

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

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: Klamath Falls Resource Area

Lease/Serial/Case File No. DNA-03-09

Proposed Action Title/Type: Stukel Mountain Prescribed Fire Units 98-2 East and Stukel 98-9

Location of Proposed Action: T 40S, R 10E, Sec. 12, 13
T 40S, R 11E, Sec. 7, 18
T 40S, R 11E, Sec. 5, 6

Description of the Proposed Action:

The prescribed fire unit 98-2 is approximately 724 acres on the east side of Stukel Mountain. It contains an active bald eagle territory that contains 2 known nests. The other unit (98-9) is also on Stukel Mountain and is approximately 468 acres. It contains one bald eagle nest, an alternate eagle nest, and is adjacent to a golden eagle nest site. These units were randomly selected for fuels treatment under the KFRA Fire Management EA #OR-014-94-09. The units originally contracted for prescribed fire treatment in 1998, but due to the presence of the bald eagles the units were postponed. In 2001 and 2002, pretreatments were conducted on the bald and golden eagle nest stands to reduce potential impacts to the nest stands during prescribed fire activities. Streamlining processes for consultation were initiated with FWS in Spring of 2001 and formal consultation will be completed prior to implementation. Ignition for the unit may be a combination of aerial, mechanical and manual operations (see Stukel Mountain 98-2 East burn plan for detailed information).

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

KFRA RMP/ROD	Date Approved: 1995
KFRA Fire Management EA #OR-014-94-09	Date Approved: 1994
Stukel Mountain 98-2 East Burn Plan	Date Approved: 2003
National Fire Plan	Date Approved: 2000
Biological Assessment for Prescribed Fire and Fuels Reduction on Stukel Mountain	Date Approved: 2003
Biological Opinion for Prescribed Fire and Fuels Reduction on Stukel Mountain	Date Approved: In Progress

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

The Resource Management Plan/EIS incorporates by reference the analyses and decisions made by the 1994 Klamath Falls Resource Area Fire Management Environmental Assessment. The KFRA RMP/ROD also states in the Wildlife Section, under Bald Eagle (pp 38) “Conduct fuels reduction management actions to help reduce potential loss of (bald eagle) habitat to catastrophic wildfire occurrences.” and “Protect known and potential habitat sites identified in the Pacific Bald Eagle Recovery Plan.”

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.

KFRA Fire Management EA #OR-014-94-09, 1994

KFRA Resource Management Plan ROD and Rangeland Program Summary June 2, 1995

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).

Biological Assessment for the Prescribed Fire and Fuels Reduction Treatments on Stukel Mountain (March 2003)
Biological Opinion for the Prescribed Fire and Fuels Reduction Treatments on Stukel Mountain (In Progress)

D. NEPA Adequacy Criteria

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

Documentation of answer and explanation:

Yes, the prescribed fire treatment on Stukel Mountain is the same action as analyzed by the KFRA Fire Management EA #OR-014-94-09. Fire effects to specific vegetation and plant associations were analyzed on pp 13-15 and fire effects on wildlife, specifically birds and bald eagles “ If fires are initiated during periods when birds are nesting or mammals are producing young, then impacts could be detrimental to local populations” (pp 18) and “ Prescribed burning will not likely have any effect on large nest trees due to the resistance of large old trees to low intensity fire”(pp20). The proposed fuels reduction is also discussed in the Klamath Falls RMP/ROD pp 38, “Conduct fuels reduction management actions to help reduce potential loss of (bald eagle) habitat to catastrophic wildfire occurrences.” and “ Protect known and potential habitat sites identified in the Pacific Bald Eagle Recovery Plan”.

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?

Documentation of answer and explanation:

The range of alternatives in the KFRA Fuels Management Environmental Assessment (1994) is appropriate to the current proposed action, given the latest environmental concerns and interest. Interest and concerns for the need to continue fuels reduction are at an elevated level due to the wildfire seasons in the past few years. Since this EA was signed other documents such as The President's Health Forest Initiative (August 2002) and the National Fire Plan (2000) have been introduced and have shown the need to continue fuels reduction to prevent the risk of a catastrophic wildfire and resource loss.

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?

Documentation of answer and explanation:

Yes, The analysis and conclusions in the KFRA Fuels Management Environmental Assessment are adequate and the new information (Forest Health Initiative and National Fire Plan) that has come to light since this analysis strengthens the need to continue to reduce fuels and improve the health our forested habitat.

Yes, Information acquired since this analysis is insignificant with regard to the proposed action.

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:

Yes, the methodology and approach described in the KFRA Fuels Management Environmental Assessment (1994) is appropriate for the current action. Under the Preferred Alternative (pp 7-8), ignition techniques, management ignition prescribed fire and associated activities; unit selection by a random selection process, and treatments within the Urban Interface are appropriate for the proposed action.

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?

Documentation of answer and explanation:

Yes, The direct and indirect impacts are substantially unchanged from the effects analyzed in the KFRA Fuels Management Environmental Assessment (1994). The Environmental Consequences Section (pp12-26) discusses impacts to Resources.

Yes, This EA analyzes the specific vegetation type (pp 13-17) on Stukel Mountain as well as the impacts to wildlife (pp 18-20) including bald eagles. “ If fires are initiated during periods when birds are nesting or mammals are producing young, then impacts could be detrimental to local populations” and “ Prescribed burning will not likely have any effect on large (bald eagle) nest trees due to the resistance of large old trees to low intensity fire”.

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)?

Documentation of answer and explanation:

Yes, the cumulative impacts would not be greater than those analyzed under the KFRA Fuels Management Environmental Assessment (1994) and the KFRA Resource Management Plan ROD and Rangeland Program Summary. The impacts from this prescribed fire would not be greater than those already analyzed.

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

Documentation of answer and explanation:

The KFRA Fuels Management Environmental Assessment (1994) and KFRA Resource Management Plan ROD and Rangeland Program Summary (1995) were open for public scooping and review and those comments considered prior to the final decision being issued. Consultation by the Fish and Wildlife Service (FWS) was conducted on both plans and formal consultation with the FWS is in progress on this project. Oregon Department of Fish and Wildlife was also consulted of the proposed project.

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>
Steve Hayner	Wildlife Biologist	Wildlife

Gayle Sitter
Don Hoffheins
Joe Foran
Barbara Ditman

Wildlife Biologist
Planner
Fuels Specialist
Branch Chief

Wildlife
NEPA Coordinator
Fuels/Fire
Fuels/Fire

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.

Project Design Features from the Biological Assessment for the Prescribed Fire and Fuels Treatments on Stukel Mountain that will be implemented:

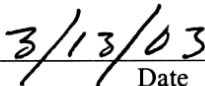
- The Resource Advisor will be in direct communication with the Burn Boss to mitigate the disturbance from people on the ground as well as the helicopter in the air within the limits of human safety.
- Ignition near the nest sight may be done manually with as few people as possible and as quickly as possible to minimize the duration and the disturbance that the eagles are exposed.
- During the ignition period there will be a minimum of 2 people monitoring the behavior and nest activities using spotting scopes and in direct communication with the resource advisor.
- Smoke will be monitored and lighting patterns adjusted to minimize smoke to the eagles.
- Activities will be temporarily halted if harm may occur to adult bald eagles or their nest site is in jeopardy.
- In case of an injury to an eagle, emergency measures will be in place.
- A camera may be installed to record activities at the nest site during prescribed fire activities
- Vegetation and fuels monitoring plots have been established in 98-2 and 98-9 under both bald eagle nests. Plots were designed to measure dead and down material and vegetation change after prescribed fire treatments have been completed. National Park Service fuel monitoring techniques were used in designing the study.
- Pre-treatment activities as discussed earlier were completed to minimize the risk to the nest stand and reduce the risk to nesting eagles.
- Ground vehicle (ATV, FMC, Engines, etc.) traffic will be kept to a minimum near the bald and golden eagle nests.
- No mop-up will occur in the direct area around the nest site unless fire behavior dictates it. Crews conducting patrol will keep traffic to a minimum near the nest stand. The resource advisor will be informed of mop-up and patrol needs around nests.
- A contingency plan will be in place as part of the burn plan in the event of an escape and efforts will be made to protect the nest stand from impacts during suppression.

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 constitutes BLM's compliance with the requirements of NEPA.

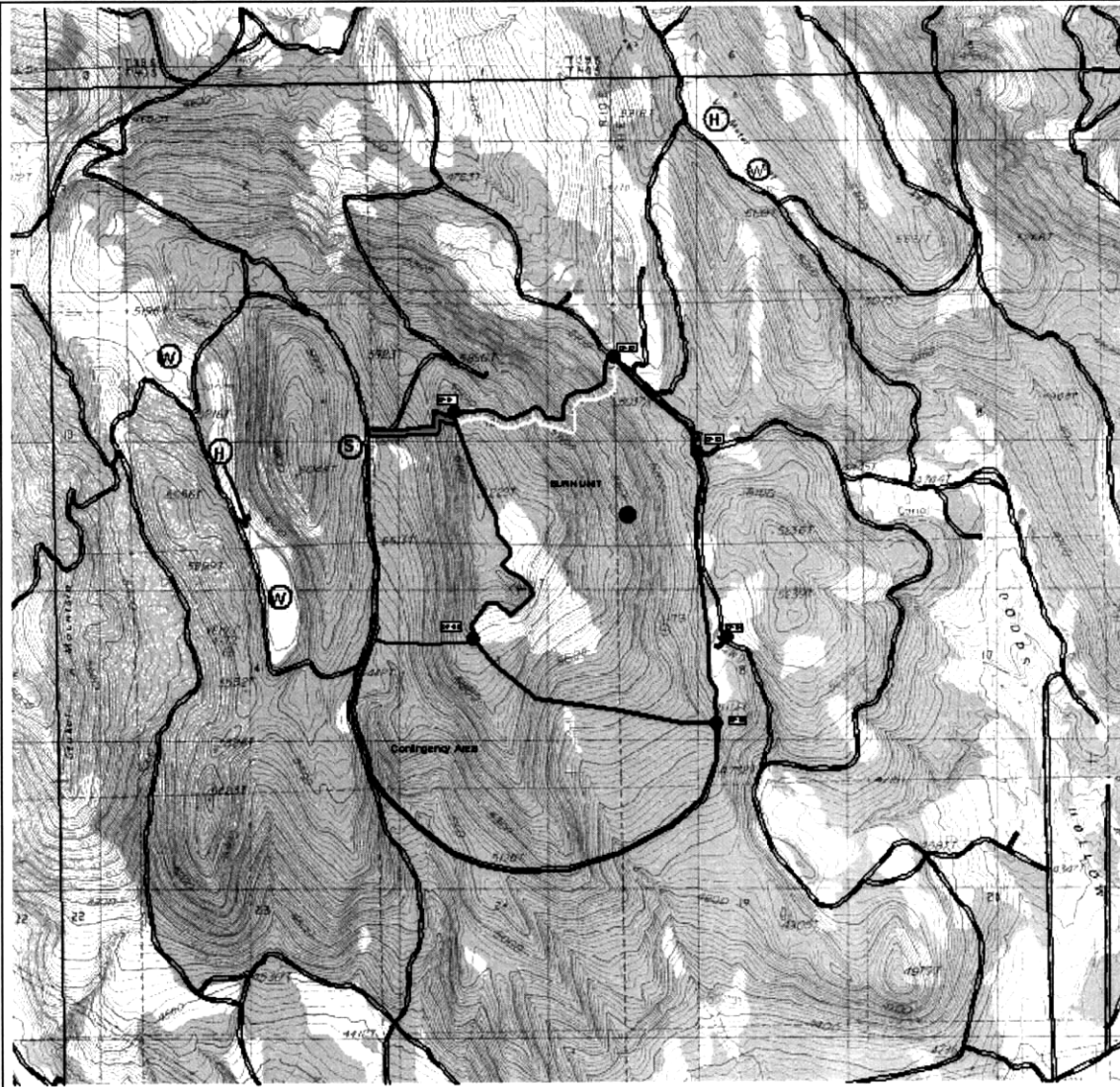


Signature of the Responsible Official



Date

VICINITY MAP



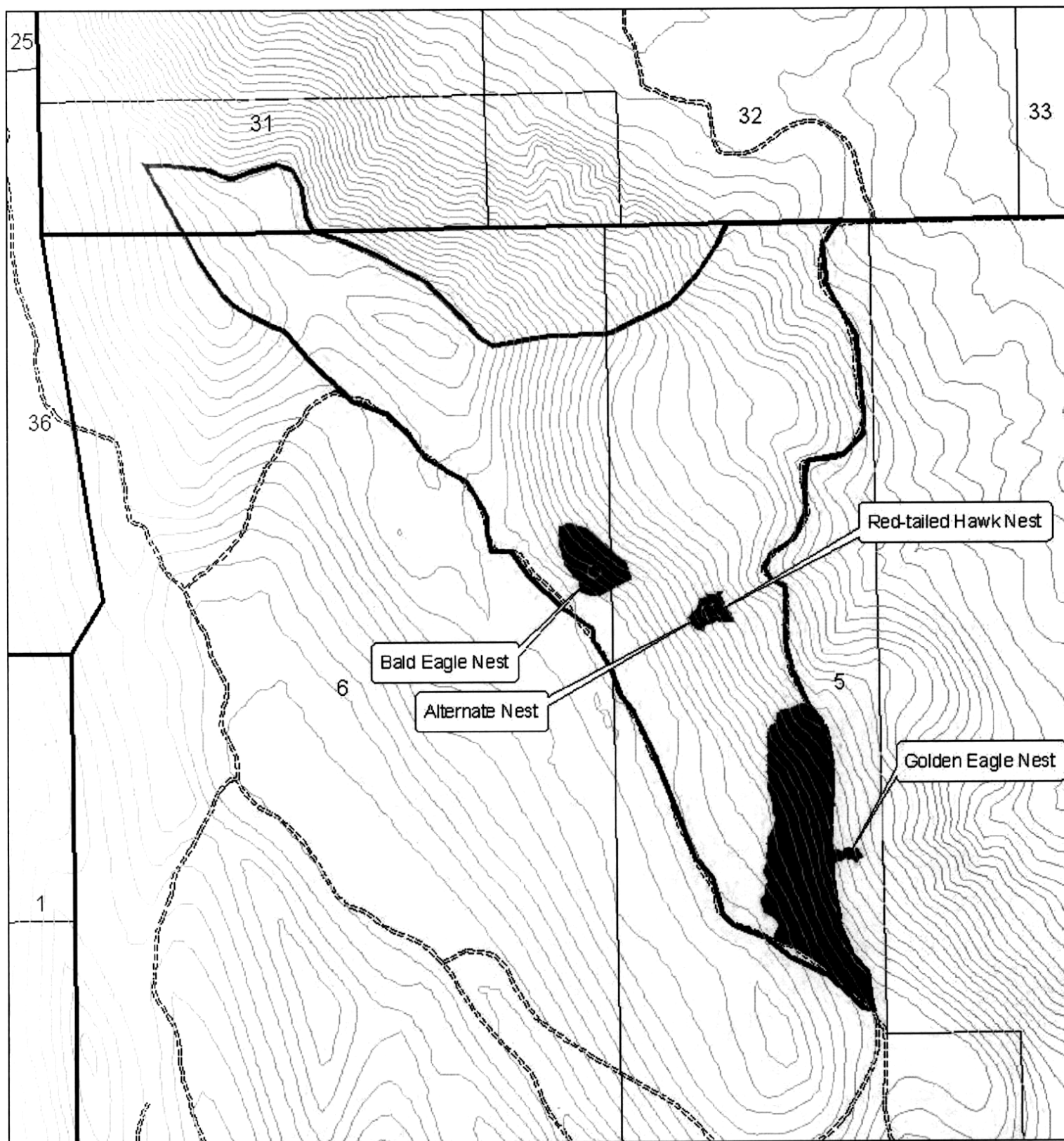
Stukel Mountain 98-2 East Vicinity Map



0 1 2 Miles

LEGEND

- Stukel 98-2 East Rx Unit
- Stukel Mountain Roads
- Unimproved Two-Track Road
- Hand-line
- Eagle Nest Tree



98-9 Rx Burn Pretreated Areas

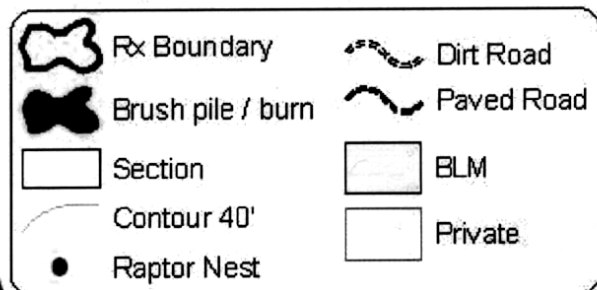
1:15,840 1 inch equals 0.25 mile

0 0.25 0.5 0.75 Miles



For Internal Use Only

T. 39S R. 11.5E
T. 40S R. 11E



Klamath Falls Resource Area NEPA Document Routing Slip for Internal Review

Project Name: PROPOSED FIRE TREATMENTS STUKEE 98-2 + 98-9

Date Initiated: 3/10/03

Resource or Staff Responsible	Review Priority	Preliminary Review Date/Initials	Comments Attached/Incorporated	Final Review Date/Initials
Manager: Teri Raml MEL	Last			<i>MEL 3/13/03</i>
Branch Chief: Barbara Ditman	Second to Last	<i>GOOD!!</i>	<i>ATTACH MAPS OF STUKEE - CAN YOU PRINT BETTER COPY?</i>	<i>BAL 3/12/03</i>
Branch Chief: Larry Frazier	Second to Last	<i>NICE JOBS</i>	<i>-MINOR COMMENT on pg 1-3</i>	<i>LF 3/12/03</i>
Branch Chief: Mel Crockett	Second to Last			
Planner/EC: Don Hoffheins, Kathy Lindsey	Third from Last			
Range: Bill Lindsey, Dana Eckard				
Wild Horses: Tonya Pinckney				
Fire/Air Quality: Joe Foran		<i>JNF 3/12/03</i>		<i>JNF 3/12/03</i>
Silviculture: Bill Johnson, Gabi Sommerauer				
Timber: Mike Bechdolt				
Botany/ACEC/Noxious Weeds: Lou Whiteaker				
Soils: Jannice & Mike Cutler				
Cultural: Tim Canaday				
Minerals/HazMat: Tom Cottingham				
Lands/Realty: Linda Younger				
Recreation/Visual/Wilderness: Scott Senter				
Hydrology/Riparian: Mike Turaski, Andy Hamilton				
Wildlife/T&E: Gayle Sitter		<i>GS 3/12/03</i>	<i>included.</i>	<i>GS 3/12/03</i>
Fisheries/T&E: Scott Snedaker				
W/S Rivers: Grant Weidenbach				
Engineering: Brian McCarty				
Survey/Manage: Molly Juillerat				
Clearances/Surveys	Needed	Done/Attached	<p>*This document will not sit on your desk for more than 8 hours. Please check on calendar to make sure that the next person will be available to review the document.</p> <p>**Some resource areas may not apply for all projects. If so, just mark "N/A" in "Review Priority" column.</p>	
Cultural				
Botanical				
T&E, BA & or Consultation	<i>In Progress</i>	<i>GS 3/12/03</i>		
R-O-W Permits				