

# Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior  
Bureau of Land Management

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**Office:** Grants Pass Resource Area

**Tracking Number:** DOI-BLM-OR-M070-2014-0013-DNA

**Environmental Assessment:** Medford District Programmatic Aquatic and Riparian Habitat Enhancement EA DOI-BLM-OR-M000-2013-0004-EA

**Proposed Action Title/Type:** Grave Creek Road Culvert Replacement

**Location/Legal Description:** T33S-R4W-Section 11 (BLM Road #34-5-10.0)

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

The BLM proposes to install a bottomless structure 18 feet wide and 55 feet long, to replace a failing existing culvert on BLM road #34-5-10.0. The new structure would accommodate the bankfull width of the stream channel to provide for passage of all aquatic organisms. The existing culvert is deteriorated, rusted and buckling, with sharp remnants of the corrugations protruding above the culvert bottom, large voids eroded out from beneath the pipe, and a collapsing roof which has caused the road fill to wash out into the stream on multiple occasions. This condition now warrants a long term solution to end the chronic sedimentation, and to restore passage for fish and all aquatic organisms.

The existing arch culvert (13 ft wide by 70 ft long by 9 ft high) and associated fill would be removed. Approximately 425 cubic yards of material from the site would be excavated to restore the channel opening at the road crossing to bankfull width, and to install the footings and abutments. Some of the excavation spoils will be used to backfill the footings and abutments. The remaining excavated soil and rock would be hauled to an approved disposal site where it could not enter streams or other water bodies.

The flow in Grave Creek would be redirected through a pipe around the work zone to allow the work to be done under relatively dry conditions. All instream work will be done during the Oregon Department of Fish and Wildlife (ODFW) In-Water Work period unless otherwise authorized with a waiver from ODFW. Approximately 180 cubic yards of Class 4 riprap would be placed to armor the restored banks and protect the footings and abutments from erosion. Riprap would not be placed within the bankfull width of the stream. Riprap would only be placed below bankfull height when necessary for protection of footings. The amount of rip rap would not constrict bankfull flow (ARBO II). Any fish that may be found in the work zone will be captured and released back into the creek by BLM fisheries biologists before excavation begins.

Work is anticipated to begin on or around July 14<sup>th</sup>, 2014. The instream excavation, footing and

abutment preparation, bankfull width restoration, and riprap placement would occur approximately between July 14 and July 21, 2014, at which time the stream flow will be restored to its normal route. Installation will occur within or around the week of August 11, 2014. This project is permitted programmatically through the USACOE Regional General Permit (RGP), the Department of State Lands General Permit (GP) and the Department of Environmental Quality 401 certification associated with the ARBO II.

The BLM proposes to temporarily close the road with a concrete barrier for approximately one month for public safety and to ensure prevention of further resource damage during the upcoming wet season. A sign would be installed stating that off-road vehicle use is prohibited and that the area is closed for safety reasons until repairs are completed. This portion of the road is not used for residential access. A BLM press release would also inform the public of this temporary road closure.

Specific Best Management Practices (BMPs) and Project Design Features (PDFs) identified in the Aquatic and Riparian Habitat Enhancement Environmental Assessment (DOI-BLM-OR-M000-2013-0004-EA) on pages 9 thru 13 have been incorporated into the design of this project where applicable. The BLM will comply with the Clean Water Act to the extent required. Through the use of BMPs, this project will minimize sediment delivery to streams to the maximum extent practicable. Specific features include:

- Exposed soils, created during construction activities along either side of the constructed roadbed, would be mulched with certified weed-free mulch and planted with native seed by Oct. 15<sup>th</sup> to reduce the amount of material that would be prone to erosion.
- All vehicles and equipment would be cleaned prior to entry on to BLM lands in accordance with the PDFs on page 13 of the EA
- Actions would occur during low flow or dry conditions when the probability of soil detachment and transport are low (EA, p.28).
- Work area isolation, dewatering would use all relevant PDFs and BMPs from the EA (pp. 10-11)
- Rock or gravel used in this project must be from a weed-free source/quarry
- When possible parking, or staging of equipment should occur on a hard surface such as asphalt or chipseal. No parking of vehicles or staging of equipment near flagged sites.

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

This project conforms with and is consistent with the Medford District's 1995 RMP.

Watershed restoration is addressed in the Medford District Record of Decision and Resource Management Plan as one of the four components of the Northwest Forest Plan's Aquatic

Conservation Strategy (ACS). The primary objective of the ACS is to restore and maintain the ecological health of watersheds and aquatic ecosystems contained within them on public lands. Proposed actions in the EA are identified in the 1995 RMP as actions necessary to restore the conditions of riparian stands (RMP/ROD, p.22, 27); enhance natural populations of fish (RMP/ROD, pp.49-50); increase instream habitat, channel stability, complexity and passage (RMP/ROD, pp. 23-28); minimize sediment delivery to streams through road drainage improvements, outsloping and closing/stabilizing roads (RMP/ROD, p.28-29); and restore and maintain water quality to protect designated beneficial uses (RMP/ROD, p.41).

**C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the Proposed Action.**

- *Environmental Assessment for Aquatic and Riparian Habitat Enhancement* (DOI-BLM-OR-M000-2013-0004-EA) (March 2014)
- *Aquatic and Riparian Habitat Enhancement Finding of No Significant Impact and Decision Record* (April 16, 2014)
- Grave Creek Watershed Analysis (August 1999)
- *Water Quality Restoration Plan Rogue River Basin Lower Rogue River Sub-basin Grave Creek*, Bureau of Land Management (BLM), Medford District Office (2001).

Pursuant with the Endangered Species Act, BLM consulted on all actions authorized by the decision with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS). All proposed projects would be consistent with actions identified by the NMFS (Fisheries BO 2013/9664) and the USFWS (Wildlife BO #13420-2007-F-0055, LOC #13420-2008-1-0045 and Plant LOC #13420-2008-1-0136) for Programmatic Consultation on Fish Habitat Restoration Activities in Oregon and Washington.

**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 project is very similar to the proposed action, Alternative 2, which lists culvert replacement (EA p. 11) and streambank restoration (EA p.9). The Grave Creek Road Culvert Replacement Project is fully analyzed under the Aquatic and Riparian Habitat Enhancement EA.

**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 Aquatic and Riparian Habitat Enhancement EA (2014) is appropriate because Grants Pass Resource Area is not aware of, and has not received

comments regarding any new environmental concerns or interest since the decision was signed in April 2014.

**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?**

The Grave Creek Road Culvert Replacement Project is consistent with the 2001 Survey and Manage Record of Decision of the Northwest Forest Plan, as incorporated into the Medford District Resource Management Plan.

The analysis in the Aquatic and Riparian Habitat Enhancement EA (2014) is appropriate because Grants Pass Resource Area is not aware of, and has not received comments regarding any new environmental concerns or interest since the decision was signed in April 2014.

**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 proposed project is very similar to the Proposed Action, Alternative 2, (Aquatic and Riparian Habitat Enhancement EA), which lists road and culvert projects (EA pp. 10-11). The Grave Creek Road Culvert Replacement Project is fully analyzed under the Revised Aquatic and Riparian Habitat Enhancement EA.

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

Public involvement and interagency review for the EA were adequate. The EA was available for public comment for 21 days beginning on April 15, 2009. BLM received one comment but determined (Decision Record, p. 6) that their specific concerns were not affected by this project.

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

<b>Name</b>	<b>Title</b>	<b>Resource/Agency Represented</b>
Jon Raybourn	Fisheries Biologist	Fisheries
Jason Reilly	Wildlife Biologist	Wildlife
Merry Haydon	Archaeologist	Cultural
Rachel Showalter	Botanist	Botany/Weeds
Miriam Liberatore	Engineer	Roads
Paul Showalter	Hydrologist	Soils/hydrology/riparian

Note: Refer to the Revised Aquatic and Riparian Habitat Enhancement EA for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

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



7 / 14 / 14

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Allen Bollschweiler  
Area Field 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.