

**Worksheet
Interim
Documentation of Land Use Plan Conformance and NEPA Adequacy
(DNA)**

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

Note: This Worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled, "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy" transmitting this Worksheet and the "Guidelines for using the DNA Worksheet," located at the end of the Worksheet.

A. Describe the Proposed Action

The proposed action is to allow the prescribed fire scheduled for a portion of the Frosty II timber sale area to move into and burn portions of the Old Baldy Research Natural Area. The treatment of the timber sale area with prescribed fire is covered under the Klamath Falls Resource Area Fire Management EA # OR-014-94-09 (approved 04/29/94), and is consistent with the Klamath Falls Resource Area Resource Management Plan and Environmental Impact Statement (September 1994). The timber sale area to be treated is adjacent to the RNA, and ground disturbing management actions would be required to prevent the fire from entering the RNA. The proposed action would eliminate additional ground disturbing activities adjacent to a designated RNA, thus reducing the potential for noxious weed invasion, and allow the fire to be introduced into the area as a natural ecosystem process which has been disrupted by fire suppression activities and fragmentation of the landscape.

B. Land Use Plan (LUP) Conformance

LUP Name*: Klamath Falls Resource Area Resource Management Plan and Environmental Impact Statement (KFRA RMP/EIS dated September 1994).

Date Approved: June 1995 via the Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary(KFRA ROD/RMP/RPS)

* List applicable LUPs (e.g., Resource Management Plans and activity, project, management, or program plans, or applicable amendments thereto)

The proposed action is in conformance with the applicable LUPs because it is

specifically provided for in the following LUP decisions:

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

The KFRA RMP/EIS states the objectives for the Old Baldy RNA on page 2-38 as “Preserve, protect, or restore natural processes or system.” The RNA was designated to fill the southern Cascades chaparral plant community cell. Fire is an extremely important process in this community-type, and is at least partially responsible for maintenance of this community-type on this site. The KFRA RMP/EIS on page 3-24 also describes the importance of natural fire in the development and succession of plant communities in the resource area. The document goes on to describe how fire as a natural process has been disrupted by fire suppression and fragmentation of the landscape. Therefore, re-introduction of fire as a natural process into the RNA will help achieve the RMP/EIS objectives established for the RNA.

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

List by name and date all applicable NEPA documents that cover the proposed action.

Klamath Falls Resource Area Resource Management Plan and Environmental Impact Statement (KFRA RMP/EIS) dated September 1994 and approved via the June 1995 Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary (KFRA ROD/RMP/RPS). This is the overall plan for the Klamath Falls Resource Area.

Klamath Falls Resource Area Fire Management Environmental Assessment dated April 29, 1994 and approved via the June 1994 Record of Decision. This is a programmatic EA for both wildfire suppression and the application of prescribed fire in the resource area.

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

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 located at a site specifically analyzed in an existing document?

Documentation of answer and explanation:

The proposed action is consistent with the objectives identified specifically for the Old Baldy RNA in the KFRA RMP/EIS Proposed Resource Management Plan, and affirmed and implemented by the KFRA ROD/RMP/RPS.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?

Documentation of answer and explanation:

The proposed action lies within the range of various alternatives identified and analyzed in the KFRA RMP/EIS (numbers special areas and acres in special areas is summarized by alternative in Table S-1 “Comparisons of Allocations and Management by alternative,” pages 18-50). This array and range of alternatives include a No Action alternative and five other alternatives (A through E) which covered a span of management from a strong emphasis on commodities production (A) to a strong emphasis on resource protection/preservation (E), and the PRMP that emphasizes a balanced approach to producing an array of socially valuable products within the concept of ecosystem management. Since this plan is relatively recent, it is thought to adequately reflect “current environmental concerns, interests, and resource values.”

3. Is the existing analysis valid in light of any new information or circumstances?

Documentation of answer and explanation:

The existing analysis in the KFRA RMP/EIS is still considered valid because it addresses current scientific knowledge concerning the role of fire as an historic natural process, and how prescribed fire mimicking this natural function is to be conducted on selected areas for ecosystem management when it established the objectives for the Old Baldy RNA.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Documentation of answer and explanation:

The KFRA RMP/EIS and subsequent KFRA ROD/RMP/RPS designated particular areas as ACEC’s and ACEC/RNA’s which warranted special management direction to maintain and protect relevant and important values, and established overall objectives for each area so designated. The development of the Proposed Resource Management Plan in the KFRA RMP/EIS, as adjusted or affirmed by the KFRA ROD/RMP/RPS, meets NEPA standards for impact analysis. The methodology and analyses employed

in the KFRA RMP/EIS, including the evaluations of potential ACEC's and ACEC/RNA's, are still considered valid as this planning effort is still relatively recent (June 1995) and considered up to date procedurally.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?

Documentation of answer and explanation:

The proposed action is consistent with the KFRA RMP/EIS, as adjusted or affirmed by the KFRA ROD/RMP/RPS. The environmental consequences of designation of special areas were analyzed in Chapter 4 - Environmental Consequences (pages 4-1 through 4-143). The KFRA RMP/EIS also analyzed the impacts of fire as an historic natural process, and how prescribed fire mimicking this natural function is to be conducted on selected areas for ecosystem management as described in the KFRA Fire Management Environmental Assessment. Objectives were established specifically for the Old Baldy RNA in order to preserve, protect, or restore native species composition and ecological processes within the Southern Cascades chaparral plant community cell identified by the Oregon Natural Heritage Program.

6. Are the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)?

Documentation of answer and explanation:

The proposed action as analyzed in the PRMP of the KFRA RMP/EIS, as affirmed or adjusted by the KFRA ROD/RMP/RPS, would not change analysis of cumulative impacts. Any cumulative impacts are the same as and within the parameters of those identified and accepted in that planning document.

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

Documentation of answer and explanation:

The KFRA RMP/EIS and KFRA ROD/RMP/RPS were distributed to all interested publics and other government agencies for review. Since the proposed action is consistent with the objectives for the Old Baldy RNA listed in the LUP and that plan went through all of the appropriate and legally required public/agency review, public involvement is considered to be at least adequate.

All of those publics/agencies have also been kept informed of plan implementation through periodic planning update reports. These planning updates, or Annual Program Summaries as they are now titled, include information on special areas program and prescribed fire accomplishments, monitoring reports, planned activities for the coming year, and other information necessary to allow for adequate public involvement opportunities.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the NEPA analysis and preparation of this worksheet.

<u>Name</u>	<u>Title</u>
Louis D. Whiteaker	Botanist/author

(See attached NEPA cover sheet for reviewers/participants)

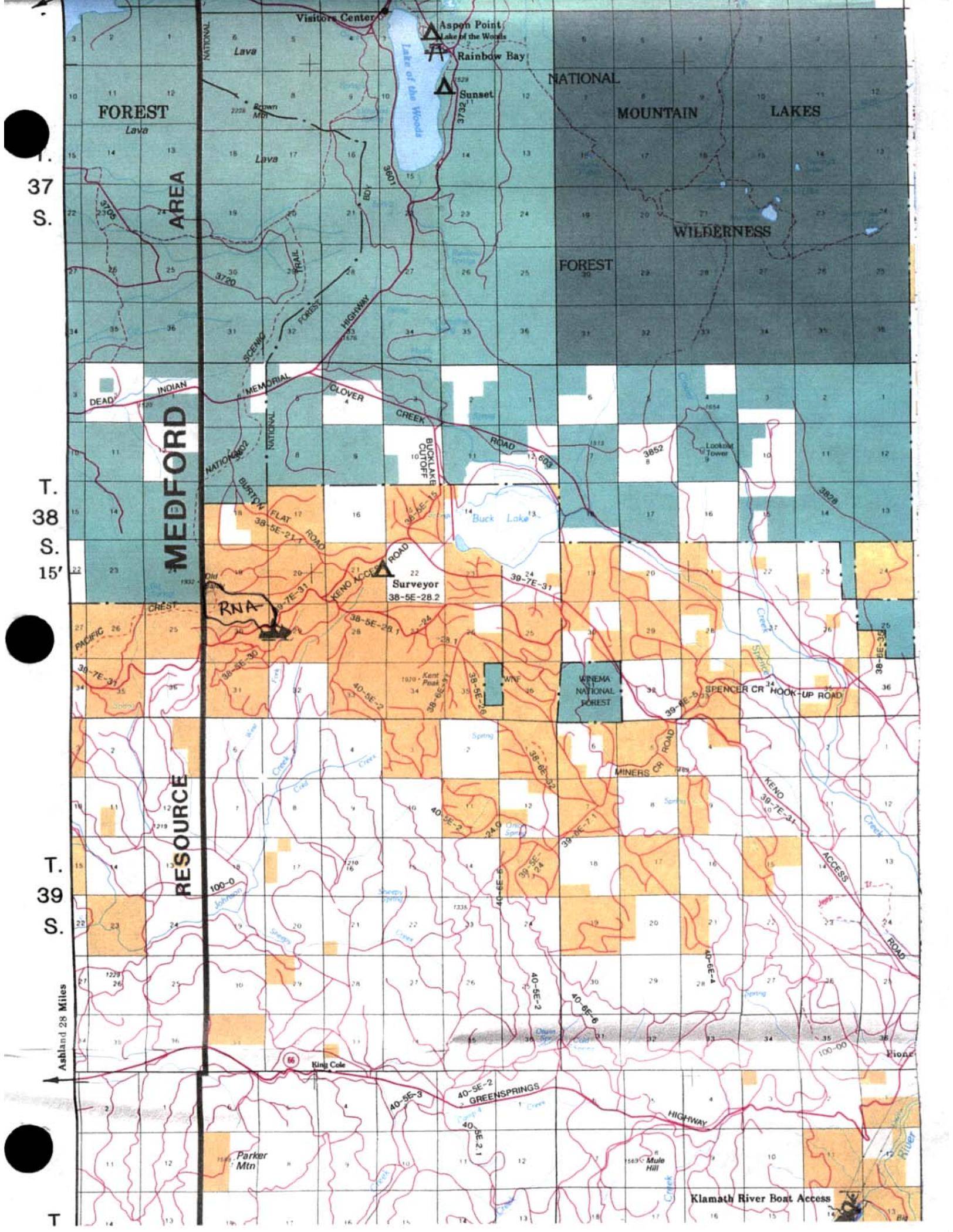
Conclusion

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 NEPA

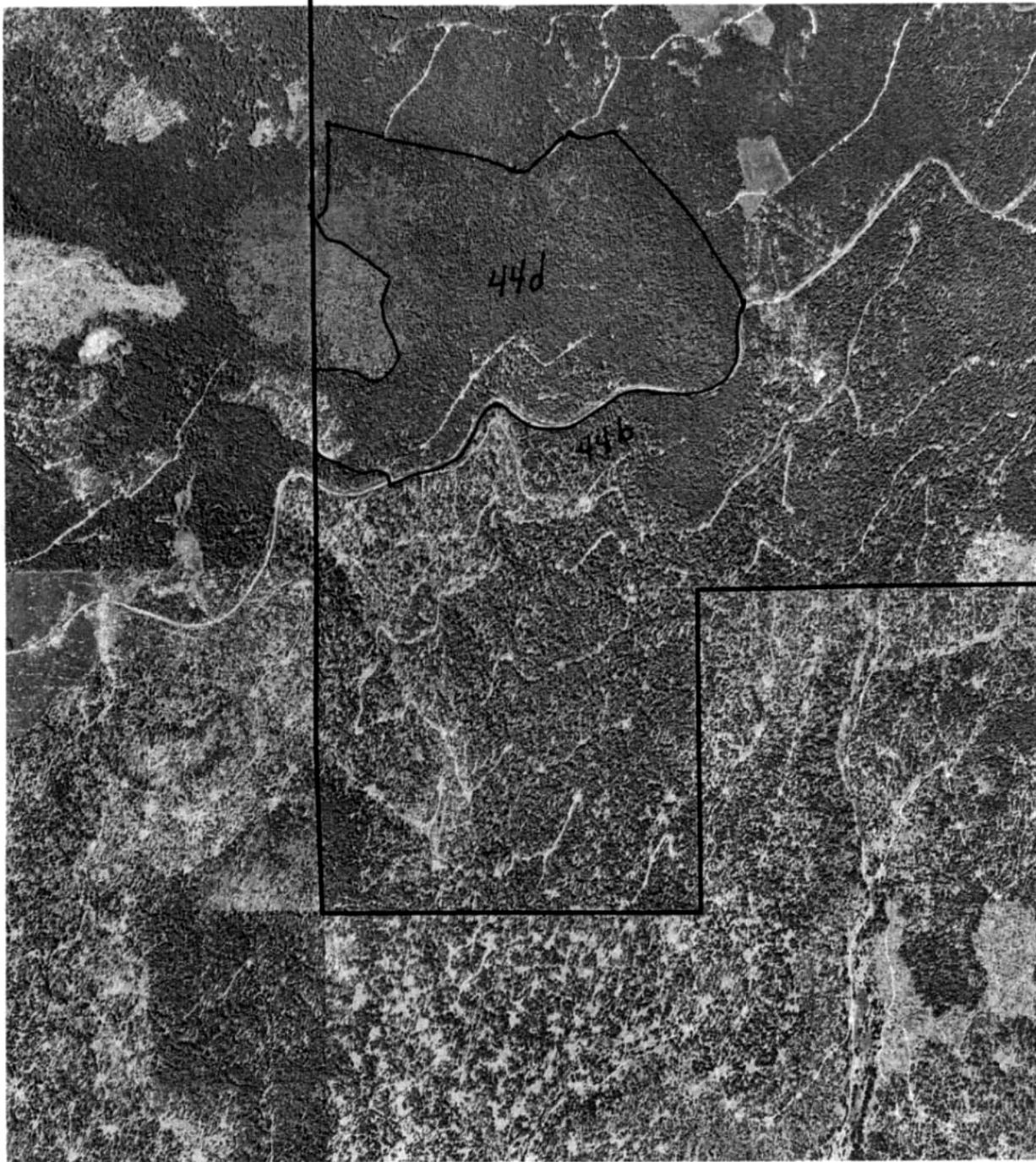
Note: If you found that one or more of these criteria is not met, you will not be able to check this box.

<u>/s/ Melvin D. Crockett</u>	<u>6/9/00</u>
Manager, Klamath Falls Resource Area	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.



540.6 Acres



POTENTIAL R_x BURN AREA