

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
NORTHWEST OREGON DISTRICT OFFICE

DETERMINATION OF NEPA ADEQUACY (DNA) WORKSHEET

OFFICE: Upper Willamette Field Office

TRACKING NUMBER: DOI-BLM-ORWA-N050-2018-0016-DNA

CASE FILE / PROJECT NUMBER (if any): Not Applicable

PROJECT NAME: Thurston Hills Non-Motorized Trails and Forest Management Project

LOCATION/LLEGAL DESCRIPTION: T18S R2W Section 1 and T17S R1W Section 31

APPLICANT (if any): Not Applicable

A. Description of Proposed Action and any applicable mitigation measures

The Proposed Action is to implement Alternative 4 from the Thurston Hills Non-Motorized Trails and Forest Management Project Environmental Assessment (DOI-BLM-N050-2017-0006-EA, EA), with a minor modification to the timber harvest action (the Pedal Power timber sale) and no changes to the trail development action. The EA (May 2018) is hereby incorporated by reference. The BLM would implement a regeneration harvest per the management direction of the 2016 RMP for the Harvest Land Base (HLB) – Moderate Intensity Timber Area (MITA), followed by construction of non-motorized hiking and mountain biking trails in the Willamalane Extensive Recreation Management Area (ERMA). This suite of two separate but connected actions is herein referenced as the Modified Alternative 4.

Modified Alternative 4, similar to Alternative 4, would implement timber harvest prior to trail development, but would forego harvest on approximately 56 acres of HLB in the eastern portion of Section 1, where trails would be developed prior to a future timber harvest (EA p. 28).

Modified Alternative 4 similarly fulfills the purposes and needs of the project. The timber harvest is proposed to meet two purposes: *to conduct regeneration harvest to adjust the age class distribution in each sustained yield unit and to implement commercial harvest to produce timber and contribute to the attainment of the declared Allowable Sale Quantity (ASQ)* (EA pp. 5-7). The trail development is proposed to meet the purpose to *develop a network of hiking and mountain biking trails adjoining the Willamalane Park and Recreation District trail system* (EA p. 5).

Modified Alternative 4 includes one modification to the timber harvest: the regeneration harvest would implement approximately 15 percent green tree retention (based on pre-harvest basal area) rather than approximately 10 percent. As a result of this modification, the harvest area would be approximately 100 acres rather than 105 acres, with approximately 11 acres of aggregate green trees (not included in the harvest area). Approximately half of the total aggregate retention would be placed along the south side of the regeneration harvest unit in Section 1, to provide visual

screening of the harvest area from the adjacent Willamalane Park and Recreation District (WPRD) Thurston Hills property and to provide a forested corridor for BLM’s future trail in that location. The remaining retention would be dispersed within the harvest area. The timber volume generated would be approximately 4.0 million board feet (MMBF). The Modified Alternative 4 is shown on Figure 1. Differences between the Alternative 4 and the Modified Alternative 4 regeneration harvest proposals are shown in Table 1.

Table 1. Differences between the Alternative 4 and the Modified Alternative 4 regeneration harvest (Note: all data are approximations based on planning-level data)

	Alternative 4 Regeneration Harvest (in EA)	Modified Alternative 4 Regeneration Harvest
Total Harvest Unit Area (Acres)	111	111
Acres of Regeneration Harvest and Acres Converted to 0-10-yr Age Class	105	100
Green Tree Retention (percent of stand pre-harvest basal area)	10 %	15 %
Acres of Aggregate Retention	6	11
Timber Volume (MMBF)	4.2	4.0

The action would include all of the other management direction for regeneration harvest as described in the EA (p. 25). The harvest unit boundaries, the proposed haul roads, the road and culvert improvements, the harvest practices, harvest methods, post-harvest slash disposal, site preparation, reforestation activities, and project design features would all be the same as Alternative 4 (EA pp. 28-29). The timber harvest would be accomplished by two harvest methods including ground-based and cable (skyline) yarding. Associated actions would include road work and post-harvest slash disposal, site preparation, and reforestation, as described in the EA (pp. 26-29). Road work would include approximately 0.4 mile of road construction, 3.5 miles of road renovation, new cross-drains, and up to five (5) culverts at stream crossings. Similar to Alternative 4, the majority of the retention (approximately 70 percent) would be implemented in aggregates.

The trail development action would be identical to Alternative 4 in the EA, described in the EA on page 28. The trail development action would develop approximately 8.5 miles of non-motorized hiking and mountain biking trails within the BLM’s Willamalane Non-Motorized Trails Extensive Recreation Management Area (ERMA). The trail layout would have two potential connections to the adjacent hiking and mountain biking trail system being developed by the Willamalane Park and Recreation Department (WPRD) in the WPRD’s Thurston Hills Natural Area. All trails would be open to hiking and mountain biking. However, to complement the WPRD trail system, the proposed BLM trails would be designed for primary use by mountain bikers, with secondary uses by hikers (including trail runners, joggers, and pedestrians). Trail layout, design, and construction of the trails would be guided by the International Mountain

Bicycling Association (IMBA) trail design guidelines and BLM's *Guidelines to a Quality Trail Experience; Mountain Bike Trail Guidelines* (USDI BLM, 2017).

Both the timber harvest and the trail development actions include measures to avoid or minimize adverse environmental effects and ensure conformance with regulations, laws, and policies, as enumerated in the EA (Appendix B). These measures would apply to the Modified Alternative 4. Measures include adhering to RMP guidance, utilizing standard design practices, locating project activities in appropriate terrain, and incorporating Project Design Features (PDFs) and Best Management Practices (BMPs) (EA p. 20). The BLM would implement PDFs during design, layout, and construction of the proposed actions, through contract administration and monitoring.

The BLM anticipates implementing the Pedal Power Timber Sale over an approximately two year period, probably beginning in 2018, and implementing the trail development actions as soon as the BLM has secured funding and trail construction can safely start in areas outside of, or subsequent to, timber harvest operations. The BLM anticipates that trail development would begin between 2019 and 2021, and may require up to five years to fund and construct the entire trail system.

B. Land Use Plan (LUP) Conformance

LUP Name: Northwestern and Coastal Oregon Record of Decision and Resource Management Plan (ROD/RMP)

Date Approved: August 2016.

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

The Upper Willamette Field Office designed this project to conform to the 2016 ROD/RMP, which is the authorizing RMP for the Northwest Oregon District and for this project. The proposed harvest action is specifically provided for in the RMP because the underlying land use in the timber harvest areas is Harvest Land Base (HLB), and on HLB lands, the RMP directs the BLM to implement timber harvest activities in a manner that, repeated over time, results in a sustainable harvest level (RMP, p. 296). The proposed trail development action is provided for in the RMP because the RMP directs the BLM to *Manage Extensive Recreation Management Areas in accordance with their planning frameworks* (RMP, p.88), and the Willamalane ERMA planning framework specifically identifies the opportunity to connect BLM's future trail network in Sections 1 and 31 to a similar network of hiking and mountain biking trails on the adjoining WPRD lands (Willamalane ERMA Framework, p. 1).

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

NEPA documents:

U.S.D.I. Bureau of Land Management. (May 2018). Thurston Hills Non-Motorized Trails and Forest Management Project EA. DOI-BLM-N050-2017-0006-EA.

Other documents that cover the proposed action:

- U.S.D.I Bureau of Land Management, U.S. Forest Service, U.S. Fish and Wildlife Service. (2006). *Interagency Conservation Agreement for Eucephalus vialis (wayside aster)*.
- U.S.D.I Bureau of Land Management (2017). *Guidelines for a Quality Trail Experience*. Bureau of Land Management, Portland, Oregon.
- U.S.D.I. Bureau of Land Management. (2015). *Northwestern and Coastal Oregon Record of Decision and Resource Management Plan Planning Criteria*. Retrieved from <https://www.blm.gov/or/plans/rmpwesternoregon/files/rmp-criteria.pdf>
- U.S.D.I. Bureau of Land Management. (2016). *Proposed Resource Management Plan/Final Environmental Impact Statements, Western Oregon*. Bureau of Land Management Oregon and Washington State Office, Portland, Oregon.
- U.S.D.I. Bureau of Land Management. (2016). *Northwestern & Coastal Oregon Record of Decision and Resource Management Plan*. Bureau of Land Management, Portland, Oregon.
- U.S.D.I. Bureau of Land Management. (2010). *Memorandum of Understanding between the Bureau of Land Management and the U.S. Fish and Wildlife Service to Promote the Conservation of Migratory Birds (IB-2010-110)*.
- US Fish and Wildlife Service. (2017). *Biological Opinion: Habitat Alteration Projects in FY 2018-2019. FWS Ref. No. 01EOW00-2018-F-0121*. Portland, OR: Oregon Fish and Wildlife Office of the U.S.F.W.S.

D. NEPA Adequacy Criteria

- 1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

Yes. The Modified Alternative 4 is similar to Alternative 4 as described in the EA except in the amount of green tree retention, which is an element of the harvest design. The harvest unit boundaries, the proposed haul roads, the road and culvert improvements, the harvest practices, harvest methods, post-harvest slash disposal, site preparation, reforestation activities, and project design features would all be the same as Alternative 4 (EA pp. 28-29). Therefore, the geographic area, the analysis area, the relevant issues, and the resource conditions are the same as those analyzed in the EA.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes. Since the completion of the EA in May 2018, resource conditions in the project area have not changed. The range of alternatives in the EA, completed in May 2018, is appropriate given current environmental concerns, interests, and resource values. The current environmental concerns, interests, resource values, reflected by scoping and public comments on the EA, are substantially the same as those analyzed in the EA. Concerns that timber harvest would compromise recreational values – one of the predominant concerns expressed in public comments on the EA - were addressed in the EA through a range of alternatives that included different levels of harvest, including no harvest, before and after trail development. Therefore, the range of alternatives analyzed in the EA is still relevant and appropriate.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. Since the completion of the EA in May 2018, circumstances in the project area have not changed, and endangered species and BLM-sensitive species lists have not changed. The BLM has reviewed scientific information, including research papers that the public provided to BLM during the course of public comment and protest periods, and found no new information that would change the analyses in the EA or of the new proposed action. Since there are no changes in circumstances and no new information to change the analysis, the existing analysis is valid.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes. The EA (p. 25) identified that:

“The BLM would incorporate the following harvest practices pursuant to the RMP management direction for regeneration harvest within the HLB and HLB-MITA:

- a) Retain 5-15 percent (approximately 10 percent) of the pre-harvest stand basal area in live green trees (RMP, p. 63).”*

The EA utilized a target of 10 percent retention in order to fall within the 5 to 15 percent range in the event of variability when implementing projects in the field. Aiming for approximately 15 percent rather than 10 percent is in conformance with the intent of the RMP and does not substantively change the quantitative or qualitative results of the natural resource effects analyses for the following resources and issues because those analyses

accounted for a 5-15 percent retention level: recreational experiences and levels of difficulty for mountain biking and hiking (Issue 1 on pp. 34-39); fire hazard (EA pp. 10-11); fire risk (EA pp. 11-12); invasive plants (EA pp. 13-14); trespassing, litter, vagrancy, privacy, traffic, and traffic noise (EA pp. 14-16); nature and late-successional forest characteristics and habitat for late-successional species (EA pp. 16-18); and sediment yield (pp. 18-19). Nor does the modification affect issues evaluated but not included in the EA, including carbon storage, stream flows, and visual resources.

Implementing the Modified Alternative 4 with 15 percent retention would change the quantitative results for three issues analyzed in the EA, which used 10 percent retention for estimating purposes: Issues 2, 3, and 4. As described below, the results for Modified Alternative 4 would be quantitatively similar to Alternative 4, primarily because of the already-small scale of the project. There would be no qualitative differences.

Issue 2: What are the costs and revenues associated with trail building, road construction, and timber harvest?

Costs relative to trail building and road construction would not change as a result of the revised retention level. Costs and revenues associated with the timber harvest would be slightly reduced. Corresponding to the approximately 5 percent reduction in timber volume resulting from the modified retention, revenues from the Modified Alternative 4 would be approximately 5 percent lower than the Alternative 4 estimate of \$1,428,566, or \$1,360,540. The Modified Alternative 4 revenues are similar to Alternative 4 revenues in that they are only a minor portion of revenues to be expected from the entire Eugene SYU on an annual basis, corresponding to a very small project.

Issue 3: How would proposed timber harvest in the Thurston Hills project provide Allowable Sale Quantity (ASQ) timber volume for the Eugene SYU? How would the volume affect the ability to meet ASQ volume targets for the Eugene SYU?

The timber volume generated would be approximately 4.0 million board feet (MMBF), corresponding to 7.5 percent the Eugene SYU annual target of 53 MMBF, rather than the approximately 8 percent of the Eugene SYU annual target represented by the volume of 4.2 MMBF provided by Alternative 4 (EA p. 47). The Modified Alternative 4 is similar to Alternative 4 in that it represents only a small portion (7 to 8 percent) of the annual Eugene SYU ASQ target. The quality of the timber would be the same as Alternative 4 because timber conditions across the site are relatively homogeneous; the areas identified for the extra 5 percent green tree retention are similar to other portions of the site.

Issue 4: How would proposed regeneration harvest change the age-class distribution within the Upper Willamette Field Office and the Eugene SYU?

The 100 acres converted to the 0-10-year stand age class would represent a 20 percent increase in the acres in the 0-10-year age class at the SYU level, which is essentially similar to (within one percent of) the 21 percent increase resulting from Alternative 4 (EA p. 49), and a 23 percent increase in the Upper Willamette Field Office portion of the SYU, which is

essentially similar to (within two percent of) the 25 percent increase under Alternative 4 (EA p. 49).

Based on the above evaluations, the direct, indirect, and cumulative effects resulting from implementing the Modified Alternative 4 would be similar (both quantitatively and qualitatively) to those analyzed for Alternative 4 in the EA.

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

The BLM provided numerous opportunities for meaningful public involvement on the Thurston Hills project and utilized public input during development of project alternatives and issues. The BLM solicited input on project alternatives and issues during early project scoping in April 2017 by way of a published scoping notice and a public meeting, and sent coordination letters to the Confederated Tribes of Siletz, the Confederated Tribes of Grand Ronde, and the Confederated Tribes of Warm Springs, inviting them to consult. The BLM held a second public meeting after identifying specific alternatives and issues for the EA in November 2017. The BLM posted these specific issues and alternatives on BLM's ePlanning website in November 2017. The BLM posted the EA and Preliminary Finding of No Significant Impact (FONSI) on April 23, 2018, for a 15-day public comment period ending May 8, 2018, during which 6 comment letters were received. The BLM prepared responses to substantive comments and included them in the May 30, 2018 Decision Record in Appendix A. The BLM added additional language and context to the EA as a result of public comments and internal review, and notified the public through the interested stakeholders list (by email) of its release on May 30, 2018. The additional language did not include additional analysis or change the conclusions of the EA. The Modified Alternative 4 is essentially similar to the Alternative 4 identified as a project alternative for the November 2017 public meeting and in the EA. The public and agencies had many opportunities to provide input on this alternative and its associated issues. Therefore, the public involvement and interagency review associated with the EA is adequate for the current proposed action.

E. Persons/Agencies /BLM Staff Consulted

Name	Title	Resource or Topics
Andy Hamilton	Hydrologist	Hydrology, sediment yield
Robert Titcomb	Silviculturist	Age class, timber volume, carbon
Matt Buss	Forester	Retention levels, timber revenues
Jess Gallimore	Fuels specialist	Fire risk, fire hazard

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

Signature of Project Lead:

/s/ **Brian Bickford**
Brian Bickford, Supervisory Forester

Date: **August 15, 2018**

Signature of NEPA Coordinator:

/s/ **Linda Wright**
Linda Wright, Planning & Environmental
Specialist

Date: **August 14, 2018**

Signature of the Responsible Official:

/s/ **Michael Kinsey**
Michael Kinsey, Field Manager

Date: **August 15, 2018**

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program specific regulations.

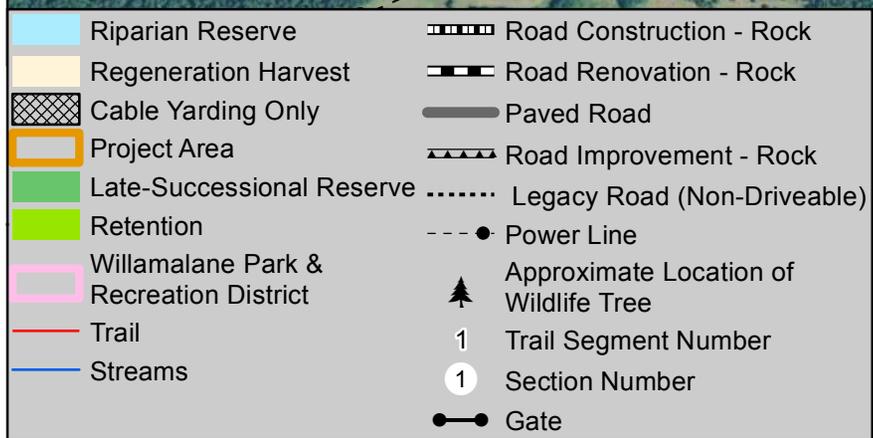
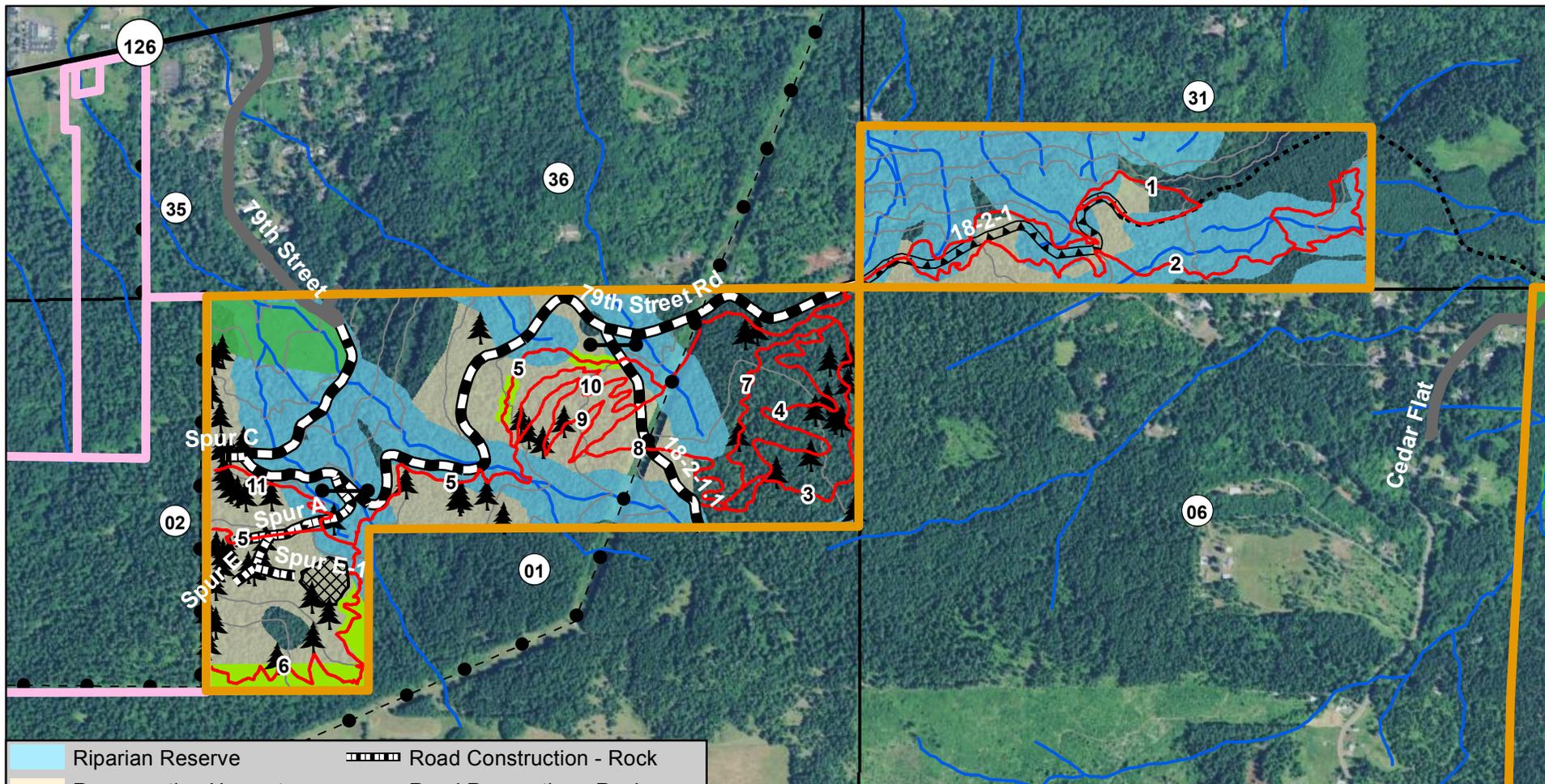
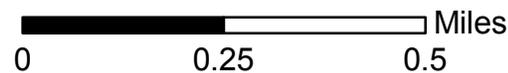


Figure 1. Modified Alternative 4 - 100 Acre Regeneration Harvest and Trails



THURSTON HILLS NON-MOTORIZED TRAILS AND FOREST MANAGEMENT PROJECT

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