

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

U.S. Department of the Interior  
Bureau of Land Management (BLM)  
Eugene District, Oregon

### Prairie Road Thin DOI-BLM-OR-E050-2009-0004-DNA

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#### A. Description of the Proposed Action

The proposed action is to implement the Prairie Road Thin by commercially thinning approximately 150 acres within the North Lake Creek planning area. The proposed action, including silvicultural prescriptions, logging systems, Riparian Reserve treatments, road decommissioning prescriptions, and wildlife and botany mitigation measures is described in the attached "Project Implementation Prescription."

Land Use Allocations (LUAs). Under the 1995 RMP the project area was in the Matrix and Riparian Reserve LUA. Under the 2008 RMP the project area lies in the Late Successional Management Area (LSMA) and Riparian Management Area (RMA) LUAs.

**Location:** T15S, R7W, Sections 15, 16 and 21

#### B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

This decision is in conformance with the Eugene District 2008 Record of Decision and Resource Management Plan (2008 ROD/RMP).

Revision of a resource management plan necessarily involves a transition from the application of the old resource management plan to the application of the new resource management plan. A transition from the old resource management plan to the new resource management plan avoids disruption of the management of BLM administered lands and allows the BLM to utilize work already begun on the planning and analysis of projects.

The 2008 ROD allowed for such projects to be implemented consistent with the management direction of either the 1995 resource management plan (1995 RMP) or the 2008 ROD/RMP at the discretion of the decision maker.

This project meets the requirements designated in the 2008 ROD for such transition projects:

1. This decision was not signed prior to the effective date of the 2008 ROD.
2. Preparation of National Environmental Policy Act documentation began prior to the effective date of the 2008 ROD. The effective date of the 2008 RMP is December 30th 2008. The Prairie Road project was included in the June 2008 issue of the Eugene District Planning newsletter – "Eye to the Future"
3. A decision on the project will be signed within two years of the effective date of the 2008 ROD.
4. Regeneration harvest would not occur in a late-successional management area or deferred timber management area.
5. There would be no destruction or adverse modification of critical habitat designated for species listed as endangered or threatened under the Endangered Species Act.

Since the planning and design for this project was initiated prior to the 2008 ROD, it contains certain project design features that are not consistent with the management direction contained in the 2008 RMP.

The design features for this project that are consistent with the 1995 RMP but not consistent with the 2008 RMP include:

1. Streams 6 and 14 have a no treatment buffer of 50 feet (slope distance) on each side of the stream. All other streams in the project area have a no treatment buffer of 75 feet (slope distance) on each side of the stream. Streams 6 and 14 are small first order streams, their inception area mostly lie within the project area. The 50 foot no treatment buffers have been determined to preserve the primary shade zone for these streams. Thinning in the secondary shade zone will maintain at least 50% canopy closure.

The 2008 RMP mandates 60 foot no harvest buffers on perennial and intermittent fish bearing streams and perennial non-fish bearing streams and 35 foot no harvest buffers on intermittent streams.

2. Coarse woody debris (CWD) and snags. There will be no coarse wood or snags created in the project area. All down coarse woody debris of advanced decay will be retained.

The 2008 RMP recommends the retention of CWD and snags in Late Successional Management Area (LSMA) land use allocations (LUAs) when existing levels of snags and coarse wood debris do not meet the levels defined in the management direction provided in the 2008 RMP, Chapter 2 page 29, tables 2-2 and 2-3.

The 2008 ROD anticipated these inconsistencies and projected they would not alter the analysis of effects in the final environmental impact statement. Although the analysis of environmental effects for this project was initiated and completed under the 1995 RMP and associated EIS, the Determination of NEPA Adequacy (DOI-BLM-OR-E050-2009-0004-DNA) for this project verified that implementation of the noted design features would not result in effects outside the scope of the analysis of effects in the 2008 EIS.

**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.

- Eugene District 2008 ROD/RMP
- Eugene District Proposed RMP/Environmental Impact Statement 1995.
- EA OR090-04-07, North Lake Creek Thinning Project; June, 2005.
- Lake Creek Watershed Analysis
- Prairie Road project analysis file

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).

- Biological Assessment of the North Lake Creek Thinning Project, January 25, 2005, Eugene District, Siuslaw Resource Area.
- Biological Opinion – US Fish and Wildlife Service, March 17, 2005, amended September 15, 2008.

**D. NEPA Adequacy Criteria**

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

Yes. The North Lake Creek EA considered commercial thinning on 5,500 acres of Matrix and Riparian Reserve LUAs. The Proposed Action is included in that analysis area (see Map 5 in the EA).

**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?**

Yes. The EA analyzed an appropriate range of alternatives given the purpose and need for the project. Five alternatives were analyzed: (1) Alternative A, No Action; (2) Alternative B, designed to contribute to the Eugene District's Allowable Sale Quantity (ASQ) as well as provide for forest health and productivity; (3) Alternative C, designed to contribute to ASQ, but included additional objectives to protect and enhance northern spotted owl habitat and mushroom productivity; (4) Alternative D, designed to contribute to ASQ, but included objectives to emphasize stand structure development in a portion of the Riparian Reserves and minimize short-term impacts to aquatic habitat; and (5) Alternative E, which would contribute to ASQ, but also enhance aquatic habitat complexity. See EA, pp. 5-11. The selected alternative is Alternative E as described in the North Lake Creek Thinning Project EA, modified to include the heavy thinning in 20% of the Riparian Reserves as described under Alternative D. Prairie Road Thin includes 150 acres of moderate thinning as described in Alternative E. No new environmental concerns, interests, resource values, or circumstances have been revealed since the EA was published in 2004 that would indicate a need for additional alternatives.

**3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances.**

Yes. No new information or circumstances have arisen since the EA was published in 2004 that could affect the adequacy of the analysis. The effects analysis regarding road-related sediment was extensive

and appropriate for the type of landscape comprising the Prairie Road Thin timber sale, in that the type and amount of road construction and renovation needed to implement the Prairie Road Thin project is consistent with what was anticipated in the EA (pp. 5, 8, 9-11). Effects analysis in the EA regarding dispersal habitat for spotted owls and mushroom production remains adequate. The Prairie Road Thin project is within the Upper Lake Creek and Upper Congdon Creek northern spotted owl home ranges; the EA specified that thinning dispersal habitat would degrade but not remove dispersal habitat (pp. 31-32). This conclusion is consistent with the findings of the Biological Opinion (BO) of the USFWS and the amendment to the BO due to the re-designation of critical habitat. Analysis of mushroom productivity assumed that productivity would be reduced on a nearly 1:1 ratio between the number of trees removed and loss of mushrooms, when averaged over a large area and multiple years (EA, p. 34). The EA estimated that productivity would be reduced overall to 38% within thinned areas (EA, p.36) for the Proposed Action under a moderate thinning regime (EA, p. 8) with a relative density in the mid-30's. The silvicultural prescription for Prairie Road Thin would result in a relative density ranging from 32-36, within the range anticipated in the EA.

**4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?**

Yes. A new recovery plan for the northern spotted owl was released in August of 2008, resulting in portions of the North Lake Creek area being designated as critical habitat. The Prairie Road timber sale is located within the newly designated critical habitat. Formal consultation was reinitiated for the North Lake Creek EA resulting in an amendment to the original Biological Opinion. The Prairie road project is consistent with the US Fish and Wildlife Service's biological opinion and its amendment for the North Lake Creek EA. There are no changes in resource conditions from when the EA was published in 2004. There are no changes in resource-related plans, policies or programs of other government agencies, Indian tribes. There are no changes in statute, case law, or regulation that would affect the implementation of the Prairie road project.

**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?**

Yes. The EA describes impacts to the aquatic ecosystem, northern spotted owl foraging habitat and dispersal habitat, mushroom productivity, noxious weeds, and implementation costs. Impacts from implementing the Prairie Road Thin timber sale would fall within those analyzed in the EA, and were anticipated in the EA. The models used in the EA to predict road-related sediment remain current and appropriate at the landscape scale. The analysis of effects to northern spotted owls is consistent with that contained in the original and amended Biological Opinion from the US Fish and Wildlife Service. No new research has come to light regarding effects of commercial thinning on mushroom productivity. The EA analysis included typical effects that would be expected at the site-specific level, and identified BMPs that would be implemented as needed depending on site-specific conditions. In regards to Special Status Species, two sites of *Tetraplodon mnioides*, a Bureau Sensitive species of dung moss, are located at the end of the 15-7-21.71 road. The substrate of site 1 on which the moss is growing will be relocated to the lower site 2 and located within a reserve area off the landing at the end of the 15-7-21.71 road. One site of *Pseudocyphellaria mallota*, a Bureau Sensitive lichen, is also located at the end of the 15-7-21.71 road within the same reserve area. There are no known wildlife special status species in the project area. There is no indication that implementing the Prairie Road Thin would result in different environmental effects than those anticipated in the EA.

**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)?**

Yes. Cumulative effects considered in the EA included those from past and future timber sales on public and private land, recreation management activities through implementation of the Upper Lake Creek Recreation Area Management Plan (RAMP), and road paving (EA, p. 19). No unanticipated actions or events have occurred in the North Lake Creek planning area that would have additional cumulative effects with the Prairie Road Thin project.

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

Yes. The Prairie Road Thin project area is within the North Lake Creek planning area, which went through extensive public scoping prior to development of the EA. In August, 2003, a scoping letter was mailed to over 300 groups, businesses, local government agencies, and individuals, announcing that BLM was seeking help identifying issues and concerns regarding timber harvest in the North Lake Creek area. An open house was held at the Triangle Grange on September 4, 2003, and BLM staff was available during the Blachly Fair, September 7-8, 2003. In May, 2004, the North Lake Creek EA was released for a 30-day public review and was sent to 12 groups or businesses, 9 state or local government agencies, and 15 individuals. In addition, a notice announcing the availability of the EA was sent to approximately 90 individuals who had received commercial mushroom harvesting permits for this area since October 2003.

Formal consultation as required by Section 7 of the Endangered Species Act was initiated with the US Fish and Wildlife Service (FWS). The FWS issued its biological opinion on March 17, 2005. After a new spotted owl recovery plan was released by the USFW in August of 2008 formal consultation was reinitiated with the services and an amendment to the original Biological Opinion was issued on September 15, 2008. Because the current proposed action would have no effect on coho salmon and its designated critical habitat, as well as no adverse effect on Essential Fish Habitat, consultation with NOAA Fisheries is not required.

**E. Interdisciplinary Analysis:** Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>
Christopher Finn	Team Lead
Sharmila Premdas	Landscape Planner
Jeff Apel	Engineer
Karin Baitis	Soils Scientist
Dan Crannell	Wildlife Biologist
Janet Zentner	Logging Systems Forester
Doug Goldenberg	Botanist
Peter O'Toole	Planning Forester
Christi Oliver	Recreation
Leo Poole	Fisheries Biologist
Dave Reed	Fuels Specialist
Steve Steiner	Hydrologist

**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.

(see attached implementation prescription)

**REVIEWED BY**

/s/ Sharmila Premdas  
NEPA Coordinator

2/23/09  
Date

**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.

/s/ Dan Howells  
**ACTING** Field Manager  
Siuslaw Resource Area

2/23/09  
Date

**North Lake Creek  
Project Implementation Prescription  
Prairie Road Timber Sale-Tract E-09-551  
T. 15 S., R. 7 W. Secs. 15, 16, 21**

## **SILVICULTURE**

### Stand Types

D3H3=1942, D3=1950, HD3D3=1952, D3=1957, D3=1960, D3=1964

### Matrix Treatment

- Vary the leave tree spacing as needed to generally reserve the larger diameter, more vigorous trees.
- Select conifer leave trees to reserve 135 ft<sup>2</sup> basal area/acre.
- Retention of target basal area will average 85-90 conifer trees/acre, stand RD = 33
- Selected leave trees shall be of good form and relatively free of defect.
- Reserve hardwoods, Pacific yew, and snags. Merchantable hardwoods in the right-of-way shall be removed.

### Riparian Treatment

- Thin Riparian Reserves using the same prescription as the adjacent Matrix.
- Buffer Streams 6 and 14 with a no-treatment buffer of 50 feet (slope distance) on each side of streams.
- Buffer all other streams with a no-treatment buffer of 75 feet (slope distance) on each side.

### Est. Yield

Project total: 150 acres x 20 MBF/ac = 3.0MMBF

Matrix: 110 acres = 2.2 MMBF

Riparian Reserves: 40 acres = 0.8 MMBF

## **LOGGING SYSTEMS**

### General Design Features:

- Retain non-merchantable tree tops and limbs where the source tree is felled, if operationally feasible.
- Retain reserved hardwoods, Pacific yew, and snags felled for safety reasons (consistent with Oregon safety practices) as down wood where the source tree is felled, if operationally feasible.
- Restrict log lengths to 40 feet plus trim.
- Retain all down coarse woody debris of advanced decay (Decay Class 3, 4, or 5) where found, if operationally feasible.
- Do not allow harvest activities during sap flow season (April 15-June 15), unless waived by the Authorized Officer.
- Note: No Superior Plus trees are within the timber sale boundaries.

### Cable Yarding Design Features – approx 110 acres

- Yard to designated or approved landings.
- Space cable corridors 150 feet apart at one end and limit to 12 feet in width (use a cable system capable of 75 foot lateral yarding would be used).
- Require one-end suspension of logs. Use intermediate supports necessary to achieve the required suspension.
- Require full suspension of logs when yarding over streams. Anticipate the need to yard logs over Stream 7 (Identified as Stream 1 in timber sale contract) on map. Leave any cut corridor trees in reserve area.
- Make cable yarding corridors erosion resistant if needed where severe gouging has occurred.
- Require directional felling and yard away from streams.

### Ground Based Yarding Design Features – approx 40 acres

- Allow operations when soil moisture content provides the most resistance to compaction (generally less than 25% - during the dry season, typically, July 1<sup>st</sup> to October 15<sup>th</sup>).
- Limit skid trails to slopes less than 35%.
- Use existing skid trails wherever possible.
- Preplan and designate skid trails to occupy less than 10% of the unit by requiring a minimum of 150-foot spacing between skid trails and limiting width of skid trails to 12 feet.
- Require low ground pressure (<6 psi) ground-based yarding equipment when operating outside

designated primary skid trails. Limit to a single pass and utilize downed slash on the skid trail.

- Require felling of trees to lead to the skid trails and maximize winching distances.
- Skid logs to designated or approved landings.
- Limit gouging on skid trails not to exceed a maximum of one foot in depth.
- Till and waterbar skid trails and landings and place slash and brush on trails. Till immediately after logging operations and prior to onset of fall rains. If tillage cannot be accomplished the same operating season, block trails and leave them in an erosion resistant condition.

## ROAD CONSTRUCTION AND RENOVATION

Construct roads as follows:

- 15-7-16.72 = 360 feet
- 15-7-16.73 = 1,765 feet
- 15-7-16.74 = 715 feet
- Spur A = 150 feet
- Equipment road = 460 feet

These roads will be surfaced with crushed rock to facilitate winter haul, except for the equipment road which the Purchaser shall have the option to rock.

A logger's choice spur may be needed to yard the area surrounding the headwall of Stream 7 (Stream 1 in timber sale contract). The spur is approximately 300 feet and the Purchaser shall have the option to rock it.

Improve BLM roads as follows:

- 15-7-16.71 = 1,200 feet
- 15-7-21.2 = 3,000 feet

Road No. 15-7-21.2 runs through LSR LUA in Section 21. Trees cut in the right-of-way must either remain on site or may be used for stream restoration projects.

Improvement work will consist of brushing, scarifying or grading and/or widening the existing subgrade to a 14 foot width, and adding crushed rock surfacing to facilitate winter haul.

Re-condition (Improve) BLM road as follows:

- 15-7-23 = 1.0 mi.

Re-conditioning work will consist of replacing old culverts and installing new culverts, and adding additional crushed rock surfacing to facilitate continued log haul. Decommissioning is not required.

## ROAD DECOMMISSIONING

Conduct all decommissioning work during the dry season. Decommissioning may include the following work items as indicated in the following table.

- (aa) Till all skid trails and natural surface roads with decompaction equipment, such as a track mounted excavator .
- (bb) Construct drainage dips, waterbars and/or lead-off ditches as needed.
- (cc) Place logging slash, where available, on the entire road prism of tilled, natural-surfaced roads. Place logging slash, where available, on rocked road surfaces for the distance visible from Road No. 15-7-23.
- (dd) Block roads with root wads, logs and slash or earthen barricades at a point where they are not visible from Road No. 15-7-23.

Road Number	Road Rocking	Decommissioning measure(s) to be used			
		(aa) Tilling	(bb) Drainage	(cc) Logging Slash	(dd) Blocking
All skid trails <i>* Those skid trails where access roads are not blocked</i>	Not allowed	X	X	X	
Spur A	If Rocked				
	If Not Rocked	X	X	X	
15-7-21.2	If Rocked			X (por.)	X
	If Not Rocked	X	X	X	
15-7-16.71	If Rocked				

	If Not Rocked	X	X	X	
15-7-16.72	If Rocked			X (por.)	X
	If Not Rocked	X	X	X	
15-7-16.73	If Rocked			X (por.)	X
	If Not Rocked	X	X	X	
15-7-16.74	If Rocked			X (por.)	X
	If Not Rocked	X	X	X	
Equipment road	If Rocked				
	If Not Rocked	X	X	X	

## WILDLIFE

### Threatened and Endangered Species

#### ***Northern spotted owls:***

- 65 yards of all unsurveyed habitat or habitat occupied by a resident male:
  - Require a seasonal restriction from March 1 – July 7, designated on the project map as “Special Operating Area”.
- 1.5 miles from nesting pair:
  - No restrictions are required. In 2007, the Upper Lake Creek owl pair produced one young, and in 2008 the owl pair were documented, but not confirmed. The final 2008 status was single male resident.

***Marbled murrelets:*** No restrictions are required.

***Bald eagles:*** No restrictions are required.

### Special Status Species

No Special Status Species or unique habitats were located during surveys.

### Survey and Manage Species

There are no vertebrate or invertebrate species in the project area for which S&M species surveys are required.

## BOTANY

### Threatened and Endangered Species

No federally listed Threatened or Endangered plant species were located during surveys.

### Special Status Species

***Vascular Plants:*** *Poa laxiflora*, a Bureau Tracking species, was located during surveys. No mitigation measures are required.

***Lichens and Bryophytes:*** Two sites of *Tetraplodon mnioides* (*Dung moss*), and one site *Pseudocyphellaria mallota* (*lichen*), both Bureau Sensitive species, were located within the harvest area during surveys.

- Provide mitigation measures for *Tetraplodon mnioides* and *Pseudocyphellaria mallota* by reserving the area at the landing at the end of Road No. 15-7-16.71 (shown as “Vegetation Study Area” on map). This area has been marked on the ground with metal fence posts and signs. One of the sites of *Tetraplodon mnioides* (southern site as described in Botany report) will be moved by the Resource Area botanist before operations begin to the second site, located in the reserved area. The *Pseudocyphellaria mallota* site is located in this reserved area.

### Survey and Manage Species

Surveys and Manage does not apply to this project area.

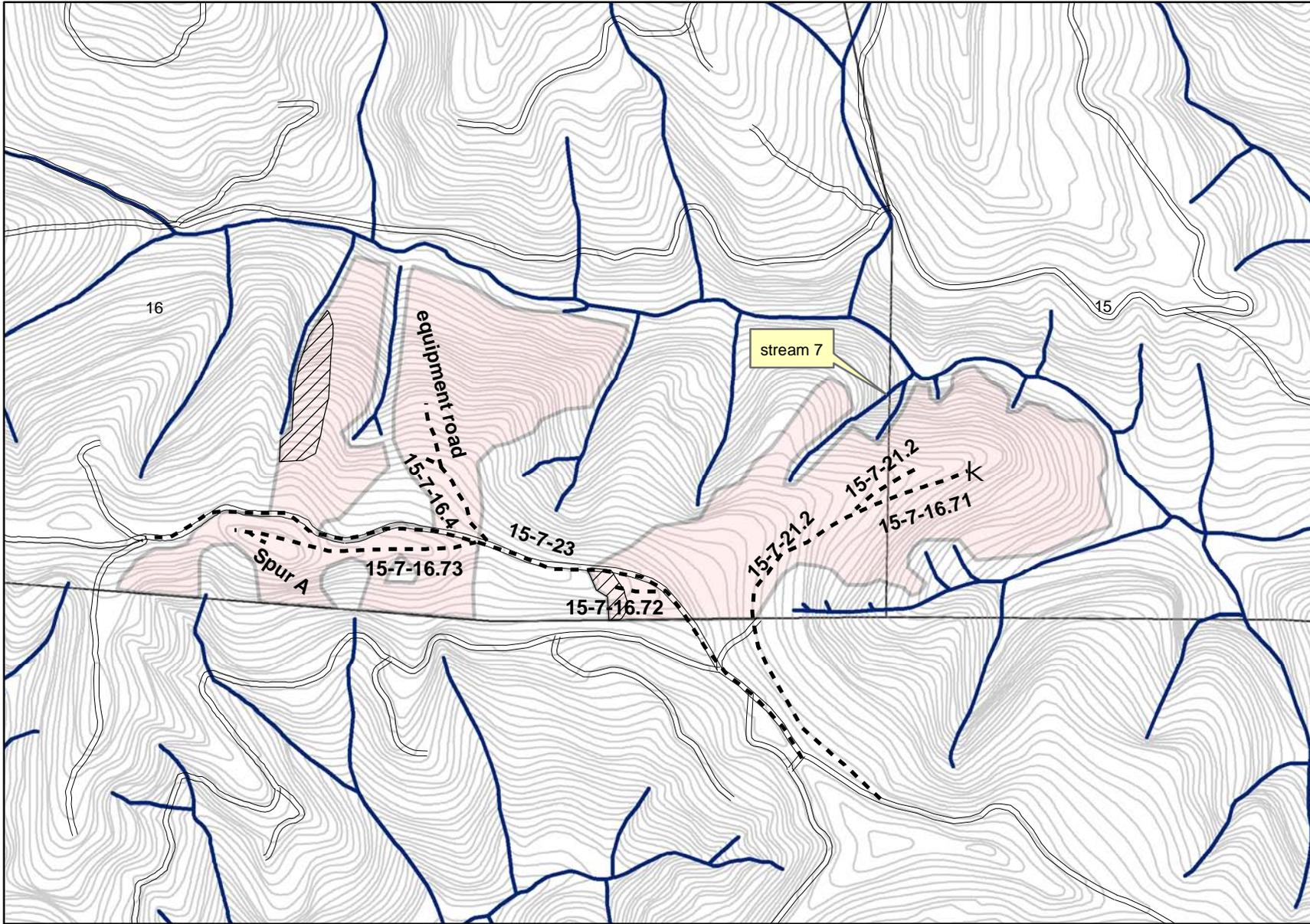
### Noxious Weeds and Invasive Non-native species

- Clean all yarding and road construction equipment prior to arrival on BLM-managed lands to lessen the spread of noxious weed seed.
- Seed natural-surfaced decommissioned roads with native grasses if seed is available.

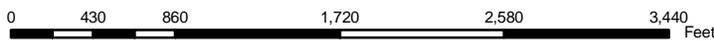
## FUELS

- Scatter roadside and landing piles across roads to be closed after harvest. Scatter slash in a manner that does not create a deep continuous fuel bed.
- Cover and burn any piles not scattered across closed roads.
- Pile, cover, and burn logging debris within 25 feet of Road No. 15-7-23. An excavator may be used.
- Burn piles in the late fall when favorable smoke dispersion conditions are common.

UNITED STATE  
 DEPARTMENT OF THE INTERIOR  
 BUREAU OF LAND MANAGEMEN  
 ROJECT AREA MAP: Prairie Road  
 T15S, R7W, Sec 15, 16, 21, WILL MER., EUGENE DISTRICT



- Legend**
- public roads
  - - - renovated/improved roads
  - partial harvest area
  - streams
  - K Vegetation Study Area
  - ▨ Special Operating Area



1:12,000

LUA: Matrix  
 Acres: 150  
 Volume: 3000 mbf