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-L040-2012-019-DNA

CASEFILE/PROJECT NUMBER: NA

PROPOSED ACTION TITLE/TYPE: Spencer Creek Silviculture Treatments

LOCATION/LEGAL DESCRIPTION: Klamath Falls Resource Area BLM, Klamath County, OR
T.38S, R5E, Sec. 26; T.38S, R6E, Sec.33

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

The proposed action is to change the treatment method of the Unit 26-1 from mechanical thinning to manual thinning, and to change the treatment method of the Unit 33-1 from manual to mechanical thinning. These changes are a result of recent field observations of slope and terrain.

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:

- Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary (KFRA ROD/RMP/RPS), approved June 1995

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

Spencer Creek Forest Health Treatments Environmental Assessment (EA) # OR-014-08-09

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?

Documentation of answer and explanation:
The units proposed for treatment are to the same as treatments analyzed under the same EA, alternative and analysis area. The treatments were originally planned for units 26-1 and 33-1 as mechanical and manual, respectively. After reviewing the units with the contractor it was determined that the slope of the units require that we alter the planned treatment. Treatments in similar/adjacent units were analyzed in the EA. In the case of unit 33-1 the unit immediately adjacent was planned for mechanical treatment. In the case of unit 26-1, there were a number of units similar to this one analyzed for manual treatment.

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?

Documentation of answer and explanation:
The range of alternatives in the existing NEPA document was analyzed and there have been no 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?

Documentation of answer and explanation:
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 do not change the analysis that was done in the EA.

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?

Documentation of answer and explanation:
The direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar to those described in the EA. There are two resources for discussion regarding the implementation of this proposed action:

Spotted Owls Disruption and Disturbance
A **disruption distance** is the distance within which the effects to listed species from noise, or mechanical movement associated with an action would be expected to exceed the level of discountable or insignificant, or might cause the incidental "take" of a listed animal. Thus, within the disruption distance, actions would be expected to adversely affect listed species. The disruption threshold is the distance within which activities occurring during the critical breeding period could drastically disrupt the normal behavior pattern of individual animals or breeding pairs and could create a likelihood of injury (USDI FWS 2006

A **disturbance distance** is the distance within which the effects to listed species from noise, human intrusion, and mechanical movement associated with an action would be expected to be discountable or insignificant and incidental "take" would not be expected. Effects are expected to be "insignificant" or "discountable" beyond the disruption distance and up to the disturbance distance. Thus, between the disruption distance threshold and disturbance distance threshold, effects would be expected to not adversely affect listed species. To correctly apply the standards of this assessment to individual animals or breeding pairs, the unit wildlife biologist may increase or decrease these disturbance distances according to the best available scientific information and site-specific conditions. Beyond the disturbance distance threshold, no effects to listed species are expected (USDI FWS 2006).

During the nesting season, seasonal restrictions, also known as a limited operating period (LOP) will be implemented within a ¼-mile of the nest site from March 1st – September 30th (RMP). The RMP states, "fall no tree within ¼ mile of all active spotted owl nests" (RMP, p. 38). Therefore no disturbance to spotted owls would occur from tree falling. For other activities associated with the proposed action (chainsaw use, heavy equipment), operations will adhere to the distances in Table 13 within the same LOP. There are four known spotted owl territories within the project area. The LOP will apply to all four territories. Therefore the human activities that occur from the proposed actions would be considered discountable or insignificant during the

critical nesting period for spotted owls. Outside of the nesting season, disturbance would still occur on individual adult owls but it is reasonable to assume they can move away from the area and avoid injury.

These units are both outside of a ¼ mile from any active owl's nests, therefore no additional impacts from mechanical operations are expected.

Soils
The EA states that: Roads, skid trails, and landings have the greatest impact on soils because of their long-lasting effects of compaction, rutting, displacement, erosion, and subsequent loss of soil productivity.

Under the Proposed Action and Alternative 1, soils in the project area may sustain increased compaction, rutting, and displacement of surface layers. Although detrimental conditions exceeding the standards specified in the KFRA RMP/ROD have not been documented, all of the soils in the project area have characteristics that favor the formation of a compacted layer and exhibit a severe rutting hazard. Displacement, or loss of topsoil, can also result from harvesting disturbance and mechanical site preparation. It occurs most frequently and is most pronounced when harvest equipment makes small radius turns on bare ground. If BMPs (Appendix B) are effectively implemented, it is anticipated that detrimental conditions will not exceed the standards of the RMP.

A slight increase in erosion, above natural soil-building processes, may initially occur on skid trails. Here again, the potential for surface runoff and erosion within the project area can be minimized by following practices and mitigation measures specified in the RMP. Treatment units where additional design features may be necessary include the Woodcock-Pokegema soil types, 204E and 205E. These soils, present in small isolated areas of Sections 28, 29, 33, and 34, have a "severe" erosion hazard rating (see map in project record). Although they are considered highly erodible, the effective implementation of BMPs and PDFs associated with prior treatments has resulted in less than 5 percent erosion throughout the units (Cindy Foster, personal observation, 5/24/10). It is anticipated that erosion resulting from the currently proposed treatments would again be minimal, if adequate vegetative cover and woody material is retained following site disturbance.

The following mitigation measures are recommended to limit the cumulative effects of detrimental soil conditions on highly erosive soils. For reference, a map of the highly erosive soils is included in the project record.

Limit ground-based activity (timber harvest and mechanical thinning) on highly erosive soils to one or more of the following:

- single pass timber removal
- logging over snow (greater than 20 inches)
- whole tree yarding with one-end or full-tree suspension
- retain 45 to 60 percent minimum effective ground cover, including all living or dead herbaceous or woody materials

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

Documentation of answer and explanation:
Public scoping on both manual and mechanical projects in this analysis area was done on 4/21/08.

E. Persons/Agencies Consulted

NA

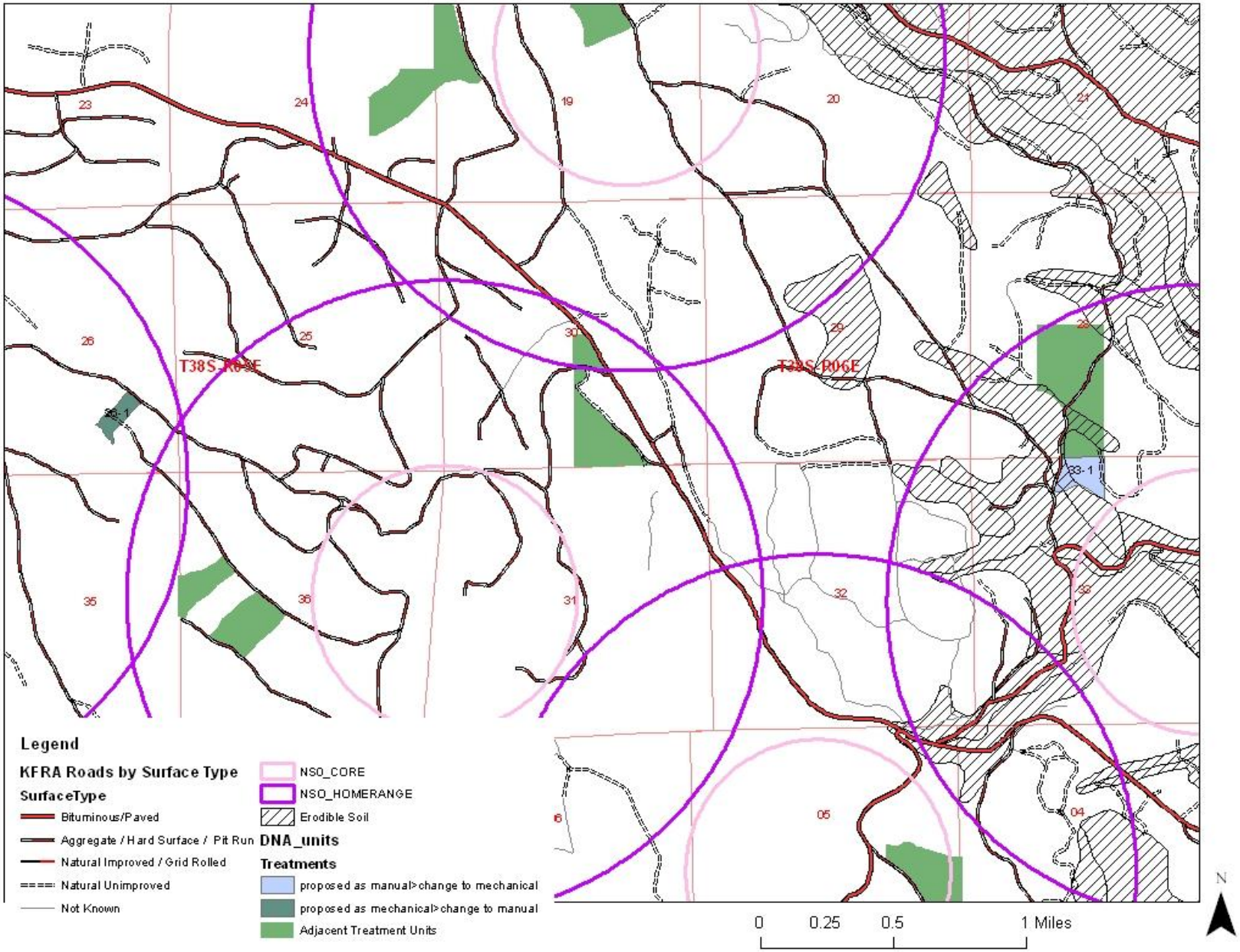
F. Interdisciplinary Team*
Madeline Campbell, Forester
Sarah Diehr, Forester
Matt Broyles, Wildlife Biologist
Cindy Foster, Soils Scientist
Don Hoffheins, NEPA planner

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

/S/ Donald J. Holmstrom	6/4/12
Donald J. Holmstrom, Manager	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.


23
24
19
20
21
26
25
30
29
28
T38S-R05E
T38S-R06E
33-1
35
36
31
32
33
6
05
04
Legend
KFRA Roads by Surface Type
SurfaceType
Bituminous/Paved
Aggregate / Hard Surface / Pit Run
Natural Improved / Grid Rolled
Natural Unimproved
Not Known
NSO_CORE
NSO_HOMERANGE
Erodible Soil
DNA_units
Treatments
proposed as manual>change to mechanical
proposed as mechanical>change to manual
Adjacent Treatment Units
0
0.25
0.5
1 Miles
N