Determination of NEPA Adequacy (DNA)

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

Medford District, Butte Falls Resource Area

EA #OR115-08-02 DNA

A. Location of the Proposed Action:

Matrix lands in
Township 34 South, Range 2 East, sections 13, 23, 24, 26, 35;
Township 34 South, Range 3 East, sections 19, 31;
Township 35 South, Range 2 East, sections 1, 3, 13, 21, 23, 25; and
Township 35 South, Range 3 East, sections 7, 19, 31.

Riparian Reserves in
T33S, R2E, Sections 15, 33;
T34S, R2E, Sections 17;
T35S, R2E, Sections 1, 13, 23, 25, 27; and
T36S, R2E, Section 3.

Northern Spotted Owl Activity Center in
T35S, R2E, Section 35,
Willamette Meridian, Jackson County, Oregon.

Description of the Proposed Action:

The Butte Falls Resource Area proposes to salvage a portion of the trees blown down during winter storms that occurred in January 2008. The project would recover the economic value of some of the blown down trees before fire, natural rot, or insect infestation cause the trees to lose their economic value. Salvage is proposed on lands allocated as matrix, riparian reserve, and late-successional reserve (known northern spotted owl activity center). Proposed salvage activities were analyzed in the *Butte Falls Blowdown Salvage Environmental Assessment* (EA) (July 2008).

On September 3, 2008, the BLM issued a *Finding of No Additional Significant Impact* and decided to implement a portion of the proposed action, as described in the *Decision Record for Butte Falls Blowdown Salvage* dated September 3, 2008. At that time, the Butte Falls Field Manager also deferred the decision to implement salvage activities in a portion of the project area to a later date. On November 12, 2008, the Field Manager signed the *Second Decision Record for Butte Falls Blowdown Salvage* (Second Decision Record) for those deferred activities. The portion of the salvage project authorized by the Butte Falls Field Manager in the Second Decision Record represents approximately 22 percent (1,315 acres) of the 6,100 acres analyzed in the EA.

The original Butte Falls Blowdown Salvage proposal was described in the EA on pages 1 and 2. The projects proposed for implementing the action are described in the EA on pages 13, 14, and 15. The action approved in the Second Decision Record is included in the proposed action recorded on pages 1-3 and specifies the implementation of the Project Design Features listed in the EA on pages 17-22.

Since the release of the *Finding of No Additional Significant Impact* and the first Decision Record for the Butte Falls Blowdown Salvage, a wildfire occurred in the blowdown salvage area. The Doubleday Fire began from a lightning strike on September 17, 2008 and was contained at 1,275 acres on September 21. The Doubleday Fire burned through approximately 140 acres of planned blowdown salvage harvest units. The BLM conducted a Determination of NEPA Adequacy for the 60 acres of burned salvage harvest units implemented by the first Decision Record.

The Doubleday Fire also burned another 80 acres of blowdown salvage units implemented by the Second Decision Record. Four units had portions affected and three units had fire burn through the complete unit. As a result of the fire, the BLM will reduce the amount of blowdown salvage by approximately 80 acres. The BLM removed the burned acres in order to assess the impacts of the fire and determine if future management actions should be considered. The acres removed are located in section 23, Township 35 South, Range 2 East.

B. Land Use Plan Conformance

Land Use Plan (LUP) Name: *Medford District Record of Decision and Resource Management Plan*

Date Approved: June 1995

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

> "Mortality of entire stands or of scattered trees that results from disturbance would be harvested in salvage operations. Only mortality above the level needed to meet snag retention and other habitat goals and provide desired levels of coarse woody debris would be harvested" Medford District Resource Management Plan (page 186).

The Double Down and Look Out B Low Salvage timber sales conform with the *Medford District Record of Decision and Resource Management Plan* as amended by the

- *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage Protection Buffer, and other Mitigation Measures Standards and Guidelines (January 2001),* as modified on March 21, 2004, and
- subsequent *Record of Decision To Remove the Survey and Manage Mitigation Measure Standards and Guidelines from the Bureau of Land Management resource Management Plans within the Range of the Northern Spotted Owl (July 2007)* and the related National Environmental Act (NEPA) analysis for the Annual Species Review in the supporting environmental impact statement.

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

- *Butte Falls Blowdown Salvage Environmental Assessment*, July 25, 2008
- *Finding of No Additional Significant Impact for Butte Falls Blowdown Salvage*, September 3, 2008
- *Decision Record for Butte Falls Blowdown Salvage*, September 3, 2008
- *Second Decision Record for Butte Falls Blowdown Salvage*, November 12, 2008
- Medford Bureau of Land Management (BLM) 2008 Biological Assessment for Blowdown Salvage that May Affect but will not Adversely Affect Spotted Owls and Critical Habitat
- Letter of Concurrence [LOC #8330.I0101(08)] from US Fish and Wildlife Service for "may affect, not likely to adversely affect" northern spotted owl or designated spotted owl critical habitat, July 10, 2008
- Letter of Concurrence [LOC #2008/04499] from National Marine Fisheries Service for projects within the Big Butte Creek 5th field watershed, August 12, 2008
- *Water Quality Restoration Plan for the Big Butte Creek Fifth-field Watershed*, January 2008
- *Double Day Fire Initial Emergency Stabilization Plan*, September 26, 2008
- *Survey and Manage Tracking Sheet: Botany*, October 6, 2008
- *Survey and Manage Tracking Sheet: Wildlife*, October 6, 2008

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?

Yes. The acres of salvage harvest in the new proposed action were included in the analyses for Alternatives 2 and 3 in the *Butte Falls Blowdown Salvage EA* and were also included in the November 12, 2008 *Second Decision Record for Butte Falls Blowdown Salvage*. The EA did not identify any substantial impacts that would result from the original level of salvage harvest. The number of acres included in the Second Decision Record was reduced in this new project proposal. Proposed harvest on 80 acres and road building to access those acres will not be implemented in this new proposed action. Any potential impacts, such as soil compaction from tractor yarding and sediment delivery to streams from road-related actions, associated with the 80 acres of salvage harvest units burned in the Doubleday Fire and subsequently removed in the new proposed action will not occur. The overall impacts identified in the EA will be reduced. In addition, the economic recovery of the blown down timber would not occur from these acres.

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?

Yes. The EA analyzed two action alternatives and a no action alternative. This range of alternatives was appropriate to address the purpose and need for the project. The alternatives are described in the EA in Section 2.4, Description of the Alternatives (EA p. 16). Only unburned BLM lands are included for salvage in the new proposed action and no changes have occurred to those lands since the BLM completed the EA.

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 Doubleday Fire burned a portion of a proposed blowdown salvage project; however, the BLM adjusted the project boundary and removed the acres that burned. As a result, the new proposed action contains fewer acres of salvage. Acres affected by the fire are not included in the new action so the analysis of the impacts from salvage while lessened, would not substantially change.

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?

Yes. The EA provided a thorough analysis of direct, indirect, and cumulative impacts of the salvage harvest on pages 26-141. Potential impacts, such as compacted acres from tractor harvest and sediment delivery to streams from road-related actions from this new proposed action, would be less than the original action analyzed in the EA because fewer acres would be salvaged. During preparation of the EA, the BLM interdisciplinary team furnished an extensive list of project design features to provide resource protection measures during salvage activities (EA p. 17-22). These measures also apply to this proposed action and would provide the same level of protection during implementation of the new proposed action.

The blowdown salvage areas that burned were located on gently sloping ground containing stable soils. Immediately after the fire was contained, rehabilitation actions were implemented to reduce the impacts from the fire suppression activities. Firelines were water barred to prevent erosion, drainage channels in areas with seasonal water flow were restored, and berms created by bull dozers were obliterated. Additionally, the Emergency Stabilization Plan for the Doubleday Fire will address other resource concerns, such as invasive plants and conifer regeneration, which may result from the fire.

The Doubleday Fire changed the baseline conditions on 80 acres of salvage harvest units included in the Second Decision Record. This does not, however, cause a change in the level of effects as identified in the *Butte Falls Blowdown Salvage EA* for the following reasons:

1. Sediment is the only potential resource issue identified.

2. The BLM has decided to remove the 80 acres from the blowdown salvage units that were burned by the Doubleday Fire.
3. The BLM will implement Project Design Features from the Butte Falls Blowdown Salvage EA on the remaining acres. The BLM will also implement stabilization of fire suppression activities (waterbarring firelines, seeding, and mulching) for the area burned in the Doubleday Fire, including the 80 acres removed from salvage harvest units. These actions will minimize movement of sediment off-site.
4. The BLM does not anticipate any detectable change in sediment levels from that analyzed in the EA.

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

Yes. Public involvement for the *Butte Falls Blowdown Salvage EA* included sending letters to individuals, organizations, tribes, and other government agencies seeking input on their concerns with the project. The BLM held a public meeting on June 12, 2008 in the community of Butte Falls. A total of 15 comment letters, public meeting comment forms, and e-mails were received from adjacent land owners, private citizens, timber companies, organizations, and environmental groups concerning the proposed salvage project.

The BLM conducted a field trip with Klamath Siskiyou Wildlands Center on May 7, 2008 to reveal the effects of the windstorm and discuss the BLM project proposal. The BLM met with Southern Oregon Timber Industry Association on May 13, 2008 and Jackson County Natural Resource Advisory Committee on June 17, 2008 to apprise them of the Butte Falls Blowdown Salvage project. On August 14, 2008, the BLM met with Jackson County Commissioners to discuss the Butte Falls Blowdown Salvage proposal on BLM-administered lands. A formal public comment period for the project was held from July 27 to August 26, 2008. The public was notified through a newspaper notice in the *Medford Mail Tribune* and the *Upper Rogue Independent*. Letters and copies of the EA were sent to 29 individuals, organizations, and government entities. Copies of the Scoping Letter, EA, FONSI, and Decision Record for the project were also posted on the BLM website.

Since the new proposed action is essentially the same as the original action analyzed in the EA, we consider the level of public review to be adequate.

E. Persons/Agencies/BLM Staff Consulted

Name	**Title**
Jean Williams	Environmental Specialist
John Bergin	Forest Manager
Doug Stewart	Silviculturist
Ken Van Etten	Soil Scientist
Shawn Simpson	Hydrologist

Note: Please refer to the 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.

John S. Bergin 11/12/2008

John Bergin
Project Lead

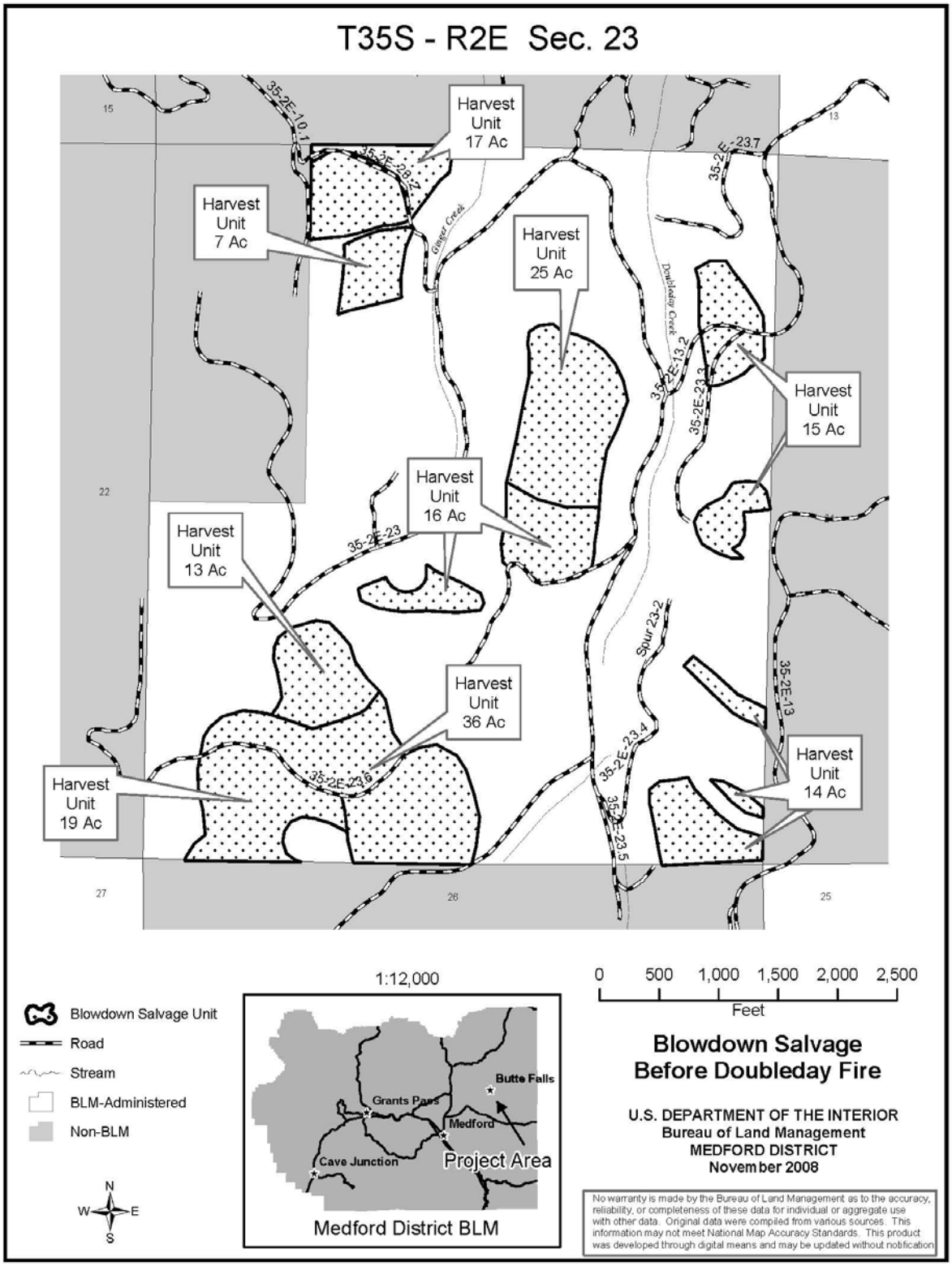
Jean A. Williams 11/12/2008

Jean Williams
NEPA Coordinator

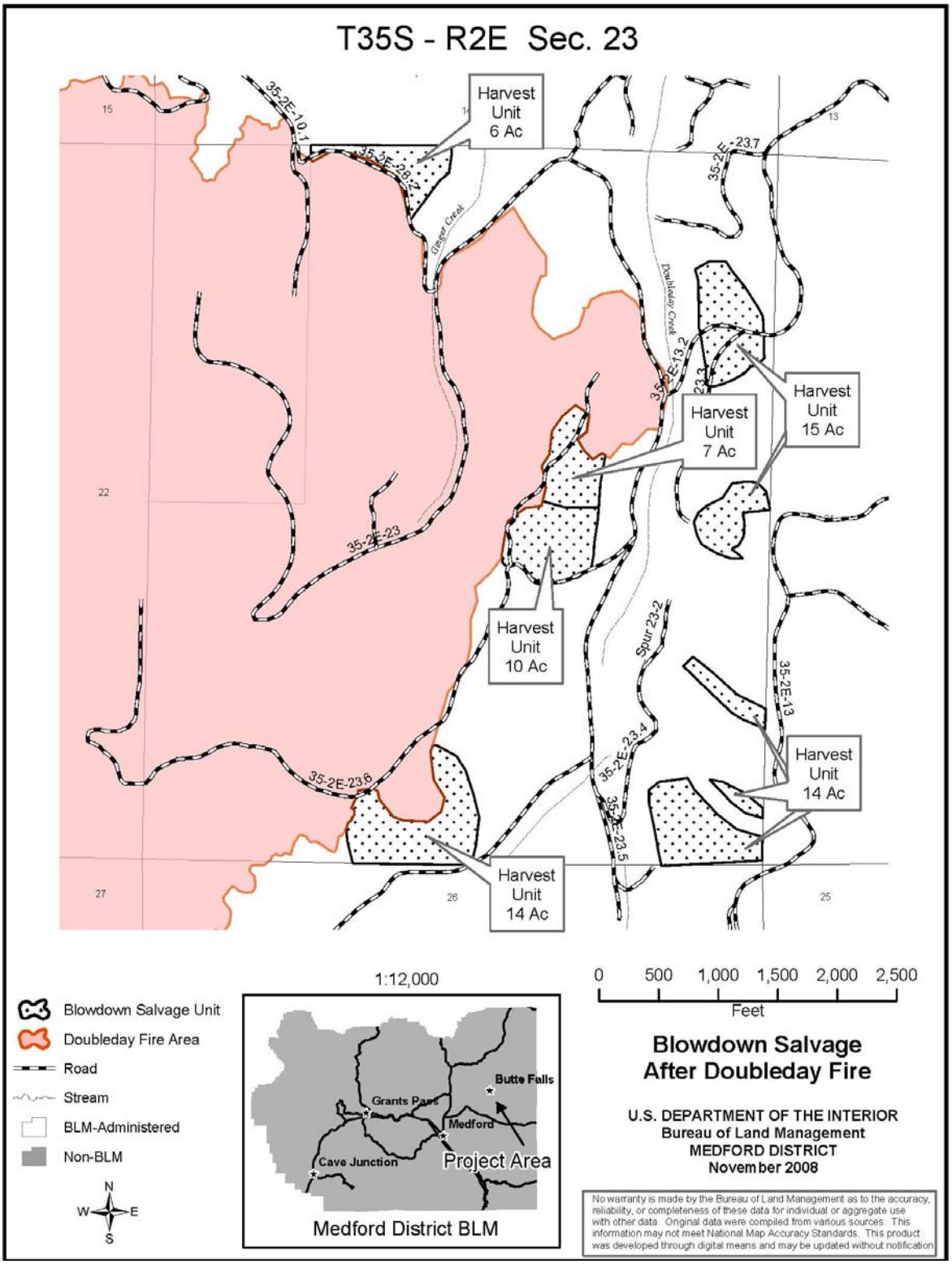
David J. Hughes 11/12/08

David J. Hughes
Acting Butte Falls Field Manager

Date



Map 1. Original timber sale units in Township 35 South, Range 2 East, section 23.



Map 2. Proposed timber sale units in Township 35 South, Range 2 East, section 23.