

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

Office: Salem District, Marys Peak Resource Area

Tracking Number: DOI-BLM-OR-S050-2015-0002-DNA

Proposed Action Title/Type: Rainbow Ridge Timber Sale

Location/Legal Description: T. 14 S., R. 6 W., Section 29, W.M. Benton County, Oregon

Applicant (if any): N/A

A. Background and Description of the Proposed Action

The BLM completed an environmental assessment for the Rainbow Ridge timber sale in November 2014. The proposed action included regeneration harvest, commercial thinning, density management, and connected actions on approximately 144 acres of BLM-managed land in the Matrix and Riparian Reserves land use allocations.

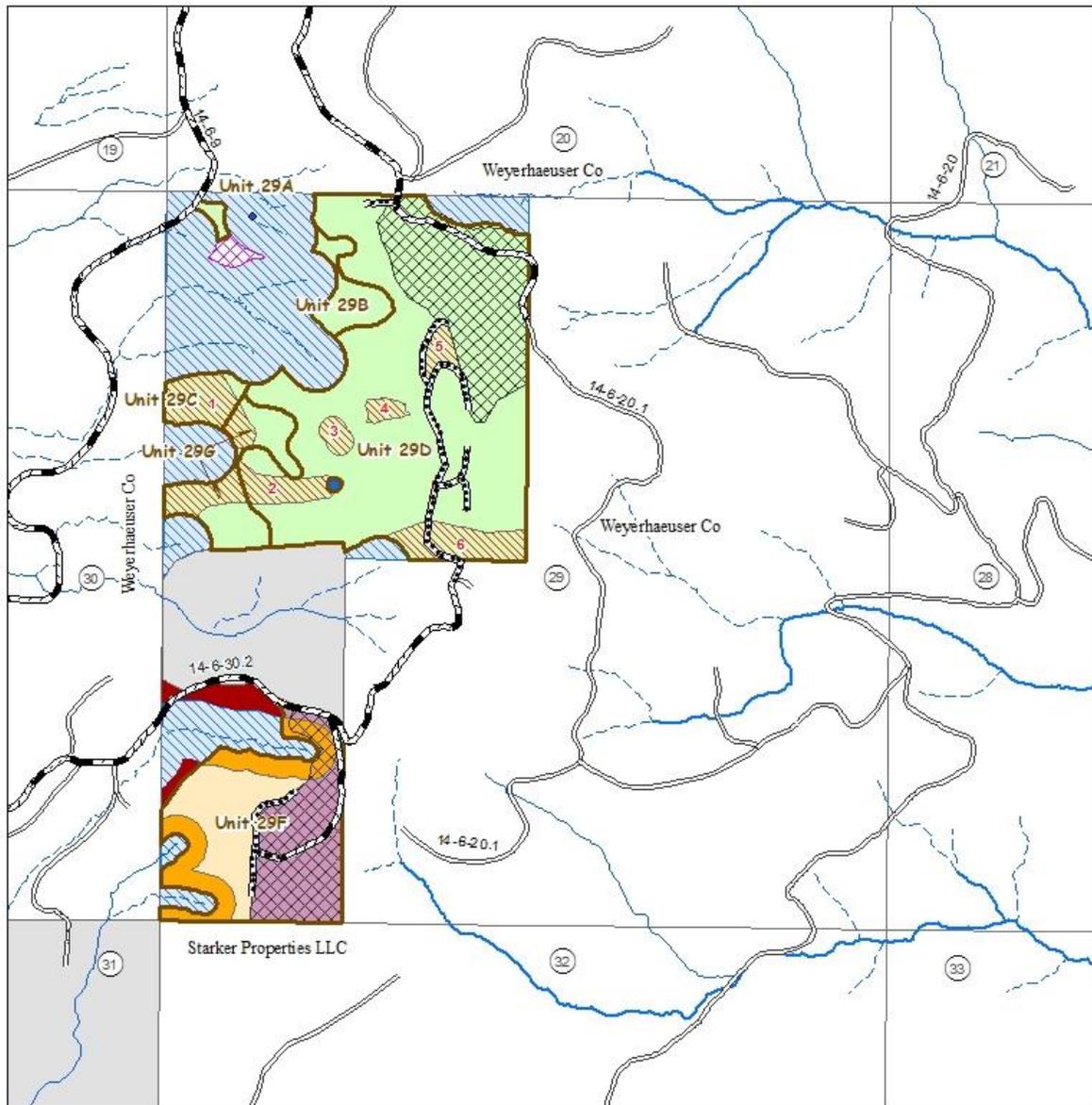
In November 2014, much of western Oregon, including the Rainbow Ridge project area, experienced severe wind and freezing rain events. These storms resulted in ice damage and windthrow within the proposed Rainbow Ridge timber sale units. Approximately 24 acres of the regeneration harvest units and 17 acres of the thinning units were affected by the storms (Figure 1 on the following page). The BLM interdisciplinary team (IDT) visited the project area in late December 2014 to assess the severity of the damage and discuss whether the proposed action would be affected.

In February 2015, the IDT met again to discuss the results of field assessments conducted subsequent to the December field trip. The BLM found that the storm damage constituted new conditions or information that required review of the existing analysis in the EA to determine whether it remains valid.

Prior to the storm events, the BLM had planned to offer the Rainbow Ridge timber sale in August 2015. To minimize economic loss associated with the recently damaged and dying trees, which rapidly deteriorate and lose economic value, the BLM decided to move the offer date to April 22, 2015.

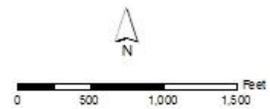
This document provides a summary of the IDT's input and review of the proposed action in light of the changed conditions. Based on IDT review and input, the BLM has determined that the existing NEPA is adequate.

Figure 1. Storm damage within the Rainbow Ridge timber sale EA harvest units



- | | | |
|---|---|--------------------------------------|
| Storm damaged areas | Inadequate stocking | Wet area outside of unit |
| EA Units | Stream protection zone | Wet area (50' radius) |
| Aggregates (19 acres) | Red Tree Vole protection area | Perennial fish-bearing stream |
| Commercial Thinning (14 acres) | Other BLM land that will not be treated | Perennial non-fish-bearing stream |
| Density Management (9 acres) | Road to be Constructed | Intermittent non-fish-bearing stream |
| Density Management in Upland (10 acres) | Road to be Renovated | |
| Regeneration Harvest (87 acres) | Existing Road | |

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B. Land Use Plan Conformance

Salem District Record of Decision and Resource Management Plan (RMP)
Date Approved: March 1995

As amended by the *Record of Decision for Amendments to the Survey and Manage, Protection Buffer, and Other Mitigation Measures Standards and Guidelines*, dated January 2001 (SM/ROD) with subsequent Annual Species Reviews. These actions comply with the SM/ROD as described above and utilize the December 2003 species list. This list incorporates species changes and removals made as a result of the 2001, 2002, and 2003 Annual Species Reviews (ASR) with the exception of the red tree vole. For the red tree vole, the Ninth Circuit Court of Appeals in *KSWC et al. v. Boody et al.*, 468 F.3d 549 (9th Cir. 2006) vacated the category change and removal of the red tree vole in the mesic zone, and returned the red tree vole to its status as existed in the 2001 ROD Standards and Guidelines, which makes the species Category C throughout its range.

The proposed action is in conformance with the Salem District RMP and other applicable plans (EA pp. 6–7).

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

NEPA Documents

Rainbow Ridge Timber Sale Environmental Assessment: DOI-BLM-OR-S050-2013-0002-EA
Rainbow Ridge Timber Sale Determination of NEPA Adequacy: DOI-BLM-OR-S050-2015-0002-DNA

Other Related Documents

Benton Foothills Watershed Analysis (1997)
South Fork Alsea Watershed Analysis (1995)
U.S. Fish and Wildlife Service Letter of Concurrence: 01EOFW00-2014-I-0234 (2014)

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 current proposed action is substantially the same action as previously analyzed in the EA. The harvest unit boundaries, prescriptions and marking guidelines, road construction, post-harvest fuel treatments, and aggregates remain the same as those analyzed in the EA. No changes were made to the proposed action overall; only minor modifications were made to on the ground implementation of the prescription to ensure consistency with EA analyses and descriptions of proposed silvicultural treatments.

Following the mid-November freezing rain and wind events, IDT members completed field reconnaissance to thoroughly assess the extent and severity of damage across the planning area. The BLM found that the storm events had resulted in windthrow and broken tree tops within 24 contiguous acres of the regeneration harvest unit and 17 acres of thinning units.

The proposed action included both aggregated and dispersed tree retention. The six aggregates were largely unaffected by the storms; trees that were broken or windthrown would remain in place. Since storm damage to these aggregates was minimal, the IDT determined that the aggregates would still function as originally intended and that no on the ground modifications were necessary.

Within the 87 acres of regeneration harvest units, one green tree per acre of dispersed retention was also planned. To compensate for trees initially marked for retention that were topped or windthrown, the BLM located and marked for retention adjacent undamaged trees with similar characteristics as the initial reserve trees (e.g., species, diameters at breast height, crown ratios). Selection of these replacement leave trees was consistent with marking guidelines, including specifications to retain the largest diameter trees with wide crowns and large branches. Topped and windthrown trees originally marked for retention within the regeneration harvest unit would be left on site to serve as standing and down coarse woody debris. This follow-up marking ensured that post-harvest tree retention targets would still be met and ensured consistency with original effects analyses. This swapping of trees does not constitute a substantial change, because the original prescription and desired ecological outcome would still be achieved.

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 range of alternatives analyzed in the EA continues to be appropriate. The affected environment has not been so greatly altered such that additional alternatives to meeting the purpose and need would be required. Project modifications implemented after the storm damage did not change the current proposed action and thus did not require additional alternatives to be analyzed.

3. Is the existing analysis valid in light of any new information or circumstances? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes, the existing analysis remains valid. The new circumstances do not substantially change the proposed action nor the effects analyses. Resource-specific information is provided below.

Silviculture:

The existing analysis and conclusions in the forest vegetation report remain adequate. While the ice and wind events resulted in scattered broken trees and windthrow, subsequent field reconnaissance, analysis, and marking replacement retention trees ensured that tree retention specifications and post-harvest stand conditions were consistent with analyses.

The silvicultural prescription for the variable retention harvest units describes dispersed retention of approximately one tree per acre across 83 percent of the unit and aggregated green tree retention across the remaining 17 percent of unit acres. Within these regeneration harvest units, the 24 acres heavily affected by the ice and wind event were located primarily in the northeastern

portion of the unit where dispersed retention was planned. Within this 24 acre area, approximately 55 percent of the trees were either standing dead or down, with approximately three green trees per acre remaining post-event. During subsequent field reconnaissance of these 24 affected acres, 22 marked, green leaf trees were tallied, along with 20 trees previously marked for retention that had been topped or killed by the ice and wind events. In addition, to ensure that dispersed retention specifications were met across these 24 acres, the BLM selected four additional green trees for retention (total of 26 trees marked for retention in the 24 acres). Selection of these additional leaf trees was consistent with marking guidelines specifications, including specifications to retain the largest diameter trees with wide crowns and large branches.

The silvicultural prescription for the thinning units utilizes thinning from below leaving healthy dominant and co-dominant trees with the largest crowns. Within these units, the 17 acres affected by the event were located primarily in the ground-based portion of the unit where commercial thinning was planned. During a follow-up field reconnaissance effort, trees previously marked for retention that had been either topped or killed by the ice and wind event were located. Adjacent, replacement retention trees with similar characteristics (e.g., species, diameters at breast height, crown ratios) were then marked for retention to compensate for those trees initially marked for retention that were subsequently topped or windthrown. This follow-up marking ensured that post-harvest tree retention targets would still be met and ensured consistency with original effects analyses.

Botany:

The storm damage is not expected to increase the amount of noxious weeds within the project area and does not create habitat for BLM special status species. The boundaries of the proposed project and protection areas remain unchanged. Any changes to the project area are insignificant in respect to noxious weeds and special status species.

Wildlife:

The analysis of wildlife habitats considered the landscape scale, stand level conditions, and special habitat features. The damage did not appreciably change wildlife habitat conditions at the landscape scale. Within the project area, the damage did not affect the adjoining forest patches on BLM that are intended to function as reserved habitat.

The damage did change the existing stand conditions within the harvest units, resulting in a greater abundance of decay class 1 and 2 snags and down logs. The aggregate retention clumps within the variable retention harvest unit were largely untouched. The damaged and downed trees that were marked for green tree retention (approximately 1 per acre) would be substituted with green trees that did not suffer any damage, such that the anticipated post-harvest stand conditions would be essentially the same. Within the thinning unit, undamaged and unmarked trees would be substituted for the damaged reserved trees, such that the post-harvest stand would retain a similar basal area and canopy cover as was originally analyzed.

The damage did not alter any additional wildlife habitats and did not create any additional impacts to special status wildlife species than those already analyzed within the EA. Thus, the conclusions reached within the existing wildlife effects analysis are still relevant and applicable.

Fisheries:

The current proposed action would result in similar effects to fish and aquatic habitat as previously analyzed. No changes or additional impacts to sediment, temperature, stream large wood recruitment, and stream flows would be anticipated. The existing analysis is adequate to

support a similar conclusion on effects to fish and aquatic habitat.

Hydrology:

There would be no changes in water quantity or water quality from the current proposed action. The original analysis is sufficient to support this conclusion.

Soils:

There would be no changes in the soil productivity, compaction, or soil disturbance from what was analyzed in the EA. The effect on overall project site productivity would remain less than three percent reduction in overall yield for the project area.

Fire and Fuels:

The existing analysis and conclusions in the fire and fuels report remain adequate. This analysis accounted for previously down wood that was on site during stand exams and accounted for tree tops, limbs, bark, and wood left on site following harvest and for wildlife purposes. Storm damage primarily affected trees by snapping out the tree tops, with the point of breakage generally occurring at the top of the tree bole in the 6- to 12-inch diameter range.

While this damage resulted in more down wood on site prior to harvest and slightly increased existing fuels loads, it is an insignificant increase. The conclusions drawn from the analysis were not based solely on the average tons per acre of slash following harvest. Other factors such as adjacency to private land, site preparation needs, and the desire to reduce the likelihood of a crown fire helped inform the fuels analysis conclusions. The objective of the variable retention harvest is to use prescribed fire to increase early successional habitat, to reduce hazardous fuels load following harvest, and as a site preparation tool for small areas of tree planting.

Within the thinning units, the analysis and conclusions are also adequate. Average tree diameters and heights are much smaller than in the regeneration harvest unit, and the changes brought to the stand by the storms are insignificant for the same reasons listed above.

Carbon and Recreation:

Since the proposed action and expected ecological outcomes remain unchanged, the effects analyses in the EA remain valid.

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 direct, indirect, and cumulative effects of the proposed action are both quantitatively and qualitatively similar to those analyzed in the existing Rainbow Ridge EA. The analysis and conclusions presented in the EA are still applicable because post-harvest stand conditions within the treatment area would be essentially the same as analyzed. The minor modifications made on the ground would result in the same type and magnitude of impacts as expected.

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

Yes, the public involvement and interagency review associated with the EA remain adequate for the proposed action. The proposed change in the action addresses intermediate stand conditions resulting from the ice and wind damage and would result in the same post-harvest effects as

previously analyzed in the original proposed action. There are no anticipated effects beyond those previously analyzed that would require additional interagency review.

The BLM released the EA for a 30 day public comment period on November 5, 2014. The BLM received five comment letters during this period. The BLM will respond to substantive comments received on the EA at the time of decision in the Decision Record.

E. Interdisciplinary Analysis

Ron Exeter	Botany
Douglass Fitting	Hydrology and Soils
Kevin Foster	Forester
Scott Hopkins	Wildlife
Stefanie Larew	NEPA
Kent Mortensen	Fire and Fuels
Mellissa Rutkowski	Engineering
Scott Snedaker	Fisheries
Stephanie Wessell	Forester – Silviculture

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 in light of the new circumstances and constitutes BLM's compliance with the requirements of the NEPA. The purpose and need of the project will still be met; no further analysis or project modifications are required.

/s/ Stefanie Larew
Stefanie Larew
Project Lead and NEPA Coordinator

/s/ Rich Hatfield
Rich Hatfield
Field Manager, Marys Peak Resource Area

February 27, 2015
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.