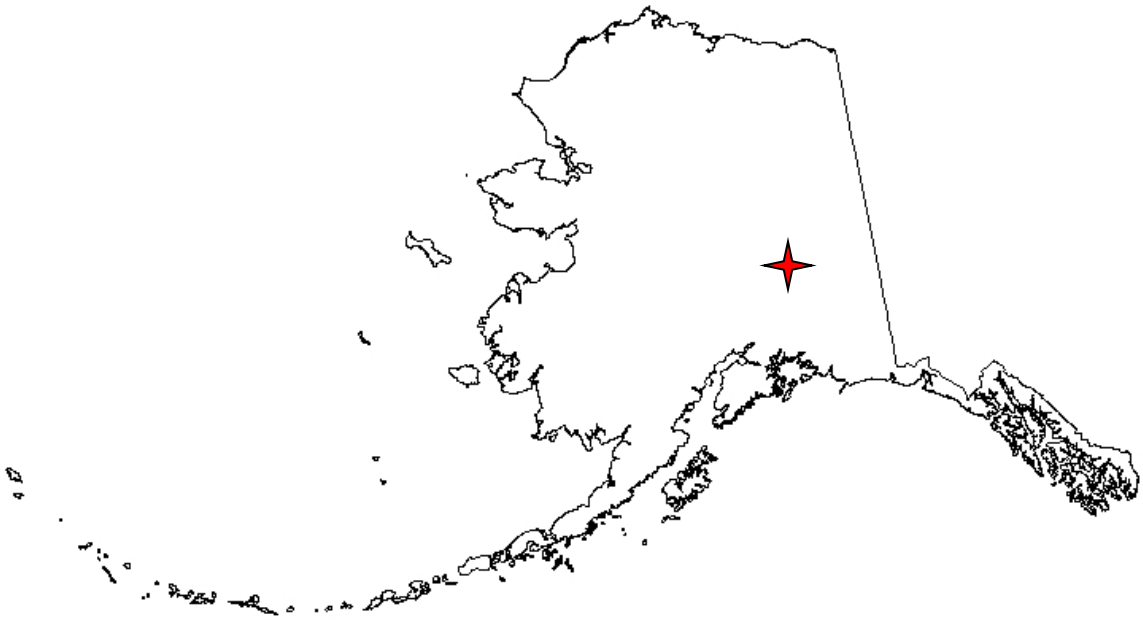
U.S. Department of the Interior
Bureau of Land Management

Glennallen Field Office
Milepost 186.5 Glenn Highway
Glennallen, Alaska 99586
http://www.blm.gov/ak/st/en/fo/gdo.html

Environmental Assessment
Access in North Slana, Suslositna
Applicant: Coy Brown
Case File Number: AA-092894
DOI-BLM-AK-A020-2011-0026-EA



Location:
Section 22, 23, 25, 26 and 36, Township 12 North, Range 9 East, Copper River Meridian

Prepared By:
Joseph Hart
Realty Specialist

November 7, 2011; revised July 5, 2012

Note to reader: Minor revisions and clarifications have been made in this document since its original release in December 2011. These changes are denoted by **bold, underlined** *text.*

1.0 Introduction

In March of 2011, Mr. Coy Brown submitted an application for an individual right-of-way (ROW) grant to the Bureau of Land Management (BLM), so that he may perform maintenance on an existing trail system in the Suslositna area and construct a new section of trail to include a bridge to cross the Suslositna Creek when he accesses his private parcel of land. The ROW request includes several routes which all begin from a common route, and then venture in different directions to reconnect again on a common route.

The Suslositna community is a portion of the settlement area known as North Slana, a block of land made available by the Bureau of Land Management in the 1980's for settlement of three types of parcels: home-sites, headquarter sites, and trade and manufacturing sites. Mr. Brown was able to purchase a parcel of land under the home-site program and owns a five acre parcel located within section 36 of Township 12. North, Range 9 East, Copper River Meridian.

All residents of this community gain their access through a trail system, a total of over 6 miles, which begins at a landing on the southeast bank of the Slana River. The trail begins on a portion of land owned by Ahtna, Incorporated and residents must obtain a permit for their access and use of Ahtna, Inc. land located on both banks of the river.

The Suslositna Homeowners Association holds a BLM ROW grant for the existing trails on BLM lands within the Suslositna Valley. Residents formed the not-for-profit organization to perform maintenance as a community and to work together to secure funds and improve the existing trail system. Mr. Brown is not a member of this association, and has submitted this request so that he may perform maintenance as he feels necessary and to gain permission for the construction of a new trail with a new bridge crossing over the Suslositna Creek. The association does not have exclusive rights over the trail system, and their current authorization does not include the new section of trail and bridge which Mr. Brown is requesting to build and maintain. If Mr. Brown were granted a ROW, he would not have exclusive rights to the existing trails nor the new portion he wishes to construct. He would hold sole responsibility for the construction and maintenance of the new portion of trail, as he would be the only one who would currently hold an authorization to construct and perform maintenance on this section.

As you read this document, the trail system is discussed and described as if you are traveling south and east from Ahtna, Incorporated, land at the Slana River to the head waters of the Suslositna Creek. The trail splits in a couple of locations and crosses the Suslositna creek at several locations. At these crossings, the residents have constructed light duty bridges, intended to facilitate their All-Terrain Vehicles which is their main mode of transportation along the trail during snow free months.

For clarity, the trail is broken into portions (see Map 1). The portion from the left bank of the Slana River to the first intersection on the trail system is called portion A. From this intersection, the trail has two routes, one which follows the Suslositna Creek, called portion B, and one which

ventures away from the creek, called portion C. These two routes re-intersect, forming intersection two. From intersection two, the remaining trail system is portion D. The small existing trail loop connecting Mr. Brown's parcel to trail portion D, is portion E. The trail portion Mr. Brown would like to construct and would include a new bridge over the Suslositna Creek would begin midway on portion B and would intersect the trail at approximately 500 feet after intersection two on portion D. This new route would be called portion F.

Please see Map 1 – Suslositna Homeowners Trail.

1.1 BLM's Purpose and Need

The purpose of the proposed action is to provide Mr. Brown with a BLM ROW, granting him an authorization for access and maintenance from public lands near the Slana River to his parcel located within the Suslositna valley, which is approximately 2.75 to 3.25 miles with the various routes included.

The need for the action is established by BLM's responsibility under the Federal Land Policy and Management Act (FLPMA) to respond to a request for a ROW grant for access to private property.

1.2 Decisions to be Made

The BLM will decide whether or not to grant Mr. Brown the ROW. If the decision is made to grant the ROW, the BLM will also decide 1) what terms and conditions will apply, and 2) what routes will be included.

1.3 Decision Framework and Policy

The East Alaska Resource Management Plan (EARMP) of September 2007 and the Federal Land Policy and Management Act (FLPMA) provide the overall long term management direction for the BLM Glennallen Field Office. The EARMP and FLPMA are the decision documents and legal basis for the integrated long term resource planning on BLM Glennallen Field Office managed lands. They establish the direction and goals for the BLM to follow for the management of these lands and resources. The proposed action and alternatives are consistent with the EARMP and FLPMA. Specifically the proposed action is consistent with the following sections of the EARMP:

I. LANDS AND REALTY

I-1: Goals

- Provide a balance between land use (rights-of-way, land use permits, leases and sales) and resource protection that best serves the public at large.

T. TRAVEL MANAGEMENT AND OHV USE

T-1: Goals (OHVs)

- Manage trails to minimize resource impacts and reduce user conflicts.
- Manage OHV use associated with permitted and development activities to provide for access while protecting resources

The proposed action would be subject to an array of laws, regulations, and acts to include:

- Alaska National Interest Lands Conservation Act of 1980 (ANILCA) Section 810
- National Historic Preservation Act as Amended 1992
- The Bald Eagle Protection Act of 1940 (as amended 1959, 1962, 1972, and 1978)
- Migratory Bird Treaty Act of 1918 (as amended 1936, 1960, 1969, 1974, 1978, 1986, and 1989)
- North America Wetlands Conservation Act of 1989 (as amended 1990 and 1994)
- Executive Order 11987 of May 1977 (Exotic Organisms)
- Executive 11990 of May 1977 (Protection of Wetlands)

1.4 Land Status

The request is for a ROW on public lands managed by the BLM. The first portion of the proposed ROW occurs in Township 12 North, Range 9 East, sections 22 and 23, Copper River Meridian on lands selected by the State of Alaska for conveyance. The remaining portions of the proposed ROW occurs in Township 12 North, Range 9 East, sections 25 and 26, Copper River Meridian on BLM unencumbered land within the North Slana settlement land. The portion of the trail within sections 22 and 23 is a State of Alaska conveyance priority fourteen and are expected to remain with BLM.

There are no ANCSA selections on any lands affected by the proposed action.

1.5 Scoping and Issues

Public notice for this EA was posted on October 17, 2011, on the BLM Glennallen Field Office Website NEPA log:

BUREAU OF LAND MANAGEMENT GLENNALLEN FIELD OFFICE NEPA REGISTER

No comments have been received.

An interdisciplinary team (IDT) was assembled and initially met on September 26, 2011. A field visit by the IDT was conducted on October 4, 2011 and a second internal scoping meeting on October 18, 2011 revealed the following as issues to be addressed in the EA:

- Cultural Resources;
- Travel management – trail widening to reach the site, trail reroutes to reach the site, improved access throughout the area;
- Riparian, Fisheries, and Hydrology.

2.0 Proposed Action and Alternatives

2.1 Proposed Action by the Applicant

The BLM Glennallen Field Office is considering authorizing a right of way for the applicant to access his private parcel located within the Suslositna Valley. The authorization would include performing trail maintenance to the existing trail portions A, B, C, and D, constructing a new trail portion F, and building new bridges over the Suslositna Creek for portions F and E., as described within the introduction of this document and illustrated in appendix A.

Access
Mr. Brown currently has access via casual use and use of the existing trail system, currently maintained by the Suslositna Homeowners Association, which holds BLM ROW authorization AA87119, for access and maintenance over six miles of existing trails on BLM managed public lands in the area.

2.2 Alternatives being considered by the BLM

The National Environmental Policy Act requires that a reasonable range of alternatives be developed that address the issues. Based on the issues, the interdisciplinary team developed three alternatives for consideration:

Alternative 1: Is the No Action alternative as required by NEPA.
Alternative 2: This alternative analyzes the issuance of portions A – D, not including portion F or E, as identified and mapped.
Alternative 3: This alternative analyzes the action as proposed by the applicant, portions A-F.

2.2.1 Alternative 1- No Action: Do not approve the right-of-way across public land

The No Action Alternative denies the applicants request to hold an authorization for performing maintenance on portions A through E; constructing new trail on portion F; and constructing a new bridge on portion F and E.

2.2.2 Alternative 2 - The authorization for access and maintenance on the existing trails, portions A-E, as identified and mapped.

This alternative would authorize Mr. Brown a non-exclusive ROW grant to perform maintenance and facilitate his access on the existing trail system only as mapped and identified in portions A through E. **However,** no new construction of trails or bridges would be allowed for any portion.

2.2.3 Alternative 3 – Authorizing the proposed action by Mr. Brown, portions A to F.

This alternative would authorize Mr. Brown a non-exclusive ROW grant to perform maintenance and facilitate his access on the existing trails, portions A through E; allow the construction of a new portion of trail with a bridge over Suslositna Creek, portion F; and to construct a bridge at portion E **if needed**. This alternative would give the authorization for construction and maintenance of portion F, including the associated bridge, only to Mr. Brown.

2.3 Alternatives Considered but Eliminated From Detailed Analysis

No alternatives were eliminated from detailed analysis.

3.0 Affected Environment

This section describes the existing environment and the current conditions of important resources in the area of the right-of-way that would be affected by any of the alternatives under consideration. Topics examined include:

- Archaeology & Paleontology
- Travel Management and Recreation
- Riparian, Fisheries and Hydrology

3.1 Archaeology & Paleontology

The Suslositna Creek drainage contains both prehistoric and historic cultural resources. Archaeological surveys along existing OHV trails in the project area have located three nearby cache pit features for the storage of fish near the mouth of the Suslositna River, including NAB-372, NAB-457, and NAB-458. This indicates that a fish camp or village site may be nearby along the banks of the river. Additionally, a prehistoric camp, NAB-490, and a historic trapping cabin dating from prior to the 1940's, NAB-489, were also discovered near the headwaters of the creek, several miles upstream. However, no archaeological surveys have been conducted along the proposed OHV route F.

The entire Suslositna Creek drainage consists of Quaternary aged sediments from glaciers and streams, which have a low likelihood of containing significant paleontological resources.

3.2 Travel Management and Recreation

OHV tails in the Suslositna watershed are managed under the 2007 East Alaska Management Plan which limited OHV's to existing trails. Existing OHV trails in the Suslositna watershed were pioneered without proper trail layout design or engineering, which resulted in more routes being established to access homesteads and lands beyond the river corridor**.**

The travel network within the Suslositna watershed was developed primarily as a means of access to private inholdings in the surrounding area. The main trails tend to parallel the creek itself while meandering in and out of the riparian area. One major spur trail is present (segment C) which appears to be utilized as an alternative route to segment B and as a wood gathering area. Shorter spurs access private inholdings within the area. The first mile of trail is located in lowland bogs, tundra, and black spruce. The trail is very wet and muddy during the spring, summer and fall; as such it is subject to erosion and trail braiding. Homeowners have installed traditional log corduroy as well as elevated wood planking in an attempt to lessen these impacts and reduce hardships to their travel. After mile one the trail improves significantly and transitions to more stable soils forested with white spruce and cottonwood, with some rock composition present. While conditions along the trail are adequate for the current level of use, improvements could be made to elevate and promote drainage within the first .9 miles and at a handful of locations in segments B and D.

Recreational use within the area and associated trail system is extremely low. Recreation features and experiences are limited in nature and as such the route serves more of a utilitarian purpose for property owners. Access to the Suslositna trail system requires ferrying or fording the Slana River which creates a natural barrier to casual recreational use. Access can be gained to the end of segment D by traveling the Bear Valley trail entering from the north. This access route is long (20+ miles) and also not highly utilized by recreational users with an exception during the moose hunting season (Sep. 1 – 20). Use estimates for 2011 along the Suslositna trail system total 1500 users (BLM RMIS), of which nearly one hundred percent are private property owners.

3.3 Riparian, Fisheries and Hydrology

Fish Resources

The Suslositna Creek is listed with the State of Alaska as important for the spawning, rearing, or migration of anadromous fish, as stream number 212-20-10080-2605-3040. The creek has documented sockeye salmon (*Oncorhynchus nerka*) present.

Riparian Vegetation

The riparian vegetation in the creek valleys of Suslositna watershed is mature forest composed of a poplar, willow, alder, and spruce. Naturally vegetated riparian areas perform many beneficial functions for aquatic resources and comprise some of the most important and productive habitat on BLM-managed lands. These riparian functions may be grouped into four broad categories of habitat, water quality, water quantity, and food supply. The complexity, hydraulic resistance, and stability provided by riparian vegetation to streams affects the size, shape, and distribution of the stream channel and habitat features such as pools, riffles, and undercut banks. The riparian vegetation also helps to maintain the hydrologic connectivity between mainstem stream channels, side channels, tributaries, backwater sloughs, and hyporheic (groundwater) zones. Water quality functions performed by riparian vegetation includes fine sediment deposition and filtering of containments, thereby reducing erosion and turbidity while maintaining high water quality required by many aquatic organisms. Riparian habitats also provide leaf litter and detritus to rivers and streams supporting the primary production that is the basis of the aquatic food supply. An example of a riparian food supply is the detritus (decomposed vegetative matter) from decaying leaves, twigs, etc. which fall into the stream and provide a key energy source fueling the base of the aquatic food chain.

Riparian vegetation condition directly influences the condition, quality, and maintenance of aquatic habitat. Riparian plants filter sediments and nutrients, provide shade, stabilize streambanks, provide cover in the form of large and small woody debris, produce leaf litter energy inputs, and promote infiltration and recharge of the alluvial aquifer. As a result of these functions, spawning beds for fish and microhabitats for macroinvertebrates remain relatively free of damaging fine sediment deposits. Riparian vegetation reduces sedimentation of pools, thereby maintaining water depths and structural diversity of the channel. Base flow levels are augmented throughout the year by the slow release of water stored in aquifers. Complex, off-channel habitats, such as backwaters, eddies, and side channels, are often formed by the interaction of streamflow and riparian features such as living vegetation and large woody debris. These areas of slower water provide critical refuge during floods for a variety of aquatic species and serve as rearing areas for juvenile fish.

The bank stabilizing function of riparian vegetation not only helps reduce erosion and influence channel morphology but also acts to supplement instream cover by the developing of undercut streambanks and by providing overhanging vegetation. Well-vegetated stream channels and stable streambanks help reduce turbidity and channel scouring resulting from high runoff rates and, in turn, can enhance primary production.

The current condition of the banks is stable, with little evidence of human influence other than at the bridged stream crossings.

Erosion and Sedimentation

Removing the vegetative cover, altering the natural topsoil, or changing the shape of the slope can increase the potential for erosion, increase runoff; and create more sediment in waterbodies.

Soil compaction and the shear forces caused by OHV weight create mud holes that alter hydrologic patterns and increase erosion and sedimentation. The main factors influencing erosion rate include the volume and velocity of runoff from precipitation, the rate of precipitation infiltration through the soil, the amount of plant cover, the slope length or the distance from the point of origin of overland flow to the point of deposition. Accelerated erosion occurs whenever the soil surface is disturbed. Sediments created by accelerated erosion clog streams and fill lakes and impair the water-holding capacity. Erosion decreases the productive value of the soil as well as reducing the quality of the waters that receive the sediment. These changes can lead to decreased survival of fish in the egg and alevin stages; decreased density, biomass, and diversity of aquatic insects; and decreased primary production.

4.0 Environmental Impacts

4.1 Effects of Alternative 1: No Action

4.1.1 Archaeology & Paleontology

The existing trails have been archaeologically surveyed and no cultural resources were located which were being impacted by those trails. Therefore, no direct effects to archaeological or paleontological resources are anticipated from Alternative 1.

4.1.2 Travel Management and Recreation

Access to Private In-holdings

Direct Effects: This alternative does not prevent the applicant from access to his parcel. The applicant has access via the grant authorized to the Suslositna Homeowners Association and under federal regulations defined as casual use. The no action alternative, however, does not permit the applicant to perform maintenance to the existing trails and does not permit the applicant to construct a new section of trail portion F nor build a bridge to facilitate his crossing the Suslositna Creek at portion F and E. The no action alternative would not limit nor reduce Mr. Brown's existing legal access to his property.

Bridge on Suslositna Creek trail

Indirect Effects: A bridge failure would lead to increased debris and materials within Suslositna Creek. A high precipitation event or annual spring thaw may dislodge these materials from the creek bottom carrying them further downstream. These materials traveling at increased velocities downstream may create failures at other bridge locations.

4.1.3 Riparian, Fisheries and Hydrology

Direct and Indirect Effects

No new ground disturbing activities are proposed; therefore no direct effects are anticipated. Limiting OHV trails and river crossings to those already existing would minimize damage to sensitive fisheries habitats.

4.2 Effects of Alternative 2-The authorization for access and maintenance on the existing trails, portions A-E, as identified and mapped.

4.2.1 Archaeology & Paleontology

The effects of Alternative 2 to cultural and paleontological resources are essentially the same as Alternative 1. The existing trails have been archaeologically surveyed and no cultural or paleontological resources were located that were being impacted by those trails. Therefore, no direct effects to archaeological or paleontological resources are anticipated from this alternative.

4.2.2 Travel Management and Recreation

The effects of Alternative 2 to travel management and recreation are essentially the same as Alternative 1.

While the existing trail system within the Suslositna Creek watershed is acceptable for public safety the associated bridges at stream crossings are in need of maintenance. A bridge failure occurred in September of 2011 which could have caused serious injury or death to users of the trail system. Another bridge failure would lead to increased debris and materials within Suslositna Creek. A high precipitation event or annual spring thaw may dislodge these materials from the creek bottom carrying them further downstream. These increased materials traveling at increased velocities downstream may create failures at other bridge locations.

If this alternative is chosen, a recommended condition would be to require that a single sign shall be placed at the beginning of the Suslositna Creek trail systems which states that all trails are maintained privately and travel is conducted at the risk of the user.

4.2.3 Riparian, Fisheries and Hydrology

The effects of Alternative 2 to riparian, fisheries and hydrology are essentially the same as Alternative 1. No new ground disturbing activities are proposed; therefore no direct effects are anticipated. Limiting OHV trails and river crossings to those already existing would minimize damage to sensitive fisheries habitats.

There could be a slight positive benefit to fisheries habitat due to a potential increased maintenance of the trails. Having maintenance authority would be an incentive for Mr. Brown to improve the trail. Effects of this action would be a reduction in erosion and sedimentation that

could potentially be deposited into the Suslositna Creek during heavy rainfall or high stream discharge. This alternative reduces, however slight, the potential for stream destabilization, riparian habitat degradation, erosion, and sedimentation as compared to the no action alternative.

4.3 Effects of Alternative 3 – Authorizing the proposed action by Mr. Brown, portions A to F.

4.3.1 Archaeology & Paleontology

Direct Effects: Trail construction and maintenance on proposed portion F could affect undiscovered cultural resources through the disturbance and erosion of soil stratigraphy and any associated artifacts, resulting in the irretrievable loss of cultural resources.

To mitigate or prevent these impacts, the following stipulations should be in the terms and conditions:
1. Applicant should delineate his proposed route F by flagging it for an archaeological survey.
2. As soon as snow cover allows, an archaeological survey of the trail and its immediate vicinity will be conducted to determine if any cultural resources will be impacted by proposed route F.
3. If there are cultural resources discovered, the field office will work with the cultural resource specialist to reroute the trail.

4.3.2 Travel Management and Recreation

The construction of proposed route F would increase the overall footprint of the trail network in the Suslositna Creek drainage. The issuance of a ROW twenty feet in width over approximately one eighth mile of trail would create .30 acres of new ground disturbance. This route **(as well as the requested new bridge and associated approach route on Segment E)** would be duplicative in nature providing access to segment D, which is already accessed by two trail segments, segments C and B.

Typical Trail Conditions Segment B

Typical Trail Conditions Segment C

Travel intensity and associated effects (soil displacement, erosion, and soil compaction) would be reduced on segments C and B if route F was constructed. Essentially it would offer a third route to segment D in addition to segments B and C. The construction of segment F, if constructed in similar fashion to existing trails in the area, would be subject to some erosion, incising, and trail braiding in low lying areas.

Segment F would need to be aligned on higher elevations, outside of the floodplain, and be designed with sustainable trail building measures in mind. Trail layout, design, and construction would need to adhere to Best Management Practices. Property owners do an admirable job of keeping the trails passable throughout the seasons, however current maintenance levels would not meet sustainable trail standards. Increasing the amount of trail and thereby increasing the amount of necessary maintenance would increase burden on property owners in the area.

Segment F would require the construction and maintenance of a new bridge crossing Suslositna Creek. While the existing trail system within the Suslositna Creek watershed is acceptable for public safety the associated bridges at stream crossings are in need of maintenance. A bridge failure occurred in September of 2011 which could have caused serious injury or death to users of the trail system. Another bridge failure would lead to increased debris and materials within Suslositna Creek. A high precipitation event or annual spring thaw may dislodge these materials from the creek bottom carrying them further downstream. These increased materials traveling at increased velocities downstream may create failures at other bridge locations. Adding 5th **and 6th** bridges to the trail network would increase the maintenance responsibilities and risk of failure associated with the bridges by **50%** percent.

If this alternative is chosen, a recommended condition would be to require that a single sign shall be placed at the beginning of the Suslositna Creek trail systems which states that all trails are maintained privately and travel is conducted at the risk of the user.

Suslositna Creek trail

4.3.3 Riparian, Fisheries and Hydrology

This alternative would add approximately an additional 660' of OHV trail paralleling the Suslositna Creek and construction of **two additional** bridges. **Riparian** areas will be removed in construction of the new trail and approaches to the new bridges. Alternative 3 has the greatest potential for stream banks destabilization, riparian vegetation loss, erosion, and sedimentation. **This alternative would increase** loss of riparian vegetation over the no action alternative due to the **two** additional stream crossings required.

An indirect effect to the aquatic resources could be erosion of a new trail surface with deposition of eroded materials off the trail and onto adjacent productive/functioning wetland, riparian, or upland soils. The trail may be compacted, rutted, or eroded to varying degrees, depending on

specific physical soil conditions and amount and type of motorized use, especially during wet conditions.

4.4 Cumulative Effects of the Proposed Action and Geographic Scope

The cumulative effects analysis is based on a geographic scope area consisting of the lands and view shed associated with the Suslositna Valley trail system and watershed. This area is comprised of similar terrain, vegetation, and uses. Effects associated with the proposed action would occur within this area.

4.4.1 Archaeology & Paleontology

There are no anticipated cumulative effects to cultural or paleontological resources from any of the alternatives.

4.4.2 Travel Management and Recreation

There are no known cumulative effects of any of the alternatives in relation to effects to the trail network within the Suslositna Creek drainage.

4.4.3 Riparian, Fisheries and Hydrology

Past, present, and future OHV travel have affected aquatic resources throughout the Suslositna watershed. Effects of past, present, and future actions would be the same as discussed under riparian vegetation, erosion, and sedimentation sections in affected environment section. Under Alternative 1, OHV use would be limited to existing trails and bridges, contributing to a reduction in seasonal adverse effects to fish habitat through alterations in drainage patterns, degradation of water quality, and riparian loss or damage, especially in heavy use areas. Therefore, adoption of the management actions under this alternative, combined with past, present, and future actions may have an overall beneficial effect on fish habitat within the Suslositna watershed.

5.0 Coordination and Consultation

5.1 Interdisciplinary Team Members Participating on ID Team, October 18, 2011

John Jangala, Archaeologist, Bureau of Land Management
Cory Larson, Outdoor Recreation Planner, Bureau of Land Management
Elijah Waters, Branch Chief, Bureau of Land Management
Joseph Hart, Realty Specialist, Bureau of Land Management
Tim Sundlov, Fisheries Biologist, Bureau of Land Management
Marnie Graham, Public Affairs, Bureau of Land Management

A site visit to the proposed route was conducted by Cory Larson, John Jangala, Ben Seifert, Tim Sundluv and Joseph Hart on October 4, 2011, and Elijah Waters and Joseph Hart on October 6, 2011.

5.2 Non-Governmental Organizations, Native Entities, Private Parties

BLM NEPA guidance requires public involvement in the preparation of all Environmental Assessments. Public notice for this EA was posted on October 3, 2011, on the BLM Glennallen Field Office Website NEPA log:

BUREAU OF LAND MANAGEMENT GLENNALLEN FIELD OFFICE NEPA REGISTER

No comments have been received.

The lands affected by the proposed action are not encumbered by ANCSA selections. The Native village of Mentasta (nearest federally recognized Tribe) is approximately 15 road miles to the North and West, therefore no Native Entities were consulted.

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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Access in North Slana, Suslositna (Coy Brown, Applicant)
Environmental Assessment, DOI-BLM-AKA-020-2011-0026-EA

Case File AA-92894

Assessment of New Information

May 24, 2012

On December 15, 2011, a Decision Record was signed and a right-of-way grant was offered to Mr. Coy Brown. The right-of-way offered was not Mr. Brown's requested right-of-way. Mr. Brown appealed the decision and grant to the Interior Board of Land Appeals (IBLA) on January 23, 2012.

Mr. Brown did not file a statement of reasons for appealing the December 2011 decision. However, on February 7, 2012, via phone conversation with the U.S. Department of the Interior Regional Solicitor's Office, Mr. Brown raised safety concerns about steep segments of the authorized route (as granted to the Suslositna Homeowners' Association under right-of-way authorization AA-87119) while hauling heavy loads in the winter.

On March 13, 2012, at the BLM's request, the decision was remanded back to the Glennallen Field Office for the purposes of reviewing and considering information brought to light after the decision and right-of-way grant were offered to Mr. Brown, specifically, the concerns that Mr. Brown raised to the Solicitor's Office. Prior to this phone discussion, these concerns had not been raised in the environmental review process. Therefore, the BLM decided to consider these concerns as "new information" that could be relevant to the BLM's decision on the request.

The National Environmental Policy Act (NEPA) includes provisions for the consideration of new information relative to existing and proposed Federal activities. 40 CFR § 1502.9(c) states (emphasis added):

> Agencies:
> (1) Shall prepare supplements to either draft or final environmental impact statements if:
>
> (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or
> (ii) There are **significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts**.

Although the regulation is specific to Environmental Impact Statements, BLM policies extend this concept to other levels of NEPA analysis, including Environmental Assessments (BLM NEPA Handbook, H-1790-1 §5.3).

Consistent with 40 CFR § 1502.9(c), the Glennallen Field Office staff made a good faith effort to determine if, for one, Mr. Brown's safety concerns had a bearing on the proposed action or its impacts and, secondly, if these concerns would result in substantial changes to the alternatives considered and/or the impact analysis, and subsequently, the decision.

Specifically, on April 4, 2012, the Glennallen Field Office staff conducted a winter site visit to assess typical winter conditions encountered along the approved trail, identify hazards, and record steep grades or slopes along the route of travel (see Larson memo, 2012; attached).

Ultimately, the Glennallen Field Office staff's field review indicated that the approved route is reasonable and does provide suitable access even in winter conditions.

Given the results of the site visit, the BLM has determined that the new information is not relevant to environmental concerns for this action nor does it have a bearing on the alternatives or impacts for the reasons described here:

- The new information presented by Mr. Brown is directly related to winter-time access (i.e., snow-covered trails) along the approved ROW.
- Adequate snow cover for winter-time access was an assumption of the original impact analysis.
- Mr. Brown's concerns, the new information, also rely on the assumption that the ground would be covered in adequate snow to allow for winter access by snow machine.
- Given this, the new information does not prompt revisions to the BLM's assumptions for the analysis.
- Ground disturbance, and subsequent environmental impacts, would be limited or non-existent in the winter months due to sufficient snow and ice cover.
- Therefore, the new information does not, in any way, alter the findings about the effects of the proposed action or alternatives.

The new information is immaterial to the environmental analysis.

Concurrence with Findings

(Signed originals on file at the Glennallen Field Office)
Riparian / Fisheries / Hydrology: _____
Archaeology / Paleontology: _____
Travel Management / Recreation: _____
Planning and NEPA: _____
Field Manager: _____

Attachments
Larson, C. 2012. Coy Brown EA and Suslositna Trail System. Internal Memorandum to Beth Maclean, Glennallen Field Manager. April 5, 2012.

United States Department of the Interior

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INTERNAL MEMORANDUM

Date: April 5, 2012

To: Beth Maclean, Field Manager

From: Cory Larson, Outdoor Recreation Planner

Subject: Coy Brown EA and Suslositna Trail System

On April 4th 2012 Joe Hart and I visited the Suslositna area to conduct a winter inventory of trail segment C as identified in Map 1 of Environmental Assessment DOI-BLM-AK-A020-2011-0026-EA. The purpose of the inventory was to document typical winter conditions encountered along the trail, identify any hazards, and record significant grades or slopes along the route of travel. It appeared that trail segment C had not been traveled upon over the winter and as such we were required to break the entire trail from the airstrip access to segment A. Conditions were typical of a spring snowpack with depths ranging from 24-36" with sun crust on top of the snowpack, due to thermal warming, 3-4" deep. Two Skandic 440 snowmachines were used for transport.

We traversed the trail in an east/west direction beginning at the airstrip then traveling westerly back to segment A. We encountered minimal problems along the entire route. At the steepest grade of 24%, identified below as point 4, we became stuck and required about 10 minutes to pack and level the trail. There were no other sections where grade or trail conditions encountered presented any significant challenges to an operator with requisite skills and knowledge. This was an extremely surprising fact given that the trail was not broken. Below is a series of pictures identifying significant grades encountered.

Point 1, 20% Grade, 100 Feet

Point 2, 9% Grade, 75 Feet

Point 3, 16% Grade, 100 Feet

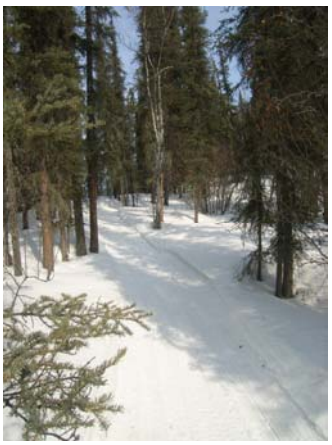
Point 4, 24% Grade, 50 Feet

Point 5, 19% Grade, 50 Feet

Point 6, 17 % Grade, 30 Feet

Point 7, 15% Grade, 30 Feet

Point 8, 21% Grade, 50 Feet


Frenchman's Bend 16%, 120 feet

We also recorded grade along the main Suslositna Trail in what is considered the steepest section of trail near what is known as the "Frenchman's Bend." This segment of trail contained a 16% grade configured in an S curve route of travel. This particular grade is also longer (120 feet) than any of the grades encountered on segment C. While segment C certainly contains more changes in trail grade than the main Suslositna Trail none of them would be considered challenging or hazardous.

Standards or guidelines for snowmachine trails are not defined in any Bureau of Land Management, U.S. Forest Service, or National Park Service directives. The closest thing to standards I was able to find was developed by the British Columbia Provincial Park System. In particular there guidelines for snowmachine trail grades are relevant to this situation. Below are the guidelines that they recommend:

Grades

- Allow for a variety in the vertical alignment. Plan vertical alignment in proper combination with horizontal alignment to control speed for user safety. Stay within a 25% grade limit. Exceed this limit only for short distances. Ensure the approaches to steep trail sections are straight and gradual. Design the trail to provide smooth transitions between gradients.

- Use a maximum sustained grade of 8% for easiest trail to 15% for more difficult trails. Do not exceed a maximum grade on short pitches of 35% on most difficult trails.

Summary

Taking into account trail conditions encountered, standards researched, and our ability to travel the trail even though it was unbroken I feel there is little room for argument in terming this a hazardous or inaccessible route of travel. If continual winter use of this trail existed (say one time per week) the grades would be further reduced through snow compaction and incising. It is also important to note that freighting of equipment and supplies would generally be conducted coming into the trail system (rather than out of the trail system) which means that the more substantial loads would be coming down the steepest sections of trail rather than up them. A total of 485 feet of significant grade was inventoried. The rest of the trail, approximately 4000 feet, is generally flat or has minimal slopes of less than 15%. An accompanying map is contained within the travel management folder for this case depicting significant grades inventoried. While segment C is definitely not as user friendly as the main trail system it does offer a suitable means of access for Mr. Brown.

Typical Trail Conditions Segment C

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Access in North Slana, Suslositna (Coy Brown, Applicant)
Environmental Assessment, DOI-BLM-AKA-020-2011-0026-EA

Case File AA-92894

FINDING OF NO SIGNIFICANT IMPACT

Background

In December 2011, the Bureau of Land Management prepared an Environmental Assessment (AKA-020-2011-0026-EA) analyzing the effects of issuing a right-of-way grant for access to private property accessed through public lands near North Slana, Alaska. The EA considered a range of route alternatives, over both existing routes as well as proposed new construction of routes, as requested by the right-of-way applicant, Mr. Coy Brown.

A Finding of No Significant Impact (FONSI), Decision Record, and right-of-way grant were issued in December 2011. Mr. Brown appealed the Decision and grant in January 2012.

In March 2012, at the BLM's request, the BLM's decision was remanded back to the Glennallen Field Office for the purposes of reviewing and considering information brought to light after the Decision. In light of the new information presented by Mr. Brown, the BLM has revisited and reaffirmed its environmental analysis of the proposed action and alternatives (see attachments). This FONSI has been prepared to document that, even in light of the new information presented, neither the proposed action nor the alternatives would result in significant impacts.

Finding of No Significant Impact

This action and its effects have been evaluated consistent with the Council on Environmental Quality regulations for determining *significance*. Per 40 CFR § 1508.27, a determination of *significance* requires consideration of both context and intensity. The former refers to the relative context in which the action would occur such as society as a whole, affected region, affected interests, etc. The latter refers to the severity of the impact.

Context

The alternatives and their effects are limited to approximately five miles of right-of-way, much of which exists, in a remote area of eastern Alaska that is used primarily by private land owners. The Suslositna Homeowners Association currently holds a BLM right-of-way grant for

the existing trails on BLM managed lands within the general area of the proposed action (the Suslositna Valley). This existing right-of-way is non-exclusive, and currently serves as Mr. Brown's primary access to his private property. (The current authorization does not include the new section of trail or bridges that Mr. Brown has requested to build and maintain.) Outside of the local homeowners association, there is likely little to no interest in or even knowledge of the requested right-of-way. The affected interests are limited to the applicant and, perhaps indirectly, the Suslositna Homeowners Association. Therefore, the action is limited in context. Furthermore, the anticipated effects are site-specific in nature; this project's effects would not affect local, state, regional or national resources or interests.

Intensity

1. *Impacts that may be both beneficial and adverse.*

The EA considered and disclosed both potential beneficial and adverse effects of the alternatives (EA pp. 10-14).

2. *The degree to which the proposed action affects public health and safety.*

On February 7, 2012, the applicant raised a concern about hauling heavy loads on the authorized route in winter. As documented in the May 24, 2012 *Assessment of New Information*, Glennallen Field Office staff conducted a field visit on April 4, 2012 to assess typical winter trail conditions along the authorized route. Field observations and data collected indicate that the route is reasonable and passable by a person with average abilities and machinery with no special accommodations. Furthermore, when adequate snowpack exists, the applicant is not obligated to stay on the authorized route. Instead, the applicant has the option to travel cross-country on BLM managed lands under casual use guidelines.

In essence, with casual use guidelines applicable in the winter, the right-of-way authorization only confines the applicant to the authorized route during summer months. The authorized route has been used by the Suslositna Homeowners Association for many years without incident. This action has limited potential to affect public health and safety.

3. *Unique characteristics of the geographic area such as proximity of historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.*

There are no parks, prime farmlands, wild and scenic rivers, or ecologically critical areas in proximity to the Proposed Action and alternatives. However, prehistoric and historic cultural resources have been documented in the project area (EA, p. 7). No effects to cultural resources are anticipated under Alternatives 1 and 2 (EA, pp. 10-11). Under Alternative 3, the EA identifies mitigating measures if cultural resources are discovered along the route in the future (EA, p. 12).

4. *The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

The anticipated effects are similar to many other rights-of-way and trail projects in remote geographic settings. No unique or appreciable scientific controversy has been identified regarding the effects of the Proposed Action or alternatives.

5. *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

Similar to Item 4 above, the anticipated effects are similar to many other rights-of-way and trail projects in remote geographic settings. The analysis has not shown that there would be any unique or unknown risks to the human environment.

6. *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

Similar right-of-way actions have been reviewed and approved in Alaska, including within the project area, as well as on a national scale (EA, p. 3). This project neither establishes a precedent nor represents a decision in principle about future actions.

7. *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.*

Cumulative effects are addressed for each of the resources (EA, p. 14). The environmental analysis did not reveal any significant cumulative effects. Furthermore, there are no other known actions within the project footprint whose effects could interact with the effects of this project to cause cumulative significant impacts.

8. *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.*

Along the existing trail segments, the EA indicates that there would be no effect to cultural or historic resources (EA, pp. 10 and 11). Mitigation measures and/or stipulations are recommended to minimize or altogether avoid effects should previously undiscovered cultural resources be identified in areas where ground-disturbing activities are proposed (EA, pp. 12 and 13).

9. *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.*

(There are no Federally threatened or endangered species within the project area.)

10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The Proposed Action and/or alternatives do not threaten to violate any law. The Proposed Action and alternatives are in compliance with the 43 CFR § 2800 regulations and are consistent with East Alaska Resource Management Plan and Record of Decision (2007), which provides direction for the protection of the environment on public lands.

Conclusion

Therefore, on the basis of the information contained in the EA (AKA-020-2011-0026-EA) and Assessment of New Information (May 2012), and all other information available to me, it is my determination that:

1. None of the environmental effects identified meet the definition of significance as defined by context and intensity considerations at 40 CFR § 1508.27;
2. The alternatives are in conformance with the Record of Decision, East Alaska Resource Management Plan (July 2007); and
3. The Proposed Action and alternatives do not constitute a major federal action having a significant effect on the human environment.

Therefore, neither an Environmental Impact Statement nor a supplement to the existing EA is necessary and neither will be prepared.

/s/ Elizabeth Maclean *July 6, 2012*

Elizabeth Maclean Date
Glennallen Field Manager

Attachments

1. Access in North Slana, Suslositna, Environmental Assessment (DOI-BLM-AK-A020-2011-0026-EA), revised May 2012
2. Assessment of New Information, May 24, 2012

United States Department of the Interior

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Access in North Slana, Suslositna (Coy Brown, Applicant)
Environmental Assessment, DOI-BLM-AKA-020-2011-0026-EA

Case File AA-92894

DECISION RECORD

Background

In December 15, 2011, a Decision Record was signed and a right-of-way grant was offered to Mr. Coy Brown. The right-of-way offered was not Mr. Brown's requested right-of-way. Mr. Brown appealed the decision and grant to the Interior Board of Land Appeals (IBLA) on January 23, 2012.

Contrary to the Appeals Procedures regulations at 43 CFR § 4.412, Mr. Brown did not file a statement of reasons for appealing the December 2011 decision. However, on February 7, 2012, via phone conversation with the U.S. Department of the Interior Regional Solicitor's Office, Mr. Brown raised safety concerns about steep segments of the authorized route (as granted to the Suslositna Homeowners' Association under right-of-way authorization AA-87119) while hauling heavy loads in the winter.

On March 13, 2012, at the BLM's request, the IBLA remanded the decision back to the Glennallen Field Office for the purposes of reviewing and considering information brought to light after the decision and right-of-way grant were offered to Mr. Brown, specifically, the concerns that Mr. Brown raised to the Solicitor's Office. Prior to this phone discussion, these concerns had not been raised in the environmental review process. Therefore, the BLM decided to consider these concerns as "new information" that could be relevant to the BLM's decision on the request.

Consistent with 40 CFR § 1502.9(c), the Glennallen Field Office staff made a good faith effort to determine if, for one, Mr. Brown's safety concerns had a bearing on the proposed action or its impacts and, secondly, if these concerns would result in substantial changes to the alternatives considered and/or the impact analysis, and subsequently, the decision.

On April 4, 2012, the Glennallen Field Office staff conducted a winter site visit to assess typical winter conditions encountered along the approved trail, identify hazards, and record steep grades or slopes along the route of travel (Larson 2012).

Given the results of the site visit, the BLM has determined that the new information is not relevant to environmental concerns for this action nor does it have a bearing on the alternatives or impacts (BLM 2012a).

Decision

I have decided to implement *Alternative 2 – Authorization for access and maintenance on existing trails, portions A-E* (EA, p. 6), hereinafter referred to as the "selected alternative." This decision is based on site-specific analysis in the *Access in North Slana, Suslositna Environmental Assessment*, the supporting project record, as well as management decisions contained in the 2007 Record of Decision for the East Alaska Resource Management Plan (EARMP) (BLM 2012 and BLM 2007, respectively). The Finding of No Significant Impact (FONSI) indicates that the selected alternative has been analyzed in an EA and has been found to have no significant environmental effects. Therefore, an Environmental Impact Statement is not required and will not be prepared.

My decision to authorize this right-of-way to Mr. Coy Brown is summarized as follows (refer to EA, p. 6 for more detail):

1) Issuance of a ten-year right-of-way authorization, with an option to renew, for non-exclusive use and access on trail segments A through E (see map attached to EA).
2) Allow Mr. Brown to perform basic maintenance on existing trail segments A through E as necessary to facilitate access to his privately owned property.
3) Prohibits the construction or installation of new trails and/or bridges on any trail segment.

Rationale for the Decision

The No Action Alternative was not selected because it would not meet the BLM's purpose for action nor would it meet the BLM's objective to grant rights-of-way to qualified individuals (see EA, p. 4 and 43 CFR § 2801.2, respectively).

Alternative 3 was not selected because it would not fulfill the direction provided in the right-of-way regulations at 43 CFR § 2801 nor would it be consistent with the EARMP goals and decisions pertaining to *Lands and Realty* and *Travel Management and OHV Use* (see next section, **Laws and Authorities**). With an existing trail and active right-of-way used for purposes similar to Mr. Brown's (i.e., access to private property), the construction of new trails and two new bridges is duplicative and therefore equates to unnecessary or undue degradation of the public lands and does not protect the associated natural resources (see EA, pp. 12-14, 43 CFR § 2801.2[a] and[b], and BLM 2007). For example, in reference to the proposed new trail segments, the EA discloses that Alternative 3,

> …would add approximately an additional 660' of OHV trail paralleling the Suslositna Creek and construction of two additional bridges. Riparian areas will be removed in construction of the new trail and approaches to the new bridges. Alternative 3 has the greatest potential for stream banks destabilization, riparian vegetation loss, erosion, and sedimentation. This alternative would increase loss of riparian vegetation over the no action alternative due to the two additional stream crossings required (EA, p. 13).

Furthermore, the creation of duplicative access routes intended for similar, if not identical, purposes also fails the BLM's objective to promote rights-of-way in common (43 CFR § 2801.2[c]). "The construction of proposed segment F would increase the overall footprint of the trail network in the Suslositna Creek drainage… This route would be duplicative in nature providing access to segment D, which is already accessed by two trail segments, segments C and B," (EA, p. 12). With respect to Segment F, the EA acknowledges that, "Travel intensity and associated effects (soil displacement, erosion, and soil compaction) would be reduced on segments C and B if route F was constructed. Essentially it would offer a third route to segment D in addition to segments B and C," (EA, p. 12). However, at this time, the level of use and subsequent effects on segments B and C does not rise to a level that warrants a third route alternative over which to disperse use.

Similarly, the new bridge requested on Segment E east of Mr. Brown's property would be duplicative with the existing bridge located north of Mr. Brown's property and therefore also fails the BLM's objective to promote rights-of-way in common [43 CFR § 2801.2{c}]).

Moreover, the two additional bridges requested under Alternative 3 increase the potential for bridge failure in the watershed; bridge failure could lead to increased debris and materials within Suslositna Creek and subsequent bridge failures downstream (EA, p. 13). Given these risks and the fact that other reasonable access exists in both cases (via Segments C and D/E), the EA demonstrates that this alternative would not protect natural resources nor would it prevent unnecessary and undue degradation to the public lands (43 CFR § 2801.2[a] and[b]).

Ultimately, Alternative 2 was selected because it meets BLM's purpose and objectives, to provide Mr. Brown with a right-of-way authorization for access to his property, while utilizing an existing trail amenity to minimize impacts to public land resources. Utilizing the existing trail for Mr. Brown's right-of-way authorization:

1. protects the associated natural resources,
2. prevents unnecessary and undue degradation to the public lands, and
3. promotes the use of rights-of-way in common.

Furthermore, Alternative 2 does not preclude Mr. Brown from traveling cross-country (or, "overland") under casual use guidelines when adequate snowpack exists. Alternative 2 protects public land resources while still allowing Mr. Brown authorization to perform basic trail maintenance as needed during the snow-free months as well as offering considerable latitude with respect to winter access to his private property.

Laws and Authorities

The EA and supporting documentation have been prepared consistent with the requirements of various statutes and regulations, including but not limited to:

- Alaska National Interest Lands Conservation Act of 1980 (ANILCA)
- Federal Land Policy and Management Act of 1976 (FLPMA)
- National Environmental Policy Act of 1969 (NEPA)
- National Historic Preservation Act of 1966 (NHPA)

The EARMP and Record of Decision (2007) provide the overall long-term management direction for lands managed by the Glennallen Field Office (BLM 2007). The proposed action and alternatives are consistent with the EARMP and Record of Decision. Specifically, the proposed action is consistent with the following decisions:

I. LANDS AND REALTY

I-1: Goals

- Provide a balance between land use (rights-of-way, land use permits, leases and sales) and resource protection that best serves the public at large.

T. TRAVEL MANAGEMENT AND OHV USE

T-1: Goals (OHVs)

- Manage trails to minimize resource impacts and reduce user conflicts.
- Manage OHV use associated with permitted and development activities to provide for access while protecting resources

Public Involvement, Consultation, and Coordination

The public was originally notified of this project and EA on October 17, 2011 via the BLM Glennallen Field Office public website and NEPA Register. No public comments have been received throughout the process. No other local, state, or Federal agencies or tribal governments were consulted due to the limited scope and context of the project.

Appeal Opportunities

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR § 4. To appeal you must file a notice of appeal at the BLM Glennallen Field Office, P.O. Box 147, Milepost 186.5 Glenn Highway, Glennallen, Alaska 99588, within 30 days from receipt of this decision. The appeal must be in writing and delivered in person, via the United States Postal Service mail system, or other common carrier, to the Glennallen Field Office as noted above. *The BLM does not accept appeals by facsimile or email*. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition pursuant to regulation 43 CFR § 4.21 (58 FR 4939, January 19, 1993) for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. Except as otherwise provided by law or other pertinent regulation, a petition for a stay of decision pending appeal shall show sufficient justification based on the following standards: (a) The relative harm to the parties if the stay is granted or denied, (b) The likelihood of the appellant's success on the merits, (c) The likelihood of immediate and irreparable harm if the stay is not granted, and (d) Whether the public interest favors granting the stay.

Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the Office of the Solicitor (see 43 CFR § 4.413); Office of the Regional Solicitor, Alaska Region, U.S. Department of the Interior, 4230 University Drive, Suite 300, Anchorage, Alaska 99508; at the same time the

original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

/s/ Elizabeth Maclean *July 6, 2012*

Elizabeth Maclean
Glennallen Field Manager

Date

Attachments

Finding of No Significant Impact, June 2012

References

BLM. 2012a. Assessment of New Information: Coy Brown Right-of-Way Request for Access in North Slana, Suslositna. May 24, 2012.

BLM. 2012b. Environmental Assessment: Access in North Slana, Suslositna. DOI-BLM-AK-A020-2011-0026-EA. Revised May 30, 2012.

Larson, C. 2012. Coy Brown EA and Suslositna Trail System. Internal Memorandum to Beth Maclean, Glennallen Field Manager. April 5, 2012.

BLM. 2007. East Alaska Resource Management Plan, Record of Decision and Approved Plan. July 2007.