



DETERMINATION OF NEPA ADEQUACY WORKSHEET

BLM Office: Butte Falls Field Office, Medford District, Oregon/Washington BLM

NEPA Tracking Number: DOI-BLM-ORWA-M050-2022-0005-DNA

Project Number: DOI-BLM-ORWA-M000-2020-0001-EA

Proposed Action Title/Type: Table Rocks Fuels Reduction and Oak Restoration Project

Location of the Proposed Action: The proposed project is located approximately west of the Town of Eagle Point, Oregon. BLM managed lands in the following legal locations are included: T35S R02W- 26, 35, 36. T36S R02W- 02, 03, 04, 05, 06, 08. See Attachment A.

A. Description of the Proposed Action and any applicable mitigation measures:

On March 2, 2022, the Bureau of Land Management (BLM) Medford District published the Final Integrated Vegetation Management for Resilient Lands Environmental Assessment (EA, BLM 2022a). Concurrently, the BLM approved a Finding of No Significant Impact (FONSI, BLM 2022b) determining the program of work authorized does not require an Environmental Impact Statement (EIS). The BLM also issued a programmatic Decision Record (Programmatic DR, BLM, 2022c) that approved a modified Alternative C as the “Selected Alternative.” The Selected Alternative consists of a program of work that would be performed by the BLM over a 10-year period (Programmatic DR, BLM 2022c, p. 1).

Approval of Alternative C, as modified, authorized a suite of treatments over a 10-year period within a 684,185-acre potential “Treatment Area” (EA, BLM 2022a, p. 1). As the approved Decision Record and supporting EA were “programmatic” in nature, they did not identify the location, timing of treatments. This Determination of NEPA Adequacy (DNA) identifies individual treatment units, the timing, and methods of treatments. This Determination of NEPA Adequacy (DNA) identifies the individual treatment units, the timing, and treatment methods the Butte Falls Field Office proposes in the Table Rocks Fuels Reduction and Oak Restoration Project (“Project” consistent with the Selected Alternative in the Programmatic DR.

The Project’s Proposed Action includes approximately 1,291 acres of BLM managed land (Project Area) across mixed oak conifer forest and other non-conifer oak plant communities (oak woodlands, oak savannas, oak chaparral, and meadows) (see Table 1). The Proposed Action includes small diameter thinning, hand piling, burning of vegetation, and follow up prescribed fire applied to ground as broadcast and/or underburning consistent with the Selected Alternative (EA, BLM 2022a, Appendix 1 - pp. 89-91). This project could begin implementation as early as the beginning of 2023.

Table 1. Vegetation community type and approximate distribution across the proposed action acreage. Data is from mapping of Table Rock vegetation conducted by The Nature Conservancy under a cooperative agreement with BLM (2015).

Vegetation Type	Approximate Acreage
Grassland	353
Oak Savannah	118
Oak/Chaparral	151
Open Oak Woodland	182
Closed Oak Woodland	171
Oak/Hardwood	198
Oak/Pine	52
Oak/Fir	55

Small diameter (generally <12 inches DBH) thinning treatments would be consistent with the EA Appendix 1 (p. 89-90, 108-110). Within special plant communities (Table 1) treatments would target thinning of encroaching conifers and shrubs (taller than one foot) to approximately 25-foot by 25-foot spacing. Retention tree preference would be weighted toward shade intolerant tree species, such as oak and ponderosa pine, tree species of cultural significance, and all shrubs greater than 12 inches at the base. Variable sized skips of untreated vegetation will be left in as operationally feasible (EA, BLM 2022a Appendix 1, p. 108) in areas outside of the Community at Risk (see Map).

Prescribed fire (handpile burning and underburning) would be applied consistent with the IVM EA (EA, BLM 2022a, Appendix 1, p. 90-91). Additionally, disturbed sites would be restored with native species, via seeding and planting with appropriate site-specific species mix, including culturally significant native plant species (EA, BLM 2022a, p. 108).

The Project’s approximately 1,291-acre Project Area represents 0.3 percent of the 684,185-acre potential Treatment Area evaluated in the EA (EA, BLM 2022a, p. 1). There are no new permanent or temporary roads, and no use of heavy equipment in the Proposed Action.

Implementation of the Proposed Action would contribute 1,291 acres toward the annual small diameter thinning limit (6,500 acres/year), and 1,291 acres toward the decadal small diameter thinning limit (60,000 acres/10-years) approved in the programmatic DR (DR, BLM 2022c, p. 3).

Implementation of the Proposed Action would contribute 1,291 acres toward the annual prescribed fire limit (7,500 acres/year), and 1,291 acres toward the decadal prescribed fire limit (70,000 acres/10-years) approved in the Programmatic DR (DR, BLM 2022c, p. 3).

B. Land Use Plan Conformance

Name of Land Use Plan (LUP): Southwestern Oregon (SWO) Record of Decision (ROD) and Resource Management Plan (RMP).

Date Approved/Amended: August 2016.

The project's Proposed Action, as described in section A, is in conformance with the applicable LUP because it is specifically provided for in the following management direction in the SWO RMP/ROD decision:

- “Create fuel beds or fuel breaks that reduce the potential for high-intensity/high-severity fire spread within the wildland urban interface or in close proximity to highly valued resources.” (RMP, BLM 2016a, p. 91).
- Treat both management activity fuels and natural hazardous fuels [to]...
 - Modify the fuel profile (e.g., raise canopy base heights or reduce surface and ladder fuels and crown bulk density)
 - Reduce potential fire behavior (e.g., crown fire activity, wildfire spread, and intensity)
 - Reduce potential fire severity
 - Improve effective fire management opportunities within the Wildland Urban Interface or in close proximity to other highly valued resources.” (RMP, BLM 2016a, p. 91).
- “Apply thinning or prescribed fire to forest stands as needed to achieve appropriate stocking and density levels.” (RMP, BLM 2016a, p. 92).
- “Conduct integrated vegetation management [to]...
 - Promote the development and retention of large, open grown trees and multi-cohort stands.
 - Develop diverse understory plant communities.
 - Increase or maintain vegetative species diversity.
 - Restore and maintain habitat for Bureau Special Status species.
 - Promote or enhance the development of structural complexity and heterogeneity
 - Create growing space for hardwood and pine persistence and regeneration
 - Create and maintain areas for hardwood and shrub dominance.
 - Adjust stand composition or dominance.
 - Reduce stand susceptibility to disturbances such as a fire, windstorm, disease, or insect infestation.” (RMP, BLM 2016a, p. 72).
- “Modify fuel beds to produce characteristic fire behavior and fire effects representative of the fire regime. Implement interim fuels treatments (e.g., hand pile and burn) in areas that are highly departed from natural conditions in order to facilitate prescribed fire in the future.” (RMP, BLM 2016a, p. 75).
- “Apply prescribed fire in low/mixed severity or high-frequency fire regimes to emulate historic fire function and processes. Apply prescribed fire across the landscape to create a mosaic of spatial and temporal stand conditions and patterning (appropriate to the fire regime)” (RMP, BLM 2016a, p. 75).

- “Apply prescribed fire and mechanical or hand fuels treatments to reduce the potential for uncharacteristic wildfires. Apply maintenance treatments at appropriate intervals to retain or improve fire-resilient conditions” (RMP, BLM 2016a, p. 75).
- Maintain or restore natural processes, native species composition, and vegetation structure in natural communities through actions such as applying prescribed fire, thinning, removing encroaching vegetation [and] retaining legacy components (e.g., large trees, snags, and down logs)...” (RMP, BLM 2016a, p. 106).
- In the District Designated Reserve-Areas of Critical Environmental Concern (DDR-ACEC) LUA, “Implement activities as necessary to maintain, enhance, or restore relevant and important values.” (RMP, BLM 2016a, p. 55).
- “Apply silvicultural or fuels treatments, including prescribed fire, that restore or maintain community-level structural characteristics, promote desired species composition, and emulate ecological conditions produced by historic fire regimes, in areas identified as unsuitable for sustained-yield timber production through the Timber Production Capability Classification system.” (RMP, BLM 2016a, pp. 55-56).
- “Manage naturally occurring special habitats to maintain their ecological function, such as ... natural meadows, ...oak savannah/woodlands...” (RMP, BLM 2016a).
- “Manage habitat to maintain populations of ESA-listed, proposed, and candidate plant species.” (RMP, BLM 2016a, p. 106).
- Manage mixed conifer communities to maintain and enhance ponderosa (*Pinus ponderosa*), (...) persistence and structure by removing competing conifers, thinning, and applying prescribed fire, to the extent consistent with management direction for the land use allocation.” (RMP, BLM 2016a, p. 107).
- “Manage mixed hardwood/conifer communities to maintain and enhance [Oregon white] oak (*Quercus* [*garryana* and California black oak (*Quercus kelloggii*)] persistence and structure by removing competing conifers, thinning, and prescribed fire, to the extent consistent with management direction for the land use allocation.” (RMP, BLM 2016a, p. 107).
- “Manage ESA candidate and Bureau Sensitive species consistent with any conservation agreements or strategies including the protection and restoration of habitat...and other strategies designed to conserve populations of the species.” (RMP, BLM 2016a, p. 106).
- “Manage vegetation to maintain and enhance rare plant habitat, oak woodlands, and other vegetation communities” in Table Rocks ACEC (RMP, BLM 2016a, p. 252).

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

Integrated Vegetation Management for Resilient Lands Environmental Assessment, Finding of No Significant Impact and Decision Record (DOI-BLM-ORWA-M000-2020-0001-EA) (March 2, 2022).

Medford and Roseburg BLM Southwest Oregon Dry Forest Resilient Lands Biological Assessment (March 11, 2021).

Resilient Lands BA – Errata (March 16, 2021).

Medford and Roseburg BLM Southwest Oregon Dry Forest Resilient Lands Biological Assessment Amendment (October 20, 2021).

Formal Consultation on the Medford and Roseburg Districts of the Bureau of Land Management’s Southwest Oregon Dry Forest Resilient Lands Activities (Reference Number 01EOFW00-2021-F-0597) (December 20, 2021).

Assessment of Activities That May Affect the Federally Listed Plant Species Gentner’s Fritillary and Cook’s Lomatium, on the Medford District BLM, Biological Assessment (October 1, 2020).

Informal Consultation the Medford District Bureau of Land Management’s Proposed Activities on Federally Listed Plant Species and Designated Critical Habitat (#01EOFW00-2021-I-0017) (November 10, 2020).

Biological Assessment FY2017-FY2022 - Programmatic Activities that may Affect the Northern Spotted Owl, Marble Murrelet, Vernal Pool Fairly Shrimp and the Oregon Spotted Frog. Medford District, Bureau of Land Management. May 2017.

Biological Opinion. Medford BLM Batch of Routine Activities Affecting Listed Wildlife. TAILS: 01EOFW00-2017-F-0374. Roseburg Field Office. July 2017.

Southwest Oregon Proposed Resource Management Plan/Final Environmental Impact Statement (PRMP/FEIS) (August 5, 2016).

D. NEPA Adequacy Criteria

1. Is the 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 Proposed Action is a feature of the activities analyzed under Alternative C in the EA (EA, BLM 2022a, pp. 11-14, 86-94, 103-110). On March 2, 2022 the BLM published the EA and selected a modified Alternative C. Activities authorized under a modified Alternative C and in this Project include small diameter thinning and prescribed fire.

The Table Rocks Fuels Reduction and Oak Restoration Interdisciplinary Team (IDT) designed the Project to conform with Alternative C of the EA and is consistent with the actions analyzed in Alternative C (EA, BLM 2022a, p. 11). The Project includes the following elements which are described in detail below:

The Project Area is located within the 684,185-acre potential Treatment Area of the EA. The geographic and resource conditions within the project area are consistent with those considered in the EA.

The IDT conducted surveys and field visits to the Project Area to ensure that resource conditions are sufficiently similar to those analyzed within the EA. Additionally, under the existing EA, specific locations of treatment units had not been identified, therefore no project biological and cultural surveys were completed during the preparation of the EA. As described below, the field office determined whether new biological and/or cultural surveys were needed, what the conclusions of such surveys were, and how they were consistent with the analysis in the EA.

Cultural Resources

The project archaeologist conducted pre-field research of the proposed treatment areas. A detailed description of the results will be included in a cultural resource inventory report to be completed after field surveys have been finished. To summarize, approximately 228 acres of the 1,291-acre proposed Project Area have been surveyed for cultural resources (either for this project or previous ones) and the Project Area contains three previously recorded archaeological sites. One of the previously recorded sites is eligible for the National Register of Historic Places (NRHP) and the other two are unevaluated; unevaluated sites must be treated as eligible. Approximately 327 acres of the Project Area remain to be surveyed prior to project implementation. The remaining acres will not be surveyed due to low sensitivity for cultural resources and/or being unsurveyable due to steep slope and dense buckbrush-poison oak thickets.

Protection measures for archaeological sites are dependent on the type of site as well as the proposed treatment. Not all treatments would constitute an adverse effect to cultural sites, and not all cultural sites have the same sensitivity to various treatments. Further, some treatments may meet exemptions described in the 2015 Protocol between the OR/WA BLM and the Oregon State Historic Preservation Office (SHPO) (Protocol), Appendix C: Prescribed Burn Project Areas, and Appendix E: Undertakings Exempted from Field Survey and Consultation with the SHPO.

This project consists of treatments proposed for oak restoration and fuel reduction purposes only, limited to small diameter thinning, hand piling, burning of vegetation, and follow-up prescribed fire applied to the ground as broadcast and/or underburning. In some cases, the archaeologist may determine that certain treatments, such as low-intensity broadcast burning, would not constitute an adverse effect to a site. In those situations, the archaeologist would consult with SHPO and Native American Tribes and seek agreement that such treatments could be pursued within the boundaries of cultural sites without causing adverse impacts. Further, according to Appendix E of the Protocol, pre-commercial (i.e. small diameter) thinning is an action exempt from field survey and consultation with SHPO as long as the slash is hand-scattered or piled and left (burning of hand piles is not included in the exemption, as the focused heat could adversely

impact archaeological features and artifacts). The BLM may use this exemption to treat acres that have not been surveyed for cultural resources or that contain known cultural resources, if the treatment is modified such that it excludes pile-burning and includes only thinning and either lopping and scattering or hand-piling and leaving.

Implementation within the project area is expected to occur over the course of at least three years as funding becomes available. Prior to implementation in any particular unit, the archaeologist will complete a field survey, record all newly identified archaeological sites, and update any previously recorded archaeological sites. All site and survey documentation will be included in a cultural resource inventory report that will be submitted to the SHPO and the three tribes who take interest in this area (Confederated Tribes of the Grand Ronde Community [CTGR], the Confederated Tribes of the Siletz Indians [CTSI], and the Cow Creek Band of Umpqua Tribe of Indians [Cow Creek]). Sites that are unevaluated or eligible for the NRHP will be flagged for avoidance except on a case-by-case basis if, in consultation with Tribes and SHPO, the archaeologist determines that a treatment will not cause an adverse effect.

Project Design Features (PDFs) for the Protection of Cultural Resources

The EA describes how projects will be implemented in a way that avoids adversely affecting significant cultural resources and contains PDFs for the protection of cultural resources. As stated on page 239 of the EA, “Because all appropriate cultural resource surveys, site recordation and protections will be completed prior to any ground-disturbing activities, effects are not expected under any of the alternatives.” Please see Attachment B of this document for a list of all applicable cultural resource PDFs for this project, which describe how adverse effects to cultural resources will be avoided.

If cultural resource surveys conducted for this project identify any heretofore unknown archaeological sites, they will be flagged for avoidance unless determined not eligible for the NRHP, as documented in a formal site record containing a Determination of Eligibility. Most sites will be left unevaluated, but certain site types (unassociated historic refuse scatters, most commonly) will be evaluated.

Tribal Consultation

The BLM notified the three Tribes who take interest in this area (CTGR, CTSI, and Cow Creek) of this project by certified mail on November 4, 2022, with electronic carbon copies to the appropriate tribal staff on November 7, 2022. The Tribes were invited to formally consult and/or provide information regarding any tribal concerns or comments at that time. A representative of the Cow Creek responded that they would like to be sent updates as the project moves forward and asked to be contacted should any cultural material be discovered during project implementation. It should also be noted that the BLM invited the Tribes to consult during the development of the EA and incorporated tribal input into that document.

Biological Resources (ESA and Bureau Sensitive)

Wildlife

- Threatened and Endangered (T&E) Terrestrial Wildlife:
 - There are no new federal Endangered Species Act listings or proposed or final critical habitat designations since the EA.

- Spotted owl (NSO) surveys were not conducted because there is no nesting-roosting or foraging habitat within the Proposed Action area.
 - The nearest known spotted owl site is approximately five miles from the proposed treatments units. The Project Area is surrounded by large amounts of agricultural lands and low habitat suitability for spotted owls, so there is a low likelihood the area would be occupied by spotted owls.
 - The majority (1,171 of 1,291 acres) of the proposed treatment acres are non-habitat for spotted owls. There are 120 acres of dispersal-only habitat. These habitat types were determined by field evaluations, LiDAR, and GIS owl habitat modeling.
 - No treatment is proposed within the Late-Successional Reserve (LSR) land-use allocation.
 - None of the treatment units occur in the December 2021 designated spotted owl critical habitat and would have no effect to critical habitat.
- The Project is within the historic range of the Franklin's bumble bee and habitat is located within the Action Area. Surveys for Franklin's bumble bee have not been conducted in the Project Area. Annual surveys have occurred in the best habitat in SW Oregon and there have not been any recent Franklin's bumble bee detections. The project is approximately 32 miles northeast of the last Franklin's bumble bee detection, which was in 2006. Treatments would occur in up to 1,171 acres of oak, grassland and ceanothus plant communities.
- The project is outside of designated critical habitat and outside of vernal pools where fairy shrimp have been confirmed through historic surveys. No treatments are proposed on the tops, or plateaus, of Upper and Lower Table Rocks where fairy shrimp, and their designated critical habitat, are known to occur on BLM lands. In 2012, the BLM purchased land from The Nature Conservancy in 35S-02W-26, that contains up to 2.5 acres of pools (8) and small ponds (4) spread out across an area 0.75 miles by 0.75 miles. These pools and ponds have not been surveyed for fairy shrimp but may contain habitat for them.
- Consultation with USFWS for T&E wildlife species has been completed per the EA pp. 281-282 (NAID 13) under the associated Southwest Oregon Dry Forest Resilient Lands Consultation.

Other Special Status Species

- There have been no changes to the BLM Bureau Sensitive species list since the EA. The project is within the range of several Bureau Special Status wildlife species. However, site specific surveys would not provide additional data not considered in the EA. Additionally, PDFs would mitigate effects to Bureau Special Status species.

Plants

Special Status Plants

This Project Area is in the range of Gentner's fritillary (*Fritillaria gentneri*). This is the only federally listed plant species known to occur in the vicinity of this project. Seven vascular and one lichen (non-vascular) Bureau Sensitive species occur in the Project Area.

- Surveys for Federally Listed and State Director’s Sensitive vascular and non-vascular (collectively, Special Status) plant species were completed between 2012 and 2022 by professional botanists in T35S-R02W-S25, 26, 35, 36 and T36S-R02W-S02 for project areas proposed for treatment according to the appropriate protocol for each species. Species on the most current State Director’s list, in the year surveys were completed were searched for and include the lists from 2015, 2016, 2018 and 2021 (BLM, 2021).
- Surveys for Special Status plants will be completed during the Spring of 2023 for proposed treatment units occurring in T36S-R02W-S05, 06, & 08.
- Surveys documented three Gentner’s fritillary sites and ten Bureau Sensitive species occurring across 46 sites in the Project Area.

T&E Plants

This project is covered by the *Biological Assessment (BA): Assessment of Activities that May Affect the Federally Listed Plant Species, Gentner’s Fritillary & Cook’s Lomatium, on the Medford District BLM* and Letter of Concurrence that proposed actions may affect but are not likely to adversely affect Gentner’s fritillary (BA, BLM 2020; FWS 2021).

- There is no critical habitat or management areas for any threatened or endangered species in the Project Area.
- Surveys for Gentner’s fritillary in 35S-02W-S26, 34, 35 and 36S-02W-S02 have been completed according to the Project Design Criteria (PDC) required in the Biological Assessment. High quality potential habitat for Gentner’s fritillary (FRGE) located within project units U4 and U5 in 36S-02W-S02 will need another year of surveys for FRGE before being treated because abundant indeterminate fritillary species bulb leaves near new FRGE occurrences were discovered during the clearance survey, triggering an additional year of surveys in accordance with PDC in the BA. Any plants determined to be Gentner’s fritillary will be protected according to PDC in the BA & LOC (BA, BLM 2020; FWS 2021). Indeterminate fritillary species bulb leaves were also located within project units U11, U12, U13, and U14 in 35S-02W-S35. The unknown bulb leaves will be treated as Gentner’s fritillary occurrences and protected according to PDC in the BA & LOC (BA, BLM 2020; FWS 2021).
- There are two documented Gentner’s fritillary sites within project unit U5 proposed for treatment in 36S-02W-S02, plus one additional FRGE site located within the Project Area 250 m west of unit U4. All relevant Project Design Criteria prescribed in the Biological Assessment will be implemented to ensure project activities do not adversely affect FRGE populations nor degrade the condition of potential and occupied Gentner’s fritillary habitat (BA, BLM 2020, pp. 24-38).
- See Attachment C for planned phases of implementation based on clearance of botany surveys. Phase 1 would occur first.

Sensitive Plants

The activities proposed in this project will not trend Sensitive plants toward listing because sites will be protected from potential direct effects and the Project will improve the condition and resiliency of potential Special Status plant habitat.

- Surveys were completed of all potentially suitable habitat for Sensitive plants.
- Known sites will be protected from direct effects through the implementation of ‘no treatment’ buffers around occupied habitat or occupied habitat will be improved through the implementation of specific treatments and limits recommended in various conservation documents in occupied habitat according to individual species habitat requirements and the current condition.
- Sites will be protected from indirect effects due to potential increases in invasive species occurrences or density in response to increases in light or accidental seed introduction by monitoring and treating invasive species near rare plant sites as needed before and after project activities, ensuring equipment is free of invasive plant material and seed before working near rare plants sites and by applying locally adapted native seed to burn pile scars and soil disturbed by project activities near rare plant sites to reduce potential competition from non-native and invasive species establishment (see Non-native Invasive Plants PDFs).
- There are two winged water-starwort (*Callitriche marginata*) sites, one wheel fruited water-starwort (*Callitriche trochlearis*) site, seven dwarf meadowfoam (*Limnanthes pumila ssp. pumila*) sites, two Austin’s plagiobothrys (*Plagiobothrys austiniiae*) sites, four fragrant popcornflower (*Plagiobothrys figuratus* var. *corallicarpus*) sites, and 14 Greene's popcornflower (*Plagiobothrys greenei*) sites which will be protected by management recommendations in the Recovery Plan for Rogue and Illinois Valley Vernal Pool and Wet Meadow Ecosystems (FWS 2012).
- There are eleven white fairypoppy (*Meconella oregana*) sites will be protected by management recommendations in the 2008 Status evaluation of *Meconella oregana* (ODA 2008).
- There is one American pillwort (*Pilularia americana*) site that will be protected according to the management recommendations provided in the California Native Plant Society 1998 policy on mitigation guidelines regarding impacts to rare, threatened, and endangered plants (CNPS 1998).
- There are two Southern Oregon buttercup (*Ranunculus austro-oreganus*) sites that will be protected according to the management recommendations provided in the California Native Plant Society 1998 policy on mitigation guidelines regarding impacts to rare, threatened, and endangered plants (CNPS 1998).
- There is one batwing vinyl lichen (*Leptogium platynum*) site.

Non-native Invasive Plants

The BLM botanists used vascular plant survey reports and invasive plant infestation data in the BLM’s Vegetation Management Action Portal (VMAP) to characterize and evaluate invasive plant infestations within the Project Area. The VMAP dataset represents the known distribution and abundance of noxious weeds on the Medford District, but it does not include most other invasive plants species. The BLM botanist gathered information about unmapped invasive plant occurrences from vascular plant survey reports completed between 2012 to 2022. The BLM has documented 49 non-native plant species in the Project Area, including eight invasive plant species (Table 2) currently managed with the 2022 Medford Annual Treatment Plan for Invasive Plant Management DNA (BLM 2022d).

Table 2. Invasive Plant Species.

Species	ODA Status	Rating	Acres	Predominant habitats in the Project Area
<i>Bromus tectorum</i>	NL	high	40	Scattered in upland meadows and grassy openings in oak savannah and chaparral, roadsides.
<i>Centaurea solstitialis</i>	B	high	45	Scattered to pervasive in upland meadows and grassy openings in oak savannah and chaparral, roadsides.
<i>Chondrilla juncea</i>	B	moderate	0.1	Few scattered in disturbed and dry grasslands, roadsides.
<i>Dipsacus fullonum</i>	NL	low	0.2	Riparian areas, drainage ditches, roadsides.
<i>Hypericum perforatum</i>	B	low	0.1	Lightly scattered in upland meadows and grassy openings in oak savannah and chaparral, roadsides.
<i>Rubus bifrons (R. armeniacus)</i>	B	high	0.2	Riparian areas, drainage ditches, forest openings, roadsides.
<i>Taeniatherum caput-medusae</i>	B	high	300	Scattered in upland meadows and grassy openings in oak savannah and chaparral, roadsides. Densest infestations on mounds at the top of the Table Rocks.
<i>Ventenata dubia</i>	B	moderate	1	Roadsides, meadows, rangeland, chaparral.

BLM botanists would evaluate and monitor existing and new infestations before and after implementation of the Proposed Action to determine when and where to take management action. An integrated approach outlined in the 2018 Medford District Integrated Invasive Plant Management (IIPM) Revised EA (BLM 2018) would be used to manage invasive plants in ways that minimize adverse effects to ecological function and economic values. For each infestation, BLM botanist would establish an action threshold and monitor to determine if the threshold has been reached or exceeded. Action thresholds are the levels of ecological or economic damage permitted before treatments are needed, and these thresholds differ across sites, projects, and species.

The BLM botanist would select invasive plant control methods that would be most effective for the target species and appropriate for the infested site, including in the presence of Sensitive or Threatened and Endangered species. Invasive plant control methods considered for the Project Area would include manual (pulling and grubbing), mechanical (string trimmers and brush cutters), herbicide spot treatments (backpack sprayers), and classical biological control. To improve long-term success, invasive plant control treatments would often be coupled with competitive seeding to provide a desirable native vegetative component to compete with invasive plants in treatment areas. When revegetating disturbed sites in the Project Area, the BLM botanist would select locally adapted native grass and forbs seeds that are genetically appropriate for each revegetation site, thereby increasing the probability of successful and persistent native plant establishment that is resistant to invasive plants.

The implementation of PDFs (Attachment B) such as washing equipment and ensuring personal gear is weed free prior to entry into the Project Area, seeding of burn pile scars and other disturbed areas with native species, mulching with weed-free straw, and the ongoing treatment of noxious weeds in the Project Area would aid the establishment of desirable vegetation that would then compete with invasive plants and reduce the risk of introduction or spread of noxious weeds.

Soils

There are fragile soils for mass movement due to Pyroclastic parent material (FP) in the proposed Treatment Area. These soils are largely located on the slopes of the Table Rocks. This type of soil movement is characterized by slow moving, small rotational-style slumps. Earthwork such as road building or other heavy machinery work has the potential to exacerbate this type of soil movement. However, the project description does not include earthwork such as road building or ground based machinery so it is not expected that the Proposed Action would exacerbate the fragile soils.

Project implementation would follow Project Design Features for soils resources outlined in the Integrated Vegetation Management for Resilient Lands (EA, BLM 2022a, pp. 121-122), found in Attachment B.

Hydrology

The Proposed Action is located within four class 1 & 2, dry, sub-watersheds: Snider Creek, Reese Creek-Rogue River, Whetstone Creek-Rogue River, and Sams Creek-Rogue River. Surface water in the Project Area includes streams, springs, wetlands, and natural ponds. Streams in the Project Area are classified as perennial, intermittent, and dry draws with ephemeral flow. The stream types and wetland/spring locations on BLM-administered land have been determined through a combination of LiDAR imaging and in-person surveys. The project hydrologist conducted a review of the Proposed Action and determined there would be no effects to stream temperature, stream sedimentation, water quality or water quantity/flow regime. An in-depth discussion of these issues can be found in the Hydrology and Water Quality section of Appendix 10 in the EA (EA, BLM 2022a, pp. 223-230). The PDFs described in Attachment B as well as those PDFs outlined in the EA (EA, BLM 2022a, p. 119) will be implemented alongside the Proposed Action. These PDFs serve to further reduce the risk of potential impacts and to hydrologically disconnect project actions from water resources.

Fish

T&E Fish and designated Critical and Essential Fish Habitat

The Project Area is within the Snider Creek, Reese Creek-Rogue River, Whetstone Creek-Rogue River, and Sams Creek-Rogue River sub-watersheds, and is a Class I and II, dry, sub-watershed. There is one evolutionarily significant unit (ESU) of coho salmon found adjacent to, and just downstream of the Project Area: the Southern Oregon/Northern California Coasts (SONCC)- this ESU is listed as “threatened”. This coho ESU is in the Sams Creek- Rock Creek subwatershed and is a tributary to Sams Creek. The streams within this Project Area include Rock Creek and Snider Creek, both tributaries to the Rogue River and both considered Coho Critical Habitat (CCH).

No new fish or other aquatic species have been listed since the programmatic Decision Record was signed for the EA, therefore all proposed activities within this DNA are covered by the programmatic biological opinion for the BLM's Forest Management Program for Western Oregon (FOMBO) (USDC, 2018).

There are no units within the Project Area that either straddle or are directly adjacent to a fish-bearing stream. The north half of the unit in the north/northeast part of the Project Area has a perennial stream running through it; that stream is a tributary to Snider Creek, which is Coho Critical Habitat (CCH). The closest any action would be to Rock Creek is approximately 1,400 feet; the closest any action would be to Snider Creek is approximately 1,180 feet. Other units have intermittent streams that run through them.

Fuels treatments in Riparian Reserves in the inner zone would follow RMP management direction and include guidance such as, do not conduct fuels treatments within 60 feet of fish-bearing or perennial streams, retain at least 50 percent canopy cover per acre, and do not cut trees > 12" DBH (RMP, BLM 2016a, pp. 82-84). The fuels treatments proposed here would only include hand treatments (cutting with a saw, hand-pile and burn, underburn). The topography of the area is flat or low slope. These treatments would not affect stream shade or stream temperature and would not create any mechanism whereby sediment could reach streams. Any ash created from pile burning would not make it into streams because either there would be a 60-foot buffer between the bare spot where the pile burned or, for both perennial and intermittent streams, each bare spot would be surrounded by intact, unburned vegetation.

The actions proposed in this project will not modify or have any Effect to aquatic habitats, CCH, or Essential Fish Habitat (EFH) as there are no ground disturbing activities proposed that would have any connectivity with stream channels, therefore no effects are anticipated.

Special Status and Native Fish (includes T&E species)

There are two Bureau Sensitive species within the proposed Project Area: Pacific lamprey and steelhead (summer and winter), as well as native species such as trout and sculpin. The effects of the Proposed Action for the Bureau Sensitive fish species would be the same as those described in the paragraphs above for coho and CCH: no Effect to aquatic species or their habitats. BMPs/PDFs (Attachment B) that are listed for protection of coho, CCH and EFH would also provide protections for all aquatic habitats and their associated species.

Recreation and Visual Resources

Manage newly acquired lands for the purpose for which they were acquired or in a manner that is consistent with management objectives for adjacent BLM-administered lands or other BLM-administered lands having similar resource values (RMP, BLM 2016a p. 94). The assumption will be made that all lands in the Table Rocks Management Area that have been acquired since the signing of the ROD will be managed as adjacent lands. Therefore, all lands within in the Project Area are managed as a Special Recreation Management Area.

There is one Recreation Management Area, Table Rocks Special Recreation Management Area (SRMA), located within the Project Area. The Table Rocks SRMA provides hiking opportunities to the top of Table Rocks, as well as educational and interpretive information on cultural, botanical, and historical resources. The Table Rocks SRMA recreation framework allows fuel

treatments or other vegetation modifications if compatible with meeting recreation objectives, not interfering with recreation opportunities, and maintaining setting characteristics. All proposed treatments are located away from any designated recreational trails or congregation areas. The EA states that there are no proposed actions that would shift the recreation setting characteristics towards a more developed Recreation Opportunity Spectrum (ROS) class, based on analytical assumptions identified in Section 3.3.3 and based on the PMRP/FEIS, (EIS, BLM 2016a, p. 559). Removing the encroaching brush species will help move the landscape back to a more historically characteristic landscape.

The Project Area is in a Visual Resource Management (VRM) II landscape which requires actions to retain the existing character of the landscape. A visual assessment was completed and the Proposed Actions are only visible from Antioch road. The proposed treatments would remove the encroaching brush in the oak woodlands and retain all legacy oaks. The proposed treatments would improve the visibility of the existing characteristic open oak woodland landscape.

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

Yes, the range of alternatives evaluated in the EA remains valid for the current environmental concerns, interests, and resource values.

The BLM analyzed four alternatives for the management of the BLM-administered lands in the Treatment Area: a No Action Alternative and three action alternatives (Alternatives A, B, and C). The action alternatives vary in number of acres treated per year and over 10-years and areas allowed for treatment type (commercial and non-commercial thinning and prescribed fire). Additionally, 9 Alternatives were considered but eliminated from detailed analysis as described in the EA (EA, BLM 2022a, pp. 216-222).

As stated in the EA, the need for this program of work and its purposes are established in the SWO ROD/RMP (RMP, BLM 2016b) and the supporting PRMP/FEIS (EIS, BLM 2016a; EA, BLM 2022a, p. 3). The purpose of the Integrated Vegetation Management for Resilient Lands program is to remove vegetation, to apply prescribed fire, and to install protective structures in the Treatment Area to promote and develop:

- Safe and effective wildfire response and reduce wildland fire risk to Highly Valued Resources and Assets (HRVAs), (specifically Communities at Risk, northern spotted owl [NSO] [*Strix occidentalis caurina*] habitat and sites, marbled murrelet [*Brachyramphus marmoratus*] habitat and sites, special status plants, and special plant communities);
- Fire and disturbance resilient lands and fire-resistant stands;
- Habitat for Special Status Species and unique native plant communities.

The range of alternatives analyzed in the EA is appropriate with respect to the Proposed Action, given current environmental concerns, interests, resource values and need to meet the purposes

described above and these are applicable to the Proposed Action. The Table Rocks Fuels Reduction & Oak Restoration IDT determined current environmental concerns, interests, and resource values that existed in March 2022 (EA Decision Record release) are the same as they are today.

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 the new information and new circumstances would not substantially change the analysis of the Proposed Action?

Yes, the Proposed Action is consistent with the existing analysis for Alternative C in the EA, which remains valid in light of new information as described below.

No new fish or other aquatic species have been listed since the programmatic Decision Record was signed for the EA, therefore all proposed activities within this DNA are covered by the programmatic biological opinion for the BLM's Forest Management Program for Western Oregon (FOMBO) (NMFS 2019).

There are no new federal Endangered Species Act wildlife listings or proposed or final critical habitat designations since the EA.

No new vascular or nonvascular plants have been listed since the EA, therefore all proposed activities within the project area are covered by the Biological Assessment & Letter of Concurrence (BA, BLM 2020; LOC, FWS 2021).

Executive Order (EO) 14072 on Strengthening the Nation's Forests, Communities, and Local Economies, was signed on April 22, 2022. Section 1 of the EO focuses on strengthening America's forests, including mature and old-growth forests, and reducing the threats of climate impacts, catastrophic wildfires, insect infestation, and disease. The EO discusses the need to "pursue science-based, sustainable forest and land management; conserve America's mature and old-growth forests on Federal lands; invest in forest health and restoration; support indigenous traditional ecological knowledge and cultural and subsistence practices; honor Tribal treaty rights; and deploy climate-smart forestry practices and other nature-based solutions to improve the resilience of our lands, waters, wildlife, and communities in the face of increasing disturbances and chronic stress arising from climate impacts" (E.O. Sec.1).

Section 2 of the Executive Order states that the Administration will "manage forests on Federal lands, which include many mature and old-growth forests, to promote their continued health and resilience; retain and enhance carbon storage; conserve biodiversity; mitigate the risk of wildfires; enhance climate resilience; enable subsistence and cultural uses; provide outdoor recreational opportunities; and promote sustainable local economic development."

The EA tiers to the 2016 Proposed Resource Management Plan/Final Environmental Impact Statement for the Resource Management Plans for Western Oregon, which addresses many of the elements in Executive Order 14072, including defining and inventorying mature and structurally complex forest (EIS, pp. 127-128, 318-333, 1205-1206). The purpose and need for

the EA (EA, BLM 2022a, pp. 3 – 8) align with Sections 1 and 2 of the Executive Order. As stated above, the range of alternatives evaluated in the EA remains valid for the current environmental concerns and interests, and it is reasonable to conclude these new circumstances would not substantially change the analysis of the Proposed Action.

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

Yes, the direct, indirect, and cumulative effects that would result from the Proposed Action are similar to the effects described in the EA, whether the resource or issue was analyzed in detail or detailed analysis was not warranted. The EA evaluated potential effects to eight resources or issues in detail (EA, BLM 2022a, pp. 15-62), and potential effects to 51 other resources and issues not analyzed in detail (EA, BLM 2022a, pp. 223-292). As described below, the BLM has quantified the effects to specific resources for the proposed treatment units for each of the eight issues which were analyzed in detail in the EA (EA, BLM 2022a, pp. 15-62):

How would the Proposed Action affect landscape scale resiliency in terms of successional class distribution (i.e., distribution of open and closed forest conditions) in the dry forest?

The conditions within the Project Area are within the scope of those described in the affected environment in the EA. The current balance of open and closed forest conditions within the Project Area are departed from the historic range of variability, with an overrepresentation of mid-closed forest and a deficit of late-open forest conditions (Table 3), which is consistent with the affected environment described in the EA (EA, BLM 2022a, p. 17). The Proposed Action does not include commercial thinning or selection harvest, so consistent with the EA, these actions would not result in a shift in forest structural stages (EA, BLM 2022a, p. 16).

Table 3. Natural Range of Variability (NRV) and Current Forest Successional Condition/Structural Stage distribution across BLM-administered lands within the Proposed Project Area and the EA Treatment Area. GIS acres are approximate. Remaining project areas are non-forested.

Successional Condition/Structural Stage	NRV for Douglas Fir Dry and Moist: SW Oregon	Current Approximate Percent (Acres) Distribution for Proposed Project Area	Current Approximate Percent (Acres) Distribution for IVM Treatment Area
Early Seral	7-17%	10% (70 acres)	6% (40,546 acres)
Mid Seral Closed Canopy	2-8%	57% (421 acres)	70% (450,650 acres)
Mid Seral Open Canopy	11-22%	24% (175 acres)	10% (66,440 acres)
Late Seral Open Canopy	40-55%	7% (53 acres)	1% (7,521 acres)
Late Seral Closed Canopy	16-25%	3% (20 acres)	13% (82,184 acres)

How would the Proposed Action affect stand level hazard or fire resistance in the fire-adapted dry forests?

The conditions within the Project Area are within the scope of those described in the affected environment in the EA. Within the current project, ladder fuels, expressed as canopy base height, are less than five feet for 80 percent of the Project Area (Table 4), similar to conditions described in the EA (EA, BLM 2022a, pp. 26, 172).

Table 4. Current distribution of Canopy Base Height across the Proposed Project Area. Canopy Base Height data acquired from LANDFIRE (LF 2020). GIS acres are approximate.

CBH (feet)	Proposed Project Area		EA Treatment Area Distribution
	Acres	Percent Distribution	
0 to <2	817	60%	47%
2 to <5	236	21%	32%
5 to <8	219	17%	11%
8 to <12	4	0%	1%
12+	16	1%	9%

As described in the EA, the majority of the Table Rock Project Area is represented by *very high* load forested surface fuel models (EA, Table 5; BLM 2022a, pp. 26, 172, 173). *Moderate* load forest surface fuel models and grass-shrub fuel models also represent a combined 35 percent of the Project Area, similar to distributions described in the EA (Table 5).

Table 5. Approximate acres and percent distribution of Surface Fire Behavior Fuel Models (FBFM) (LF 2020) grouped by loading category descriptions and corresponding FBFM number code (Scott and Burgan 2005) across the Proposed Project Area (bold FBFM number codes represent the majority).

Fuel Loading Description Categories (Fire Behavior Fuel Models)	Proposed Project Area		EA Treatment Area Distribution
	Acres	Percent Distribution	
Non-burnable (91,99)	9	1%	1%
Low load grass (102)	539	42%	3%
Low load grass - shrub (121)	-	0%	2%
Low load mixed conifer - hardwood	-	0%	0.3%
Moderate load grass-shrub (122)	145	11%	16%
Moderate load mixed conifer - hardwood (162, 186, 188)	340	26%	16%
High load shrub (147)	29	2%	0.03%
High load conifer (184, 185)	4	0%	6%
Very High load mixed conifer-hardwood/understory (165,189)	224	17%	55%

As stated above, the proposed action will be implemented in stands with the presence of suppressed fire tolerant species and dense continuous ladder and surface fuels which is consistent with the EA analytic assumptions (EA, BLM 2022a, pp. 22).

Consistent with the EA, the combined direct effect of the Proposed Action to reduce surface fuels and ladder fuels, via small diameter thinning, non-conifer treatments, and prescribed fire would alter the continuity of the fuel profile to result in *High* relative resistance to stand replacement fire for 100 percent of Table Rock Project Area acreage (EA, BLM 2022a, pp. 28-29; Table 6).

Additionally, the Proposed Action (create openings, leave untreated skips, and apply prescribed fire) would result in effects to fuel heterogeneity, similar to those disclosed in the EA (EA, BLM 2022, p. 31-32).

Table 6. Table Rocks Fuels Reduction Project Contribution Toward Stand-Level Fire Resistance, Relative to EA effects analysis.

EA Treatment Type and Commercial Theme	Short-term Stand-Level Fire Resistance Rating	Percent of Table Rocks Fuels Reduction Project Proposed Acreage	Proposed Action Acreage	Percent of EA Treatment Area
Small diameter thinning and prescribed fire treatments only	High	100%	1,291	0.002%

Cumulative effects at the stand-level for all actions would be similar to those disclosed in the EA, requiring maintenance disturbance every of 10 to 30 years to maintain *low-moderate* loading surface fuel profiles (EA, BLM 2022a, p. 32 - 34).

In conclusion, the direct, indirect, and cumulative effects of the Proposed Action would be consistent with those disclosed in the issue analyzed in detail (EA, BLM 2022a, p. 27-29, 31-32).

How would the Proposed Action effect short and long-term wildfire risk to forests and highly valued resources and assets, namely communities, or contribute toward safe and effective wildfire response?

The conditions within the Project Area are within the scope of those described in the affected environment in the EA (EA, BLM 2022a, p.36-37). Lands within the Project Area are comprised of all ownerships and lie within strategic “linear feature” (e.g., POD boundary), local “area-based” (e.g., ¼ mile around Communities at Risk), and landscape “area-based” (i.e. POD polygons) wildfire risk reduction extents, consistent with the EA treatment area (EA, BLM 2022a, p. 37). There are two Potential wildfire Operational Delineations (PODs) which the Table Rocks Fuels Reduction project Proposed Actions fall within (see Attachment A, map). The BLM used GIS to calculate that BLM-administered lands comprise 21 percent of the total PODs acreage (14,018), six percent of the strategic “linear feature” (e.g., POD boundary), and 13 percent of the local “area-based” (e.g., ¼ mile around Communities at Risk) wildfire risk reduction extents (Table 7). The project is also near Medford and Eagle Point, two of the top six communities in Oregon with the highest cumulative wildfire risk (Scott et al. 2018, p. 2 and Table 2 p. 9; EA, BLM 2022a, Map 8 and p.37).

Table 7. BLM-administered lands relative to wildfire risk reduction strategy extents within the PODs encompassing the proposed action and comparison to EA treatment area BLM-administered lands distribution.

EA Risk Reduction Strategy Extent	All-Lands Distribution within selected PODs	BLM-administered lands within selected PODs		BLM-administered Lands proportion of PODs encompassing EA Treatment Area
		Acres	Percent (%)	
“Linear features” [POD Boundaries] (300ft width)	500	29	6%	35%
Local “Area-based” [¼ Mile Around Communities at Risk]	9,615	1,290	13%	21%
Landscape “Area based” [PODs area]	14,018	2,966	21%	35%

Consistent with the EA analysis, the Proposed Action would reduce the potential for stand-replacing crown fire (i.e., stand level hazard), creating post-treatment conditions that set stands up to better receive fire (prescribed or wildfire) (EA, BLM 2022a, pp. 39-42). Where implemented, proposed actions would contribute toward wildfire risk reduction, consistent with the direct, indirect, and cumulative effects disclosed in the EA (EA, BLM 2022a, pp. 39 - 42). The Proposed Action would reduce wildfire risk on approximately five percent of the strategic “linear feature” extent (e.g., POD boundary), seven percent of the local “area-based” extent (e.g., ¼ mile around Communities at Risk), and nine percent of the landscape “area-based” (i.e. POD polygons) wildfire risk reduction extent (Table 8).

Table 8. Table Rocks Proposed Actions contribution toward EA wildfire risk reduction strategy extents within the PODs encompassing the proposed action and comparison to EA treatment area and maximum implementation distribution.

EA Risk Reduction Strategy Extent	Table Rocks Proposed Actions		Table Rocks Proposed Action relative to EA Treatment Area (%)	Potential Maximum 10-year Implementation of EA Treatment Area (%)
	Acres	Percent (%)		
“Linear features” [POD Boundaries] (300ft width)	23	5%	0.003%	3.9%
Local “Area-based” [¼ Mile Around Communities at Risk]	646	7%	0.094%	15%
Landscape “Area based” [PODs area]	1,290	9%	0.189%	35%

Between 2015 and 2020, partners completed oak restoration and fuels reduction treatments, similar to this proposed action, across approximately 770 acres at Lower and Upper Table Rocks, adjacent to the Proposed Action (Table 9 and Attachment A, map). Thus, the Proposed Action will contribute towards cumulative effects of reducing wildfire risk as discussed in the EA (p. 42).

Table 9. Previously completed actions (2015 -2020) cumulative contribution toward EA wildfire risk reduction strategy extents within the two PODs encompassing the new Proposed Action.

EA Risk Reduction Strategy Extent	Table Rocks Past Actions (All - Lands) (2015- 2020)	
	Acres	Percent (%)
“Linear features” [POD Boundaries] (300ft width)	0	0%
Local “Area-based” [¼ Mile Around Communities at Risk]	540	6%
Landscape “Area based” [PODs area]	770	5%

In conclusion, the direct, indirect, and cumulative effects of the Proposed Action would be consistent with those disclosed in the issues analyzed in detail (EA, BLM 2022a, pp. 39 - 42).

How would the Proposed Action affect northern spotted owl habitat and critical habitat?

The Table Rocks project is consistent with the EA analysis and conclusions because the project is following the EA prescriptions. Additionally, as described below (and shown in Table 9), the effects from the Proposed Action are within the estimated range of effects in the EA.

Table 9. Treatment effects and acres of spotted owl habitat types treated.

Activity Type	Effects to Nesting/Roosting Habitat			Foraging-only Habitat	Effects to Dispersal-Only Habitat	
	Remove	Downgrade	Modify	Modify	Remove	Modify
Small Diameter Thinning Acres (% of EA analyzed acreage)	0 acres	0 acres	0 acres	0 acres	0 acres	120 acres (0.5%)
Understory/Hand pile Burning Acres** (% of EA analyzed acreage)	0 acres	0 acres	0 acres	0 acres	0 acres	120 acres (0.5%)
TOTAL						120

**Duplicate acres of small diameter thinning and understory/ hand pile burning would be fuels reduction treatments on the same footprint.

The Table Rocks project would modify but maintain dispersal-only habitat function on approximately 0.001 percent of the dispersal-only habitat within the EA NSO Analysis Area. This is within the EA effects analysis that concluded that treatments that would modify but maintain the function of dispersal, would impact up to 35 percent of dispersal-only habitat within the EA NSO Analysis Area.

The cumulative effects from the project are consistent with the EA because these acres were considered under the proposed actions in the EA and no additional projects are proposed in the Project Area that were not considered in the EA cumulative effects analysis in Section 3.5 (EA, BLM 2022a, pp. 55-56).

Additionally, since nesting/roosting or foraging habitat would not be treated and is not located within a provincial home range (1.3 miles) of the project area, there are no anticipated effects to spotted owl sites.

There would be no effects to spotted owl designated critical habitat because no treatments are proposed in spotted owl critical habitat.

Would the Proposed Action in the late-successional reserves speed the development and not preclude or delay by 20 years or more the development of northern spotted owl nesting-roosting habitat?

There would be no effects to the development of nesting-roosting habitat in late-successional reserves because no treatments are proposed in late-successional reserves.

How would the Proposed Action affect the Pacific marten (also known as “coastal” marten)?

There would be no effects to Pacific martens (*Martes caurina*) or their proposed critical habitat from this project because the project is not within any known Extant Population Areas (EPA) or within proposed critical habitat. The project is approximately 40 miles from the nearest (EPA). Additionally, no Pacific martens have been observed in the Project Area and there is no habitat within the Project Area.

How would the Proposed Action develop and promote special status plant habitat?

The information for Special Status plants specific to this project and project location is consistent with the analysis in the EA for Special Status plants, as described in D.1 above.

As described in D.1 The BLM has/will conduct pre-project surveys and will implement protection measures for sites, as described in the EA (EA, BLM 2022a, pp. 234-236).

How would the Proposed Action promote and develop habitat in special plant communities or native plant communities, including those in Areas of Critical Environmental Concern?

Many of the native plant communities in the Table Rocks ACEC have been degraded or altered during the last 100-150 years because of development, fire exclusion, invasive plants encroachment, and other human activities. Implementation of the Proposed Action would improve 1,291 acres of habitat for special plant communities within the Table Rocks ACEC (Table 1) and is consistent with the special management needs for the ACEC where fuels treatments would “manage vegetation to maintain and enhance rare plant habitat, oak woodlands, and other vegetation communities (RMP, BLM 2016a, p. 252). The proposed action also follows management direction for rare plants from the RMP to manage habitats: to maintain populations of ESA-listed, proposed, and candidate plant species; to manage ESA candidate and Bureau Sensitive species consistent with recovery plans, conservation agreements, or species management plans including the protection and restoration of habitat; to maintain or restore natural processes, native species composition, and vegetation structure in natural communities; to manage mixed conifer communities to maintain and enhance ponderosa and sugar pine persistence and structure; and to manage mixed hardwood/conifer communities to maintain and enhance Oregon white oak and California black oak persistence and structure (RMP, BLM 2016a, pp. 106-107).

Both thinning and prescribed fire would be used to improve conditions in non-conifer plant communities. Shrubs and trees would be thinned to allow regeneration of understory herbaceous native plants, regeneration of shrubs, and development of a mosaic of uneven age shrubs. Trees and shrubs would be thinned and underburning at low to moderate intensity levels would be completed to remove encroaching conifers, shrubs, and herbaceous plant thatch. Trees and shrubs up to 12 inches DBH would be thinned in conifer and non-conifer plant communities, which allows more flexibility to reduce densities to increase fire resistance, develop understory herbaceous species, and promote plant growth and vigor of the remaining vegetation (EA, BLM 2022a, p.82).

The Proposed Actions would make the mixed oak conifer stands and non-conifer plant communities more persistent and resilient and less susceptible to damage from high intensity, stand replacing wildfires and the effects of climate change. They would increase the acres of open plant communities that would support greater plant species diversity, especially understory

herbaceous species. The Proposed Actions would enhance or restore important and relevant values in the Table Rocks ACEC by contributing to the persistence and resilience of the plant communities they were designated to protect (EA, BLM 2022a, p. 82).

The PRMP/FEIS analysis concluded that rare plants, especially vascular species in the non-conifer habitat group, would benefit from thinning, fuel reduction treatments, and removing encroaching vegetation because those actions would reduce competition and shade from encroaching vegetation and increase light, moisture, and nutrients that would support increased growth and reproduction of Special Status plants and other desired vegetation (RMP, BLM 2016a, pp. 520-533).

Implementation of invasive plant preventative PDFs and continued weeds management under the Integrated Invasive Plant management for the Medford District Revised EA (BLM 2018, 346 pp.) would minimize potential introductions or spread of nonnative invasive plants into treatment areas and special plant communities. The proposed action also includes restoring native species to disturbed sites through seeding or planting, using appropriate site-specific species, including culturally significant native plants.

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

The BLM conducted extensive public outreach between 2019 and 2020 on the EA (“existing NEPA document”). Public scoping started on July 3, 2019. Scoping notices were sent to individuals, organizations and agencies via letter and email. The BLM provided a scoping notice to the following tribes on July 3, 2019, including the Karuk, Cow Creek, Klamath, Confederated Tribes of the Grande Ronde, Quartz Valley Indian Reservation, and Confederated Tribes of Siletz Indians. The scoping period ended on August 2, 2019 (BLM 2022c, pp. 12-13).

On October 29, 2019, the BLM provided the opportunity for the public to provide input on a preliminary version of Chapters 1 and 2 of the EA. The BLM sent notices to individuals, organizations and agencies via letter and email. Notifications were also made to the following tribes on October 30, 2019, including the Karuk, Cow Creek, Klamath, Confederated Tribes of the Grande Ronde, Quartz Valley Indian Reservation, and Confederated Tribes of Siletz Indians. The BLM also hosted meetings in Williams on November 5, 2019, and on November 13, 2019, in Applegate, and made a presentation before the Jackson County Board of Commissioners on December 10, 2019. The BLM also hosted a public open house at the Jackson County Expo on November 14, 2019 (BLM 2022c, pp. 12-13).

On August 19, 2020, the BLM initiated a 30-day public comment period on the complete EA. Notices were sent to individuals, organizations and agencies via letter and email. Notifications were also made to the following tribes on August 25, 2020, including the Karuk, Cow Creek, Klamath, Confederated Tribes of the Grande Ronde, Quartz Valley Indian Reservation, and Confederated Tribes of Siletz Indians. A webinar was hosted by the BLM on August 27, 2020. The public comment period was extended on September 18, 2020, until October 19, 2020 (BLM 2022c, pp. 12-13).

On March 2, 2022, the BLM approved the EA. Notification via email and letter was made to approximately 1,340 individuals, organizations, and agencies of the approval of the project. Notifications of the project approval were also made on March 3, 2022, to the following tribes including the Karuk, Cow Creek, Klamath, Confederated Tribes of the Grande Ronde, Quartz Valley Indian Reservation, and Confederated Tribes of Siletz Indians. In addition to notifications, the BLM also released a press release on March 2, 2022, with the announcement of the project approval.

On November 4, 2022 notifications were made to Cow Creek Band of Umpqua Tribe of Indians, Confederated Tribes of the Grande Ronde, and Confederated Tribes of Siletz Indians. They were invited to consult or provide input for the Project.

On January 27, 2023 the BLM initiated a 17-day public review and comment period on this “draft”/unsigned Determination of NEPA Adequacy (DNA) worksheet. The BLM notified 222 individuals, organizations, and agencies on the project mailing list of this document’s availability, along with maps of preliminary treatment units, and information on how to provide effective comments. The BLM may reconsider or update this DNA or the proposed action if comments show an update is warranted prior to issuing a signed DNA. Additionally, the BLM will describe the results of this public participation period and how substantive comments are addressed in a Project Decision Record should the BLM decide to implement this Project.

E. Persons/Agencies/BLM Staff Consulted

Name	Title
Jen Sigler	Cultural
Dave Roelofs	Wildlife
Thomas Hender	Botany/Invasive Weeds
Nick McDaniels	Recreation
Amy Meredith	Soils
Rose Hanrahan	Fish
Michael Webber	Hydrology
Al Mason	Fire/Fuels
Jena Volpe	Fire Ecologist
Kim Thompson	Planner

Note: refer to the EA for a complete list of the team members participating in the preparation of the original environmental analysis.

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Conclusion:

Based on the review documented above, I conclude that this proposal conforms to the applicable LUP and that the NEPA documentation fully covers the Proposed Action and constitutes BLM’s compliance with the requirements of NEPA.

Project Lead: _____
(Signature)

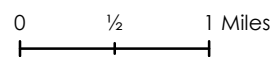
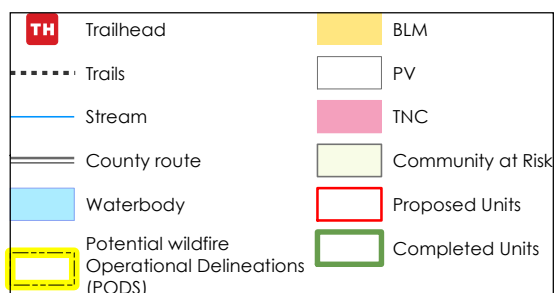
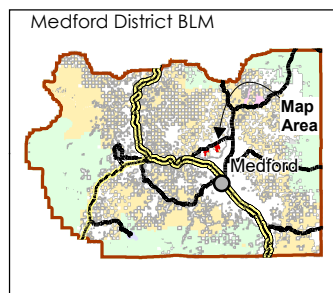
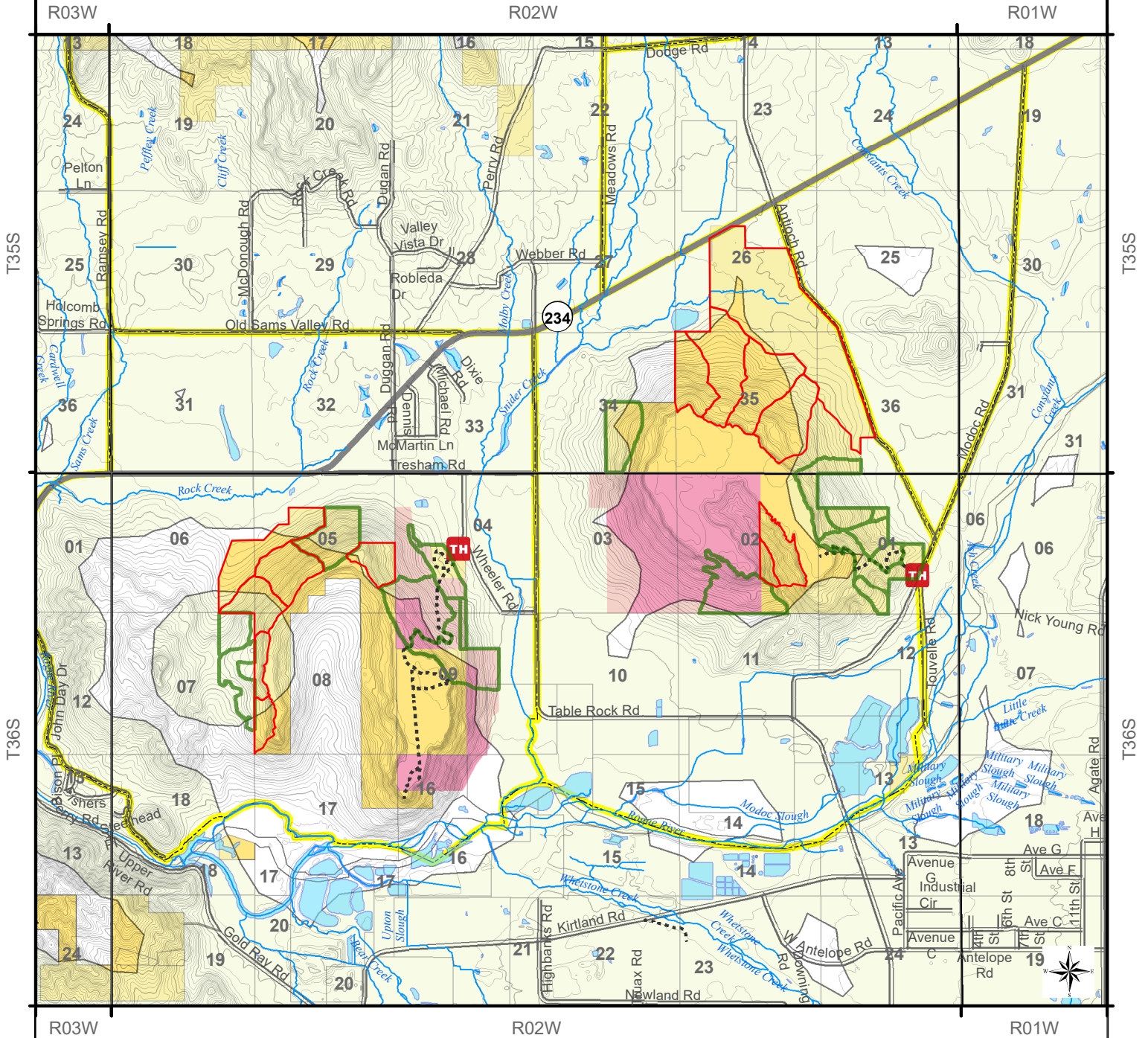
NEPA Coordinator: _____
(Signature)

Authorized Official/Date: _____
(Signature)

Name: Jared Nichol
Title: Field Manager
Office: Butte Falls Field Office

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 authorization based on this DNA is subject to appeal under 43 Code of Federal Regulations Part 4 and the program-specific regulations.

Table Rocks Fuels Reduction and Oak Restoration Project Determination of NEPA Adequacy



20 ft. Contours



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources and may be updated without notification.

Attachment B

Table Rocks Fuels Reduction and Oak Restoration Project

Project Design Features

Project Design Features (PDFs) listed in the tables below apply to this project.

Botanical PDFs

PDF #	BMP No. or RMP citation	Description
1	140	Conduct surveys to locate Special Status plants in all project areas where proposed actions could result in habitat modification or species' disturbance, following all applicable protocols and conducted by qualified botanists.
2	145	Conduct soil-disturbing vegetation treatments in Gentner's fritillary and Cook's lomatium populations when plants are dormant, generally between July 1 and February 15.
3	146	Implement protection measures for Special Status plant sites on a site-by-site basis, taking into consideration the species and its habitat requirements, the proposed treatment, management recommendations if available, and current environmental conditions at the site.
4	154	Restrict broadcast burning within T&E and Sensitive plant sites to the dormant season (generally July 1 -February 15).
5	159 and BLM 2020, pp. 24-38	For manual treatment, maintain 25-foot no-treatment buffers around Gentner's fritillary sites during the growing season. Tree falling and shrub removal is allowed within the buffer during the dormant season (July 1 -February 15) but maintain 40% canopy cover and-remove cut material within buffer and create piles at least 25 feet outside the buffer flagging.
6	163	When re-vegetating degraded or disturbed areas, utilize locally adapted seeds and native plant materials appropriate to the location and site-specific conditions, and meeting management objectives for vegetation management and restoration activities. Use seeds and plant materials that are genetically appropriate and native to the plant community or region, to the extent practicable.
7	164	Clean soil and plant parts from equipment, boots, and clothing prior to entering treatment areas to reduce the risk of introducing or spreading non-native invasive plants. Cleaning may be completed with pressurized air or water and brushes.
8	179	Do not burn slash within 100 feet of Gentner's fritillary sites.
9	USDI FWS, 2012	Avoid direct disturbance to winged water-starwort, dwarf meadowfoam, Greene's popcornflower, and fragrant popcornflower sites or alterations to hydrology of surrounding wetland; allow thinning to eliminate encroachment and maintain wetland but place piles outside buffer; thinning shrubs and conifers in/around wetland would

		benefit habitat, no heavy equipment allowed inside buffer, if broadcast burnt manage for low intensity fire in wetland, moderate to high intensity may damage seed bank.
10	F 01	Locate fire lines so that open meadows associated with streams do not burn, unless prescribed for restoration.
11	F 02	Reduce fuel loads by whole tree yarding, and piling material, as necessary, prior to under burning in dry forest types where fuel loads are elevated.
12	F 03	Avoid burning of large woody material that is touching the high water mark of a waterbody or that may be affected by high flows.
13	F 04	Avoid delivery of chemical retardant foam or additives to waterbodies, and wetlands. Store and dispose of ignition devices/ materials (e.g., flares and plastic spheres) outside Riparian Reserve or a minimum of 150 feet from waterbodies, floodplains, and wetlands. Maintain and refuel equipment (e.g., drip torches and chainsaws) a minimum of 100 feet from waterbodies, floodplains, and wetlands. Portable pumps can be refueled on-site within a spill containment system
14	F 05	Limit fire lines inside Riparian Reserve. Construct fire lines by hand on all slopes greater than 35 percent and inside the Riparian Reserve inner zone. Use erosion control techniques such as tilling, waterbarring, or debris placement on fire lines when there is potential for soil erosion and delivery to waterbodies, floodplains, and wetlands. Space the waterbars as shown in Table C-6 of the RMP (p. 191). Avoid placement of fire lines where water would be directed into waterbodies, floodplains, wetlands, headwalls, or areas of instability.
15	F 06	In broadcast burning, consume only the upper horizon organic materials and allow no more than 15 percent of the burned area mineral soil surface to change to a reddish color.
16	F 07	Avoid burning piles within 35 feet of a stream channel.
17	F 10	Do not operate ground-based machinery for fuels reduction within 50 feet of streams (slope distance), except where machinery is on improved roads, designated stream crossings, or where equipment entry into the 50-foot zone would not increase the potential for sediment delivery into the stream.
18	F 12	Place residual slash on severely burned areas, where there is potential for sediment delivery into waterbodies, floodplains, and wetlands.
19	F 14	Avoid cutting logs that extend into the stream channel. Fall snags in the Riparian Reserve towards the stream channel when felling is necessary for safety or fire suppression activities.

Cultural/Tribal/Paleontological Project Design Features

PDF #	BMP No. or RMP citation	Description
20	2015 BLM/SH PO Protocol	Consultation with Tribes and/or SHPO will be completed prior to the signing of any DRs completed under this EA.
21	2015 BLM/SH PO Protocol	Archaeologists will conduct pre-field examinations of existing site, survey, and other relevant information to determine what areas of proposed projects (if any) will need to be surveyed.
22	2015 BLM/SH PO Protocol	All surveys will be conducted or led by qualified cultural resource specialists familiar with the BLM Protocol and Section 106 of the NHPA.
23	2015 BLM/SH PO Protocol	Cultural or paleontological sites occurring within activity areas may be flagged for avoidance, unless evaluated and treated or discharged from management. Sites that need to be protected will be identified to the project proponent/implementor on a map.
24	Standard practice	Cultural sites that are located within prescribed fire units will have hand lines constructed around them as necessary to protect the resource from fire.
25	Standard practice	Cultural sites that are within treatment units may be hand-treated to reduce fuel-loading, and to lessen their visibility on the landscape. These sites will be identified prior to project implementation by Medford District archaeological staff.
26	Standard practice	All materials cut from cultural sites, and any other cut materials will be piled off-site for burning purposes. The Medford District archaeological staff will work with other BLM staff to identify suitable areas for pile burning. No trees or other vegetation shall be dragged through a cultural site.
27	Standard practice	Sensitive areas (such as flagged sites or areas identified by Tribes) will be discussed with the contractor to ensure that they understand the need to avoid these areas. The contractor will also be informed that they cannot collect artifacts or disturb cultural resource sites in any way.
28	Standard practice	Any fire lines leading to or near cultural or paleontological sites that originate from roads shall be blocked after project implementation to prevent unauthorized all-terrain vehicle use.
29	2015 BLM/SH PO Protocol & EA PDF 32	Only existing breaches or areas along ditch systems designated by Medford District archaeological staff shall be used for the removal of vegetation. If new crossings are needed to facilitate access, these areas will be developed with the archaeological staff and in consultation with SHPO.
30	2015 BLM/SH PO Protocol,	Brush and tree removal within historic ditch systems will be discussed with archaeological staff prior to removal. Any wooden features (such as trellises, flumes, and other wooden items of historical significance) within ditches must remain in place and will be protected. All brush and other woody materials will be piled away from the ditches for burning.

	EA PDF 33	
31	EA PDF 34	Prior to any underburning activities, all ditches or ditch segments will be examined by the archaeologists to identify any wooden features. Any wooden features (such as trellises, flumes, and other wooden items of historical significance) identified will be flagged for avoidance. Appropriate mitigation for such features will be developed by archaeological staff.
32	1780 Manual	Large patches of culturally significant plants (as identified by Tribes) will be protected from all treatment activities unless such activity will benefit the patch.
33	Standard practice	All areas designated for personal use firewood collection will be discussed with BLM archaeological staff and developed in cooperation with them in order to protect any cultural resources.
34	BLM policy	Tribes shall have access to project areas to collect Special Forest Products before treatment if culturally significant products are identified within treatment areas. Such products include bear grass, pine cones, acorns, several species of root plants, fir boughs, mushrooms, etc.

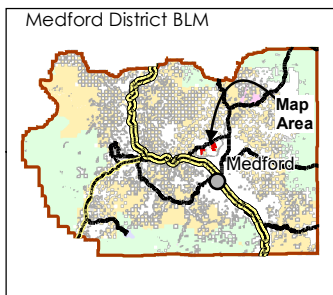
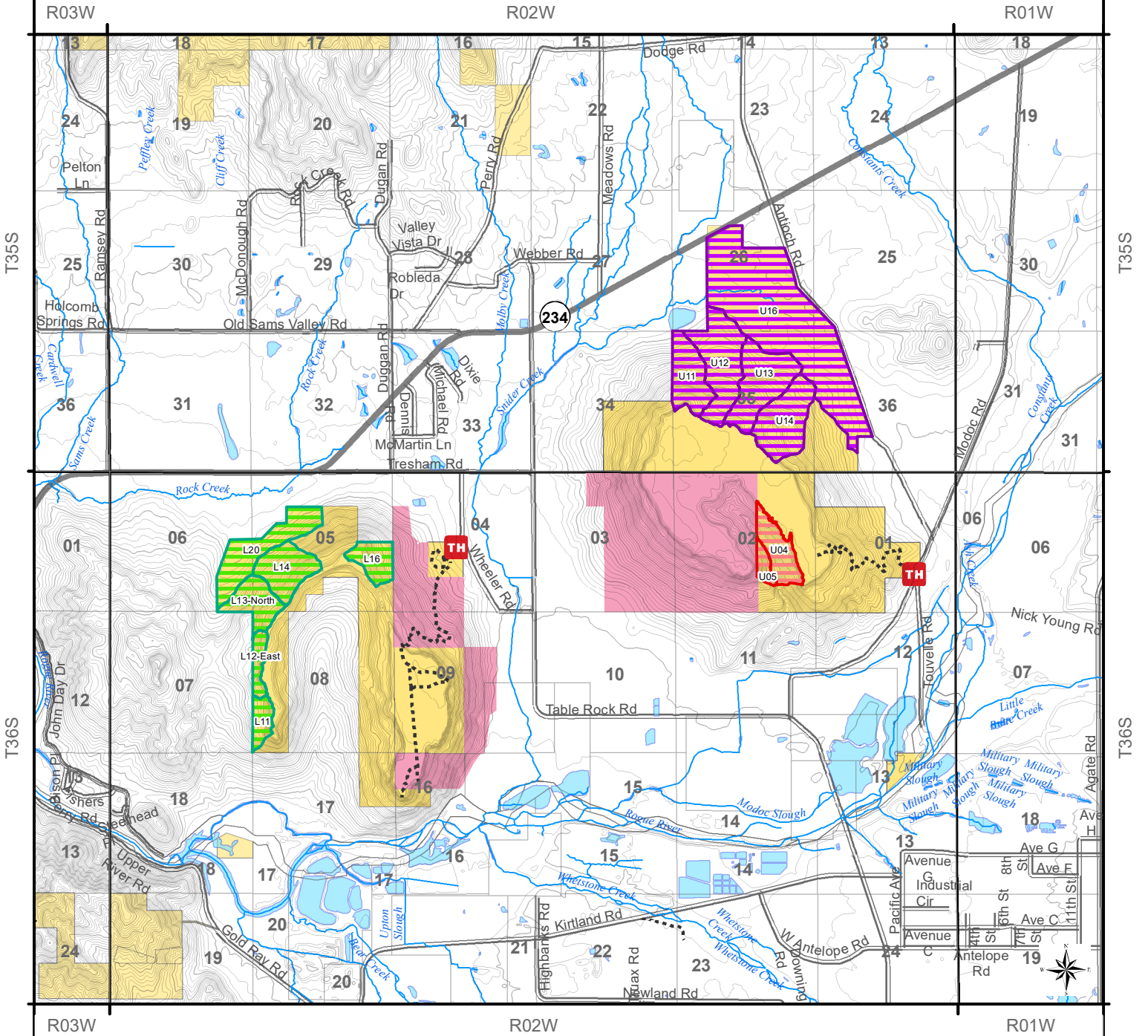
Hydrology Project Design Features

PDF #	BMP No. or RMP citation	Description
35	SP 01	Take precautions to prevent leaks or spills of petroleum products (e.g., fuel, motor oil, and hydraulic fluid) from entering the waters of the State.
36	SP 02	Take immediate action to stop and contain leaks or spills of chemicals and other petroleum products. Notify the Oregon Emergency Response System, through the District Hazard Materials specialist, of any spill that enters the waters of the State
37	SP 03	Inspect and clean heavy equipment as necessary prior to moving on to the project site, in order to remove oil and grease, non-native invasive plants, including noxious weeds, and excessive soil. Where practicable, maintain and refuel heavy equipment a minimum of 150 feet away from streams and other waterbodies. Refuel small equipment (e.g. chainsaws and water pumps) at least 100 feet from waterbodies (or as far as practicable from the waterbody where local site conditions do not allow a 100-foot setback) to prevent direct delivery of contaminants into a waterbody. Refuel small equipment from no more than 5-gallon containers. Use absorbent material or a containment system to prevent spills when re-fueling small equipment within the stream margins or near the edge of waterbodies.
38	SP 07	Operators shall be responsible for the clean-up, removal, and proper disposal of contaminated materials from the site.

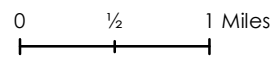
Wildlife Project Design Features

PDF #	BMP No. or RMP citation	Description
39	RMP p. 116	Do not conduct operations during the breeding season within 660 feet of bald eagle or golden eagle nests, January 1st- August 31 st , in T35S, R02W, Section 35, Units U12 and U13.
40	2017 Programmatic BA p. 26	The following PDC were designed to help reduce impacts to vernal pool habitat in 35S-02E-26, unit U16:
41		Vernal pools would be assumed occupied unless surveys indicate otherwise. Non-herbicide invasive plant treatments (propane torch, hand pulling, or string trimmer) in or adjacent to vernal pools will only occur during the dry season, which is when fairy shrimp have not hatched and are non-reproductive. This period generally occurs between April and November.
42		Herbicide treatments will not occur within the vernal pools. Treatments adjacent to the vernal pools will only occur during the dry season and will only occur outside of a 30-foot buffer around the margin of the pools.
43		Standard Operating Procedures, Mitigation Measures, or other Protection Measures from the <i>Medford District Integrated Invasive Plant Management Environmental Assessment</i> will be implemented.
44		Fire lines for prescribed fire will not be constructed through vernal pools.
45		Prescribed fire will occur in the fall when vernal pools are dry and outside of the reproductive season for fairy shrimp.
46	USDI FWS 2021, p. 34	Seasonal restrictions identified in the Southwest Oregon Dry Forest Resilient Lands consultation, including restricting burning and habitat modifying actions, will be implemented for treatments within meadows and brush patches, between May 15 and September 30.

Table Rocks Fuels Reduction and Oak Restoration Project Determination of NEPA Adequacy



Trailhead	BLM
Trails	PV
Stream	TNC
County route	Phase
Waterbody	1
	2
	3



20 ft. Contours



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