Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
U.S. Department of the Interior Bureau of Land Management
Grand Junction Field Office, Colorado
Lapham Post Maintenance Treatment
DOI-BLM-CO-130-2012-0019 DNA

A. Purpose and Need:
In 2004 and 2005, the Lapham Post hazardous fuels reduction project (CO-GJFO-03-08-EA, CO-130-2004-082-DNA) was implemented. The proposed action was to reduce hazardous fuels caused by the over mature oakbrush/mountain shrub, sagebrush, and pinion-juniper vegetation types within the project area. The project size was approximately 1100 acres, and treatment was conducted using a D-7 dozer and roller-chopper. Although these treatments were successful in meeting objectives, monitoring has shown substantial regrowth in the sagebrush and oakbrush/mountain shrub vegetation types. It is proposed that further treatment is needed to reduce hazardous fuels to 2004 and 2005 levels.

B. Proposed Action:
The proposed action is to use prescribed fire and mechanical means to retreat and maintain approximately 1040 acres within the previous Lapham post rollerchop project which is experiencing vegetation regrowth. Broadcast burning will be one option used to reduce the fuel loading and canopy cover of oakbrush/mountain shrub. This will effectively change the vegetation from dense vegetative community with low perennial understory density and diversity and low browse potential to a more diverse grass and forb community. This treatment would result in an increase in wildlife and livestock forage opportunities and results in a lower intensity wildfire in the event one should occur as compared to the current condition.

All prescribed fire operations will be conducted in accordance with an approved prescribed fire burn plan and the State of Colorado Smoke Management Plan and Memorandum of Understanding (MOU), and will be regulated under Colorado Department of Public Health and Environment, Air Pollution Control Division, approved open burning permits.

In the event that a burn window cannot be obtained, an agency owned and operated Fecon machine would be used to complete treatment units. The Fecon is a small dozer type machine with a rotary head which will be used to mulch vegetation which has regenerated in previous treated project areas. The treatment would be completed by BLM force account and mitigation identified by this analysis would be carried forward. Additionally, handcrews with chainsaws may also be used as an alternative or to supplement mechanical measures. Treatment would begin in FY 2012 with a 283 acre burn unit and continue through subsequent years as budgets allow. Impacts would be similar to the 2004 and 2005 Lapham Post treatments (CO-GJFO-03-08-EA, CO-130-2004-082-DNA).

A baseline for monitoring would be established before the project is implemented. Monitoring for measurable objectives would be carried out at one year (minimum one growing season), three year, and 10 year intervals from implementation to ensure that objectives are met. The primary objectives of the project are as follows:

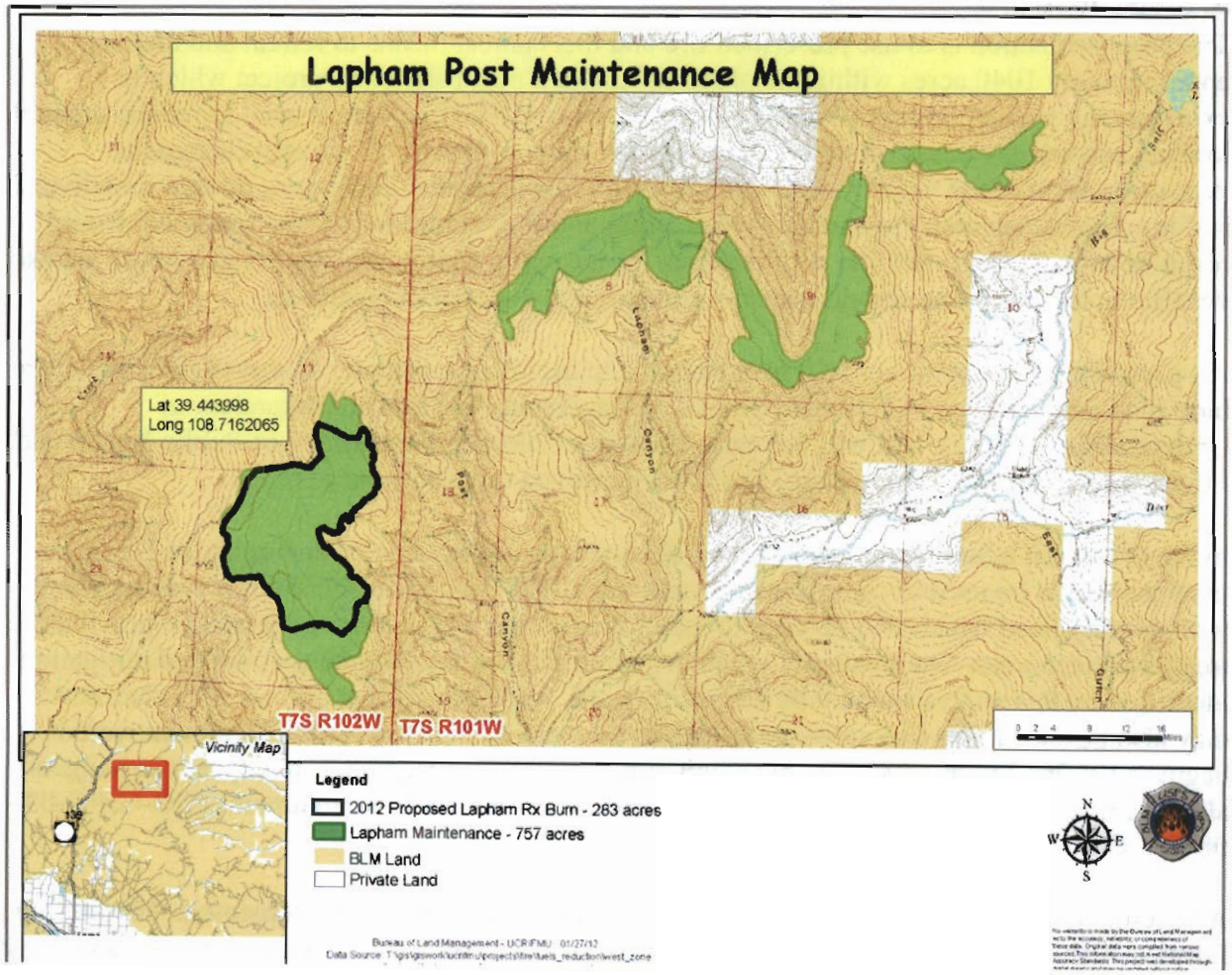
1) Reduce the hazardous fuel conditions in project area to decrease the threat of a catastrophic wildland fire moving from public land to private lands.

2) To create diversity in the mixed oakbrush/mountain shrub vegetation types within the landscape by converting vegetation in the treatment areas to early seral stage.

3) Increase forage availability to big game, livestock and other wildlife in the project area while retaining adequate cover.

The Project Area for the Proposed Action is located approximately eighteen miles north of Fruita at an elevation of 7650 ft. More specifically the Project Area is located in T7S, R102W, Sections13 and 24; T7S, R101W, Sections 3, 9, 8, 7, 4.

Figure 1. Map of project area.



C. Land Use Plan (LUP) Conformance

LUP Name: Grand Junction Resource Area RMP Date Approved: January 1987

Decision Number/Page: Chapter 2, Page 42, Paragraph 1; WM-5-2-14, and FM-4-2-32

Decision Language: Under all alternatives, habitat of the major wildlife species would be actively managed using standard management practices; Wildlife Management: Actively manage the areas shown on Map 10 and listed in Table 11 placing management emphasis on the key species shown, and Fire Management: Assign levels to areas based upon protection of resource values present, and manage or suppress fires as prescribed by the assigned levels.

D. Identify applicable NEPA documents and other related documents that cover the proposed action.

Name of Document: Lapham Post Fuels Reduction, CO-GJFO-03-08-EA, Lapham Post Additional Acres, CO-130-2004-082-DNA.

Date Approved: February 20, 2003, June 16, 2004

E. NEPA Adequacy Criteria

1. Is the current proposed action largely the same action (or a part of the same action) that was previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document? The current proposed action will use the same type of treatments that were analyzed in the Lapham post Fuels reduction EA. The proposed action falls within the boundary of the area analyzed in that EA.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values? The proposed action area within Lapham Post has the same environmental concerns, interests, and resource values as the area analyzed in the existing NEPA document. The proposed action falls within the range of alternatives provided in the original NEPA document.

3. Is the existing analysis valid in light of any new information or circumstances? Yes. No circumstances or information has changed that would result in impacts that were not analyzed in the existing 2003 EA and 2004 DNA.

4. Does the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action? Yes. The area is within the analysis area for the referenced EA and the methodology and analytical approach used in the existing 2003 EA and 2004 DNA would be the same if a new EA was written.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action? Yes. The direct and indirect impacts of the proposed action are the same as those identified in the existing NEPA document,

because the proposed action is the same as the action in the preferred alternative of the referenced EA and DNA, the resources and resource concerns are the same.

6. Are the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s) Yes, this action combined with the actions analyzed in the existing EA and DNA would contribute to hazardous fuels reduction and landscape-scale improvements to wildlife habitat. Cumulative impacts in the area are limited and would remain the same as those analyzed in the referenced EA, DNA.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action? This proposed action is consistent with the actions of the existing 2003 EA and 2004 DNA in which scoping and a public meeting was held. Annual meetings continue to be held with interested parties in the Lapham Post area to discuss progress and the results of vegetative treatments.

F. Interdisciplinary Analysis: Team members conducting or participating in the NEPA analysis and preparation of this worksheet.

Name	Title
Alissa Leavitt-Reynolds	**Archaeologist**
John Toolen	**Wildlife Biologist/ Special Status Species (fish and wildlife)**
Nate Dieterich	**Hydrologist (Soils, Water Quality, Air)**
Christina Stark	**Wetlands/Riparian Zones**
Scott Clarke	**Rangeland Management Specialist**

REMARKS:

Cultural Resources:
Affected Environment: A records search of the project area indicates that a Class III inventory of the Area of Potential Effect, as defined in the National Historic Preservation Act (NHPA), was completed by Grand River Institute, a Colorado BLM permitted cultural resource contracting firm (GJFO CRIR 1103-02). Conditions of the existing cultural environment are incorporated by this reference but the following briefly summarizes cultural resources in the APE. Three prehistoric isolated finds were recorded during the inventory. These isolated finds were found to be not-eligible for listing on the National Register of Historic Places. No other cultural resources were found. The project inventory and evaluation is in compliance with the NHPA, the Colorado State Protocol Agreement, and other federal law, regulation, policy, and guidelines regarding cultural resources.

Environmental Consequences/Mitigation: There are no archaeological sites or historic properties present in the project area. Adherence to the attached standard stipulations will adequately protect unidentified cultural resources and prevent adverse effects on known eligible and potentially eligible properties.

All persons in the area who are associated with this project shall be informed that any person who, without a permit, injures, destroys, excavates, appropriates or removes any historic or prehistoric ruin, artifact, object of antiquity, Native American remains, Native American cultural

item, or archaeological resources on public lands is subject to arrest and penalty of law (16 USC 433, 16 USC 470, 18 USC 641, 18 USC 1170, and 18 USC 1361). Strict adherence to the confidentiality of information concerning the nature and location of archeological resources would be required of the proponent and all of their subcontractors (Archaeological Resource Protection Act, 16 U.S.C. 470hh)

Inadvertent Discovery: The National Historic Preservation Act (NHPA) [16 USC 470s., 36 CFR 800.13], as amended, requires that if newly discovered historic or archaeological materials or other cultural resources are identified during the Proposed Action implementation, work in that area must stop and the BLM Authorized Officer (AO) must be notified immediately. Within five working days the AO will determine the actions that will likely have to be completed before the site can be used (assuming in place preservation is not necessary).

The Native American Graves Protection and Repatriation Act (NAGPRA) [25 USC 3001 et seq., 43 CFR 10.4] requires that if inadvertent discovery of Native American Human Remains or Objects of Cultural Patrimony occurs, any activity must cease in the area of discovery, a reasonable effort made to protect the item(s) discovered, and immediate notice be made to the BLM Authorized Officer, as well as the appropriate Native American group(s) (IV.C.2). Notice may be followed by a 30-day delay (NAGPRA Section 3(d)).

The operator may relocate activities to avoid the expense of mitigation and delays associated with this process, as long as the new area has been appropriately inventoried and has no resource concerns, and the exposed materials are recorded and stabilized. Otherwise, the operator shall be responsible for mitigation costs. The BLM authorized officer will provide technical and procedural guidelines for relocation and/or to conduct mitigation. Upon verification from the BLM authorized officer that the required mitigation has been completed, the operator will be allowed to resume construction.

Antiquities, historic ruins, prehistoric ruins, and other cultural or paleontological objects of scientific interest that are outside the authorization boundaries but potentially affected, either directly or indirectly, by the proposed action shall also be included in this evaluation or mitigation. Impacts that occur to such resources as a result of the authorized activities shall be mitigated at the operator's cost, including the cost of consultation with Native American groups

Native American Religious Concerns:
Affected Environment: American Indian religious concerns are legislatively considered under several acts and Executive Orders, namely the American Indian Religious Freedom Act of 1978 (PL 95-341), the Native American Graves Environmental Assessment Protection and Repatriation Act of 1990 (PL 101-601), and Executive Order 13007 (1996; Indian Sacred Sites). In summary, these require, in concert with other provisions such as those found in the NHPA and ARPA, that the federal government carefully and proactively take into consideration traditional and religious Native American culture and life and ensure, to the degree possible, that access to sacred sites, the treatment of human remains, the possession of sacred items, the conduct of traditional religious practices, and the preservation of important cultural properties are considered and not unduly infringed upon. In some cases, these concerns are directly related to "historic properties" and "archaeological resources". In some cases elements of the landscape without archaeological or other human material remains may be involved. Identification of these concerns is normally completed during the land use planning efforts, reference to existing studies, or via direct consultation. There is no known evidence that suggests the project area

holds special significance for Native Americans, or is actively used to maintain any traditional practices. The project would not alter or limit any access if there were traditional uses that are not known to the agency.

Environmental Consequences/Mitigation: The Ute have a generalized concept of spiritual significance that is not easily transferred to Western models or definitions. As such the BLM recognizes that the Ute have identified sites that are of concern because of their association with Ute occupation of the area as part of their traditional lands. No traditional cultural properties, unique natural resources, or properties of a type previously identified as being of interest to local tribes, were identified during the cultural resources inventory of the project area. No additional Native American Indian consultation was conducted for the proposed project.

Special Status Species: No federally threatened, endangered, or candidate species inhabit the area, nor do any Colorado listed threatened, endangered, or special concern species. No potential habitat for any of these species occurs locally. The area does not support, or contain appropriate habitat, for BLM Sensitive species.

Wildlife: The project area provides winter range for mule deer and elk, and lies within an elk winter concentration area. In the short term (1-10 years), the project should provide improved winter foraging for elk, at the expense of shrubby browse more favorable to deer. Over time, however, new shrub regrowth will become more favorable for deer, and provide younger more vigorous vegetation compared to much of the older, dense mountain shrub and oak types in the broader area.

Air Quality: All prescribed fire operations will be conducted in accordance with an approved prescribed fire burn plan and the State of Colorado Smoke Management Plan and Memorandum of Understanding (MOU), and will be regulated under Colorado Department of Public Health and Environment, Air Pollution Control Division, approved open burning permits. Thus, impacts to air quality will be sufficiently mitigated through CDPHE-APCD and are not anticipated to significantly deteriorate air quality locally or regionally.

Water quality/ Hydrology: The proposed action is situated within the Big Salt Wash watershed. More specifically, the proposed action has potential to directly impact Lapham Canyon which is an ephemeral tributary to the interrupted perennial Big Salt Wash. Big Salt Wash is a tributary to the Colorado River near Fruita, Colorado. Treatments are proposed high in the watershed on predominantly gentle topography which provides a large buffer to all perennial reaches of Big Salt Wash. Potential for increased erosion and sedimentation to Lapham Canyon could occur if heavy equipment were to be utilized to near this drainage as soil compaction and alteration of natural drainage patterns could accelerate these natural processes. To sufficiently mitigate potential increases in erosion or sedimentation to Lapham Canyon, treatments adjacent to Lapham Canyon should be restricted within 100 feet of the active channel.

Additionally, three springs are situated within or adjacent to the proposed treatment area (Post Canyon Spring, Lapham #1 and Lapham #2). The use of heavy equipment in or immediately adjacent to these areas could impair spring function through compaction of sediments and/or erosion in source areas. Alteration of natural drainage patterns in recharge areas associated with these water sources could also reduce recharge potential decreasing discharge rates at springs. To effectively mitigate impacts to springs in the project area, the use of heavy equipment and prescribed fire should be restricted within a minimum distance of 100 ft. of source areas. Mechanical means of vegetation

treatment utilizing hand crews could be permitted within this buffer as site conditions warrant. Adequate buffers will be determined by the GJFO Hydrologist and flagged prior to implementation of the proposed project.

Soils: The existing treatment area is generally situated on heavily vegetated slopes less than 40% which are inherently stabile. With successful implementation of the proposed treatment as outlined in the proposed action, erosion rates are anticipated to be maintained at near "natural" levels. In small areas where slopes exceed 40%, erosion potential will increase and can be further exacerbated by the use of heavy equipment do to soil compaction and alteration of natural flow patterns.

To sufficiently mitigate unnecessary impacts to soils on slopes exceeding 40%, mechanized forms of treatment should be limited to hand treatment in those areas. With mitigation, natural erosion rates on slopes greater than 40% would be preserved and objectives of the proposed action can still be met.

Wetlands/Riparian Zones:
Riparian habitat located within the project area is minimal and is associated with springs. Riparian vegetation at the springs varies due to development of the springs and frequency of maintenance. There are three springs located immediately adjacent to within the proposed treatment areas. Two of the springs were last assessed in 1981. Riparian vegetation found during the assessment consisted primarily of Wood's rose and rushes and sedges. Minimal data was collected during the previous assessments, and no recent assessments have been completed. The treatments areas are located within 0.5 miles to 1.5 miles to the northwest of Big Salt Wash. The reaches of Big Salt Wash below the treatment areas were found to be stable and in Proper Functioning Condition in 2006.

Uplands vegetation around the springs has likely been impacted by cattle, which would result in decreased cover and density. Sparse upland vegetation near the springs would act as a fire break and slow the fire and decrease the burn intensity in these areas. Impacts to riparian vegetation would be short-term with recovery expected within 1 to 2 years. There are no known large woody species at the springs that would potentially require more long-term recovery. Impacts to riparian habitat along Big Salt wash is also expected to be minimal due to the distance of the creek from the project area and the phased approach to the treatments. The riparian zone may experience a flush of sediment and nutrients during the first few precipitation events following the treatments, but transport of increased sediment is expected to decrease once disturbed vegetation begins to resprout and germinate. The proposed project would have minimal short-term impacts on riparian habitat as proposed.

If fire intensity is high during the burn than special measures should be used to slow the fire as it approaches the springs to protect riparian habitat and ensure rapid recovery. Fire intensity should be monitored in these locations, but special protection measures are not expected to be necessary.

Weeds/Invasive Species:
As a supplement to mitigation measure # 3, the following language is recommended: If mechanical means are used to accomplish vegetation objectives, the machine should be thoroughly cleaned before transporting to the site to reduce the chance of inadvertent weed introduction. The cutting head, tracks, air intake pre-cleaner (if equipped), radiator, and any site on the machine that collects debris should be cleaned. Cleaning methods can be compressed air, power-washing, or low-pressure/high volume (e.g. garden/fire hose). MT 2/7/12

Hazardous/Solid Waste:
Standard fuel management practices should be used to minimize potential negative impacts from fuel spills and all spills should be reported.

Vegetation, Forestry:
There would be an initial short term negative impact to vegetation after the implementation of the prescribed fire and/or mechanical treatment. However, with proper project mitigation, implementation and monitoring there will likely be long term positive benefits from the proposed action to vegetation and forestry. Such as reducing the fuel loading and canopy cover of oakbrush/mountain shrub will likely effectively change the vegetation from dense vegetative community with low perennial understory density and diversity and low browse potential to a more diverse grass and forb community.

Range Management:
The proposed treatment would increase grass and available forage for livestock and open up areas that livestock haven't been able to use due to the thick oakbrush/mountain shrub. Opening these areas would improve livestock distribution on the allotment with more uniform use occurring across the allotment.

The burned area would require adequate rest from livestock grazing until vegetation has recovered.

Table 1– Potentially Impacted Resources (double click on boxes to check)

Resources	Not Present On Location	No Impact	Potentially Impacted	Mitigation necessary	Comments included in DNA text	BLM Evaluator Initial & Date
PHYSICAL RESOURCES						
Air and Climate	☐	☐	☒	☐	☒	ND 2/9/12
Geological	☐	☒	☐	☐	☐	DSG 2/7/12
Mineral Resources	☐	☒	☐	☐	☐	DSG 2/7/12
Soils	☐	☐	☒	☒	☒	ND 2/9/12
Water (surface & subsurface, floodplains)	☐	☐	☒	☒	☒	ND 2/9/12
BIOLOGICAL RESOURCES						
Invasive, Non-native Species	☐	☐	☒	☐	☒	MT 2/7/12
Sensitive Species	☒	☒	☐	☐	☒	JT 2/9/12
Threatened or Endangered Species	☒	☒	☐	☐	☒	JT 2/9/12
Vegetation, Forestry	☐	☐	☒	☐	☐	JAM 2/22/12
Wetlands/Riparian Zones	☐	☐	☒	☐	☒	CARS 2/8/12
Wildlife	☐	☒	☐	☐	☒	JT 2/9/12
HERITAGE RESOURCES AND HUMAN ENV.						
Cultural or Historical	☐	☐	☒	☐	☒	ALR 1/9/12
Paleontological	☐	☒	☐	☐	☐	DSG 2/7/12
Tribal & American Indian Religious Concerns	☐	☐	☒	☐	☒	ALR 1/9/12
Visual Resources	☐	☐	☒	☐	☐	CPP 2/7/2012
Social	☐	☒	☐	☐	☐	JP 2/17/12
Economic	☐	☒	☐	☐	☐	JP 2/17/12
Environmental Justice	☐	☒	☐	☐	☐	JP 2/17/12
Transportation and Access	☐	☒	☐	☐	☐	CPP2/7/2012
Wastes, Hazardous or Solid	☐	☐	☒	☐	☒	AEK 2/8/12
LAND RESOURCES						

Table 1– Potentially Impacted Resources (double click on boxes to check)

Resources	Not Present On Location	No Impact	Potentially Impacted	Mitigation necessary	Comments included in DNA text	BLM Evaluator Initial & Date
Prime or Unique Farmlands	☐	☒	☐	☐	☐	JP 2/17/12
Recreation	☐	☐	☒	☐	☐	CPP 2/7/2012
Special Designations (ACEC, SMAs etc.)	☒	☐	☐	☐	☐	JP 2/17/12
Wild and Scenic Rivers	☒	☐	☐	☐	☐	JP 2/17/12
Wilderness	☒	☐	☐	☐	☐	JP 2/17/12
Range Management	☐	☐	☒	☐	☐	SC 2/17/12
Wild Horse and Burros	☐	☒	☐	☐	☐	JP 2/17/12
Land Tenure, ROW, Other Uses	☐	☒	☐	☐	☐	RBL 1/10/12

NAME OF ENVIRONMENTAL COORDINATOR: Collin Ewing

DATE: 3/8/2012 CE

Conclusion

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

SIGNATURE OF AUTHORIZED OFFICIAL:

for Wayne W

Grand Junction Field Manager

DATE SIGNED: 3-9-12

The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.

The following mitigation measures are also part of the Proposed Action:

1. Locate, flag, and protect any survey monuments (brass cap monuments, bearing trees, private monuments) that may exist in this project area.

2. Areas to be avoided by equipment to protect other resource values would be flagged prior to project implementation. In areas with significant cultural resources, project boundaries will be designed as to avoid such areas.

3. To prevent the spread of noxious weeds equipment would be cleaned through established procedures as part of the Statement of Work.

4. Fueling and maintenance activities should not be conducted within 100 feet of any drainage or watercourse. All spills of fuel and lubricants should be reported to the BLM and should be cleaned up promptly. Fueling of machinery and storage of fuel would be accomplished through established BLM procedures.

5. Determine boundaries of the treatment areas near private lands prior to fuel reduction to avoid treatment of private lands.

6. Existing roads and trails would be used by agency personnel to eliminate development of new routes and trails. When driving off roads, personnel would avoid repeatedly driving back and forth via the same route.

7. Schedule project work outside of the dates May 15th and July15th, which would comply with measures to protect species identified by the Migratory Bird Treaty Act.

8. Coordinate with the BLM Wildlife Biologist and the Colorado Department of Wildlife to best determine timing and operation procedures to limit any possible wildlife issues.

9. All road, telephone, and power line rights-of-way's and facilities will be located and flagged prior to commencement of the project to assure that no damage will occur.

10. Heavy equipment use will not occur when soils are saturated to a depth of three inches or more. All drainage courses will be protected from any impacts associated with operation of heavy equipment (e.g. bank shearing, de-stabilization of existing drainage patterns, etc…). In areas closest to drainages or over 40% slope, alternative methods for treating vegetation (e.g. hand crews) will be used. Furthermore, treatment adjacent to Lapham Canyon should be restricted within 100 feet of the active channel. Likewise, treatment should avoid interference with springs/RIPs associated with Post Canyon Spring, Lapham #1 and Lapham #2.

11. All persons in the area who are associated with this project shall be informed that any person who, without a permit, injures, destroys, excavates, appropriates or removes any historic or prehistoric ruin, artifact, object of antiquity, Native American remains, Native American cultural item, or archaeological resources on public lands is subject to arrest and penalty of law (16 USC 433, 16 USC 470, 18 USC 641, 18 USC 1170, and 18 USC 1361). Strict adherence to the confidentiality of information concerning the nature and location of archeological resources would be required of the proponent and all of their subcontractors (Archaeological Resource Protection Act, 16 U.S.C. 470hh)

12. Inadvertent Discovery: The National Historic Preservation Act (NHPA) [16 USC 470s., 36 CFR 800.13], as amended, requires that if newly discovered historic or archaeological materials or other cultural resources are identified during the Proposed Action implementation, work in that area must stop and the BLM Authorized Officer (AO) must be notified immediately. Within five working days the AO will determine the actions that will likely have to be completed before the site can be used (assuming in place preservation is not necessary).

13. The Native American Graves Protection and Repatriation Act (NAGPRA) [25 USC 3001 et seq., 43 CFR 10.4] requires that if inadvertent discovery of Native American Human Remains or Objects of Cultural Patrimony occurs, any activity must cease in the area of discovery, a reasonable effort made to protect the item(s) discovered, and immediate notice be made to the BLM Authorized Officer, as well as the appropriate Native American group(s) (IV.C.2). Notice may be followed by a 30-day delay (NAGPRA Section 3(d)).

14. The operator may relocate activities to avoid the expense of mitigation and delays associated with this process, as long as the new area has been appropriately inventoried and has no resource concerns, and the exposed materials are recorded and stabilized. Otherwise, the operator shall be responsible for mitigation costs. The BLM authorized officer will provide technical and procedural guidelines for relocation and/or to conduct mitigation. Upon verification from the BLM authorized officer that the required mitigation has been completed, the operator will be allowed to resume construction.

15. Antiquities, historic ruins, prehistoric ruins, and other cultural or paleontological objects of scientific interest that are outside the authorization boundaries but potentially affected, either directly or indirectly, by the proposed action shall also be included in this evaluation or mitigation. Impacts that occur to such resources as a result of the authorized activities shall be mitigated at the operator's cost, including the cost of consultation with Native American groups