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

A. Background
BLM Office: Prineville, OR NEPA Log #: DOI-BLM-OR-060-2012-0023-DNA

Location: 5 miles southwest of Redmond, OR (Sec. 22, 25-28, 32-35 of T15S, R12E and Sec. 3-5, 8, 9 of T16S, R12E)

Proposed Action Title: Maston Vegetation Treatment

Description of the Proposed Action and any applicable mitigation measures:
The proposed action is juniper thinning of the Maston Zone (up to 4,099 acres within the Cline Buttes project area). The thinning will include the cutting of juniper trees less than 18 inches diameter at breast height (DBH). All old growth trees and one to four recruitment trees per acre will be retained in juniper woodland habitats. No juniper trees for recruitment purposes will be kept in shrub-steppe habitat.

The treatment of the slash from the thinning will include some or all of the following methods: biomass removal (e.g. firewood); chipping, lop and scattering, hand piling and prescribed fire. The prescribed fire methods will include pile burning, swamper burning, and jackpot burning. Additionally, seeding of some areas will be considered, if necessary.

Locations and types of treatments (e.g. thinning, hand piling, jackpot burning, etc.) and leave areas that have been identified by cultural, wildlife, botany or other resources are located on the project map (Appendix A) and will be flagged in the field prior to implementation. Visual Resource Management (VRM) specific treatments are identified in yellow on the project map and described in Table 1. Project boundaries and treatments may change due to field verification, and determining the most efficient and cost effective combinations of methods.

Mitigation measures from the Cline Buttes Recreation Area Plan and Environmental Assessment (CBRAP) DOI-BLM-OR-P060-2006-0014 as well as more detailed project design features include:

Recreation
- A travel management map is created for each vegetation treatment plan (Appendix B).
    - Temporary roads for vegetation removal would be located outside of proposed trail corridors wherever feasible.
    - No full size vehicle use would be allowed on designated non-motorized trails less than 8 feet in width.

- Designated trails and proposed right of ways (ROW's) will be flagged in the field prior to vegetation treatments to allow for retention of trees that would provide shade and or protection to maintain the curvilinear nature of recreation trails.

Soil and Water Quality

- Trees that are cut should be felled away from all stream channels, including ephemeral draws, unless explicitly prescribed to be included into the channel network.
- Equipment operations would be limited to slopes of less than 20 percent.
- Soil moisture conditions would be monitored and operations would be suspended before unacceptable limits of compaction or displacement occur.
- For ground-based yarding, main arterial trails (over 3 round-trip passes) would be designated at a spacing of 100 feet or more apart.
- Soil impacts from operations (compaction, displacement) would be limited to less than 20 percent of the total acreage within the treatment unit.
- Previously disturbed areas would be used where available to establish landings.
- Areas within 300 to 600 feet of roads and other suitable travel routes would usually be managed using the existing travel systems with wheeled or track vehicles. Areas farther than 600 feet from an existing road may require use of temporary, primitive routes when removing woody material from the site occurs. Improvements to temporary routes would be limited to thinning of woody plants and movement of large rocks if needed for haul vehicle passage (unless these routes are part of the final proposed road or trail system). Travel by haul vehicles would be limited to designated routes which would be seeded, when necessary, upon completion of the management action. Light maintenance of existing roads may occur where necessary to allow haul vehicle use.
- Landings, temporary access routes, and primary skid trails would be closed, rehabilitated, and/or disguised following use. Mounds and berms would be smoothed to the original contour.
- Rehabilitation methods for access routes, trails and landings could include seeding, scarification, and placing woody debris and/or boulders back onto the route.
- Rutted, rocky, and degraded portions of main access routes would be improved or rerouted when needed for operations or if prescribed for long-term road network improvements.
- Access roads would be maintained to the prescribed standard needed for operations, with a final maintenance treatment at the conclusion of operations. Maintenance could include such measures as adding fill to level the grade/facilitate drainage, blading, and dust abatement.

Forestry/Biomass

- To avoid wood theft problems the biomass removal contract will be scheduled to occur as soon as possible after the thinning contract. Smaller thinning subunits will be inspected, approved and released to allow quicker commercial biomass contractor access.
- Roads identified in the CBRAP to be removed will be written into the contract so the contractor can effectively close/disguise roads to rehabilitation specifications.

Weeds

- Contractors and other project entities will be required to ensure their vehicles and equipment are checked for weed matter prior to entering the project area, and be required to report any weed sightings in their work areas. Any weed sighting information will be forwarded to the District Weed Coordinator.

Visual Resources

- All vegetation treatment design will identify existing and proposed ROWs and include measures to partially screen built features (roads, structures, utility lines) from view of key observation points (KOP's). Design of vegetation management projects will assess the change in contrast due to increased visibility of these ROW's and adjacent structures and mitigate where needed to meet or exceed visual resource management (VRM) standards.
- Vegetation management actions will use BLM contrast rating methods and include completion of the VRM Contrast Rating worksheets (form 8400-4) in project design. Treatments will be designed to mimic patterns found in the characteristic landscape as well as to improve long distance scenic view opportunities.
- Vegetation management actions would incorporate seen area mapping from KOPs as a tool to help locate actions that cause greater contrast such as landings, swamper burn piles and machine piles in order to meet or exceed VRM standards.
- In locations where trails or ROWs are visible or potentially visible as part of a wide, panoramic view, treatment design will consider locating treatment edges at or near these routes, to avoid routes bisecting cleared areas.
- Early in each treatment design process, BLM will identify and use the following in designing all vegetation treatments:
    - All proposed trails and who the intended user is for each trail
    - Trail head locations
    - Existing and proposed ROW's
    - Additional or new KOP's
- Identification and possible flagging of existing and proposed trail and ROW routes prior to vegetation management treatments would be done in order to ensure that sufficient screening vegetation may be left to meet or exceed VRM standards.
- Burn piles, landings or other major features will not be located on existing or proposed trail corridors. Stumps within 200 feet of proposed trails will be no higher than four inches above ground level, uphill side. Cut faces of visible trees will be oriented away from the trail.
- Leave adequate junipers along fence lines to avoid strong line and color contrast between BLM and private property, unless fuels can be treated simultaneously on BLM and adjacent private property.

Wildlife

- Avoid treatment in the wildlife closure area from Feb 1 – Aug 31st. The closure may be lifted early if BLM wildlife staff have determined, through monitoring, breeding activity is not occurring or the young have fledged. (On map in Appendix A)
- Nest and cavity trees will be retained from treatment.
- All snags will be retained from treatment unless decided otherwise by the IDT for purposes of safety or fuel reduction.
- Identify additional leave trees to provide screening for wildlife.

Botany

- Known populations of Peck's milkvetch (*Astragalus peckii*) have been mapped and are flagged, or if needed will be re-flagged on the ground before implementation. Removal of western juniper will be allowed in these areas when the plants are dormant, late August through March. All felled materials will be removed from the boundaries of the flagged areas.
- Seed with native or non-native seed, or a combination if it is determined seeding is needed to rehabilitate areas that have been disturbed or if seeding is needed to reach the objectives of the Cline Buttes Recreation Area Plan and Environmental Assessment (CBRAP EA pg. 11).

Cultural

- These areas have been surveyed for cultural resources and sensitive sites have been identified for protection through avoidance measures. These sites will be flagged prior to implementation. This would meet Section 106 compliance with the Oregon State Historic Preservation Office and general tribal concerns for the protection of cultural resources.

Range

- Range/livestock grazing will not be impacted by the proposed action beyond the effects described in the CBRAP EA. There is no active grazing on either allotment at this time; therefore, a formal livestock closure during treatment activities is not required. If at some point in time, livestock grazing resumes on the allotments then a grazing closure may be pursued, if deemed necessary by the interdisciplinary team.

B. Land Use Plan Conformance

Land Use Plan Name: Upper Deschutes Resource Management Plan
Record of Decision- September 2005

The proposed action is in conformance with the applicable plan, even though it is not specifically provided for, because it is clearly consistent with the following land use plan decisions (objectives, terms, conditions): "In the wildland urban interface, live and dead vegetation will be managed so that a wildland fire would burn with fire behavior where firefighters can be safe and

successful in suppression efforts under hot, dry summer weather conditions. Treatments will be designed for human safety while still considering recreation opportunities, wildlife habitat and corridors, visual quality, air and water quality, and public access." (UDRMP pg. 62)

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

The following NEPA documents (EA, DEIS, FEIS) cover the proposed action:

- Cline Buttes Recreation Area Plan and Environmental Assessment (CBRAP EA) September 2009

- Upper Deschutes Resource Area Plan Final Environmental Impact Statement January 2005

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 proposed action is covered by alternative 2 of the CBRAP EA which is similar to the Maston Vegetation Treatment proposed action.
    - "The proposed action is focused on achieving the overall vegetation objectives identified in chapter 1 to reduce the possibility of fire in the Wildland Urban Interface (WUI); restore old-growth juniper woodlands; restore shrub-steppe plant communities; and restore heavily disturbed areas. (CBRAP EA pg. 11)
    - "The following types of actions would be implemented in order to reach the above objectives.
        - Cut young juniper
        - Cut, crush or mow shrubs and trees
        - Pile and burn cut juniper and shrubs on site
        - Prescribed broadcast burn
        - Remove cut trees from the site (via firewood cutting permits or commercial sales).
        - Seed with native or non-native seed, or a combination (CBRAP EA pg. 12)
    - Methods analyzed under alternative 2 include hand pile and burn, lop and scatter, portable chipper, wood cutter commercial, wood cutter personal, chainsaw and swamper burn (CBRAP EA table 1 pg. 18)

- Yes- This project is within the same analysis area and the geographic and resource conditions are sufficiently similar to those analyzed in the CBRAP EA (Map 2 pg. 10).

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 alternatives analyzed in the CBRAP EA considered a range of alternatives including no action and the thinning of young juniper trees. The alternatives are adequate for the type and scale of treatment proposed at this time.

3. Is the existing analysis valid in light of any new information or circumstances (such as rangeland health standard assessment, recent endangered species listings, and updated lists of BLM sensitive species)? Can you reasonably conclude that all new information and new circumstances would not substantially change the analysis of the new proposed action?

- Yes- The CBRAP EA was completed in September 2009. At that time, all current issues of concern including greenhouse gases and wilderness characteristics were analyzed.

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(s)?

- Yes- The direct, indirect, and cumulative effects on hydrology, water quality, special status plant species, soils, air quality, fire management, visual resources, heritage, old growth juniper woodlands, shrub-stepp habitats, recreation, wildlife, transportation, right of ways, and range management were analyzed in the CBRAP EA pages 111-213.
    - The proposed action is a mechanical treatment of juniper and is similar to the following statement. "Mechanical treatment would, to some degree, mimic the natural role of fire which, though infrequent in old-growth juniper woodlands, historically contributed to ecological diversity by creating variable tree densities and gap the woodlands. Thinning young juniper would relieve competition for limited soil, water and nutrients and thus increase the health and longevity of the remaining trees." (CBRAP EA pg. 149)
    - The CBRAP EA analyzed the effects over the 32,000 acre project area. The proposed project is limited to 4099 acres and would therefore be within the range of predicted effects.

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

- Yes- The Upper Deschutes Resource Management Plan and the Cline Buttes Recreation Area Plan and EA met all standards for public involvement and interagency review.
    - During the planning for the proposed project, mailings, press releases, field trips, and a public meeting on June 20, 2012 was held. This correlates with the information in the CBRAP EA of "Public input would be solicited periodically from partners, local residents, adjacent communities, and through the community wildfire protection plans." (CBRAP EA pg. 16)

E. Persons/Agencies/BLM Staff consulted

Specialist Name	Resource Represented
Theresa Holtzapple	Cultural / Historic / Paleontology
JoAnne Armson	Botany/ Special Status Plants
Jenni Moffitt/ Randy Hinson	Invasive Non-native Species, Soils, Vegetation, ESI
Guy Chamness	Fire / Fuels
Steve Castillo	Forestry / Timber / Biomass
Mike McKay	Hydrology, Flood Plains, Wetlands, Riparian Zones
Molly Galbraith	Range / Livestock Grazing
Berry Phelps	Recreation Motorized
Greg Currie	Recreation Non-Motorized, Visual Resources / Scenic or Back Country Byways / VRM
Cassandra Hummel	Special Status Animals, Migratory Birds, Wildlife
Jim Eisner	Special Status Fish, Fisheries
Lisa Clark	Public Information Officer
William Dean	Assistant Field Manager
Teal Purrington	Environmental Coordinator

*A complete list of team members that participated in the Cline Buttes Recreation Area Plan and Environmental Analysis is available on pg. 216 of the CBRAP and EA.

Conclusion

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

Signature
Responsible official: Molly Brown — 8/3/12

Molly Brown
Deschutes 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.

Contact Person

For additional information concerning this review, contact: Guy Chamness, Fire Management Specialist, Prineville Field Office, 3050 NE 3rd Street, Prineville, OR 97754, telephone (541) 416-6719. gchamnes@blm.gov.

TABLE 1: Visual Resource Management Specific Treatements (Areas marked as yellow on map in Appendix A)

Area	Rx	Description
Juniper, Maston, Riverview and Jaquar Trailheads	Trees for removal will follow VRM specifications	No cutting until trailhead development is done. Thinning of small trees will occur during and after trailhead development if needed.
Cultural Resource Fencelines	Trees for removal will follow VRM specifications	Thinning will maintain the integrity of the old fence edge. Thinning will occur where rockwalls are present, but corners and fence crossings will be maintained.
Field Edges	Trees for removal will follow VRM specifications	Trees will be marked for removal to either open up views, but still keeps the integrity of the field edge.
Recreation trails in close proximity to Roads	Trees for removal will follow VRM specifications	Trees will be marked for removal to limit recreation trail views of Cline Falls Highway.
Recreation trails in close proximity to other recreation trails	Trees for removal will follow VRM specifications	Trees will be marked for removal to limit recreation trail views from other recreation trails.
Powerline Screening from Cline Falls Highways	Trees for removal will follow VRM specifications	Thin trees less than 8 feet tall. All large trees will remain for powerline screening.
Maximize screening of river canyon from trail	Trees for removal will follow VRM specifications	Trees will only be cut as marked in these area by Landscape Architect and wildlife biologist to maximize screening of river canyon from trail and limit views.
Trail viewing enhancement	Trees for removal will follow VRM specifications	Cut trees as marked in the field to open up views from trail

Appendix A:
Maston Area Vegetation Treatments

0 0.25 0.5 1
Miles

Legend

Juniper Thinning Specifications

- < 14" Thinning/Jackpot 0-5% Cover
- < 14" Thinning/Jackpot 6-15% Cover
- < 14" Thinning/Jackpot 16-30% Cover
- < 14" Thinning and Piling
- < 10" Thinning/Piling/Jackpot
- < 8" Thinning/Piling/Jackpot
- < 6" Thinning/Piling/Jackpot
- Trees for removal will follow VRM specifications-Refer to Table 1
- Leave Area
- Seasonal Wildlife Closure Areas
- Pecks Milkvetch
- Bureau of Land Management

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Appendix B
Map 3 - Travel Management Map for Fuels Treatment