

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

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

Alsea Falls Trail Construction, Phase 1  
DOI-BLM-OR-S050-2015-0003-DNA

Alsea Falls Recreation Area Management Plan Environmental Assessment  
DOI-BLM-OR-S050-2013-0001-EA

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## *A. Background and Description of the Proposed Action*

The BLM completed the Alsea Falls Recreation Area Management Plan Environmental Assessment<sup>1</sup> (hereafter referred to as the EA) and made it available for public review from October 9, 2012 to November 7, 2012. I signed the Finding of No Significant Impact (FONSI) for this project on November 20, 2012.

In January 2013, I signed the Alsea Falls Recreation Area Management Plan Decision Record (hereafter referred to as the DR) and released the Management Plan for the recreation area. These documents were the culmination of several years of planning and were intended to guide development of the area over the next 10–15 years.

The management plan and decision included a number of components including campground expansion, restoration work, day use area modifications, and an overhaul of the trail system, focused around Fall Creek. The decision included an implementation schedule that prioritized actions over the next several years. The first five years of implementation included a number of actions related to the trail system.

As described in the EA and the 2013 DR<sup>2</sup>, the trail system around Fall Creek was underutilized and minimally maintained. Prior to the current trail development, the system consisted of approximately 2.5 miles of trails and 15–20 miles of logging roads. As described in the EA, many of these trails were in poor condition and in need of maintenance (EA pp. 45–46). Use of the system was described as “moderate,” estimated at less than 1,000 visitors annually. Mountain biking and hiking appeared to be the dominant uses with very limited use by equestrians (EA, p. 45). The DR recognized that trail development was an opportunity for improvement and was deemed a high priority for action (DR p. 6).

The 2013 DR prioritized “Phase 1” of trail development with 10–12 miles including a portion designated as “shared use,” which would be open to non-motorized uses, including horses, bikes, and hikers<sup>3</sup>. The DR included an estimate of 5–6 miles of shared use trails (DR p. 5) with a

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<sup>1</sup> DOI-BLM-OR-S050-2013-0001-EA

<sup>2</sup> The 2012 EA and 2013 Decision are both available online: <http://www.blm.gov/or/districts/salem/plans/>

<sup>3</sup> The decision also included additional trail expansion opportunities in future phases. Full build out was anticipated to include up to 23 miles of trails in the area.

notation that all project implementation activities would be dependent on funding and partner opportunities (DR p.6, see footnote). The remaining 6–7 miles of Phase 1 would be trails open to biking and hiking only.

In 2013, implementation began on Phase 1. First, a combination of BLM funded contractors and a local volunteer group constructed a hiking and biking loop trail and re-routed an existing trail. Volunteer interest from the mountain biking community was immediate. Team Dirt, a Corvallis-area mountain bike group, expressed interest in supporting, building, and maintaining the new trails in the Alsea Falls area. During the summer and fall of 2013, the group actively volunteered and assisted in the construction of new trails and the maintenance of existing trails. In 2014, this volunteer effort continued and was expanded. During the winter and spring of 2014, Team Dirt constructed a new bike trail, “High Baller.” Similarly, the group assisted with the construction of a machine-built trail in May and June 2014. During the winter and spring of 2014, the group also assisted in the maintenance of the existing trail system including clearing trails in February 2014 after an extensive snow and ice event and repairing horse-related damage in April 2014.

On June 22, 2014, the new trail system (approximately six miles) was opened to the hiking and biking public. The system was an immediate hit with mountain bikers. In the first three weeks, the system hosted nearly 1,000 users (the approximate number of users the trail hosted the entire previous year). Team Dirt continued their volunteer efforts – it is estimated that in 2014, the group provided more than 4,000 volunteer hours for the trail system.

At the end of 2014, nearly six miles of hiking and biking trails are constructed and open to the public. Per the 2013 DR, we should next proceed to the shared use trail portion of the trail system. However, several factors have caused me to modify the original decision and issue this DNA.

This DNA alters the implementation schedule for the trail system and modifies the allowable uses. The shared use portion of the trail system is removed from the system. Phase 1 trail construction will continue to focus on trails for hiking and biking. Once Phase 1 is complete, Phase 2 trail construction may commence. Phase 2 is contingent upon agency resources, visitor demands, and user group participation. User group participation includes substantial and sustained participation in trail design, construction and/or maintenance. This demonstration of commitment would need to be formalized through volunteer agreements, Adopt-a-Trail agreement, or a memorandum of understanding. Table 1 in this DNA summarizes the changes from the 2013 DR. All other elements from the 2013 DR remain unchanged.

Key considerations that drove this revision include current use levels on the trails, user group participation and the 2014 BLM Recreation Strategy.

#### *Summer 2014 Use Levels*

On June 22, 2014, the Alsea Falls Trail System was re-opened to hikers and bikers. While we anticipated interest and an uptick of use on the trails, use levels have surpassed our projections. From late June to late September 2014, nearly 5,000 users, primarily mountain bikers, have used the trail system. Peak days have seen over 100 visitors. At these high use levels, safety becomes a primary concern on a shared use trail. At the high use levels we have seen at Alsea Falls, I do not believe that horses and bikes can safely share the same trails.

### *User Group Participation*

For the last year, the mountain bike community has been a valuable partner in the development of the Alsea Falls Trails System. We estimate that in 2014, they contributed over 4,000 hours of volunteer assistance. They have helped to maintain existing trails and build new trails. In February 2014, a significant weather event dropped dozens of trees across the trails. Team Dirt cleared these trees and re-opened the trails. Likewise, in April 2014 horse use on closed trails caused significant damage to the trails. Team Dirt repaired the damage, saving the government thousands of dollars. The BLM has limited resources to develop and maintain a trail system. The construction of this system would not have been possible without the volunteer contributions.

The shared use portion of the trail system, while likely utilized by bikers too, would primarily benefit equestrian users. For the existing and newly-built hiking and biking trails, we have an agreement set up with a bike group to provide maintenance. Outreach to groups who would utilize shared use trails has not resulted in a commitment of support. In the end, the investment required for shared use trails has not been supported by user group participation and involvement.

### *BLM Recreation Strategy*

In 2014, the BLM released the National Recreation Strategy (Strategy): Connecting with Communities. The Strategy charts a new course for the BLM recreation and visitor services program. It calls for the agency to “connect with communities” and align recreation opportunities to partnerships by leveraging community service provider networks.<sup>4</sup> This concept of “leveraging” partnerships and volunteers is one of the primary drivers behind this decision revision. According to the Strategy, the agency should seek to “leverage financial resources through community partner organizations to ensure that top-priority sites and services are maintained.” The Strategy calls for the agency to “reposition resources...in support of community values while optimizing benefits for the public.” (BLM Recreation Strategy, cover 2)

In addition, the Strategy moves us away from the idea that we should provide a wide range of recreation services and towards the notion that we should focus on distinct recreation products. These products should be supported by the local community and user groups. Unquestionably, this DNA reflects this ideal. We are re-focusing our trail efforts at Alsea Falls on the uses that are actively participating and involved in the trail construction and maintenance. Moving forward with additional biking and hiking trails will allow the BLM to leverage volunteer efforts and contributions and provide a valuable amenity for residents in the south Benton County area.

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<sup>4</sup> The 2014 BLM Recreation Strategy is available here:

<http://www.blm.gov/pgdata/etc/medialib/blm/wy/programs/recreation/strategy.Par.10216.File.dat/ConnectWithCommunities.pdf>

*DNA for Alsea Falls Trail System*

*DOI-BLM-OR-S050-2015-0003-DNA*

**Table 1. Modifications to the January 2013 Decision in this DNA**

Theme	January 2013 Decision	Revised Direction
<p><b>Trail System Management</b></p>	<ul style="list-style-type: none"> <li>Phase 1 trail development (10-12 miles of trail at full build out) will include a portion designated as shared use – open to bikers, hikers, and equestrians.</li> <li>Phases 2 and 3 of trail development would depend upon user group interest and participation and agency capacity.</li> </ul>	<ul style="list-style-type: none"> <li>The shared use portion of the Alsea trail system is removed. In Phase 1, up to 12 miles of bike/hike trails may be constructed.</li> <li>Phases 2 and 3 of trail construction are dependent upon demonstrated user group interest and participation. Future trail development at Alsea Falls will be guided by this policy. Mapped equestrian and mountain bike “expansion zones” are eliminated in this decision.<sup>5</sup></li> </ul>

***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). This project is authorized under the *Salem District Record of Decision and Resource Management Plan*, May 1995 (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 deletion of shared use trails conform to the Salem District Resource Management Plan/Forest Land and Resource Management Plan as amended by the 2001 *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines* (2001 ROD).

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

Applicable NEPA Documents:

- Alsea Fall Recreation Area Management Plan EA (DOI-BLM-OR-S050-2013-0001-EA) – October 9, 2012.
- Alsea Falls Recreation Area Management Plan Decision Record – January 15, 2013.

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

<sup>5</sup> These expansion zones are described in the DR at page 3 and 5. The Alsea Management Plan also provides a conceptual map of the expansion zones on pages 4 and 23. This decision removes the mapping of these expansion zones. Future trail development will be driven by demonstrated use group participation in trail design, construction and maintenance.

- Salem District RMP/EIS – November 1994 and Record of Decision – May 1995
- Alsea Falls Recreation Area Management Plan 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?**

This DNA is consistent with the EA prepared for this project in 2012. It also implements findings disclosed in the EA but later modified in the 2013 decision. For example, the 2012 EA called for separating horses and bikes on the trails and focusing on hiking and biking trails in Phase 1 (EA p. 29). Likewise, the EA analysis acknowledges that Phase 1 trail development will limit equestrian opportunities in Phase 1. The EA (p. 48) points out that:

*“[g]iven the current low equestrian use and the work that would be required to retrofit the exiting trail system, it is not practical to design a trail system in Fall Creek that would accommodate hikers, bikers, and equestrians on the same trail. The Proposed Action would utilize the existing trail system and make improvements to enhance the experience of hikers and bikers. Depending on public interest and funding, Phase 2 proposals for equestrian/hiking trails and parking would enhance opportunities for horse use at the Alsea Falls Recreation Area.”*

During the comment period, a local equestrian group expressed interest in participating in trail development in Phase 1. The 2013 Decision Record reflected this interest by including a shared use component in Phase 1. Participation from equestrians, however, has not since materialized.

Lastly, both the 2012 EA and the 2013 DR point to the importance of partnerships and user group participation to guide future trail development (EA p. 28 [see footnote 10] and DR p. 5).

##### **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 EA analyzed the No Action and the Proposed Action alternatives. No other reasonable alternatives to achieving the purpose and need were identified by the Interdisciplinary Teams or the public. No new environmental concerns, interests, resource values, or circumstances have arisen since the EAs were published that would require the development of additional alternatives. A full description of the alternatives can be found in Chapter 2 of the EA (pp. 13-32).

##### **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 existing analysis and conclusions are adequate. There is no new significant information or circumstances relative to the analysis in the EA or the current action. I find that this DNA is consistent with the original EA prepared for this project. Removing shared use trails from the trail system will not cause unintended impacts or effects that were not analyzed in the EA. I find, therefore, that the existing EA is adequate for this DNA and EA revision is not needed.

**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 affected resources (fisheries/aquatic habitat, water quality, vegetation, soils, fuels, and wildlife). The project will adhere to best management practices and project design features in the EA to minimize effects to the aforementioned resources. There are no substantial changes from those addressed in the analyses to the present.

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

Public involvement for the EA has been adequate. The BLM sent scoping letters in 2010 to 86 federal, state, and municipal government agencies, nearby landowners, tribal authorities, and interested parties. The BLM received 30 comments during this period.

The EA and FONSI were made available for a 30 day public review on October 9, 2012. The BLM received 13 comment letters on the EA. Comments were generally favorable for the plan and the proposed activities.

As described in the 2013 DR, the Alsea Falls Management Plan Project employed a robust public participation strategy. Multiple open houses were held in 2010. Similarly, an open house was held in 2012 when the EA was released for public comment.

Since the 2013 DR was released, there has been close public involvement and coordination with the mountain bike community. As referenced earlier, this user group has donated over 4,000 hours of volunteer time to support the trail development. Despite coordination with a local equestrian user group, Oregon Equestrian Trails - Mid-Willamette Chapter, there have not been tangible outcomes in the form of volunteer agreements or partnerships.

**Consultation**

As described in the 2013 DR, consultation was completed for this project for both fish and wildlife. This DNA does not introduce any factors that would trigger a re-consultation.

***E. Interdisciplinary Review***

<b>Name</b>	<b>Specialty</b>
Mellissa Rutkowski	Engineer
Ron Exeter	Botanist
Scott Hopkins	Wildlife Biologist
Stefanie Larew	NEPA Coordinator
Scott Snedaker	Fish Biologist
Douglass Fitting	Hydrologist and Soils

## 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/ Rich Hatfield  
Rich Hatfield  
Marys Peak Field Manager

4/28/2015  
Date