

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)
Salem District, Oregon
Marys Peak Resource Area

Rowell Creek Timber Sale
DOI-BLM-ORWA-S050-2016-0001-DNA

A. Background and Description of the Proposed Action

Location: T. 7. S., R. 8 W., Section 1, Willamette Meridian. Polk County, Oregon. South Yamhill-Agency Creek fifth field watershed.

The BLM analyzed a thinning project and a legacy tree release project in the South Yamhill River Watershed Enhancement Environmental Assessment¹ (EA) in May 2014. The Rowell Creek timber sale is the first of the thinning projects to be offered from this EA. The Rowell Creek timber sale consists of density management on approximately 367 acres in the Adaptive Management Reserve and Riparian Reserves land use allocations. The three forest stands that comprise the sale were between 72 and 78 years of age when the BLM published the EA in 2014 (EA p. 15).

The BLM addressed compliance with Survey and Manage in the EA (p. 9). Because Project 1 units contained no regeneration harvest and included only thinning in stands less than 80 years old, Project 1 met Pechman exemption A, which exempts the project from the Survey and Manage Standard. Currently, the Rowell Creek timber sale is scheduled to be offered for sale in February 2016 at 80 years of age and is no longer eligible for Pechman exemption A.

This DNA will describe how the Rowell Creek timber sale is in compliance with Survey and Manage and how the EA remains valid in light of changes to direction for Survey and Manage since the EA was published. To be in compliance with current Survey and Manage direction, the Rowell Creek timber sale must use the December 2003 species list, with the exception of the red tree vole. The December 2003 species list incorporates species changes and removals made as a result of the 2001, 2002, and 2003 annual species reviews (ASR).

At the outset of the project, the BLM elected to complete protocol surveys for Survey and Manage species in section 1 (where the Rowell Creek timber sale is located), which had the oldest stands analyzed in the EA. The BLM described the results in the EA (pp. 40, 59).

Botanical Species

The EA identified two lichen species, *Chaenotheca chrysocephala* and *Calicium viride*, that were located within section 1 during botany surveys conducted in the summer of 2010. The BLM found one site of *Chaenotheca chrysocephala* and two sites of *Calicium viride*.

¹ The original NEPA number for this document was DOI-BLM-OR-S050-2012-0001-EA. This NEPA number has subsequently been updated in ePlanning as DOI-BLM-ORWA-S050-2012-0001-EA.
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Chaenotheca chrysocephala has remained a Survey and Manage Category B species throughout the iterations of the Survey and Manage species lists. For Category B species, pre-disturbance surveys are not practical and the BLM must manage all known sites. This known site is located within a no-cut buffer in the southwest corner of the section (EA p. 47). There are no specific management recommendations for *Chaenotheca chrysocephala*. The BLM determined that protection of this known site is adequate due to its inclusion within a no-cut buffer. This area is excluded from harvest units and will not be disturbed.

Calicium viride was removed from the list during the 2002 ASR. Previously, the species had been listed as a Category F species in January 2001. No special protection is required for these species; however, the two known sites in section 1 are within a no-cut buffer that is excluded from harvest.

Mollusk Species

In 2001, *Megomphix hemphilli* was listed as a Category A species in part of the Oregon Coast Range province and *Hemphillia glandulosa* (warty jumping-slug) was listed as a Category C species. Both of these species were excluded from the December 2003 species list. Therefore, surveys are not required. Further, if these species are found to be within any of the project units, protection is not required.

Wildlife Species

The red tree vole (*Arborimus longicaudus*) has remained a Category C species throughout the iterations of the Survey and Manage species lists. The BLM chose to survey for red tree voles in areas with the highest likelihood of red tree vole presence due to its status as a Bureau Sensitive species and because the project area is located north of Highway 20 (where heightened concern exists for the species) (EA p. 59). Red tree voles were found in portions of Rowell Creek. All of the trees that were found to have evidence of red tree voles (both inactive and active nests) were excluded from timber harvest units. They will be managed in a reserved habitat area as specified in the Survey and Manage recommendations (EA p. 60). This is consistent with current management recommendations; the BLM has surveyed for and adequately provided protection for the species. No modification to the project is required.

A review of an interagency database (GeoBOB) and the Oregon Natural Heritage Database found no records of any other Special Status Species or Survey and Manage Species locations within the planned treatment units (EA p. 57).

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

The analysis documented in the EA is site-specific and supplements analyses found in the *Salem District Proposed Resource Management Plan/Final Environmental Impact Statement*, September 1994 (RMP/FEIS). Project 1, as described in the EA, consists of six timber sales: Blue Goose, Dorn Peak, Jackpot, Lucky Rowell, Mule's Gold, and Rowell Creek. The Rowell Creek timber sale, the first timber sale to be offered from this EA, was designed under the *Salem District Record of Decision and Resource Management Plan*, May 1995 (RMP) and related documents which direct and provide the legal framework for management of BLM lands within the Salem District. All of these documents may be reviewed at the Salem District office.

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

provided for in the LUP:

- Plan and implement silviculture treatments inside Late-Successional Reserves that are beneficial to the creation of late-successional habitat (RMP p. 16)
- Restore and maintain late-successional forest conditions which serve as habitat for late-successional forest species, which are consistent with marbled murrelet guidelines (RMP p. 19)
- Apply silvicultural practices to control stocking, reestablish and manage stands, and acquire desired vegetation characteristics needed to attain Aquatic Conservation Strategy objectives (RMP p. 11)

Additional land use plan direction was provided in the EA (pp. 3–6).

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

Applicable NEPA Documents:

- South Yamhill River Watershed Enhancement EA (DOI-BLM-ORWA-S050-2012-0001-EA) – published May 14, 2014.

Other NEPA documents and other related documents that are relevant to the proposed action include:

- Salem District RMP/EIS – November 1994 and Record of Decision – May 1995
- Mill Creek, Rickreall Creek, Rowell Creek, Luckiamute River Watershed Analysis (1998)
- South Yamhill River Watershed Enhancement EA Project File

D. NEPA Adequacy Criteria

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

Yes. The proposed action is substantially the same as described and analyzed in the EA (pp. 12–16, 20–33). Minor changes to project design and errata will be reflected in the Decision Record; these changes have no bearing on the Survey and Manage compliance addressed in this DNA.

No changes to habitat protections need to be made. The provisions provided in the EA remain sufficient for species protection and are consistent with current Survey and Manage direction.

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?

Yes. The EA analyzed two action alternatives: Alternative 2 (the proposed action) and Alternative 3 (Limited Road Construction). As stated above, the provisions provided in

both action alternatives analyzed in the EA remain sufficient for species protection and are consistent with current Survey and Manage direction.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Yes. The changes in direction for Survey and Manage since the EA was completed do not change the analysis or conclusions in the EA. As described on page 1 of this DNA, the BLM found two lichen species at Rowell Creek that were on the 2001 species list: *Chaenotheca chrysocephala* and *Calicium viride*. The status of *Chaenotheca chrysocephala* has not changed; it remains a Category B species on the 2003 list. The status of *Calicium viride* has been downgraded; it was a Category F species on the 2001 list and it was removed during the 2002 ASR.

The listing status has no effect on the Rowell Creek timber sale. The BLM conducted surveys and applied management recommendations that are consistent with current direction for each of these species. For the red tree vole, the BLM has reserved a habitat area consistent with management recommendations for the species.

No specific recommendations exist for the two lichen species; the discretion is left to the agency. Each known site (one of *Chaenotheca chrysocephala* and two of *Calicium viride*) is within a no-cut buffer and is excluded from harvest. Therefore, the analysis and conclusions remain adequate.

4. Are the direct, indirect, and cumulative effects of the current proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document(s)?

The EA analyzed direct, indirect, and cumulative effects of the proposed action on potentially affected resources (vegetation, wildlife, fisheries and aquatic habitat, hydrology, soils, air quality, fire risk and fuels management, recreation, and carbon sequestration and climate change). There are no substantial changes from those addressed in the analyses to the present. As designed and analyzed, the Rowell Creek timber sale remains consistent with current Survey and Management direction, and as such, there are no changes to effects analyzed in the EA.

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

Yes. Public involvement and interagency review for the EA have been adequate. On April 4, 2012 the BLM sent a scoping letter to 24 potentially affected or interested individuals, groups, and agencies. The BLM received three responses during the 30 day scoping period and used these comments in the development of the EA (p. 130). The BLM made the EA available for a 30 day public comment period in May 2014. Further, a description of the project has been included in the quarterly BLM publication "Project Update" since Spring 2012.

E. Interdisciplinary Analysis

Name	Specialty
Ron Exeter	Botanist
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Prepared and Reviewed By

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1/21/2016
Date

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.

/s/ Paul Tigan
Paul Tigan
Field Manager, Marys Peak Resource Area

1/21/2016
Date