

Appendix A: Information on the 18 EAs Provided by the BLM to Justify the Proposed Categorical Exclusion for Pinyon Juniper Removal Projects

This appendix has three sections. [Section 1](#) is a chart summarizing information on the 18 EAs. [Section 2](#) is detailed information gleaned from the materials provided by the BLM on each of the 18 projects. [Section 3](#) is an analysis of the data in Sections 1 and 2.

Section 1: Summary of 18 Environmental Analyses Provided by the BLM to Justify the Proposed Categorical Exclusion for Pinyon Juniper Removal Projects. Shading indicates projects that are not “qualified” because either they are programmatic environmental assessments or are tiered to Environmental Impact Statements.

Project Name

EcoRegion/ State

NEPA Remarks Purpose/Meets

NEPA Remarks Purpose/Meets

purpose of CX

purpose of CX

Size (Acres)

Size (Acres)

Size (Acres)

Size (Acres)

Major Activities Mitigations/

Major Activities Mitigations/

Major Activities Mitigations/

Major Activities Mitigations/

Required Mitigations Will Result in

Reduced Impacts

Required Mitigations Will Result in

Reduced Impacts

Required Mitigations Will Result in

Reduced Impacts

Required Mitigations Will Result in

Reduced Impacts

LWC, WSA, Other

LWC, WSA, Other

LWC, WSA, Other

LWC, WSA, Other

LWC, WSA, Other

LWC, WSA, Other

LWC, WSA, Other

**Special Status Species Present and
Possibly Affected?**

**Special Status Species Present and
Possibly Affected?**

**Special Status Species Present and
Possibly Affected?**

**Special Status Species Present and
Possibly Affected?**

**Special Status Species Present and
Possibly Affected?**

**Special Status Species Present and
Possibly Affected?**

**Special Status Species Present and
Possibly Affected?**

**Special Status Species Present and
Possibly Affected?**

Monitoring Effect of

Monitoring Effect of

Monitoring Effect of

Monitoring Effect of

Monitoring Effect of

Monitoring Effect of

Monitoring Effect of

Public Engagement

Public Engagement

Public Engagement

Public Engagement

Public Engagement

Public Engagement

Public Engagement

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Activities not covered by proposed CX?

Applegate Sage Steppe Habitat

Restoration
Eastern Cascades Slopes and
Foothills/CA
Programmatic EA. Tiered to 2008 FEIS.
Projects will be done via DNA with public
engagement and administrative remedies.
Programmatic EA. Tiered to 2008 FEIS.
Projects will be done via DNA with public
engagement and administrative remedies.
Sage grouse habitat enhancement/Yes
Sage grouse habitat enhancement/Yes
Sage grouse habitat enhancement/Yes
20 to 1000+ per project within 150,000
acres slated for treatment.
20 to 1000+ per project within 150,000
acres slated for treatment.
20 to 1000+ per project within 150,000
acres slated for treatment.
20 to 1000+ per project within 150,000
acres slated for treatment.
Hand clearing, mechanical thinning,
broadcast burning, and pile burning
Hand clearing, mechanical thinning,
broadcast burning, and pile burning
Hand clearing, mechanical thinning,
broadcast burning, and pile burning
Hand clearing, mechanical thinning,
broadcast burning, and pile burning
Hand clearing, mechanical thinning,
broadcast burning, and pile burning
Subject to design features, special
protection measures, constraints from
FEIS. Cultural, Wildlife, Visual, Special
Status Plants, old growth, fuelwood,
livestock and riparian protection measures
/ Yes
Subject to design features, special
protection measures, constraints from
FEIS. Cultural, Wildlife, Visual, Special
Status Plants, old growth, fuelwood,
livestock and riparian protection measures
/ Yes
Subject to design features, special

protection measures, constraints from
FEIS. Cultural, Wildlife, Visual, Special
Status Plants, old growth, fuelwood,
livestock and riparian protection measures
/ Yes
Subject to design features, special
protection measures, constraints from
FEIS. Cultural, Wildlife, Visual, Special
Status Plants, old growth, fuelwood,
livestock and riparian protection measures
/ Yes
Subject to design features, special
protection measures, constraints from
FEIS. Cultural, Wildlife, Visual, Special
Status Plants, old growth, fuelwood,
livestock and riparian protection measures
/ Yes
Subject to design features, special
protection measures, constraints from
FEIS. Cultural, Wildlife, Visual, Special
Status Plants, old growth, fuelwood,
livestock and riparian protection measures
/ Yes
Y Pre-treatment, and 2, 5, 10, 15 years
post treatment. Line pint intercept, gap,
soil, species richness, grass density, etc.
Data used for adaptive learning.
Y Pre-treatment, and 2, 5, 10, 15 years
post treatment. Line pint intercept, gap,
soil, species richness, grass density, etc.
Data used for adaptive learning.
Y Pre-treatment, and 2, 5, 10, 15 years
post treatment. Line pint intercept, gap,
soil, species richness, grass density, etc.
Data used for adaptive learning.
Y Pre-treatment, and 2, 5, 10, 15 years
post treatment. Line pint intercept, gap,
soil, species richness, grass density, etc.
Data used for adaptive learning.
Y Pre-treatment, and 2, 5, 10, 15 years
post treatment. Line pint intercept, gap,
soil, species richness, grass density, etc.
Data used for adaptive learning.

Y Pre-treatment, and 2, 5, 10, 15 years post treatment. Line pint intercept, gap, soil, species richness, grass density, etc. Data used for adaptive learning.

Y Pre-treatment, and 2, 5, 10, 15 years post treatment. Line pint intercept, gap, soil, species richness, grass density, etc. Data used for adaptive learning.

No substantive changes

No substantive changes

No substantive changes

No substantive changes

No substantive changes

No substantive changes

No substantive changes

No substantive changes

Yes, broadcast burning

Yes, broadcast burning

Yes, broadcast burning

Yes, broadcast burning

Yes, broadcast burning

Yes, broadcast burning

Yes, broadcast burning

Yes, broadcast burning

Yes, broadcast burning

Hassayampa WUI Fire Defense System
Arizona-New Mexico Plateau/AZ

Reduce intensity/severity of wildland fires in the WUI in a number of ecosystems/No
Reduce intensity/severity of wildland fires in the WUI in a number of ecosystems/No

22,084 Mowing,

22,084 Mowing,

22,084 Mowing,

mastication, hand cutting, herbicides, targeted grazing, seeding, biomass utilization, chipping, pile burning, broadcast burning

mastication, hand cutting, herbicides, targeted grazing, seeding, biomass utilization, chipping, pile burning, broadcast burning

mastication, hand cutting, herbicides, targeted grazing, seeding, biomass utilization, chipping, pile burning, broadcast burning

Subject to design features (include: no new roads, timing and siting of projects to protect migratory birds, fencing to prevent unauthorized OHV use) and special instructions for listed Sonoran Desert Tortoise/ **Yes**

Subject to design features (include: no new roads, timing and siting of projects to protect migratory birds, fencing to prevent unauthorized OHV use) and special instructions for listed Sonoran Desert Tortoise/ **Yes**

Subject to design features (include: no new roads, timing and siting of projects to protect migratory birds, fencing to prevent unauthorized OHV use) and special instructions for listed Sonoran Desert Tortoise/ **Yes**

Subject to design features (include: no new roads, timing and siting of projects to protect migratory birds, fencing to prevent unauthorized OHV use) and special instructions for listed Sonoran Desert Tortoise/ **Yes**

Subject to design features (include: no new roads, timing and siting of projects to protect migratory birds, fencing to prevent unauthorized OHV use) and special instructions for listed Sonoran Desert Tortoise/ **Yes**

T&E, Critical Habitat

T&E, Critical Habitat
T&E, Critical Habitat
T&E, Critical Habitat
T&E, Critical Habitat
T&E, Critical Habitat
Pre-treatment and one year follow up
monitoring to evaluate seeding success.
Yearly monitoring of areas known to
contain noxious weeds.
Pre-treatment and one year follow up
monitoring to evaluate seeding success.
Yearly monitoring of areas known to
contain noxious weeds.
Pre-treatment and one year follow up
monitoring to evaluate seeding success.
Yearly monitoring of areas known to
contain noxious weeds.
Pre-treatment and one year follow up
monitoring to evaluate seeding success.
Yearly monitoring of areas known to
contain noxious weeds.
Pre-treatment and one year follow up
monitoring to evaluate seeding success.
Yearly monitoring of areas known to
contain noxious weeds.
Pre-treatment and one year follow up
monitoring to evaluate seeding success.
Yearly monitoring of areas known to
contain noxious weeds.
Pre-treatment and one year follow up
monitoring to evaluate seeding success.
Yearly monitoring of areas known to
contain noxious weeds.

Changed because of ID team input

Monitoring Project

[EcoRegion/](#)

**NEPA Remarks Purpose/Meets
Size**

Major Activities Mitigations/

LWC, WSA,

Special

Effect of

Activities Name

Changed because of ID team input
Changed because of ID team input
Changed because of ID team input
Changed because of ID team input
Changed because of ID team input
Changed because of ID team input
Changed because of ID team input
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing
Yes, herbicides, broadcast burning,
targeted grazing

State
purpose of CX
(Acres)
Required Mitigations
Other
Status
Public
not covered Will Result in
Species
Engagement
by proposed Reduced Impacts
Present and
CX? Possibly Affected? Deer Pen West Pinyon Juniper Removal
n/a
Encroaching Juniper Removal
S. Rockies/CO Improve
834 Hydro-axing,
Mitigated for cultural
WSA, W&SR,
Yes 3 to 5 years sagebrush habitat
hand-cutting, lop
resources, weeds,
LWC
post treatment and to better
and scatter
migratory birds,
for weeds and connect at
hunting, soils / **Yes**
adaptive landscape level
learning. sage grouse habitat / Yes
n/a Yes, mowing
Silva Flat Sage Steppe Restoration and Pit Construction
Wyoming
Programmatic
Enhance
10,000-
Mastication,
Design features
LWC Yes Photo points for Basin/CO
EA. Follow up
sagebrush biome
30,000
mowing, pile

address soil, wildlife,
3 years on fuel projects via
for sage grouse
acres per
burning and hand
recreation, cult. and
treatments. DNA
and reduce fuels
project
cutting
paleontological, to increase safety
weeds, wilderness in 1.3 million
values / Yes acres / Partially Eastern
Tiered to 2008
Improve sage
180 Mechanical
No new roads (temp
LWC (maybe,
No Monitoring
n/a Yes, Pit Cascade
FEIS
grouse habitat /
removal with
or perm) and no
EA is hard to
consistent with
reservoir Slopes and
Partially
forwarders, feller-
improvements to
understand)
2008 FEIS.
construction, Foothills / CA
bunchers, and
roads. No old growth
fence skidding
removed. Rested from
construction, machines;
grazing for 2 years+.
use of heavy chipping; piling
Cultural resources
equipment and burning;
flagged / Yes

not covered construction of
by CX two pit reservoirs and 2800 feet of fence
3

Monitoring Project

[EcoRegion/](#)

**NEPA Remarks Purpose/Meets
Size**

Major Activities Mitigations/

LWC, WSA,

Special

Effect of

Activities Name

State

purpose of CX

(Acres)

Required Mitigations

Other

Status

Public

not covered Will Result in

Species

Engagement

by proposed Reduced Impacts

Present and

CX? Possibly Affected? Phase II South Cliffs Pinyon Juniper Removal

n/a

South Cliffs Pinyon Juniper Removal

S. Rockies /

Improve sage

258 Hydro-axing,

Noxious weeds, soils,

LWC Yes

3 to 5 post CO

grouse habitat

chain sawing, lop

wilderness values,

(brewer's

treatment for and deer/elk

and scatter

cultural values / **Yes**

sparrow)

weeds. winter range / Yes S. Rockies /

Improve sage

Effect of
Activities Name
State
purpose of CX
(Acres)
Required Mitigations
Other
Status
Public
not covered Will Result in
Species
Engagement
by proposed Reduced Impacts
Present and
CX? Possibly Affected? Southwest Gerber Habitat Restoration
Eastern
Tiered to 3
Improve
5,080 over
Hand cutting on
Minimal mitigations
Shortnose
No Appears that
Yes, temp. Cascades
FEIS'
rangelands and
5 to 10
3000 acres,
to prevent spreading
sucker,
changes
roads Slopes and
riparian habitat
years
mechanical
of medusahead / No
potential
resulted Foothills / OR
for wildlife
cutting 970 acres,
take of SS
from public species (mule
planting and

bird species:
comment deer and sage-
seeding, exclosure
brewers
during grouse) / Yes
fence,
sparrow and
scoping maintenance
vesper hand cutting
sparrow (not in EA, from Verification Report).

6

Monitoring Project
EcoRegion/
NEPA Remarks Purpose/Meets
Size
Major Activities Mitigations/
LWC, WSA,
Special
Effect of
Activities Name
State
purpose of CX
(Acres)
Required Mitigations
Other
Status
Public
not covered Will Result in
Species
Engagement
by proposed Reduced Impacts
Present and

CX? Possibly Affected? New Hayden Fox

Eastern
Tiered to
Meet annual
1,480
Mechanical
Invasive species, soils
Northern
None None Yes, cutting Cascades
Klamath Falls
Allowable Sale

mastication

Areas

Fire in significant

Partially

mitigation impacts

activities not “beyond those

designed to already

meet CX addressed in

purpose. the Vernal RMP”. So analysis tiered to that?

10

Monitoring Project

[EcoRegion/](#)

NEPA Remarks Purpose/Meets

Size

Major Activities Mitigations/

LWC, WSA,

Special

Effect of

Activities Name

State

purpose of CX

(Acres)

Required Mitigations

Other

Status

Public

not covered Will Result in

Species

Engagement

by proposed Reduced Impacts

Present and

CX? Possibly Affected? Clay Basin/Browns Park Sagebrush Treatments and Fuel

Reduction Treatments II

Wyoming

This EA is a

Fuels reduction/

2,150 Lop and scatter,

Weeds, migratory

ACEC Bighorn

None None Yes Basin / UT

supplement to

wildlife habitat

ongoing weed

birds, cultural sites
sheep
herbicides. a previous EA
restoration /
control following
(historic cabin) / **Yes**
Fire (phase I) that
Partially
treatment
mitigation was completed
activities not a year earlier.
designed to This EA is
meet CX essentially the
purpose. same, they just added additional units for treatment.
11

Section 2: Review of 18 Projected Uses as Justification for Proposed Pinyon Juniper Categorical Exclusion

Project and Field Office: Applegate Sage Steppe Habitat Restoration, Applegate
Field Office

Decision Date:
1/16/2018

Ecoregion: Eastern Cascades Slopes and
Foothills

State:
CA

Project Summary (purpose, size, activities, timeframe)

- Programmatic EA to implement invasive juniper treatments within 150,000 acres of public land managed by the AGFO that is tiered to and consistent with the Sage Steppe Ecosystem Restoration Record of Decision (SSER)
- Habitat restoration and fuels reduction projects on invasive western juniper trees utilizing a mix of hand clearing, mechanical thinning, broadcast burning, and pile burning to remove invasive juniper trees on up to 150,000 acres of sage-steppe ecosystems. Individual projects range from 20 acres to 1000+ acres in size. FONSI at 2.
- Purpose is to enhance and restore sage grouse habitat that are declining in vigor as a result of juniper encroachment. Project objectives include improving sagebrush-steppe, oak woodlands, and other plant communities, improving habitat conditions for wildlife

species dependent upon brush-dominated habitats, improving hydrologic conditions, enhancing the forage quantities and quality for wildlife and domestic animals, and reducing hazardous fuels. FONSI at 1.

- Individual treatment projects will be implemented on approximately 15,000 acres per year for a total of 150,000 acres over a 10-year period. No more than 10% of lands within the focus area (640,000 acres) treated each year. FONSI at 2.
- Treatments will be designed based on the site-level phase of juniper encroachment. FONSI at 2.
- Guiding RMPs include goals, objectives, and management direction supporting reduction of invasive juniper into sagebrush and other habitats. Additionally both RMPs distinguish between invasive juniper and desired juniper communities and support the retention of old growth juniper and desired juniper woodland areas. 2015 sage grouse amendments provide additional guidance around pj treatment.

Scoping and Public Engagement (did public engagement or the NEPA analysis process change the project substantially?)

- March 15, 2016
- Federally recognized tribes were consulted and the California State Historic Preservation Officer (SHPO) was consulted.
- The BLM also requested technical assistance from the USFWS relating to the project planning process for greater sage-grouse.
- 11 comments received
- September 15, 2017 solicitation for comments on prelim EA. 2 comments received. **Did not require substantive changes in EA.**

NEPA History (Tiered to a FEIS? Will implementation level projects have NEPA? Programmatic document? Cumulative impacts mitigated in any way?)

1
2

- Tiered to and consistent with the Sage Steppe Ecosystem Restoration Record of Decision (SSER).
- Individual projects would require preparation of a Documentation of Land Use Plan Conformance and Documentation of National Environmental Policy Act Adequacy (DNA), tiered to this programmatic document, to identify specific project areas and select appropriate treatments based on management direction in this programmatic document.

- Additional on-the-ground surveys and clearances for special status wildlife, plants, and cultural resources would be required for each proposed project plan area prior to implementing treatments.
- All projects will meet current direction for land management and applicable consultations under the Endangered Species Act and National Historic Protection Action (NHPA) and will be completed for each project.
- Project proposals and Decision Records would be written and posted on the BLM's ePlanning website and available for at least 30 days for public review. Following public review, Decision Records would be subject to Administrative Remedies in accordance with 43 CFR Chapter 4 regulations.
- The environmental analysis did not reveal any cumulative effects beyond those already analyzed in the Alturas and Surprise Field Office RMPs and FEIS and the Sage-Steppe Ecosystem Restoration FEIS which encompasses the project area. FONSI at 6.
- Each project subject to DNA. The DNA process would result in the issuance of a Decision Record (DR) to implement the project, initiation of an EA for the project, or the project would be dropped. EA at 7.

Important resources implicated (T&E, NLCS, ACEC, other)

- Special status species. "The relevant BLM special status species and habitats that occur within the Focus Area and may be affected by the Proposed Action include: greater sage-grouse (*Centrocercus urophasianus*), golden eagle (*Aquila chrysaetos*), and Swainson's hawk (*Buteo swainsoni*)." EA at 54.

Mitigations (List mitigations (beyond BMPs and standard design features) and the significant issues that they are mitigating – e.g., LWCs, invasive species; Do you consider the mitigations necessary to keep below significance threshold? Say why.)

- Tiered to and consistent with requirements and mitigations in the *Sage-Steppe Ecosystem Restoration Strategy Record of Decision and Final Environmental Impact Statement, Modoc, Lassen, Shasta and Siskiyou counties, California and Washoe County, Nevada*. Record of Decision (ROD) signed December 2008 (USDA, FS 2008).
- Crews completing juniper reduction projects will follow the Project Design Guidelines (PDGs) and Standard Resource Protection Measures (SRPMs) outlined in Appendices B and C respectively in the EA. Include cultural, old growth, special status, fuelwood, livestock wildlife and riparian protection measures.
- More intensive cultural and wildlife surveys will be completed in a treatment unit before implementation of the project occurs. Cultural and wildlife staff will outline additional mitigation measures, as needed, to ensure resources within a specific treatment area are

not negatively and/or adversely affected. The AGFO Field Manager will review and approve all additional mitigation measures.

- Potential adverse effects to visual and biological resources resulting would be minimized through implementation of proposed PDFs, SRPMs and mitigation measures. FONSI at 4.
- Under a programmatic approach, AGFO resource specialists would propose and refine individual projects to be consistent with descriptions and stipulations for the appropriate juniper cover

1
3

phase. Additional on-the-ground surveys and clearances for special status wildlife, plants, and cultural resources would be required for each project plan area prior to implementing treatments. EA at 4.

FONSI

Justification

- I have determined that the actions will not have a significant effect on the human environment other than those already analyzed in the Sage Steppe Ecosystem Restoration Strategy FEIS.
- Project specific proposals will require all necessary surveys, clearances, and consultation prior to signing of a Decision Record implementing specific treatments within the project area.
- Does not include lands currently designated as Areas of Critical Environmental Concern (ACECs) and Wilderness Study Areas (WSAs).
- In designing projects, ID team would survey etc and use the process contained in Miller *et al.*, (2014) would guide the development of specific treatment project objectives and areas.
- Potential adverse effects to visual and biological resources resulting from implementation of the Proposed Action would be minimized through implementation of proposed PDFs, SRPMs and mitigation measures.
- 2,300 historic sites in Focus Area. Many sites have yet to be documented or are unknown to archaeological personnel due to insufficient inventory.
- The environmental analysis did not reveal any cumulative effects beyond those already analyzed in the Alturas and Surprise Field Office RMPs and FEIS and the Sage-Steppe Ecosystem Restoration FEIS which encompasses the project area.
- There are no known federally-listed species present in the proposed project areas.

- Implementation of the Proposed Action would result in short-term effects to habitat for some sage steppe obligate species. However, long-term habitat productivity for sage steppe obligate species would improve following restoration. Juniper-dependent species would experience short-term and long-term effects resulting from proposed treatments and resultant restoration activities. It is anticipated that implementation of the PDFs and SRPMs (identified in Appendices B and C respectively) in combination with proposed mitigation measures relevant to wildlife would minimize potential adverse effects.

Monitoring

Sites would be monitored following the Sage-Steppe Project Monitoring Handbook (2011) with data collected prior to the treatment and two, five, ten, and fifteen years post-treatment. In addition, all vegetation monitoring plots would follow BLM’s Assessment, Inventory, and Monitoring (AIM) protocols (Burkett *et al.*, 2015). Specific methods include: line point intercept, gap, soil stability, species richness, perennial grass density, site characteristics, photo-point, and ecological site verification. An additional step would be to add shrub and tree density belt transects (modified Miller transects) as was completed for the SSER FEIS. Data that includes a pre-cut shrub and tree density can easily be compared to post-cut conditions. Data would then be used to evaluate the influence of the treatment on plant communities. EA at 19.

Conclusion:

Purpose Sage grouse habitat enhancement **Size** Individual projects range from 20 acres to 1000+ acres in size. No more than 15,000 acres per year. **Timeframe** Over ten years

1
4

NEPA History Programmatic EA tiered to and consistent with the Sage Steppe Ecosystem Restoration Record of Decision. Implementation will happen through a series of projects subject to DNA. Project proposals and Decision Records would be written and posted on the BLM’s ePlanning website and available for at least 30 days for public review. Following public review, Decision Records would be subject to Administrative Remedies.

Effects of Public Engagement

No substantive changes

Mitigations Tiered to and consistent with requirements and mitigations in FEIS.

Projects must be consistent with Project Design Guidelines (PDGs) and

- Tiered to and consistent with requirements and mitigations in the *Sage- Steppe Ecosystem Restoration Strategy Record of Decision and Final Environmental Impact Statement, Modoc, Lassen, Shasta and Siskiyou counties, California and Washoe County, Nevada*. Record of Decision (ROD) signed December 2008 (USDA, FS 2008).
- Crews completing juniper reduction projects will follow the Project Design Guidelines (PDGs) and Standard Resource Protection Measures (SRPMs) outlined in Appendices B and C respectively in the EA.
- More intensive cultural and wildlife surveys will be completed in a treatment unit before implementation of the project occurs. Cultural and wildlife staff will outline additional mitigation measures, as needed, to ensure resources within a specific treatment area are not negatively and/or adversely affected. The AGFO Field Manager will review and approve all additional mitigation measures.
- Potential adverse effects to visual and biological resources resulting would be minimized through implementation of proposed PDFs, SRPMs and mitigation measures. FONSI at 4.
- Under a programmatic approach, AGFO resource specialists would propose and refine individual projects to be consistent with descriptions and stipulations for the appropriate juniper cover phase. Additional on- the-ground surveys and clearances for special status wildlife, plants, and cultural resources would be required for each project plan area prior to implementing treatments. EA at 4.

Mitigated FONSI? Yes. Lots of mitigations and constraints imposed to reduce impacts. **T&E** no **NLCS** no **ACEC** no **Other Important Resources Implicated?**

LWCs, special status species

Pinyon Jay Discussed?

No

Other species with I- t negative impacts

Juniper-dependent species would experience short-term and long-term effects resulting from proposed treatments and resultant restoration activities. **Monitoring** Sites would be monitored following the Sage-Steppe Project Monitoring

Handbook (2011) with data collected prior to the treatment and two, five, ten, and fifteen years post-treatment. In addition, all vegetation monitoring

15

plots would follow BLM's Assessment, Inventory, and Monitoring (AIM) protocols (Burkett et al., 2015). Specific methods include: line point intercept, gap, soil stability, species richness, perennial grass density, site characteristics, photo-point, and ecological site verification. An additional step would be to add shrub and tree density belt transects (modified Miller transects) as was completed for the SSER FEIS. Data that includes a pre- cut shrub and tree density can easily be compared to post-cut conditions. Data would then be used to evaluate the influence of the treatment on plant communities. EA at 19. **Falls within the CX purpose?**

Yes

Activities in this Project not covered by CX

Broadcast burning

Major Activities in Project

Hand clearing, mechanical thinning, broadcast burning, and pile burning

16

Project and Field Office: Hassayampa WUI Fire Defense System, Hassayampa Field Office

Weblink:

[DOI-BLM-AZ-P010-2014-0030-EA](#)

Decision Date:

2/13/2015

Ecoregion: Arizona/New Mexico

Plateau

State:

AZ

Project Summary (purpose, size, activities, timeframe)

- The purpose is to reduce the intensity and severity of future wildland fires in the WUI by reducing hazardous fuels on the ground and by creating a defensible buffer to provide for a safer suppression environment. EA at 5. Activities include reducing shrub density and restoring native vegetation where exotics have taken over. Many of the treatment units were previously treated, although they were analyzed using a method that does not allow continued maintenance. Conditions in these areas have returned to pretreatment levels of fuel loading and they are in need of retreatment and maintenance. EA at 3-5.
- The project area consists of 22,084 acres of BLM administered land and all of those acres will be targeted for treatment. FONSI at 1.
- Treatments are mechanical (mowing, mastication, hand treatment), chemical (herbicides), biological (targeted grazing), seeding, activity fuel disposal (biomass utilization, chipping, pile burning, broadcast burning).
- There are various types of plant communities found within the proposed project areas. These communities include: Upper Sonoran Desert Scrub, Semidesert Grassland, Montane Conifer Forest, Riparian, and Interior Chaparral (Brown 1994). EA at 31.
- NOTE: This project is not relevant.

Scoping and Public Engagement (did public engagement or the NEPA analysis process change the project substantially?)

- Scoped and put draft EA for comment. No comments received on draft EA. Not clear

on scoping.

- ID team raised concerns around migratory birds, critical habitat, desert tortoise, and the need to coordinate treatments with recreation touring companies that have permits in the area. EA at 10.

NEPA History (Tiered to a FEIS? Will implementation level projects have NEPA? Programmatic document? Cumulative impacts mitigated in any way?)

Important resources implicated (T&E, NLCS, ACEC, other)

- Proposed critical habitat for Mexican garter snake, which was recently listed as Threatened under the Endangered Species Act, exists within the project area.
- Proposed critical habitat for the proposed threatened species yellow-billed cuckoo also exists in the project area.
- Would affect 132 acres of Sonoran desert tortoise habitat.
EA at 36.

Other information from EA (optional)

1
7

Mitigations (List mitigations (beyond BMPs and standard design features) and the significant issues that they are mitigating – e.g., LWCs, invasive species; Do you consider the mitigations necessary to keep below significance threshold? Say why.)

- The following will be applied as part of the approval of this project: 1) Guidelines For Handling Sonoran Desert Tortoises Encountered On Development Projects-Arizona Game and Fish Department (Revised October 23, 2007); and 2) Herbicide Treatment Standard Operating Procedures. DR at 2.
- Design features are in place (and documented in the EA) to minimize or reduce adverse environmental impacts that would occur from implementation of the Proposed Action. FONSI at 1.
- Design features start at EA at 17. There are design features common to all treatment units and also specific features for each treatment area. EA at 17-27. Include: no new roads, timing and siting of projects to protect migratory birds, fencing to prevent unauthorized OHV use.

FONSI Justification for EA (does it mention mitigations to avoid significance? What mitigations does it require (above BMPs and standard design features?))

Monitoring (does it meet a scientific standard for monitoring (repeatable, quantifiable?))

- Yearly monitoring of weeds

NEPA History (Tiered to a FEIS? Will implementation level projects have NEPA? Programmatic document? Cumulative impacts mitigated in any way?)

Important resources implicated (T&E, NLCS, ACEC, other)

- Within W&SR Corridor
- In vicinity and within Bull Gulch area – WSA and LWC.

Other information from EA (optional)

Mitigations (List mitigations (beyond BMPs and standard design features) and the significant issues that they are mitigating – e.g., LWCs, invasive species; Do you consider the mitigations necessary to keep below significance threshold? Say why.)

2
0

- Small list of design features, EA at 3. Stay on roads and no new routes. Timing restriction to reduce impacts to migratory birds and hunters.
- DR approves projects with specific mitigations for
 - Cultural resources – stop work if cult. Resources or Native American graves found, etc. EA at 41
 - Weeds EA at 11 and 41.
 - Veg response to apply adaptive learning around cheatgrass. EA at 41.
 - Migratory birds (timing restrictions) EA at 42.
 - Soils to prevent erosion in stream channels and in fragile soils. EA at 42.

FONSI Justification for EA (does it mention mitigations to avoid significance? What mitigations does it require (above BMPs and standard design features?))

- No FONSI provided.

Monitoring (does it meet a scientific standard for monitoring (repeatable, quantifiable?))

- 3 to 5 years post work for weeds. EA at 41.

Conclusion:

Purpose Improve the quality and quantity of sagebrush habitat available to greater sage-grouse, expand on previously implemented habitat restoration work in the watershed, and make progress towards meeting the larger landscape level goal of connecting occupied greater sage-grouse habitats **Size** 834 acres **Timeframe** 1 year **NEPA History** Stand alone EA. No FONSI. **Effects of Public Engagement**

n/a

Mitigations and Issues Mitigated

DR approves projects with specific mitigations for

- Cultural resources – stop work if cult. Resources or Native American graves found, etc. EA at 41
- Weeds EA at 11 and 41.
- Veg response to apply adaptive learning around cheatgrass. EA at 41.
- Migratory birds (timing restrictions) EA at 42.
- Hunting (timing restrictions)
- Soils to prevent erosion in stream channels and in fragile soils. EA at 42.

Mitigated FONSI? Yes. Specific mitigations were put into place and approval conditional on their being implemented. **T&E** Sage grouse **NLCS** WSA, W&SR **ACEC** **Other Important**

Resources Implicated?

LWC, special status species

Pinyon Jay Discussed?

Mentions that is a bird species of conservation concern. Generally says that since this PJ is younger, birds dependent on PJ can find other stands.

21

no **Other species with l- t negative impacts Monitoring** 3 to 5 years post work for weeds and adaptive learning around cheatgrass **Falls with the CX purpose?**

Yes

Activities in this Project not covered by CX

None

Major Activities in Project

Hydro-axing, hand-cutting, lop and scatter

22

Project and Field Office: Encroaching Juniper Removal, Little Snake Field Office

Decision Date:

9/5/2014

Weblink:

[DOI-BLM-CO-N010-2014-0039-EA](https://www.blm.gov/foia/foia_request.do?selectedAction=open&reqNo=2014-0039-EA)

Ecoregion: Wyoming Basin/Southern Rockies

State:

CO

Project Summary (purpose, size, activities, timeframe)

- Programmatic approach to the reduction of encroaching pinyon and juniper into sagebrush dominated areas to advance sustainability and integrity of the sagebrush

Yes. EA at 24. May have some long term consequences but since trees are young anticipate jays will move to older PJ in the area. **Other species with l- t negative impacts**

No

Monitoring Will take photo points for three years on fuels treatments. **Falls with the CX purpose?**

Yes

Activities in this Project not covered by CX

None

Major Activities in Project

Mastication, mowing, pile burning and hand cutting

25

Project and Field Office: Silva Flat Sage Steppe Restoration and Pit Construction, Altura Field Office

Decision Date:

11/13/14

Weblink:

[DOI-BLM-CA-N020-2015-0002-EA](https://www.doi.gov/eis/DOI-BLM-CA-N020-2015-0002-EA)

Ecoregion: Eastern Cascade Slopes and Foothills

State:

CA

Project Summary (purpose, size, activities, timeframe)

- 180 acres of mechanical removal, chipping, piling and burning of western Juniper, construction of two pit reservoirs and 2800 feet of fence on the allotment.
- Purpose is to improve sage grouse habitat and habitat for sagebrush obligates.
- Mechanical removal accomplished by heavy machinery: forwarders, feller-bunchers, and skidding machines. EA at 8.
- Constraints include: no new roads (perm or temp) and no improvements to existing roads. No old growth removed. Cultural areas flagged. Project area rested from cattle grazing for at least two years or until objectives met. EA at 8.

Scoping and Public Engagement (did public engagement or the NEPA analysis process change the project substantially?)

- Internal scoping done and EA released for 15 day public comment.

range habitat.

- Builds on other similar projects in the area to increase habitat connectivity.

Scoping and Public Engagement (did public engagement or the NEPA analysis process change the project substantially?)

NEPA History (Tiered to a FEIS? Will implementation level projects have NEPA? Programmatic document? Cumulative impacts mitigated in any way?)

- Stand alone
EA

Important resources implicated (T&E, NLCS, ACEC, other)

- LWC, special status
species

**Other information from EA
(optional)**

Mitigations (List mitigations (beyond BMPs and standard design features) and the significant issues that they are mitigating – e.g., LWCs, invasive species; Do you consider the mitigations necessary to keep below significance threshold? Say why.)

- *Mitigation related to noxious weeds.* The project area will be monitored for three to five years after work is completed. A spring survey will be conducted to detect weeds early enough to determine an effective control method and to treat weeds in time to prevent them from producing seed. EA at 11.
- A small area of less than 3 acres would be omitted from the treatment area to protect soils and minimize potential for weed invasion. EA at 15.
- *Soil.* Limit disturbance on steeper slopes and fragile soils and in/around stream channels. EA at 17.
- *Wilderness values.* No new routes. No operation in muddy conditions. EA at 19.
- *Cultural values.* Stop work if cult. resources or graves found.

FONSI Justification for EA (does it mention mitigations to avoid significance? What mitigations does it require (above BMPs and standard design features?))

n/
a

2

8

Monitoring (does it meet a scientific standard for monitoring (repeatable, quantifiable?))

- The project area will be monitored for three to five years after work is completed. A spring survey will be conducted to detect weeds early enough to determine an effective control method and to treat weeds in time to prevent them from producing seed. EA at 11.

Conclusion:

Purpose Improve sage grouse habitat and deer/elk severe winter range habitat. **Size** 258 acres **Timeframe** 6 months. EA at 3. **NEPA History** Standalone EA **Effects of Public Engagement**

n/a

Mitigations and Issues Mitigated • *Mitigation related to noxious weeds.* The project area will be monitored

for three to five years after work is completed. A spring survey will be conducted to detect weeds early enough to determine an effective control method and to treat weeds in time to prevent them from producing seed. EA at 11.

- A small area of less than 3 acres would be omitted from the treatment area to protect soils and minimize potential for weed invasion. EA at 15.
- *Soil.* Limit disturbance on steeper slopes and fragile soils and in/around stream channels. EA at 17.
- *Wilderness values.* No new routes. No operation in muddy conditions. EA at 19.
- *Cultural values.* Stop work if cult. resources or graves found.

Design features deal with washing equipment, stopping work if cultural or paleontological resources identified, avoiding driving when muddy, not piling mulch too deep. **Mitigated**

FONSI? Yes. Design features included with constraints. **T&E** No **NLCS** No **ACEC** No **Other Important Resources Implicated?**

LWC, special status species

Pinyon Jay Discussed?

Mentioned but states that they will be cutting younger PJ and PJ obligates can go to nearby older stands. **Other species with I- t negative impacts**

No

Monitoring The project area will be monitored for three to five years after work is completed. A spring survey will be conducted to detect weeds early enough to determine an effective control method and to treat weeds in time to prevent them from producing seed. EA at 11. **Falls with the CX purpose?**

Yes

Activities in this Project not covered by CX

None

**Major Activities
in Project**

chain-sawing, lop and

Project and Field Office: South Cliffs Pinyon-Juniper Removal, CO River
Field Office

Decision Date:
5/1/15

Weblink:
[DOI-BLM-CO-040-2015-0053-EA](#)

Ecoregion: Southern
Rockies

State:
CO

**Project Summary (purpose, size, activities,
timeframe)**

- Mechanical removal of encroaching pinyon and juniper trees with a hydro-axe, mulcher, roller-chopper, chainsaw, loppers, or similar equipment in the 118-acre project area.
- The purpose is to improve conditions for greater sage-grouse in preliminary priority habitat and preliminary general habitat as well as improve conditions for mule deer and elk in mapped severe winter range.
- Design features deal with washing equipment, stopping work if cultural or paleontological resources identified, avoiding driving when muddy, not piling mulch too deep.
- Work will occur within one year and within specified windows of time to work around wildlife needs.

Scoping and Public Engagement (did public engagement or the NEPA analysis process change the project substantially?)

n/a **NEPA History (Tiered to a FEIS? Will implementation level projects have NEPA?**

Programmatic document? Cumulative impacts mitigated in any way?)

- Standalone
EA

**Important resources implicated (T&E, NLCS, ACEC,
other)**

- Special status species

Other information from EA (optional)

Mitigations (List mitigations (beyond BMPs and standard design features) and the significant issues that they are mitigating – e.g., LWCs, invasive species; Do you consider the mitigations necessary to keep below significance threshold? Say why.)

- *Cultural values.* Stop work if cult. resources or graves found.
- *Soil.* Limit disturbance on steeper slopes and fragile soils and in/around stream channels. EA at 16.

Design features deal with washing equipment, stopping work if cultural or paleontological resources identified, avoiding driving when muddy, not piling mulch too deep.

FONSI Justification for EA (does it mention mitigations to avoid significance? What mitigations does it require (above BMPs and standard design features?))

n/a

3
1

Monitoring (does it meet a scientific standard for monitoring (repeatable, quantifiable?))

The project area will be monitored for three to five years after work is completed. A spring survey will be conducted to detect weeds early enough to determine an effective control method and to treat weeds in time to prevent them from producing seed. EA at 36

Conclusion:

Purpose Improve conditions for greater sage-grouse in preliminary priority habitat and preliminary general habitat as well as improve conditions for mule deer and elk in mapped severe winter range.

Size 118 acres **Timeframe** Within one year **NEPA History** Stand alone EA **Effects of Public Engagement**

n/a

Mitigations and Issues Mitigated • *Cultural values.* Stop work if cult. resources or graves found.

- *Soil.* Limit disturbance on steeper slopes and fragile soils and in/around stream channels.

EA at 16.

Design features deal with washing equipment, stopping work if cultural or paleontological resources identified, avoiding driving when muddy, not piling mulch too deep.

Mitigated FONSI? No because impacts would not likely rise to significant if they were not done. **T&E** No **NLCS** No **ACEC** No **Other Important Resources Implicated?**

Special status species

Pinyon Jay Discussed?

Mentioned but states that they will be cutting younger PJ and PJ obligates can go to nearby older stands. **Other species with I- t negative impacts Monitoring** The project area will be monitored for three to five years after work is

completed. A spring survey will be conducted to detect weeds early enough to determine an effective control method and to treat weeds in time to prevent them from producing seed. EA at 36. **Falls with the CX purpose?**

Yes

Activities in this Project not covered by CX

None

Major Activities in Project Hydro-axe, mulcher, roller-chopper, chainsaw, loppers

32

Project and Field Office: Wild Turkey, Miles Field
Office

Decision Date:

4/30/15

Weblink:

[DOI-BLM-MT-C020-2014-0118-EA](https://www.doi.gov/blm/mt/c020-2014-0118-ea)

Ecoregion: Northwestern Great
Plains

State:

MT

Project Summary (purpose, size, activities, timeframe)

- The BLM proposes to treat Ponderosa pine and Rocky Mountain juniper utilizing a series of treatments. Proposed treatments include: prescribed fire (broadcast and pile), commercial harvest, mechanical, and hand thinning. 665 acres of mechanical treatment for 2015. Work could continue for ten years. EA at 5. Ponderosa Pine is the dominant tree. Purpose is to restore resiliency in forest systems and reduce wildfire risk to adjacent private property. EA at 3.
- The purpose of this project is to improve overall ecosystem health to continue to

received.

- 7 Standard Operating Procedures suggested by the public were incorporated into the DR. DR at 10.

NEPA History (Tiered to a FEIS? Will implementation level projects have NEPA? Programmatic document? Cumulative impacts mitigated in any way?)

- The EA tiers to the 2008 SFO RMP FEIS and the 2008 SSER FEIS.
EA at 5
- Individual projects would require a DNA tiered to this programmatic EA.
DR at 2.
- The EA is a programmatic document.
- “Additional on-the ground surveys and clearances for special status wildlife, plants, and cultural resources would be required for each project plan area prior to implementing treatments.” DR at 2
- 7 additional SOPs incorporated based on public comment – see DR at 10-11.

Important resources implicated (T&E, NLCS, ACEC, other)

- Barrel Springs Traditional Cultural Property, North Hays Cultural Resource Management Area, Rahilly-Gravelly ACEC. Designated for cultural resources and plants traditionally used by Northern Paiute. EA at 33
- NOTE: The FONSI states that the project area is not within any ACECs, while the EA states the project area overlaps with one ACEC.

Other information from EA (optional)

3
7

- “As a result of Cultural Resource investigations for the Action Area, a total of 47 sites, five rock stack feature locations, and 75 isolated finds were documented.” FONSI at 4
- 422 archaeological sites have been discovered and recorded in project area. EA at 33

Mitigations (List mitigations (beyond BMPs and standard design features) and the significant issues that they are mitigating – e.g., LWCs, invasive species; Do you

consider the mitigations necessary to keep below significance threshold? Say why.)

- Six pages of mitigation measures outlined, including for: Wildlife/migratory birds and their habitat (special status species; state protected species; BLM sensitive species); Visual Resources; Air quality; woodcutting; hydrology; soils; livestock grazing; riparian areas; old growth juniper; special-status plants; vegetation; wildlife; ungulates; sagebrush obligates; noxious weeds; and recreation. DR at 10-16
- “The proposed project design features including SOP’s, SRPM’s and mitigation measures are designed to reduce impacts to a number of impacted resources including visual and recreational resources.” DR at 22 (comment response)
- “The BLM will provide project inspectors during project implementation to provide real time adjustments and address resource concerns and questions as they arise.” DR at 26
- “Juniper-dependent species would experience short-term and long-term effects resulting from proposed treatments and resulting restoration activities. It is anticipated that implementation of the Standard Operating Procedures identified in Appendix F would minimize potential adverse effects.” EA at 97
 - “reduction projects will follow the Standard Operating Procedures (SOPs), Standard Resource Protection Measures (SRPMs) and mitigation measures outlined in this document. Additionally, more intensive cultural and wildlife surveys will be completed in a treatment unit before implementation of the project occurs. Cultural and wildlife staff will outline **additional mitigation measures, as needed, to ensure resources within a specific treatment area are not negatively and/or adversely affected.**” EA at 12
 - In addition to mitigations, “treatment restrictions” are outlined, including: where mechanical treatments can occur; what treatments are appropriate for certain slopes, etc. EA at 12 and 14
 - This is a mitigated FONSI because the BLM significantly shifted the project design to incorporate mitigations (e.g. Wildlife/migratory birds and their habitat; Visual Resources; Air quality; hydrology; soils; livestock grazing; riparian areas; old growth juniper; special-status plants; vegetation; wildlife; ungulates; sagebrush obligates; noxious weeds; and recreation).

FONSI Justification for EA (does it mention mitigations to avoid significance? What mitigations does it require (above BMPs and standard design features?))

- No significant effect other than those analyzed in the Sage Steppe Ecosystem Restoration FEIS.
- “Potential adverse effects would be avoided or minimized through implementation of proposed SOP’s and mitigation measures relevant to biological and visual resources.” FONSI at 4. Similar language referenced in three other places in FONSI.

Monitoring (does it meet a scientific standard for monitoring (repeatable,

quantifiable?)

- Invasive weed monitoring (EA at 55)
- Monitor effectiveness of BMP. EA at 77
- “A monitoring and adjustment approach would be implemented within constraints of rules and regulations, Forest Plan/Resource Management Plan, NEPA and the Sage Steppe Ecosystem Restoration Strategy.” EA at 136

3
8

- Monitoring will include: systematic monitoring of site specific treatments; assessment of treatments to make real-time changes; and sharing data with other agencies and the public. EA at 136

Conclusion:

Purpose Restore sage-grouse habitat, restore historic vegetation community mosaics and reduce risk of wildfire. **Size** 100,000 acres treated within the 195,578-acre project area. No more than

10,000 acres per year. **Timeframe** 10 years **NEPA History** Programmatic EA tiered to 2008 SFO RMP FEIS and the 2008 SSER

FEIS. Follow up projects with DNAs. **Effects of Public Engagement** Incorporated an additional 7 Standard Operating Procedures

Mitigations and Issues Mitigated

Reduction projects will follow the Standard Operating Procedures (SOPs), Standard Resource Protection Measures (SRPMs) and mitigation measures outlined in this document.

Additionally, more intensive cultural and wildlife surveys will be completed in a treatment unit before implementation of the project occurs. Cultural and wildlife staff will outline additional mitigation measures, as needed, to ensure resources within a specific treatment area are not negatively and/or adversely affected. Six pages of mitigation measures outlined, including for issues: Wildlife/migratory birds and their habitat (special status species; state protected species; BLM sensitive species); Visual Resources; Air quality; woodcutting; hydrology; soils; livestock grazing; riparian areas; old growth juniper; special-status plants; vegetation; wildlife; ungulates; sagebrush obligates; noxious weeds; and recreation. **Mitigated FONSI?** Yes. An extensive list of mitigation measures (six pages) that covers more than a dozen issues is thoroughly discussed in the DR. See list above. The EA specifically sites the importance of incorporating mitigation measures to ensure resources are not negatively affected. The FONSI specifically states that adverse effects would be avoided by implementing mitigation measures and SOPs. **T&E No NLCS No ACEC No Other Important Resources**

Implicated?

Cultural resources.

Pinyon Jay Discussed?

No

Other species with l- t negative impacts

No

Monitoring Yes Falls within the CX Purpose?

Yes

Activities not covered by CX?

Temporary project roads, broadcast burning

39

**Major Activities
in Project**

, mechanical thinning, broadcast burning, pile

Scoping and Public Engagement (did public engagement or the NEPA analysis process change the project substantially?)

- Original scoping January 25, 2013. Five written comments received.

Dr at 3

- Original EA comment period April 23, 2014. One written comment received.

DR at 3

- Oregon Gulch fire burned project area prior to implementation.

- Second scoping June 10, 2015. Four written comments received.

DR at 3

- Second EA comment period November 25-December 21, 2015. Two written comments received. DR at 3

- The comments received do not provide any substantially new information or new analysis, nor do they identify substantial new data gaps that indicate additional analysis is needed. Finally, the comments do not identify any significant new data which would alter the effects described in the EA. DR at 4

NEPA History (Tiered to a FEIS? Will implementation level projects have NEPA? Programmatic document? Cumulative impacts mitigated in any way?)

- EA tiered to Klamath Falls Resource Area RMP FEIS.

DR at 2

- And cites the “the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines.” DR at 4

4

4

Important resources implicated (T&E, NLCS, ACEC, other)

- **Northern Spotted Ow Critical Habitat**

- “The BLM made a “Not likely to adversely affect” (NLAA) determination on the spotted

owl and designated critical habitat and the USFWS concurred with that determination (# 08EKLA00-2014-1-0014).” FONSI at 3

- *Limnanthes floccosa* ssp. *Bellingeriana* (Bellinger's woolly meadowfoam) occurs within project area. Populations would be avoided, issue not presented in detail in EA. EA at 4-5

**Other information from EA
(optional)**

Mitigations (List mitigations (beyond BMPs and standard design features) and the significant issues that they are mitigating – e.g., LWCs, invasive species; Do you consider the mitigations necessary to keep below significance threshold? Say why.)

- Management direction also included in: "Record of Decision and Standard and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (2001)." EA at 2
- "Negligible effects on soil productivity would be at or below the level of detection, whereby moderate effects would be readily apparent, result in changes of soil character, and would likely require mitigating measures to minimize adverse effects." EA at 50
 - "To mitigate soil degradation, it is essential that operating restrictions during periods of high soil moisture are closely adhered to." EA at 52
 - This FONSI does not appear to be mitigated because it lacks definitive mitigation measures.

FONSI Justification for EA (does it mention mitigations to avoid significance? What mitigations does it require (above BMPs and standard design features?))

- "No significant impacts were identified. No impacts beyond those anticipated in the KFRA RMP/EIS will occur." DR at 4

Monitoring (does it meet a scientific standard for monitoring (repeatable, quantifiable?))

- "Monitor the project area 1-3 years after harvest is complete and treat noxious weeds as detected in areas that were disturbed by project implementation." EA at 12, 26
- Pre-activity monitoring of existing condition of soils discussed. EA at 49
- This does not qualify as monitoring.

Conclusion:

Purpose Meet annual Allowable Sale Quantity; improve resiliency of forest stands to

