Welch	Willamette Wildlife Habitat Agreement Coordinator	Management Plan Review and Approval	Bonneville Power Administration
Tom Soward	Wildland Fire Supervisor	Fuels	Oregon Department of Forestry

Conclusion

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 constitute BLM's compliance with the requirements of the NEPA.

Signature of Project Lead:

/s/ Kristen Allison
Kristen Allison, Fuels Specialist

Date: 3/18/2015

Signature of NEPA Coordinator:

/s/ Francisca Paulete
Francisca Paulete, NEPA Planner

Date: 3/18/2015

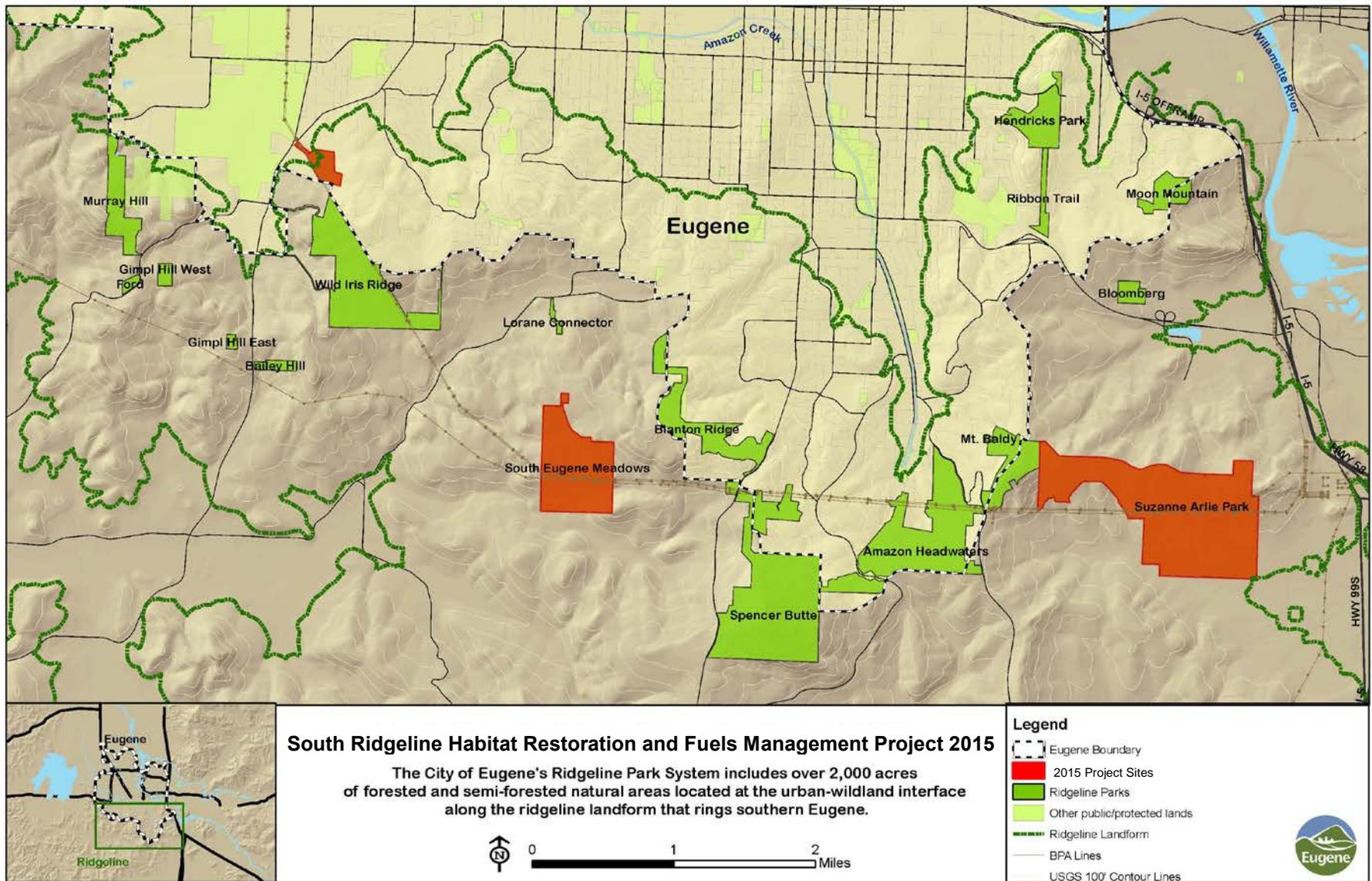
Signature of the Responsible Official:

/s/ Michael J. Korn
Michael J. Korn, Siuslaw Field Manager

Date: 3/18/2015

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program specific regulations.

ATTACHMENT A



Wild Iris Ridge North

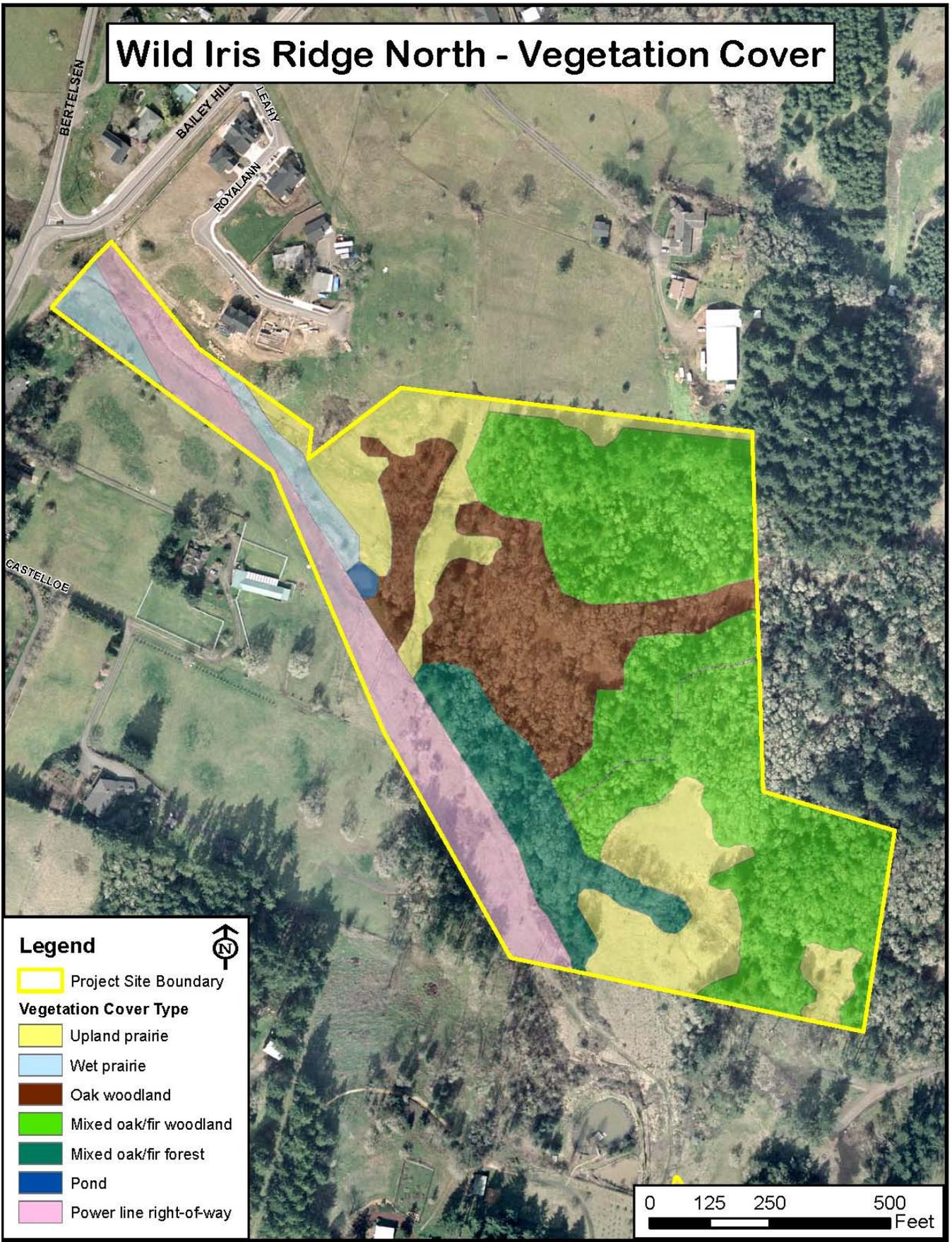
Site Size 25.6 acres
Site Location Township 18W, Range 4S, Section 3

Vegetation Cover Types			Vegetation Maintenance Treatments		
<i>Classification</i>	<i>Acres</i>	<i># units</i>	<i>Type</i>	<i>Acres</i>	<i># units</i>
Mixed oak/fir forest	2.1	1	Mechanical thin, localized hand thin, and forward	16.2	6
Mixed oak/fir woodland	9.8	3			
Oak woodland	4.3	2			
Pond	0.1	1	Hand thinning	0.3	7
Power line right-of-way	3.4	1			
Upland prairie	4.9	4			
Wet prairie	1.0	2			
	25.6	14			

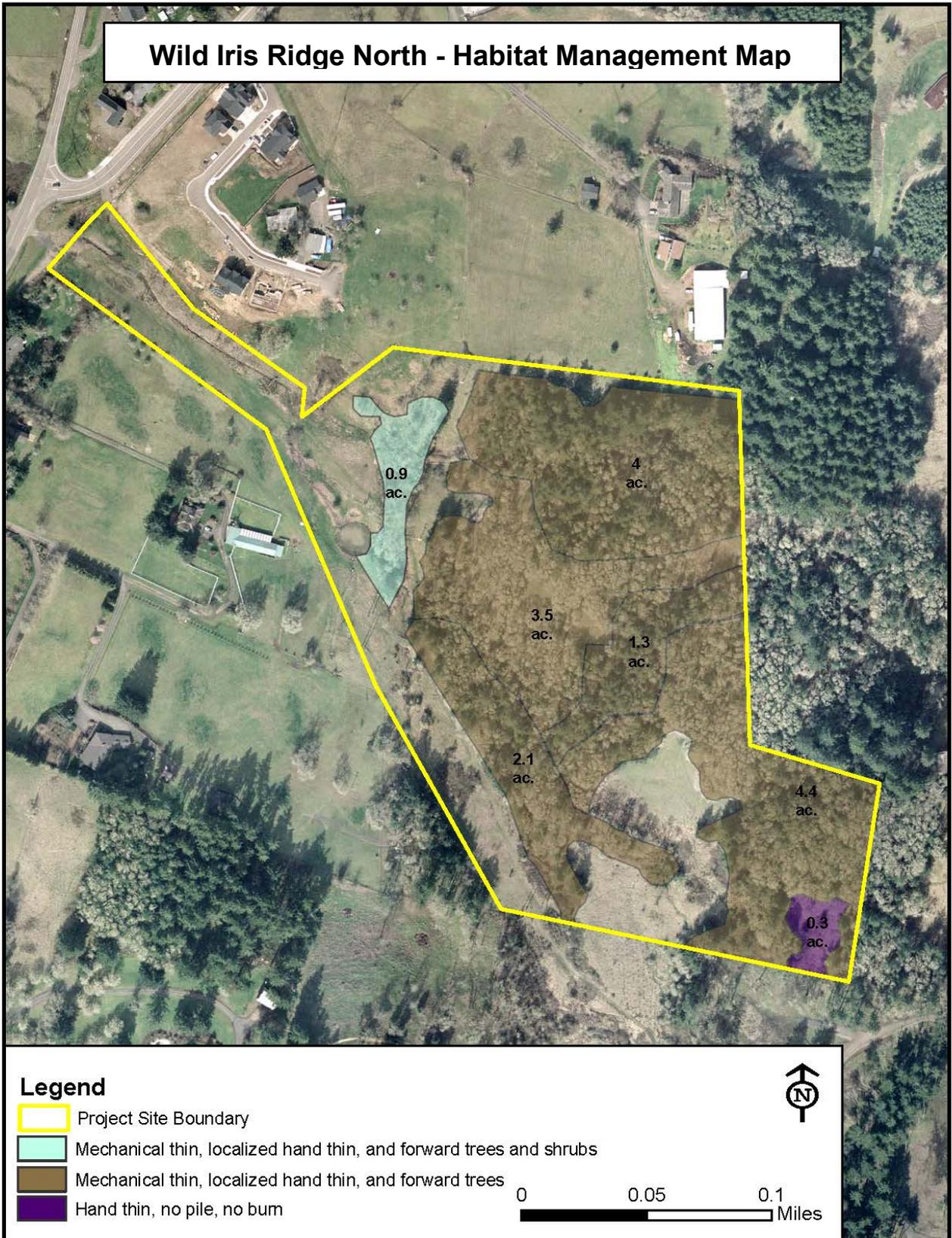
Site Description and Habitat Management Goals

Location	
<u>Project Area:</u>	Toward the western side of the Ridgeline park system, at the intersection of Bailey Hill and Bertelsen Roads.
<u>Roads/Access:</u>	A Bonneville Power Administration gravel access road extends from Bailey Hill Road, leading to the unit and along its western edge.
<u>Bordering Properties:</u>	Developed neighborhood to the north, developed neighborhood to the south east, rural-residential development to the south, and natural area (grassland, riparian corridor, and forest) to the west. New neighborhood in planning stages directly west of project area.
Site Conditions	
<u>Topography:</u>	Site slopes downward from south to north.
<u>Dominant Vegetation Cover and Condition:</u>	Oak and mixed oak/conifer woodland and forest stands interspersed with smaller areas of upland prairie. Douglas-fir colonizing oak stands.
<u>Wildfire Hazards:</u>	Establishment of Douglas-fir trees in woodlands and forests is creating ladder fuels and resulting in overstocked stands.
Habitat Management Goals	
<u>Oak woodland and Mixed oak/fir woodland</u>	Remove encroaching trees that are creating an overstocked stand condition. Remove invasive shrubs and fruit trees. Number of trees, diameter and height are large enough that forestry equipment is required. Tree removal will focus on Douglas-fir. Goal is to remove encroaching non-oak woody vegetation, ladder fuels, and achieve lower canopy cover for remaining oak.
<u>Mixed oak/fir forest</u>	Remove encroaching trees in unmanaged stands. Trees generally 20-50 years old, in understory or level with canopy. Goal is to decrease remove non-oak species, reduce stand density, increase space between trees, and remove ladder fuels. Pile burning is not an option in this area.

Wild Iris Ridge North - Vegetation Cover



Wild Iris Ridge North - Habitat Management Map



South Eugene Meadows

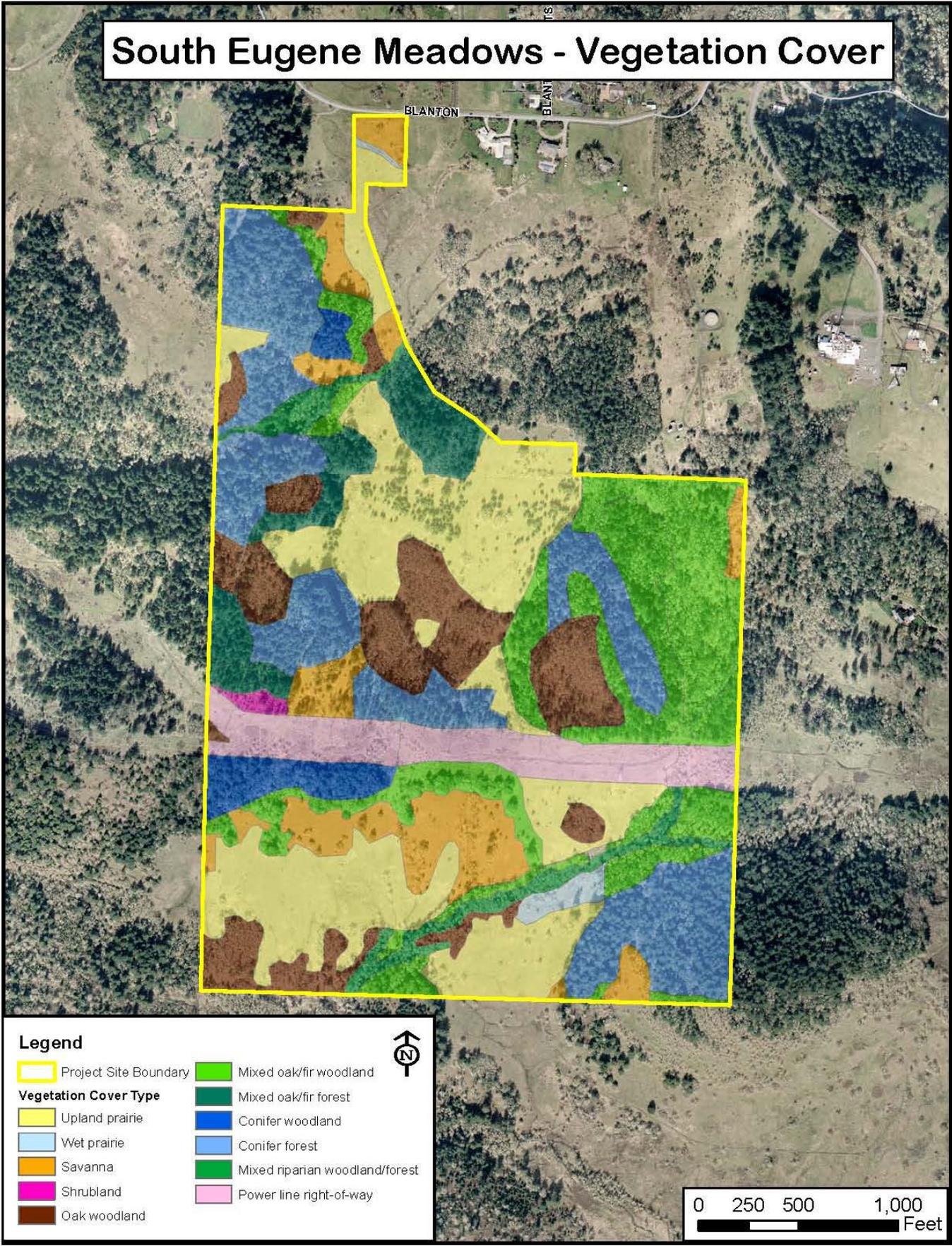
Site Size 194 acres
Site Location Township 18W, Range 4S, Sections 13 and 24

Vegetation Cover Types			Vegetation Maintenance Treatments		
<i>Classification</i>	<i>Acres</i>	<i># units</i>	<i>Type</i>	<i>Acres</i>	<i># units</i>
Conifer forest	35.3	7	Hand thin, pile, and burn	76.5	25
Conifer woodland	5.1	2			
Mixed oak/fir forest	9.6	4			
Mixed oak/fir woodland	36.8	18			
Mixed riparian woodland/forest	5.6	2			
Oak woodland	23.1	14			
Power line right-of-way	12.8	3			
Savanna	16.5	10			
Shrubland	0.6	1			
Upland prairie	47.0	8			
Wet prairie	1.5	2			
	194.0	71			

Site Description and Habitat Management Goals

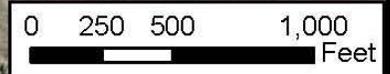
Location	
<u>Project Area:</u>	Near the geographic center of the Ridgeline landform.
<u>Roads/Access:</u>	Bounded to the north by Blanton road, and bisected by a gravel access road under a Bonneville Power Administration transmission line.
<u>Bordering Properties:</u>	Rural-residential development to the north and south, developed neighborhood to east, and timberland/natural grass west.
Site Conditions	
<u>Topography:</u>	Near level in the northern half of the property with some slight hills and a few drainages, giving way to steep south facing slopes and forested hills in the middle and southern portions of the site.
<u>Dominant Vegetation Cover and Condition:</u>	Woodland and forest cover types mainly of oak or mixed oak composition and some conifer forest interspersed with prairie areas.
<u>Wildfire Hazards:</u>	Establishment of understory and canopy trees in woodlands and forests is resulting in overstocked stands. Grassland on the south facing slope would carry fire quickly into timbered areas.
Fuels Reduction Goals	
<u>Upland prairie, Oak savanna and woodland, Mixed oak/fir woodland</u>	Remove encroaching trees that are converting to undesirable habitats and creating an overstocked stand condition. Remove invasive shrubs and fruit trees when present.
<u>Oak woodland and Mixed oak/fir forest</u>	Remove encroaching trees in unmanaged stands. Trees generally 20-50 years old, in understory or level with canopy. Goal is to decrease non-oak species, reduce stand density, increase space between trees and remove ladder fuels.

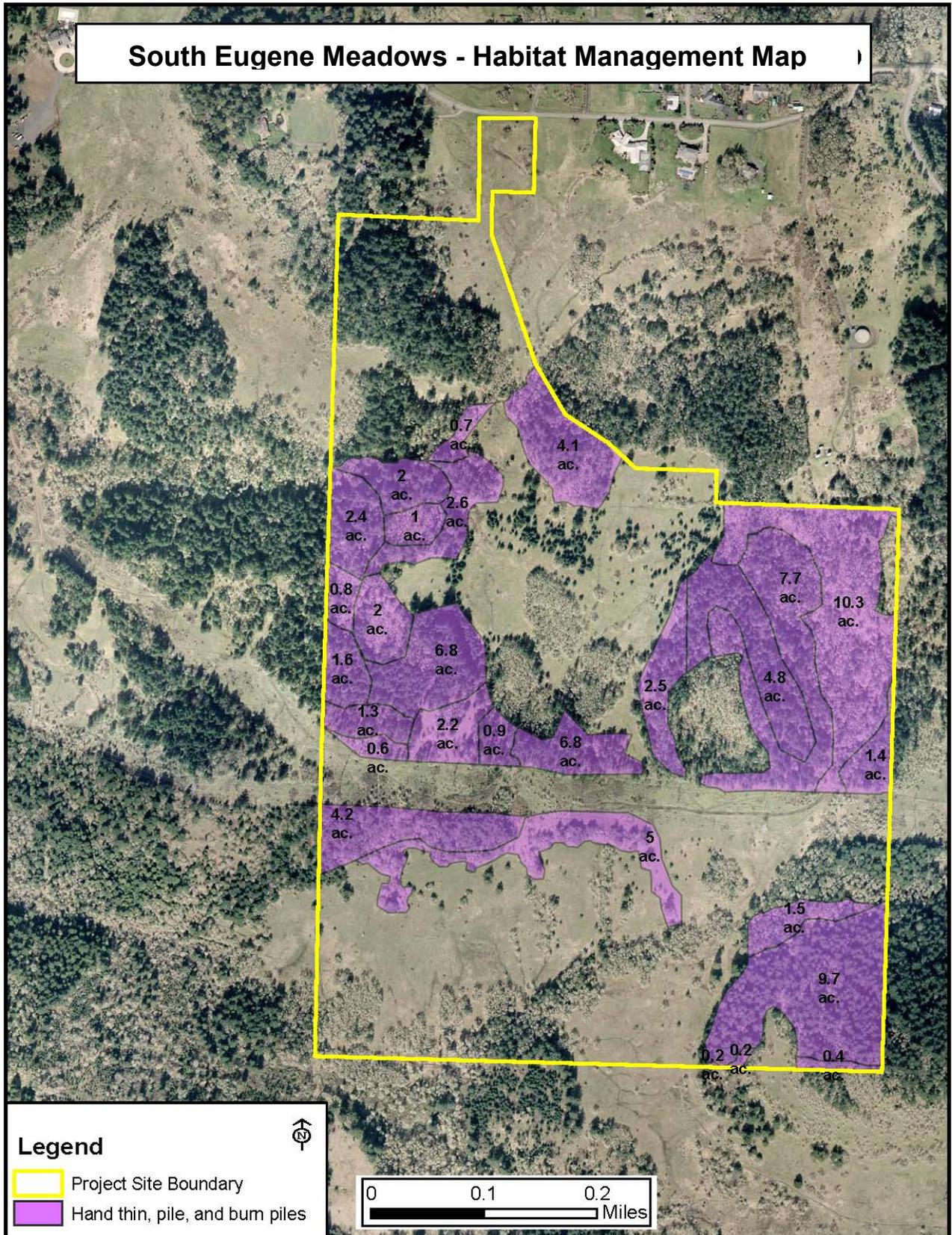
South Eugene Meadows - Vegetation Cover



Legend

- Project Site Boundary
- Upland prairie
- Wet prairie
- Savanna
- Shrubland
- Oak woodland
- Mixed oak/fir woodland
- Mixed oak/fir forest
- Conifer woodland
- Conifer forest
- Mixed riparian woodland/forest
- Power line right-of-way





Suzanne Arlie Park

Site Size 513.9 acres

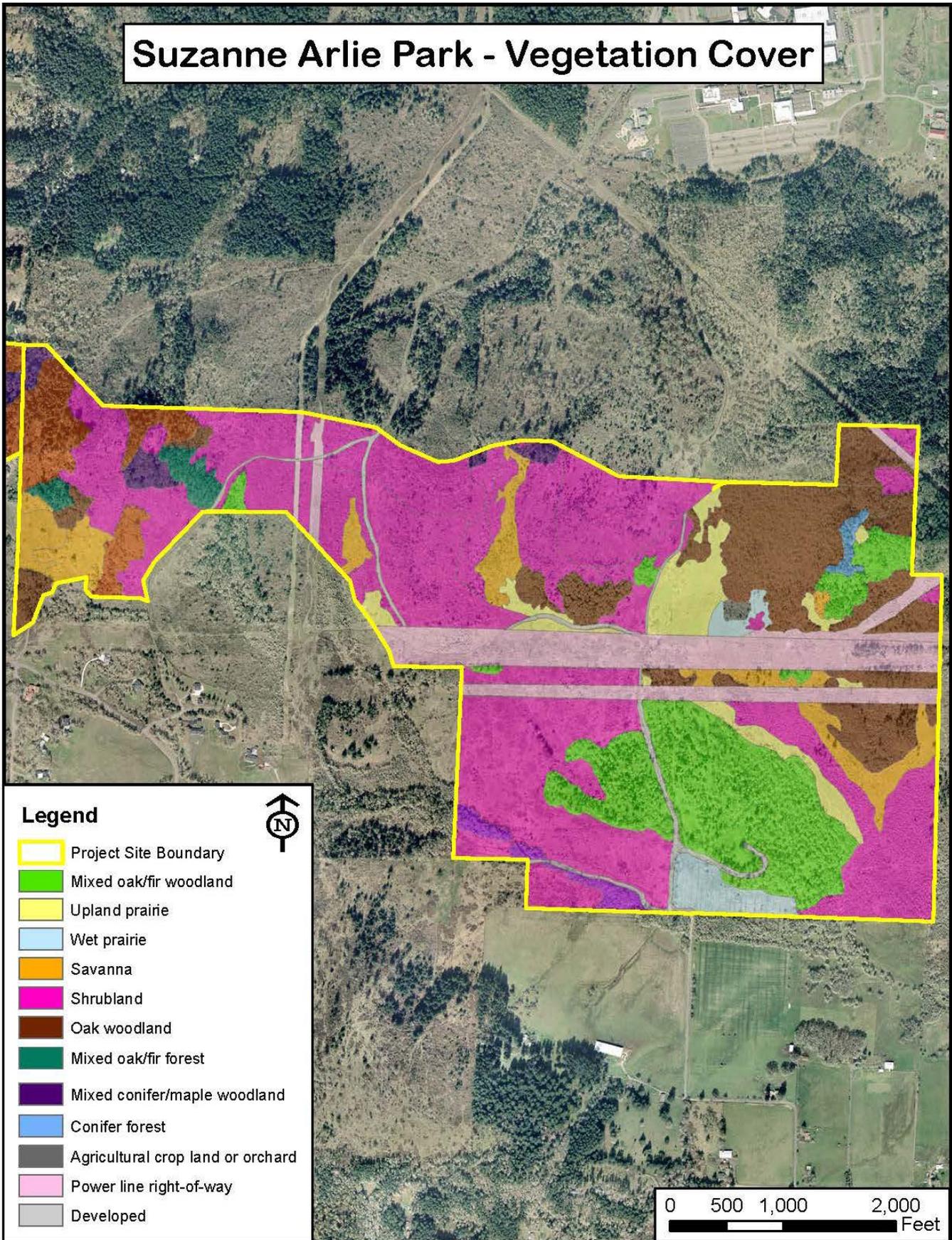
Site Location Township 18W, Range 3S, Sections 15, 16, 21, 22, and 23

Vegetation Cover Types			Vegetation Maintenance Treatment		
<i>Classification</i>	<i>Acres</i>	<i># units</i>	<i>Type</i>	<i>Acres</i>	<i># units</i>
Agricultural crop land or orchard	0.8	1	Mastication	24.4	6
Conifer forest	1.9	1	Mow	66.3	5
Developed	8.4	8	Mechanical thin and forward trees and shrubs	7.9	4
Maple woodland	5.2	3	Hand thin trees and shrubs, pile, burn	3.6	2
Mixed conifer/maple forest	19.2	4	Masticate shrubs, hand fell trees, forward, pile, and burn	5.41	2
Mixed conifer/maple woodland	6.2	4	Masticate shrubs, mechanical thin and forward, localized hand thin, pile burn	180.3	19
Mixed oak/fir forest	5.5	2			
Mixed oak/fir woodland	69.3	7			
Oak woodland	69.1	19			
Power line right-of-way	56.1	9			
Savanna	29.5	8			
Shrubland	210.7	28			
Upland prairie	21.8	10			
Wet prairie	10.2	2			
	513.9	106		287.9	38

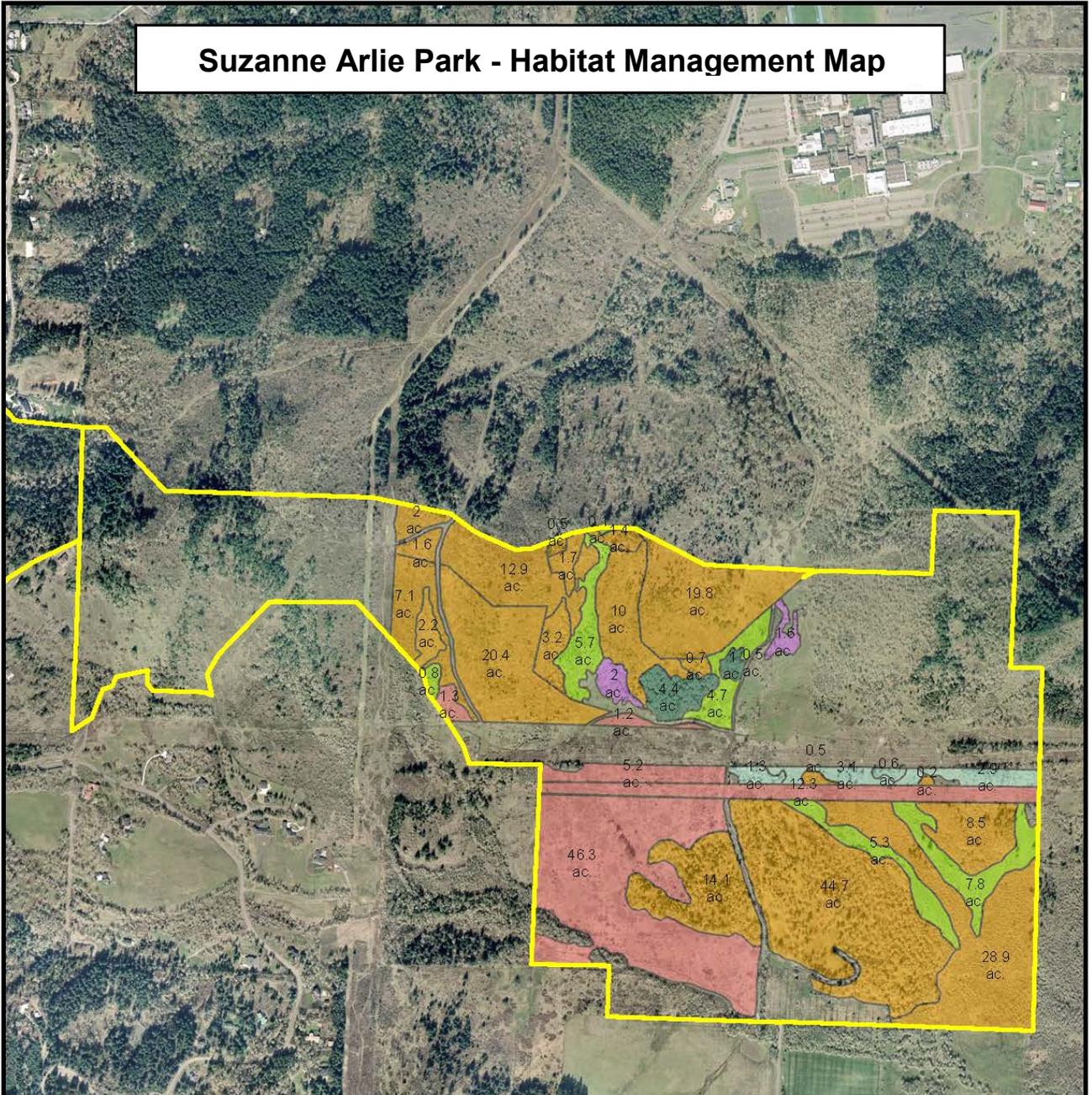
Site Description and Habitat Management Goals

Location	
<u>Project Area:</u>	Southeastern corner of City-owned properties in the Ridgeline landform.
<u>Roads/Access:</u>	Gonyea Road from the north and Schlaren Road from the south. Gravel Bonneville Power Administration access road present within the site.
<u>Bordering Properties:</u>	Lane Community College campus and forest to north and east, rural-residential development, timberland/undeveloped area to south and west. Future planned housing development will abut the site to the north.
Site Conditions	
<u>Topography:</u>	Moderately sloping to the south, with hills rising to the north.
<u>Dominant Vegetation Cover and Condition:</u>	Large areas of grassland, woodland, and forest throughout. Large expanses of dense overgrown shrub/tree thickets remaining from logging/lack of management. Thickets are impenetrable. Site is heavily impacted by woody vegetation encroachment
<u>Wildfire Hazards:</u>	Colonization of logged areas by invasive shrubs and trees has created blocks of ladder fuels connecting forested areas of the site. Overstocked conditions also exist in some portions of the site where stands have not been maintained. Fuel loads are high at this site.
Fuels Reduction Goals	
<u>Oak woodland and Mixed oak/fir woodland</u>	Remove encroaching trees that are creating an overstocked/non-oak species stand condition. Remove invasive shrubs and fruit trees when present. Volume of work is sufficient that forestry equipment is required.
<u>Shrublands</u>	Convert to grassland by masticating or cutting/piling and burning.
<u>Upland Prairie</u>	Remove invading shrubs to prevent conversion to shrubland.

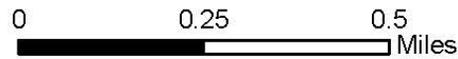
Suzanne Arlie Park - Vegetation Cover



Suzanne Arlie Park - Habitat Management Map



Legend



- Project Site Boundary
- Masticate
- Mow
- Hand thin, pile, and burn piles
- Mechanical thin, localized hand thin, and forward trees and shrubs
- Masticate shrubs, hand fell trees, forward, pile, and burn
- Masticate shrubs, mechanical thin and forward, localized hand thin, pile burn

