

Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

OFFICE: Klamath Falls Resource Area, Lakeview District

TRACKING NUMBER: DOI-BLM-OR-L040-2012-008-DNA

CASEFILE/PROJECT NUMBER: NA

PROPOSED ACTION TITLE/TYPE: Bly Mountain Juniper Hauling

LOCATION/LEGAL DESCRIPTION: Klamath Falls Resource Area (KFRA) BLM, Klamath County, OR

A. Description of the Proposed Action and any applicable mitigation measures

The proposed action consists of full suspension yarding of 240 acres of western juniper (map attached). This unit was originally proposed for burning. It was not initially analyzed for yarding due to distance constraints of 1300 feet from a road or landing at the time EA was written. With new and improved equipment, these acres can now be forwarded for utilization. Forwarding the juniper would eliminate burning of these piles and decrease potential negative air quality impacts on sensitive areas such as Bonanza, Bly Mountain residents and HWY 140, and other portions of the Klamath Basin.

B. Land Use Plan (LUP) and Related Program Planning and Decision Conformance

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

The Klamath Falls Resource Area initiated planning and design for this project to conform and be consistent with the 1995 RMP. That RMP was revised in December 2008, but the Secretary of Interior withdrew the Records of Decision in July 2009. Following the March 31, 2011 decision by the United States District Court for the District of Columbia in Douglas Timber Operators et al. v. Salazar, which vacated and remanded the administrative withdrawal of the 2008 ROD and RMP, we evaluated this project for consistency with both the 1995 RMP and the 2008 ROD and RMP. Based upon this review, the selected alternative contains some design features not mentioned specifically in the 2008 ROD and RMP. The 2008 ROD and RMP did not preclude use of these design features, and the use of these design features is clearly consistent with the goals and objectives in the 2008 ROD and RMP and meets the purpose and need of the EA. Accordingly, this project is consistent with the 1995 Klamath Falls Resource Area RMP and the 2008 Klamath Falls ROD/RMP.

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

Bly Mountain Fuels Reduction and Range Improvement Project Environmental Assessment (EA)
OR-014-08-08

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an action or 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 original analysis included a combination of yarding and burning of material within this project area. The 240 acres proposed for full suspension yarding in this DNA is in the same analysis area, and geographic and resource conditions are identical as the ground that is to be forwarded for utilization within the initial 1,300 feet identified in the original EA. The new proposed action is similar to the actions analyzed in the Bly Mountain Fuels Reduction and Range Improvement Project EA. The 240 acres included in this DNA were identified in the EA to be burned rather than forwarded for utilization due to yarding distance efficiency constraints applicable at the time EA was prepared. This area is further than 1,300 feet from a road or landing, which was thought too great of a distance for yarding. Now, new equipment is available (large dump trucks for forwarding material), which reduces impacts to the soil and vegetation compared to one-end suspension skidding. It is now economically and operationally feasible to fully suspend and forward material further than 1,300 feet from a road or landing.

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 in the existing NEPA document was analyzed and there have been no significant changes in the environmental concerns, interests or resource values.

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?

A review was conducted to determine if any new information, studies, and/or analyses has been collected or completed since 2008 that would differ from that collected and completed during the EA process. The existing analysis and conclusions were determined to be adequate. The new treatment options that are now available (fully suspended yarding using large dumptrucks) do not change the analysis that was done in the EA or effect the proposed action.

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 effects of the proposed action in this DNA do not change the effects analyzed in the EA. The direct, indirect and cumulative effects of the action proposed in this DNA are similar to those analyzed in the existing NEPA document. After reviewing the site and soil conditions, it was determined that the proposed action would meet the NEPA Adequacy Criteria for the soil resources. The dump truck technology is very similar to the methodology analyzed in the Bly Mtn EA. Furthermore, resource conditions and locations are unchanged. The range of alternatives was appropriate with respect to the soil resource. With properly implemented BMPs, the effects resulting from implementation of this action would be similar to those analyzed in the Bly Mtn EA, and RMP objectives for soil resource protection would be met under implementation of the current proposed action. To assure that resource impacts are similar to those described in the EA, skid roads, riparian crossings and landings will be pre identified on the ground prior to implementation to avoid sensitive areas.

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

The actions proposed in this DNA are similar to those identified in the existing NEPA. That EA included extensive public involvement that included a mailing of over 800 copies of a letter soliciting issues for the planning team to consider and a public meeting held at the Bonanza High school to discuss the proposed project. In addition 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.

E. Persons/Agencies Consulted

NA

F. Interdisciplinary Team*

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Dave Cantrell	Fuels Specialist	Fire/Fuels
Johanna Fickenscher	Botanist	Noxious Weeds & Rare Plants
Matt Broyles	Wildlife Biologist	Wildlife
Cindy Foster	Soil Scientist	Soils
Brooke Brown	Archeologist	Archeology
Don Hoffheins	Supervisory Planner	Planning and Environmental Coordination

* Note: For a complete list of the team members participating in the preparation the original environmental analysis or planning documents refer to that specific EA.

Conclusion

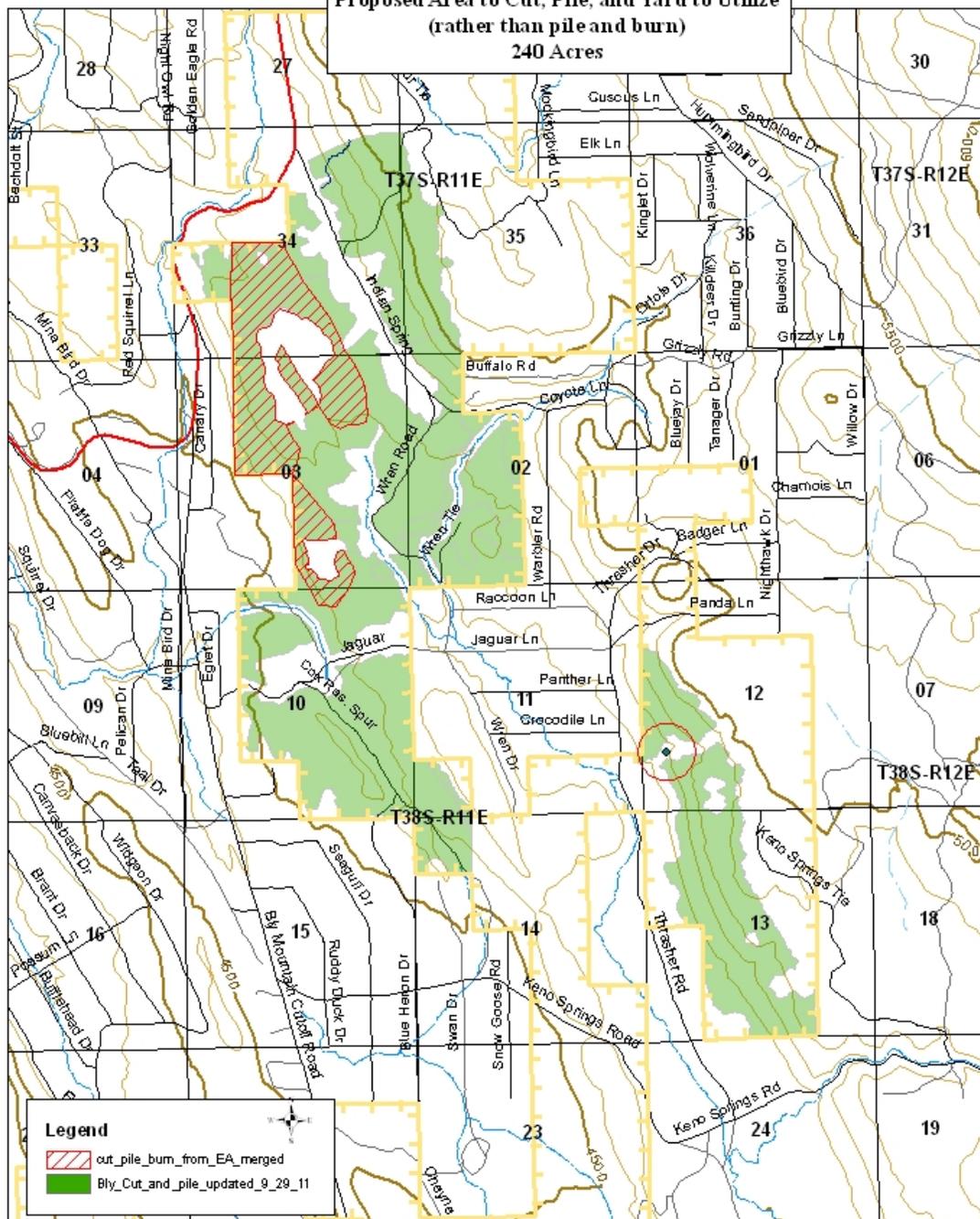
Based on the review documented above, I determine that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and it constitutes BLM's compliance with the requirements of the NEPA.

Donald J. Holmstrom
Donald J. Holmstrom, Manager

3/15/12
Date

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.

**Bly Mountain
Wildland Urban Interface
Fuels Reduction Project
Proposed Area to Cut, Pile, and Yard to Utilize
(rather than pile and burn)
240 Acres**



MXD: P:\akkk\Bly_Mtn_WUI_Phase II\Yard_pileos_burn_piles.mxd

0 0.375 0.75 1.5 Miles