

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

DNA-05-25 – South Bly WUI Juniper Yarding

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

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. (Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM’s internal analysis process and does not constitute an appealable decision.)

A. BLM Office: Lakeview District/ Klamath Falls Resource Area

Lease/Serial/Case File No. NA

Proposed Action Title/Type:

Yarding and removal of cut juniper on the following Fuel Treatment Zones:

	<u>Unit Acres</u>	<u>Estimated Acres To Be Yarded</u>
▪ <u>South Bly WUI – Juniper Yarding</u>	478 acres	469 acres
Total	478 acres	469 acres

Location of Proposed Action: Located in T.37 S., R. 14 E., Sections 9 and 10. (See attached map.)

Description of the Proposed Action:

The project consists of yarding, chipping, and hauling western juniper that has been cut under a fuels service contract. The juniper is currently (2005) being cut mechanically and bunched. The proposal is to yard the down juniper to landings, chip the material on site, and haul to a local processing facility for utilization in a hard board product. The Gerber Stew Stewardship Contract will be used to task out the yarding work. If not utilized for firewood or some other product, the material is scheduled to be burned in the fall of 2006.

A separate NEPA document has already been completed to address the impacts of the cutting treatment (South Bly WUI CX-04-12). This DNA addresses the yarding and removal of the material. It is anticipated that about 80-90% of the area on this unit will be yarded. Areas near the intermittent drainage will not be yarded. Junipers will be retained based on specific criteria (See Best Management Practices (BMPs) and Project Design Features (PDFs) on pages 4-6).

The primary objective of cutting western juniper is to improve forest and rangeland conditions that have deteriorated from encroaching western juniper. The western juniper increases the competition between desirable species; ponderosa pine, sagebrush, bitterbrush, mountain mahogany, and native plants and grasses for limited nutrients and water. To date, the KFRA has burned 70-80% of the juniper cut for rangeland restoration work. The objective of this treatment is to remove and utilize some of the residual fuel in lieu of burning. With the increased demand for western juniper for firewood, posts, poles, sawlogs, fiber, and other needs, this DNA addresses the impacts of yarding and removing the material in lieu of burning.

Applicant (if any): Not Applicable

B. Conformance with one or more of the following Land Use Plans (LUPs) and/or Related Subordinate Implementation Plans:

Klamath Falls Resource Area Resource Management Plan (RMP) June 1995 – Page 56 –

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions which states:

“Up to 1,000 acres per year of juniper woodland could be harvested for commercial forest products.”

Although there has been a considerable amount of juniper woodlands treated under the Programmatic Fire EA and the Range Improvement allotments discussed in Appendix H in the KFRA RMP, to date, less than 2,000 acres of juniper has been “harvested” for commercial forest products. Most of the juniper treatments to date have consisted primarily of cutting and burning the material. Only a small percentage has been yarded and utilized with the exception of public firewood areas. This trend is slowly changing as demand increases and the KFRA implements their Stewardship Contract to encourage utilization. In 2004, the Stewardship Contractor experimented with developing a market for juniper chips and chipped approximately 530 acres of cut juniper. In 2005, this same contractor has chipped approximately 220 acres of cut juniper. Even with this increase in utilization, the amount of juniper woodlands harvested for commercial forest products in the KFRA during the first decade of implementation of the KFRA RMP, as well as annually, is still well under that approved in the RMP.

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 Resource Area Resource Management Plan and Environmental Impact Statement – September 1994
- Fire Management Environmental Assessment – OR014-94-09
- South Bly WUI CX-04-12.

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 project is substantially the same action that was proposed in the RMP. Some previous yarding of juniper has been done under earlier EAs or CXs tied to the RMP and/or the Programmatic Fire EA. This project is specifically a DNA to yard the down juniper that has already been cut.

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 KFRA RMP Environmental Impact Statement analyzed an array of alternatives including no action, cutting and leave lay, cutting and burning, and utilization for firewood and miscellaneous products. The alternative for utilization (actually yarding and removing the material) that was analyzed in the RMP has just recently been applicable due to an increased demand for juniper in log or chip form.

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?

The analysis in the RMP Environmental Impact Statement (EIS) is presently adequate. The RMP allows for up to 1,000 acres per year. Anticipated impacts from the proposed action have not changed. Monitoring of vegetative response from similar treatments indicate that impacts are within those anticipated in the EIS. Inventories for cultural and special status plants are up-to-date and sites that were identified in the initial surveys are reflagged for protection.

This area is in a grazing allotment (North Horsefly #0821) for which the season of use is 5/1 to 6/15 each year for 45 animals (68 animal unit months). *Rangeland Health Standards Assessments* have been completed over the past several years for areas in which similar treatments have been applied. A *Rangeland Health Standards Assessment* has not been completed for this specific allotment. All of those *Assessments* noted that increased juniper encroachment or density (depending on what ecological site one is referring to) is an ever increasing and serious long-term condition problem. These *Assessments* affirmed the need for juniper treatment/control in order to maintain – or get back to - appropriate ecological conditions. The careful removal of the existing down material can assist this process by opening up more surface area for proper ecological plant succession and help avoid some of the negative effects of broad scale pile burning (e.g. annual grass infestations).

There is an intermittent stream in the area which will be managed according to RMP BMPs and PDFs. These measures are provided in Section F: Mitigation Measures.

There is also an eagle's nest within the treatment area. Provisions for avoiding impacts are provided in Section F as well.

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

The analysis used in the existing RMP EIS continues to be appropriate.

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?

The direct and indirect impacts of the proposed juniper yarding are unchanged from those initially analyzed in the RMP EIS. Best Management Practices and Project Design Features proposed in the RMP are incorporated into the implementation provisions of the contract. The site-specific impacts associated with the proposed action are substantially unchanged to those that were

considered in the RMP.

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 cumulative impacts were considered during the RMP EIS analysis. As mentioned previously, approximately 1,000 acres per year of commercial woodland harvest was considered. To date, less than 2,000 acres of juniper have been yarded for commercial purposes other than for firewood. Presently the cumulative impacts are significantly less than what was anticipated because less than 10% of the woodlands have been yarded for commercial purposes.

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

The KFRA has conducted a number of tours with the general public as well as interagency field trips to review the fuels and range restoration work that has been completed to date. In addition, there have been a number of newspaper articles discussing the juniper encroachment issue on both private and federal lands and the benefit of treating the juniper to maintain the historic rangeland plant communities. The KFRA has worked closely with local groups not only for cutting the juniper, but also reseeding and replanting the treated sites with native plants such as sage brush, bitter brush, and mountain mahogany. The KFRA has had a number of meetings through the Gerber Coordinated Resource Management Plan (CRMP) Team to discuss an array of issues including juniper encroachment. Congress authorized the BLM to develop Stewardship Contracts in 2003. The legislations encouraged the agency to work with other agencies, adjacent landowners, local rural communities and the general public to implement forest and rangeland restoration work and to utilize the fuel residue where feasible for biomass and/or other by products to offset the cost of the work.

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>
Tim Canaday	Archaeologist	Archaeology
Michelle Durant	Archaeologist	Archaeology
Steve Hayner	Biologist	Wildlife Biologist
Joe Foran	Fuel Mgt. Specialist	Fuels Management
Lou Whitaker	Botanist	Botany
Bill Johnson	Silviculturist	Forest/Woodland Mgt.
Bill Lindsey	Range Mgt. Specialist	Range Management
Mike Bechdolt	Timber Manager	Forest Management
Don Hoffheins	Planner	NEPA / Planning
Andy Hamilton	Fisheries Biologist	Fisheries
Elizabeth Berger	Hydrologist	Hydrology

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented. Best Management Practices and Project

Design Features (some of the following are found in the KFRA RMP, Appendix D) are proposed to mitigate potential impacts from the treatments. (Refer also to CX-04-12_South Bly WUI, Appendix A - Wildlife Project Design Features (PDFs) From the Fuels Programmatic Consultation; and Appendix B - Weed Mitigation Measures.)

Best Management Practices

- A no-mechanical-entry Riparian Buffer would be laid out. The boundary would be from the natural topographic break to the edge of the riparian area. In areas where a topographic break is not evident, the following guidelines would be implemented:
 - On the intermittent stream where slopes are less than 20%, a 25-foot no entry buffer would be established from the edge of the riparian area,
 - On slopes greater than 20%, a 50-foot no entry buffer would be established from the edge of the riparian area (hereafter Riparian Reserves). In wetland areas, a 50-foot no entry buffer would be established from the edge of the riparian area.
- Hand treatments would be applied within the no-mechanical-entry zones to meet fuels management objectives.
- Existing landings and roads within Riparian Reserves would be used only if replacing them with landings and roads outside the Riparian Reserves would result in greater overall disturbance to the Riparian Reserve or water quality.
- Avoid placement of skid trails and landings in areas with potential to collect and divert surface runoff such as the bottom of draws and ephemeral drainages.
- Yarding methods that would disturb the least amount of soil and would be used.
- No new permanent roads will be constructed within Riparian Reserves (except where construction or re-alignment of short road segments allows obliteration of longer road segments within Riparian Reserves).
- Yarding/skidding corridors that pass through Riparian Reserves will be designated prior to project implementation, will have a minimum spacing of 300 feet and be oriented perpendicular to streams, will have minimal relative slope, and will be revegetated following project implementation (as needed). Stream crossings will be selected at stable, naturally armored locations or will be armored with slash before being used as a corridor.
- Use of existing roads and landings within Riparian Reserves will be reviewed and approved by the Klamath Falls Resource Area interdisciplinary team.
- No ripping, piling, or mechanical site preparation (except for designated skid trails crossings, roads, or yarding corridors) would occur in Riparian Reserves.
- Install drainage dips, or water bars, in accordance with RMP BMPs to reduce surface run-off.
- A layer of duff (average of ½ inch after final burn) or slash will be retained on roads and skid trails to protect soil from erosion during the wet season.
- Mulch and seeding or other methods of soil stabilization are to be applied to any exposed soil surfaces prior to the wet season to reduce surface erosion.
- Surfacing roads in accordance with RMP BMPs (*Roads C-1-8*) is recommended for all naturally surfaced roads not proposed for decommissioning or closure.
- Design blockages (close or decommission) upon completion of treatments to minimize non-authorized use of roads and trails within treatment areas.
- Place residual slash on trails upon completion of mechanical treatments.

Project Design Features:

- All cultural sites will be buffered for avoidance protection
- Avoid disturbing healthy and concentrated areas of big sage, bitter brush, and mountain mahogany
- Equipment will be washed prior to entering area

- Avoid disturbing noxious weed areas
- Any residual material that is not utilized will be left piled/bunched as specified in the Fuel Management IDIQ contract.
- Standard log yarding stipulations will be incorporated into the permit including limiting skid trails to 150 feet apart and suspending buncher piles where feasible.
- No fuel treatments will be planned within the core area of the nest site (up to 30 acres around nest site as determined by BLM wildlife biologist) from January 1 to August 31.
- Consult with the allotment permittee to develop a cooperative agreement to rest this allotment for one to two years following treatment.

Juniper Retention Project Design Features:

- Retain juniper with older characteristics as follows:


Older juniper: Juniper that originated in the "presettlement" period, before 1870. It is assumed that these trees are growing on sites that they are adapted to, since they began growing there under "natural conditions" when natural processes (including lightning fires) determined vegetation patterns. Older juniper are usually found in rocky areas where vegetation is sparse and natural fire frequency is low. Some typical characteristics of older juniper are- - -

- *Crown is flat, rounded, broad at top, or irregular (as opposed to the more pointed tops of younger trees)
- *Spike top
- *Numerous dead branches
- *Branches covered with a coarse, bright yellow-green lichen (*Letharia*, or wolf lichen)
- *Large diameter lower branches
- *Large diameter trunk relative to height
- *Trunk has spirally-twisted bark, deep furrows
- *Hollow trunk

It is rare for an older juniper to have all of the above features, but more commonly will have at least three or four. Also, older juniper are not always the largest trees; on drier, rocky sites, they can be short, stubby, gnarly trees.

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's compliance with the requirements of NEPA.


Jon Raby, Manager
Klamath Falls Resource Area

10/14/05
Date

