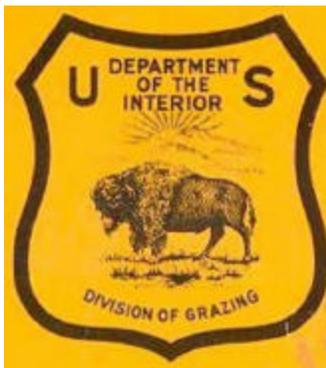


The Range-Juniper Treatment DNA



April 2002

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

U.S. Department of the Interior
Bureau of Land Management (BLM)

BLM Office: Klamath Falls Field Office

No. DNA-02-03

Proposed Action Title/Type: Fuels reduction and vegetative control by mechanical and or manual treatment (shearing, piling and burning) as described in the Klamath Falls RMP-RPS ecosystem restoration, enhancement, range and wildlife vegetation treatments.

Location of Proposed Action: Klamath Falls Resource Area, various locations – see attached map.

A. Description of the Proposed Action:

BLM proposes to reduce hazardous fuel levels by removing excessive levels of invasive juniper and other dense vegetation on approximately 8,600 acres as described in the Klamath Falls RMP-RPS by range allotment within the identified areas of the Klamath Falls Resource Area. Mechanical shearing would comprise most of the work; a small amount of mowing, hand cutting in riparian areas/steep slopes, and piling would also be done. The piles and mowed areas would be burned as necessary to complete the reduction of hazardous fuels.

The Proposed Action would include public collection of juniper firewood and up to 1000 acres of commercial use in the resource area per year. The 1000 acres of juniper would be sold or similarly utilized in commercial ventures as discussed in the Klamath Falls R.A. Resource Management Plan (page 2-52).

An additional 1200 acres of Fuel Treatment Zones (FTZ) would be treated for hazardous fuel reduction using the random selection and implementation process described under the Programmatic Fire Management EA OR 014 94-09.

Mechanical cutting of juniper (up to 24 inches in diameter) would be done with a large shear. This machine would mechanically sever the tree from its base and move the tree to a pile. The cut juniper next to roads may be left for utilization (posts, poles, firewood, etc.). The remaining slash would be allowed to cure and then burned. Treatment areas may be planted with shrubs (bitterbrush) or grass to restore native plant communities.

Mechanical mowing would be used to remove undesired brush or rejuvenate decadent brush fields and remove invasive small conifers. This type of vegetation takes away growing space for desired vegetation and is a ladder fuel that poses a threat to overstory trees. Brush fields would be mowed to within 6 inches of the ground and woody debris broken up and lowered to the litter layer. Burning in Fuel Treatment Zones and piled areas may be required to complete the rejuvenation process.

The mechanical work may all be tasked through contracting over the next five years (coincides with new mechanical treatment contract) with actual work being accomplished in the following years. Manual treatments scheduled for contracting would be tasked before September 30, 2003 to use the last year of the handwork contract. Agency personnel and equipment would complete areas of mowing and hand treatments in following years.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plan

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

LUP Name: *Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary* (KFRA ROD/RMP/RPS dated June 1995)

Other documents: *Fire Management Environmental Assessment* (OR-014-94-09 dated June 1994), the *Klamath Interstate Habitat Management Plan* (1982) and the *Juniper Control: Suggested Area Selection Criteria* (December 2001, attached).

Required Consultation: USF&WS Consultation on Fuels and Vegetation Treatment in Progress, Consultation for Programmatic Prescribed Fire completed and documented in # 1-10-99-I-77.

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

The KFRA ROD /RMP/RPS discusses the treatment of encroaching and invasive juniper stands in the Species Specific Actions of the Wildlife Habitat Section to improve forage for big game (page 34). Vegetation management is also discussed under the grazing management section (page 63 and Appendix H pages 65-69, the latter pages attached). Pages 29 and 30 of the KFRA ROD/RMP/RPS also discuss the importance of riparian-wetland management and using vegetation manipulation to improve and maintain management objectives. The impacts of these treatments are discussed in the RMP/EIS.

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) and, if applicable, implementation plan decisions:

N/A

C. Identify the applicable NEPA document(s) 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 R.A. Resource Management Plan and Environmental Impact Statement (KFRA RMP/EIS dated September 1994) which by reference on page 4 includes the objectives and process described in the KFRA Fire Management Environmental Assessment OR-014-94-09 May 1994.

The Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary (KFRA ROD/RMP/RPS), June 1995

The KFRA Fire Management Environmental Assessment OR-014-94-09, May 1994

KFRA ROD/RMP/RPS Appendix H Grazing Management Range, Improvements by Allotment Pages H-65 through H-68.

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

This juniper control is also specifically recommended and provided for by the following completed Rangeland Health Standards Assessments (by allotment): Bear Valley, Dry Prairie, Horsefly, Pitchlog, Timber Hill, Willow Valley and (4) Stukel Mountain.

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

The proposed action is consistent with the ROD/RMP and discussed under Wildlife, Species Specific Action for deer, elk and antelope, page 34 and the Grazing Management section page H- 69 and the KFRA Fire Management Environmental Assessment OR-014-94-09 May 1994, page 4, the ROD/RMP Visual Resources section, pages 43-44 and Recreation section page 30.

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, resource values, and circumstances?

The proposed action lies within the range of alternatives identified and analyzed in the KFRA RMP/EIS (summarized in table S-1 "Comparison of Allocations and Management by Alternative", pages 18-50) and page 51 in Chapter 4 – Environmental Consequences. Under control of competing vegetation, which is primarily removal of invasive juniper, the range of treatment is 0 acres for the No Action alternative to 8,600 acres Range, and 1,200 acres for Fire in the Proposed action. Since this plan is relatively recent, it is thought to adequately reflect "current environmental concerns, interests, and resource values."

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment

categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Yes, all standards and guidelines for sensitive species, riparian areas, rangeland health standards, and watershed assessment categorization are current and consistent with the analysis. Ecological site descriptions show that the current amount of juniper vastly exceeds the potential natural community descriptions on virtually every ecological site.

Treatments within riparian areas adjacent to temperature-limited streams (303Ld - listed) in the Miller Creek Watershed will be deferred until the Gerber/Willow Valley Watershed Analysis.

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

Yes, analysis in the KFRA RMP/EIS is still considered appropriate for the proposed action. Because of the lack of fire in the resource area, current plant communities are dominated by open stands of juniper. The need for large-scale juniper reduction is necessary to return natural ecological functionality.

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 sufficiently analyze site-specific impacts related to the current proposed action?

Yes, the impacts are substantially unchanged. The KFRA RMP/EIS states (page S-3) “that active management through prescribed fire or mechanical control would prevent continued unnatural juniper invasion”. The direct impacts of removing invasive juniper would be reducing the fire hazard, returning rangeland to shrubs and grass and improvement of wildlife, riparian, and aquatic habitat. By moving towards a more natural ecological condition, upland functionality would be restored. Mechanized equipment would be required to adhere to Best Management Practices to protect resources.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

The proposed action as analyzed in the KFRA ROD RMP/EIS would not change the analysis of cumulative impacts. Any adverse cumulative impacts are the same as and within the parameters of those identified and accepted in the existing NEPA documents

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

The KFRA ROD RMP/EIS was distributed to all interested public and other government agencies for review. Interested public and other agencies are kept informed through periodic planning updates (Annual Program Summaries). These updates include information for planned activities in the upcoming

year, and allow for adequate public involvement opportunities. We continue to receive meaningful comments from the public on our juniper management programs in the area.

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

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Marvin Strom	Fuels Contracting Specialist	Fire Management
Joe Foran	Fuels Management Specialist	Fire Management
Gayle Sitter	Wildlife Biologist	Wildlife Biology
Bill Lindsey	Range Conservationist	Range Science
Scott Snedaker	Fisheries Biologist	Fish, Riparian

Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUP(s) and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. The following documents that the applicable mitigation measures are incorporated and implemented.

Seasonal restrictions would be used to protect deer wintering areas, eagle nesting and roosting areas.

Best Management Practices would apply as described in the Klamath Falls Resource Management Plan, KFRA ROD/EIS. The following list is not all inclusive, but demonstrates typical Project Design Features.

To protect soil resources and water quality while limiting erosion and sedimentation to nearby streams and drainages, equipment operations would not be allowed during the wet season to prevent compaction, puddling and rutting (October 15 to June 1). Permit shearing, piling and slash busting activities during the restricted (October 15 to June 1) time period only if the soil is <20 % moisture content, frozen ground or sufficient snow is present, or as approved by the project manager with advice from a resource specialist(s). All ground operations would comply with applicable fire precaution level restrictions.

The operations permitted from June 1 to October 15 would be conducted with soil moistures <20% at the six-inch depth.

To minimize detrimental soil conditions and maintain or improve soil productivity within project areas, BMP's as outlined in the KFRA RMP including but not limited to the following would be considered: Soil Resource Protection (pg. D-11 to D-13, see KFRA RMP/EIS Appendix F for detrimental compaction definition); and Timber Harvest (pg. D-22 to D-25). KFRA RMP/EIS Appendix O (pg. O-7 to O-9) outlines implementation-monitoring requirements that are associated with ground disturbing activities. As with other resource area ground disturbing projects, these monitoring requirements will be followed for KFRA juniper treatments.

Treatment proposed within the Riparian Reserves across the resource area may occur outside of

existing reference areas. To protect riparian resources proposed mechanical treatments would be designed as per the Klamath Falls RMP BMP including but not limited to Timber Harvest BMP (pg. D-22, 23, 24, and 25), Silviculture BMP (pg. D-26, and 27), and Wildfire Prescribed Fire BMP (pg. D-28, 29, 30, and 31). Riparian reserve entries across the resource area are recommended only where treatments would reduce wildfire hazard within riparian reserves and would enhance/protect riparian conditions.

Project Design Features for delineating riparian area large equipment no-entry zones:

- To protect the thermal regime adjacent to streams and to maintain stream bank stability no-entry spacing for non-commercial treatments would occur from the natural topographic break to the stream. In areas where a topographic break is not evident the following minimum guidelines would be implemented: On intermittent streams with hill slopes less than 10 %, a 50 foot no-entry buffer would be established on each side of the stream. On hill slopes greater than 10 %, an 80-foot no-entry buffer would be established. On perennial and/or fish bearing streams with less than 10 percent slopes a minimum 100-foot buffer would be established. On perennial and/or fish bearing streams with slopes greater than 10 percent a no-entry buffer 140 foot would be established. Hand treatments within the mechanical no entry zone would be possible on a site-by-site basis, determined by the KFRA Riparian Team.

Application of the riparian area no-entry zone PDF may not be appropriate for all proposed treatment areas under this Mechanical treatment DNA. The Interdisciplinary team and the KFRA Riparian Team would address individual proposed treatments within Riparian Reserves for appropriate application.

All unique rock flow habitat, wet areas (springs, seeps, marshes, streams etc.), archeological sites, eagle roosts/nesting areas and other threatened and endangered species habitat would be buffered and protected by avoidance as directed by appropriate resource specialists. In addition approximately 10 % of all treatment areas would be left untreated if not already reserved for unique features described above.

The ongoing Gerber/Willow Valley Landscape Analysis encompasses the majority of the proposed projects. The Ecological Site Inventory has been completed for the Gerber Block and project selection reflects the recommendations derived from that document.

Up to 5 to 10 juniper trees on a project area average would be left per acre, with the largest, rounded, and green lichen covered trees (exhibiting old growth form) selected as reserve trees. Some selected treatment areas are classic invasive juniper, i.e. of similar age and small stature. Very few trees would be left in those project areas. The Contractor or machine operator would select leave trees based on contract inspector guidance or agency personnel trained for that particular work.

Additional Project Design Features are attached:

Weed Mitigation Measures.

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 constitute BLM compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

 / Teresa A. Raml /

Manager
Klamath Falls Resource Area

 June 7, 2002
Date



Kobelco Excavator with hydraulic shear attached.



Business end view of the hydraulic shear



This view is of a collapsing Mountain Mahogany stand with increasing juniper invasion component.



Brush field three to six feet deep mixed with Juniper and Ponderosa Pine.



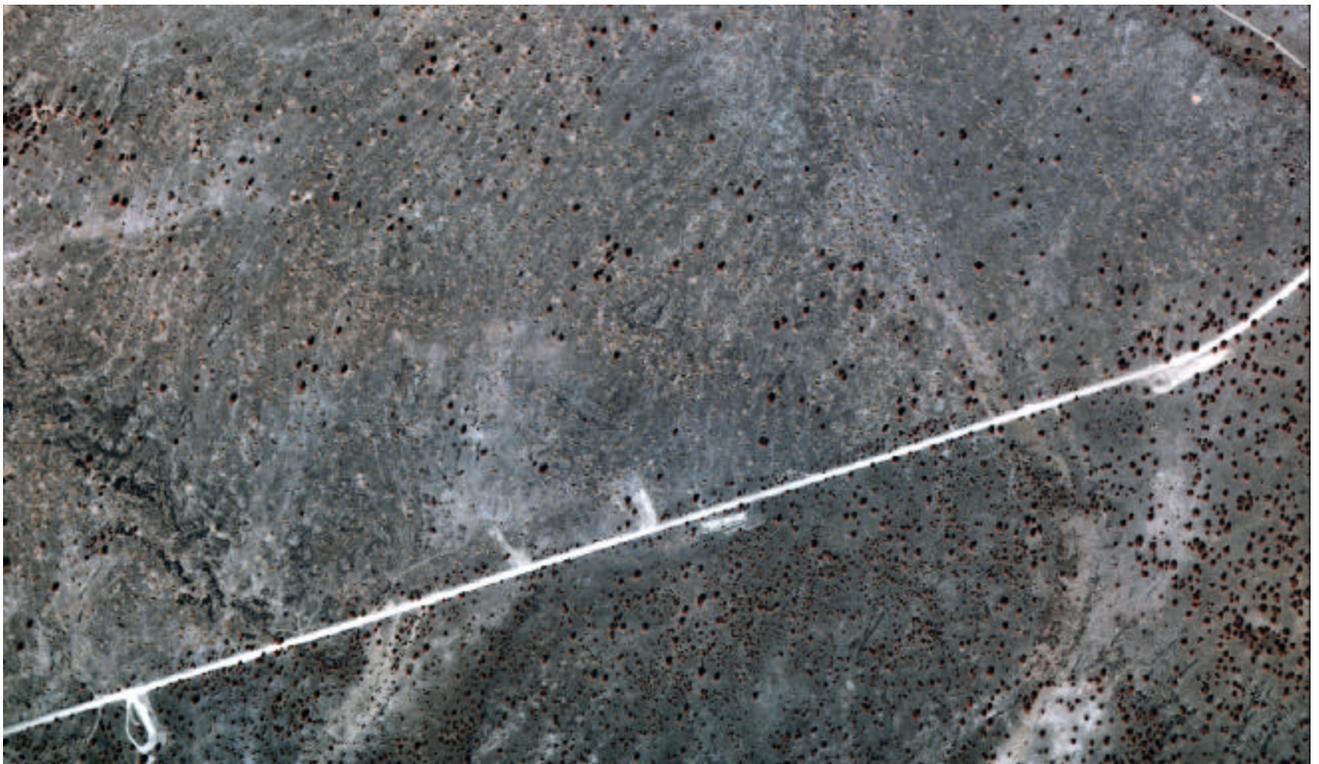
Burning shear piles mid-winter at Bumpheads FTZ # 53



Wintertime burns with wind and freeze drying produce quick fire with excellent consumption. Strong wind flow provides excellent vectoring and mixing for smoke.



Mechanical shearing and piling provides great select ability and allows for protection of Mountain Mahogany and other desired species.



Although the treated area on Bumpheads is visible to the trained eye the telltale signs will disappear after several years.



The piles provide a spot for planting natural species. At lower elevations and dryer aspects invasive species have been observed following treatments. Weed mitigation measures are required and equipment is washed between affected project areas.



Juniper invasion is considered to be a major concern in the Klamath Basin.

RMP/RPS Treatment Areas, and remaining FTZ random fuel treatment areas:

All acres are approximate and legal locations may include parts of sections not listed but are adjacent to sections that are.

UNIT NAME OR RANGE ALLOTMENT AND ALLOTMENT NUMBER (BOLDED)	POTENTIAL ACRES FROM CORE TEAM	RMP ACRES FOR EACH ALLOTMENT	FUNDING# 2823 JM or JA	RANDOM BY PROCESS DESCRIBED IN EA OR014-94-09 FTZ #	NEPA &/ Resource Management Plan
FTZ 136 b & c	125	N/A	JM - MA28	136	Fire EA -94-09
FTZ 147	280	N/A	JM - MA28	147	Fire EA -94-09
FTZ 175	146	N/A	JM – MA80	175	Fire EA -94-09
FTZ 176	406	N/A	JM – MA81	176	Fire EA -94-09
Rogers, Hill, Canard,Dehlinger, Stukel 98-7b	400	400	JM – MA57	N/A	RMP/RPS
FTZ 199-200 & KFFE WUI Area	200	N/A	JM – MA62	199, 200	Bly Mtn. T.S. EA & Fire EA 94-09
Bear Valley (876)	188	500	JA – MR70	N/A	RMP/RPS
Bumpheads (877)	231	500	JA – MR71	N/A	RMP/RPS
Dry Prairie (885)	1270	400	JA – MR72	N/A	RMP/RPS
Horse Camp Rim (886)	1397	1000	JA – MR73	N/A	RMP/RPS
Horsefly (882)	3818	3000	JA – MR74	N/A	RMP/RPS
Pitchlog (887)	1632	1000	JA – MR75	N/A	RMP/RPS
Rock Creek (888)	26	200	JA – MR76	N/A	RMP/RPS
Timber Hill (889)	649	100	JA – MR77	N/A	RMP/RPS
Willow Valley (890)	1157	1500	JA – MR78	N/A	RMP/RPS

1200 ac. 10,368 acres

8600 acres

Blue = Random Selection – Fire E.A.

Black = Range Potential Acres

Red = Range Program Acres (Resource Management Plan)

Attached:

Table of Project Areas for treatment under this document

Map of the individual proposed RMP/RPS project areas attached.

Description of selection process based on Ecological Site Inventory and multidiscipline input

Pages 65-69 Appendix H Range Program Summary

Bill Lindsey memo on Juniper Control: Suggested Area Selection Criteria

Memos from Scott Snedaker

PDF list from Scott Senter

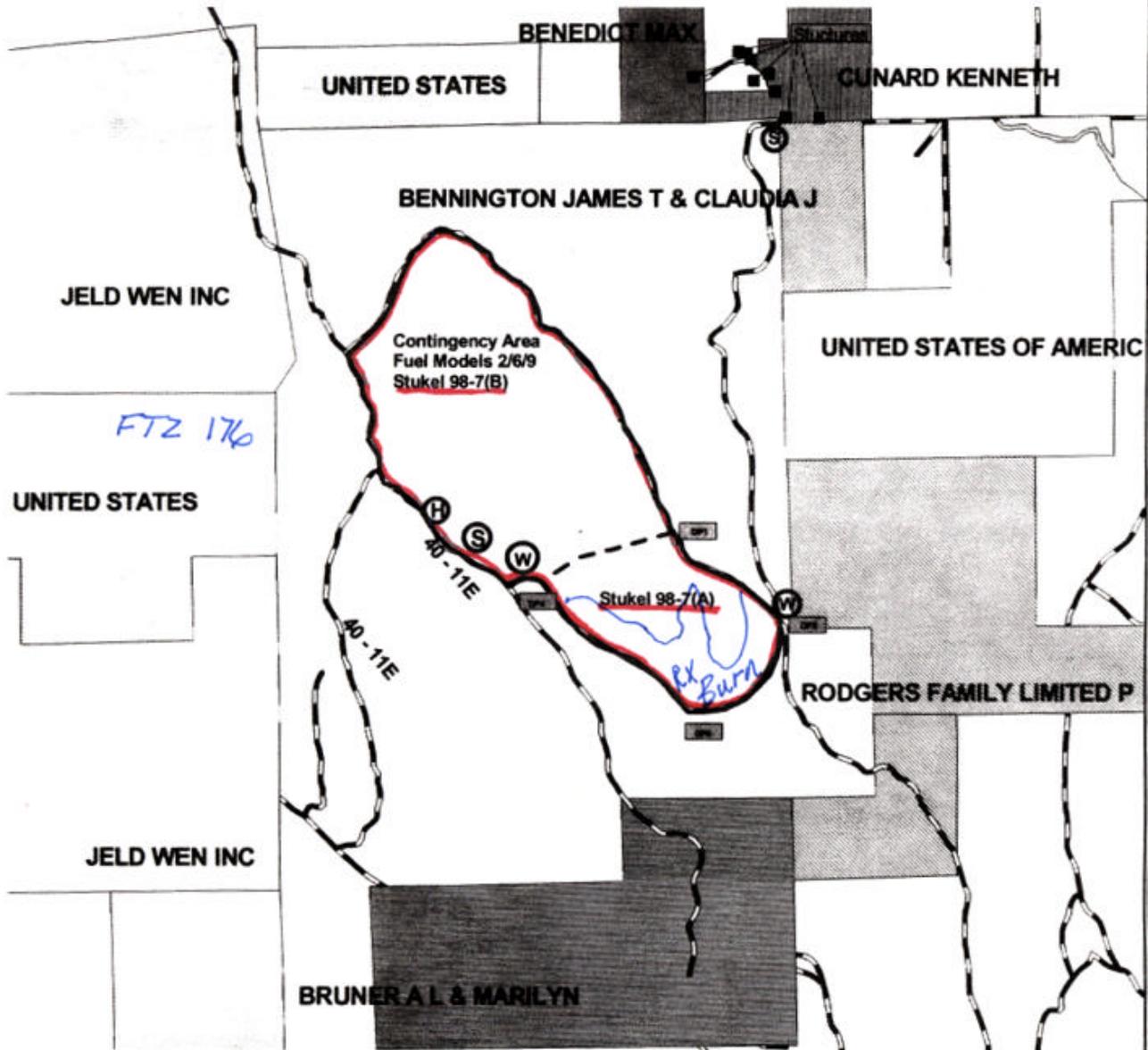
Decision Rationale and Finding Of No Significant Impact (E.A. #OR014-99-6)

(Bly Mtn./Swan Lake/White line Reservoir Timber Sale)

Vicinity Map for all Proposed Projects this DNA within Klamath Falls Resource Area.

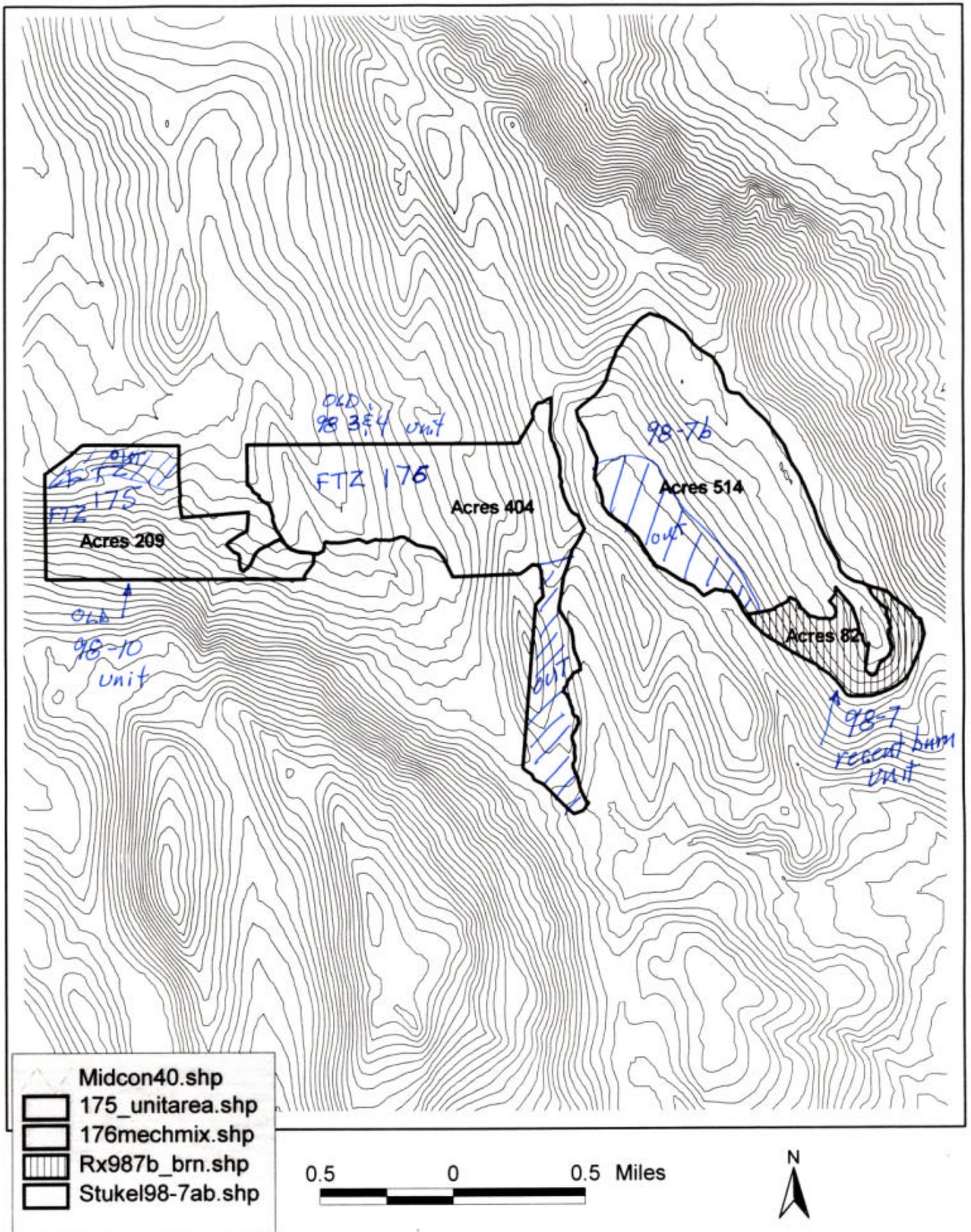
Results of Monitoring Previous Juniper Treatments FY 2001- Preliminary Baseline Information.

Juniper/Fuels Treatments to Benefit Riparian Areas.



-  Roads
-  BENEDICT MAX M & GEORGIA
-  BENNINGTON JAMES T & CLAUDIA J
-  BRUNER A L & MARILYN
-  CUNARD KENNETH
-  JELD WEN INC
-  RODGERS FAMILY LIMITED PARTNERSHIP
-  UNITED STATES
-  UNITED STATES OF AMERICA BY &

Stukel Fuel Treatment Units

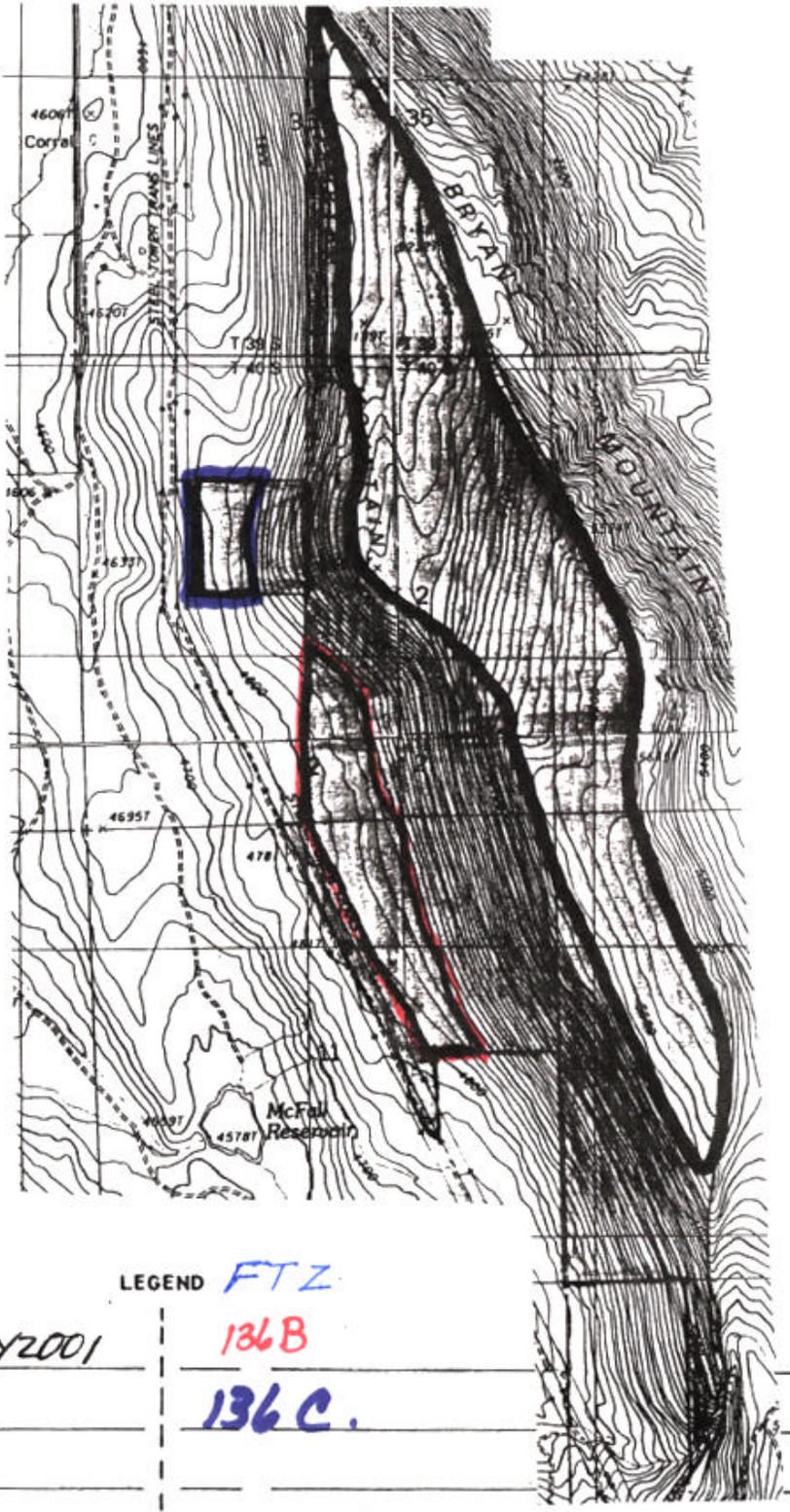


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DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Map

Township	Range	Section	Meridian	District	Date
40 S	12 E	2	Willamette	Lakeview	3-18-97
Mapper: C. Foran					



LEGEND FTZ
 136B
 136C.

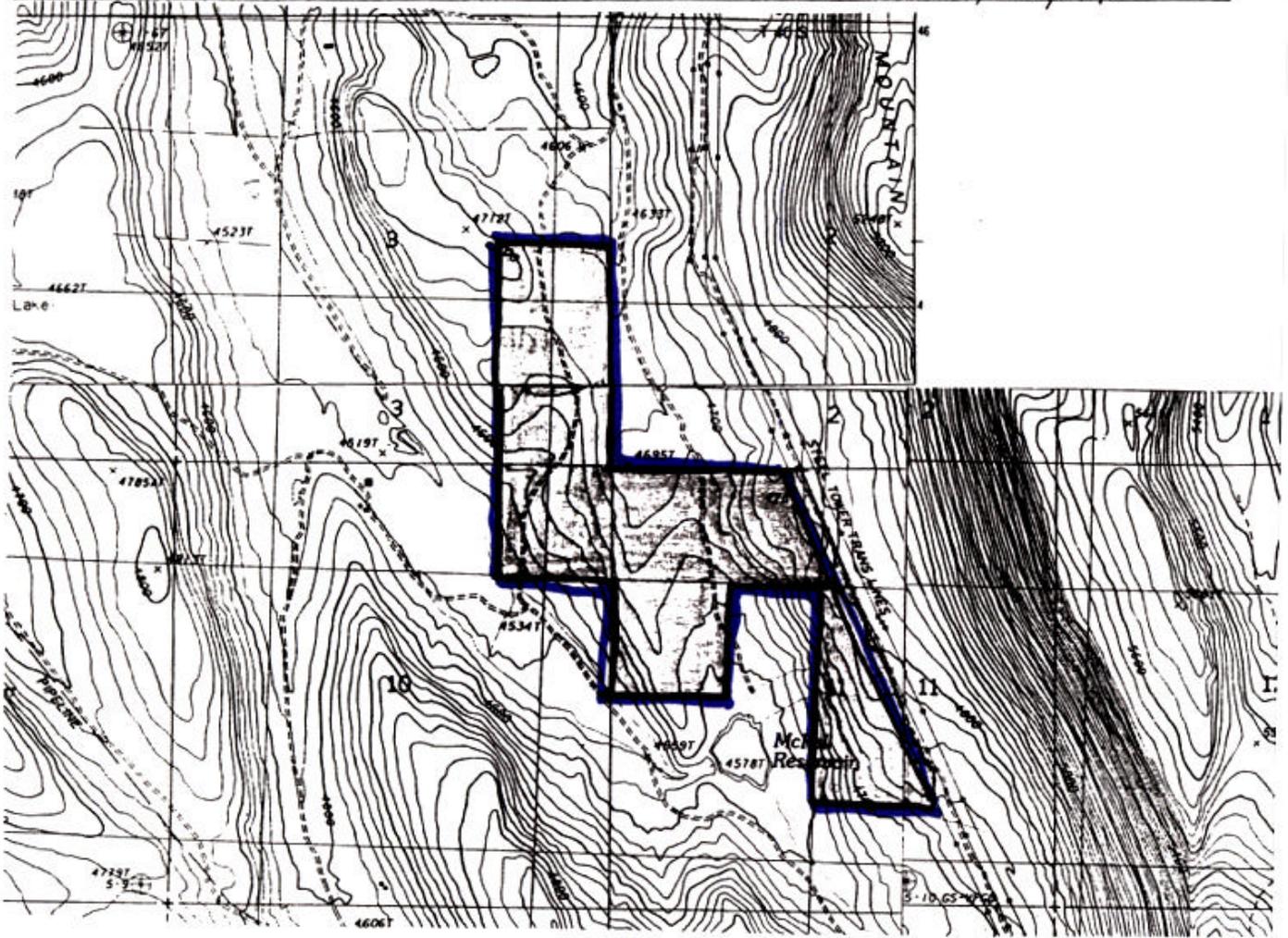
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<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

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Map

Township 40 S	Range 12 E	Section 11	Meridian Willamette	District Lakeview
Mapper C. Foran				Date 3/31/97



LEGEND

<input type="checkbox"/>	Manual	_____	_____
<input type="checkbox"/>	_____	_____	_____
<input type="checkbox"/>	_____	_____	_____
<input type="checkbox"/>	_____	_____	_____
_____	_____	_____	_____