

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

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

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BLM Office: Salem District Office

DNA No. DOI-BLM-ORWA-S000-2016-0001-DNA

## **Proposed Action Title/Type:** Tipping of Trees for fish logs at the Horning Seed Orchard

*The purpose of this document is to determine whether existing environmental analysis completed in regards to the pushing over trees for use as fish logs for restoration projects is adequate for obtaining fish logs from selected orchards at the Horning Seed Orchard. It evaluates whether conclusions reached in response to that analysis remain valid.*

*This review indicates that the project proposal is substantially similar in type, location and intensity, scope and location to the proposal analyzed in the Salem District Aquatic and Riparian Habitat Restoration Environmental Assessment (2012). It affirms that the project, as designed, is consistent with the range of alternatives analyzed during the NEPA process.*

**Location of Proposed Action:** The project is located on the Horning Seed Orchard within the Molalla watershed, near the town of Colton in Clackamas County, Oregon. Tree tipping locations are in orchard blocks in the southwestern portion of the Horning Seed Orchard in Township 4 South; Range 3 East, Sections 13 and 23 (see attached map for specific location).

**Description of the Proposed Action:** The proposed action is to push over trees in the Horning Seed Orchard (Orchard) to use as fish logs for river restoration projects. Currently, fish logs are needed to complete the last 2 years of planned restoration actions on the Salmon River that are part of a planned 7 year-long restoration project. Trees to be tipped over are located in orchards that are scheduled to be cleared of trees by 2016. The trees are being removed because they have reached the end of their useful life span for seed trees. The orchards scheduled for clearing are located in the southwestern corner of the Orchard in T.4S, R.3E section 13, Willamette Meridian (Orchard blocks B-13, and B-30), and buffer plantings of giant sequoia in T.4S, R.3E, Section 23 that separate several Orchard blocks).

Trees will be pushed over by use of a tracked excavator, dirt shaken free of the roots, and holes produced by removing the roots of the trees backfilled with soil and leveled. The trees will be cut into 50 to 60 foot long logs and loaded on log trucks and hauled to restoration project sites. Slash from broken and sawn off branches (to facilitate loading of the trees onto the log trucks) will be piled for later burning by Orchard Staff.

The project conforms to the goals and objectives for obtaining fish logs for restoration projects as outlined in the Salem District Aquatic and Riparian Habitat Restoration Environmental Assessment OR-S0000-2012-0001 (March 2012).

**Applicant (if any):** Not Applicable

## **Conformance with the Land Use Plan (LUP) and Consistency with Related**

## **Subordinate Implementation Plans**

### **Land Use Plans**

- Salem District Record of Decision and Resource Management Plan (1995)

**The proposed action is in conformance with the applicable LUPs because it is provided for in the following LUP decisions (Salem District Record of Decision and Resource Management Plan 1995):**

#### **Pages 27-28, Salem District Record of Decision and Resource Management Plan:**

Maintain or enhance the fisheries potential of streams and other waters consistent with BLM's Fish and Wildlife 2000 Plan, the Bring Back the Natives initiative and other nationwide initiatives.

Promote the rehabilitation and protection of at-risk fish stocks and their habitat.

As identified through watershed analysis, rehabilitate streams and other waters to enhance natural populations of anadromous and resident fish. Rehabilitation measures may include, but not be limited to: instream structures using boulders and log placement to create spawning and rearing habitat.

### **Identify the applicable NEPA document(s) and other related documents that cover the proposed action.**

- Salem District Aquatic and Riparian Habitat Restoration EA (2012).
- Salmon River Restoration Project EA (2010)

## **NEPA Adequacy Criteria**

### **Is the current proposed action substantially the same action (or is a part of that action) previously identified?**

Yes. The proposed action was described and analyzed in the Salem District Aquatic and Riparian Habitat Restoration EA (2012; Restoration EA). A map of the orchards to be cleared of trees, and used for fish logs in restoration projects can be found at the end of this document.

The Restoration EA analyzed the tipping of trees in source stands in native forest habitats. Impacts of tipping orchard seed trees would be less than that disclosed in the Restoration EA, because the Orchard is highly managed for the production of tree seeds, with road systems, and evenly spaced seed trees, which are grown in plantations with a grass understory.

### **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?**

Yes, the proposed action was analyzed in the Salem District Aquatic and Riparian Habitat Restoration EA (2012). The proposed project is within the range of the alternative analyzed in the EA. Impacts of tipping trees are less than that analyzed in the Restoration EA because the highly managed Seed Orchard plantations do not

support as great of a range of fish and wildlife resources as the native forests source stands, which were analyzed in the Restoration EA. Use of the trees from orchard blocks scheduled to be cleared as part of planned orchard operations provides fish logs for restoration with less impacts than obtaining logs from native forest stands, and also provides a service to the Horning Seed Orchard as staff do not have to contract or pay for the removal of a large volume of root wads, which is the case if the orchards were cleared in a more conventional manner.

**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?**

There is no additional information relevant to the proposed tree tipping in the Horning Seed Orchard (see map) that could be considered significant. With respect to fisheries, water quality, botany, invasive plants, and wildlife, there is no additional relevant information to the project in regards to the analysis.

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

The methodology and analytical approach that was used in the Restoration EA is valid, current and sufficient for supporting approval of the proposed action. It is reasonable to rely on the method previously used because it is the most current strategy the BLM uses for planning, analyzing and restoration projects, including the acquisition of trees for fish logs.

**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 direct and indirect impacts of the proposed action are analyzed in the Restoration EA and would not differ from those identified in this existing NEPA document.

Potential impacts to wildlife species (land birds) due to tree tipping are the most relevant to this project. The Restoration EA described the impact of tree tipping and removal as follows:

**Restoration EA Section 3.5 Wildlife (pg. 52)**

*A small percentage of bird habitat may be removed within the project area through riparian thinning, single tree removal for instream log material and heavy equipment access through riparian areas for culvert replacement, dam removal, and habitat placement. However, this loss would be negligible due to the large amounts of suitable habitat to be retained on adjacent land and the loss of site specific*

*habitat would be short-term until the disturbed area is revegetated.*

*Wildlife disturbance stemming from human use and intrusion includes increased noise, harassment, and traffic levels. Impacts are likely to include changes in wildlife behavior, including avoidance and breeding behavior, which could affect nesting/breeding success. Possible habitat alteration could occur such as compaction and trampling of the forest floor and disturbance of CWD from unregulated user created trails.*

Impacts to land birds and other wildlife are likely to be less than that disclosed in the Restoration EA, because the Horning Seed Orchards is a highly managed landscape (tree plantations grown for seed, with only a grass understory), such that orchard blocks support fewer wildlife species than native forest stands. Also, trees would be removed in fall after the breeding/nesting season. Additionally, the managed stands at the Orchard are commonly available in the wildland-rural interface of lands in the Estacada-Colton area.

**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)?**

Yes: Cumulative impacts that would result from the proposed action have been analyzed and can be found in the Salem District Aquatic and Riparian Habitat Restoration EA (cumulative effects are discussed under each resource section; ie. Fisheries and Aquatic Habitat section 3.1, Water Quality section 3.2, Botany section 3.3, Invasive Plants section 3.4, and Wildlife section 3.5).

The anticipated cumulative impacts that would occur under project implementation are unchanged between the existing EA and the current proposal.

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

Yes, the level of public involvement surrounding the completion of the Restoration EA is adequate and is in compliance with NEPA public involvement requirements in light of current conditions, information, issues and controversies.

Public Involvement/Consultation/Coordination surrounding the Restoration EA is as follows:

***Scoping***

The BLM sent out a scoping letter describing the Salem District Aquatic and Riparian Habitat Restoration project to 41 federal, state and municipal government agencies, tribal authorities, and interested parties on May 13, 2011. One comment (from Oregon Wild) was received on the scoping letter. The comment indicated support for the implementation of aquatic restoration activities on the District.

Between May 2011, and March 2012, a description of the project appeared regularly in the BLM Project Update publication to solicit comments on the proposed project.

The Restoration EA and FONSI were made available for public review March 6, 2012 to March 20, 2012 and posted at the Salem District website at <http://www.blm.gov/or/districts/salem/plans/index.php>. The notice for



# Horning Seed Orchard Orchard Clearing Section 13

