

**Documentation of Land Use Plan Conformance
and
NEPA Adequacy (DNA)
for
Ashland Resource Area
Star Gulch Large Wood Restoration Project
DOI-BLM-OR-M060-2011-0015-DNA**

A. Describe the Proposed Action:

The Ashland Resource Area of the Medford District Bureau of Land Management (BLM) plans to implement the Star Gulch Large Wood Restoration Project. The project involves felling an estimated 15 roadside snags (snags would be selected from along the 39-4-24 and 39-3-19.3 roads), bucking them into 40' pieces, and transporting and placing the pieces into Star Gulch to increase the amount of large wood in the stream. Additionally, two large trees have been blown down adjacent to the channel. These pieces would be dragged into the channel, with their root wads intact. All work would be conducted from established roads located from 60 to 500 feet from the channel, and would utilize a cable yarder with block and tackle to drag the trees into the wetted channel of Star Gulch. No heavy equipment will leave the road prism. Trees range in size from 18 to greater than 40 inches at DBH, and intact bole lengths, as measured from the root mass, range from 40 to 140 feet in length. Pieces would be placed parallel to stream flow, or incorporated into existing debris jams. Pieces not incorporated into existing jams would be anchored into bank side trees, which are large mature conifers. The proposed restoration project is entirely on BLM lands.

The location of the project is within the Star Gulch subwatershed (HUC# 1710030900203), Upper Applegate River fifth field Watershed, Applegate River subbasin of southwest Oregon, Jackson County. The Public Land Survey System description is: T. 39 S., R. 3 W., in the NW of the NW quarter/quarter of Section 28 and the northern half of Section 29 (see attached map). The BLM intends to start the project during the in-stream work period of 2011, between July and October.

The lower 4 miles of Star Gulch supports populations of coho salmon, steelhead, and cutthroat trout. This reach is designated Coho Critical and Essential Fish habitat for coho, which are listed as "threatened". This project is covered under the Aquatic Restoration Biological Opinion released by the National Marine Fisheries Service 2008, and hence meets section 7 consultation requirements of the Endangered Species Act.

Star Gulch was analyzed in the Applegate River/Mckee Bridge Watershed Analysis, as required by the Northwest Forest Plan as part of the Aquatic Conservation Strategy (ACS). The ACS objectives address restoration activities to enhance watershed function. This project is the type of restoration envisioned to help meet ACS objectives, and would benefit aquatic habitat conditions within the watershed.

The proposed action will incorporate all appropriate project design features included in the Environmental Assessment for the *Aquatic and Riparian Habitat Enhancement* (April 2009).

B. Land Use Plan (LUP) Conformance

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 District's 2008 ROD and RMP, we evaluated this project for consistency with both the 1995 RMP and the 2008 ROD and RMP. This watershed restoration project conforms to and is consistent with the Medford District's 2008 Western Oregon Plan Revision Record of Decision (2008 ROD) and Resource

Management Plan (2008 RMP). The proposed action is also in compliance with the 1995 Medford District Record of Decision and Resource Management Plan (RMP) (USDI). The 1995 Medford District Resource Management Plan incorporated the Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl and the Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl (Northwest Forest Plan) (USDA and USDI 1994). The 1995 Medford District Resource Management Plan was later amended by the 2001 *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*. On July 25, 2007, the *Record of Decision To Remove the Survey and Manage Mitigation Measure Standards and Guidelines from Bureau of Land Management Resource Management Plans Within the Range of the Northern Spotted Owl* amended the 1995 Medford District Resource Management Plan by removing the Survey and Manage Mitigation Measure Standards and Guidelines.

Due to ongoing litigation, current BLM guidance is for all project to comply with either the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage Protection Buffer, and other Mitigation Measures Standards and Guidelines (without Annual Species Reviews) or one of the four exemptions in the October 11, 2006, Court stipulation in Northwest Ecosystem Alliance v. Rey. None of the exemptions are relevant to the actions authorized by this Categorical Exclusion. However, as settlement agreement on the 2007 Survey and Manage Record of Decision (Conservation Northwest et al. v. Mark E. Rey et al.) is now before the court for approval, any activities completed under this Categorical Exclusion will comply with any modifications in management direction to comply with stipulations of any court order in place at the time of the action.

This proposal is also in compliance with the direction given for the management of public lands in the Medford District by the Oregon and California Lands Act of 1937 (O&C Act), Federal Land Policy and Management Act of 1976 (FLPMA), the Endangered Species Act of 1973 (ESA), the Clean Water Act of 1987 (CWA), Safe Drinking Water Act of 1974 (as amended 1986 and 1996) (SDWA), Clean Air Act of 1990, and the Archaeological Resources Protection Act of 1979 (ARPA).

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

The following documents cover the proposed action:

The Environmental Assessment for the *Aquatic and Riparian Habitat Enhancement*, (April 2009).

The Decision Record, signed June 9, 2009 for the *Aquatic and Riparian Habitat Enhancement* (April 2009) Environmental Assessment.

The Oregon Department of Fish and Wildlife' *Guide to Placing Large Wood in Streams* (1995) and *Habitat Restoration Guide* (1999).

The Decision Record, signed 6/5/98, for the *Integrated Weed Management Plan* with the associated FONSI and Medford District Integrated Weed Management Plan.

The U.S. Fish and Wildlife Service (USFWS) Biological Opinion (#13420-2007-F-0055) and Letter of Concurrence (#13420-2008-1-0136) for *Programmatic Aquatic Restoration Activities in Oregon and Washington that Affect ESA-listed Fish, Wildlife, and Plant Species and their Critical Habitats*.

The National Marine Fisheries Service' *Aquatic Restoration Biological Opinion* (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? Is the current proposed action within the same analysis area of the previously analyzed project? The *Aquatic and Riparian Habitat Enhancement EA*, listed above, analyzed programmatically a suite of activities for maintaining and restoring watershed conditions, including large wood placement for stream enhancement, across the Medford District BLM. This site-specific project is implementing wood placement for stream enhancement, and project design features required under the above referenced EA are included in this project.

2. Is the range of alternatives analyzed in the existing NEPA documents appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values? The range of alternatives analyzed in the above Environmental Assessment document is appropriate with respect to the current proposed action.

3. Is the existing analysis valid in light of any new information or circumstances? This project is consistent with the suite of activities analyzed in the above referenced EA (p. 6-7). The ID Team planning and overseeing the implementation of this site-specific project reviewed the anticipated effects of this project against those documented in the above referenced EA and found the existing analysis to be valid for this proposed action. No new information exists.

4. Do the methodology and analytical approach used in the existing NEPA documents continue to be appropriate for the current proposed action? The interdisciplinary team approach was used in evaluating the proposed action. The present methodology continues to be appropriate, because the action is the same.

5. Are the direct, indirect, and cumulative effects of the current proposed action similar to those identified in the existing NEPA documents? The ID Team planning and overseeing the implementation of this site-specific project reviewed the anticipated effects of this project against those documented in the above referenced EA and the effects disclosed are the same as those identified and analyzed. No new information or circumstances would affect the predicted environmental impacts as stated in the above referenced EA.

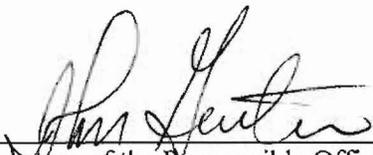
7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action? The above referenced EA was made available for public review on BLM's Medford District Website in March of 2009. This level of public and interagency review is adequate for the current proposed action.

E. Interdisciplinary Analysis: This worksheet was distributed to the appropriate members of the Ashland Resource Area Interdisciplinary Team for review and input.

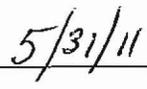
F. Mitigation Measures: Project Design Features (PDFs), discussed in Section A above, are included as part of the proposed action for the purpose of reducing or eliminating anticipated adverse environmental impacts.

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.



Signature of the Responsible Official



Date

