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
Pine Ridge Fire Emergency Rehabilitation
Flash Flood Mitigation
DOI-BLM-CO-130-2012-0047-DNA

A. Purpose and Need:

Background

The Pine Ridge Fire was started by lightning on June 27, 2012. The fire burned in pinyon juniper woodlands, sagebrush, greasewood, and riparian vegetation consisting of Fremont cottonwoods, tamarisk, and willow in rugged terrain located southwest of the town of DeBeque, Colorado in Mesa County.

With existing drought conditions, low relative humidity, and strong winds the fire burned with high intensity and had rapid rates of spread with it largest occurring on June 28th when the fire made a run of approximately 10,000 acres. The affected area experienced moderate fire severity with isolated pockets of high severity. During the fire I-70 as well as the Union Pacific railroad was closed due to safety concerns caused by the fire. The Pine Ridge fire burned large portions of vegetation within the perimeter, causing high amounts of plant mortality, leaving behind large areas of bare ground in highly erodible soils

The fire was fully contained on July 4, 2012 and burned a total of 13,920 acres (13,110 BLM, 810 Private). Overall burn severity was in the low to moderate range with some high severity areas in the canyons and on the river bottom and no areas of hydrophobicity (soils that preclude water penetration/absorption).

Large runoff events could result in excessive erosion, damage to the railroad, and decreases in water quality; which could affect municipal and irrigation water supplies, as well as the four Colorado River endangered fishes. Erosion also threatens known Historic Properties as well as potentially eligible cultural resources that are located in areas that have not been previously surveyed.

Purpose and Need Statement

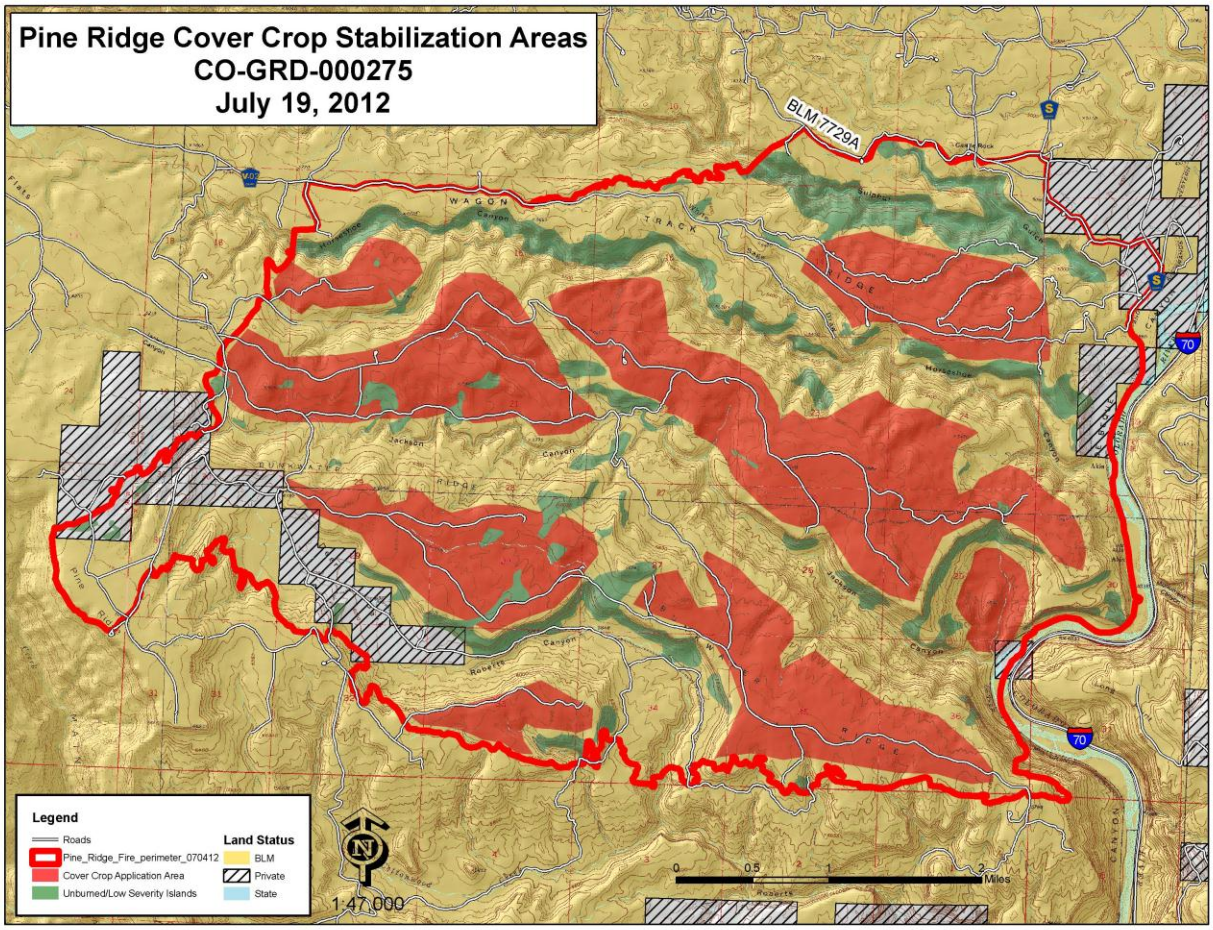
The purpose of the proposed action is to minimize runoff and sediment loss from the Pine Ridge fire into the Colorado River and its tributaries within the fire area. The need for the proposed action is to protect the aforementioned values at risk.

B. Proposed Action:

The BLM proposes to conduct the following rehabilitation efforts as soon as possible:

- Aerial seeding of a sterile Triticale (4,800 ac @ 20lbs/Acre) will be applied to provide a rapid soil stabilizing cover crop as well as provide direct competition with germinating cheatgrass.

Map 1: seeding area



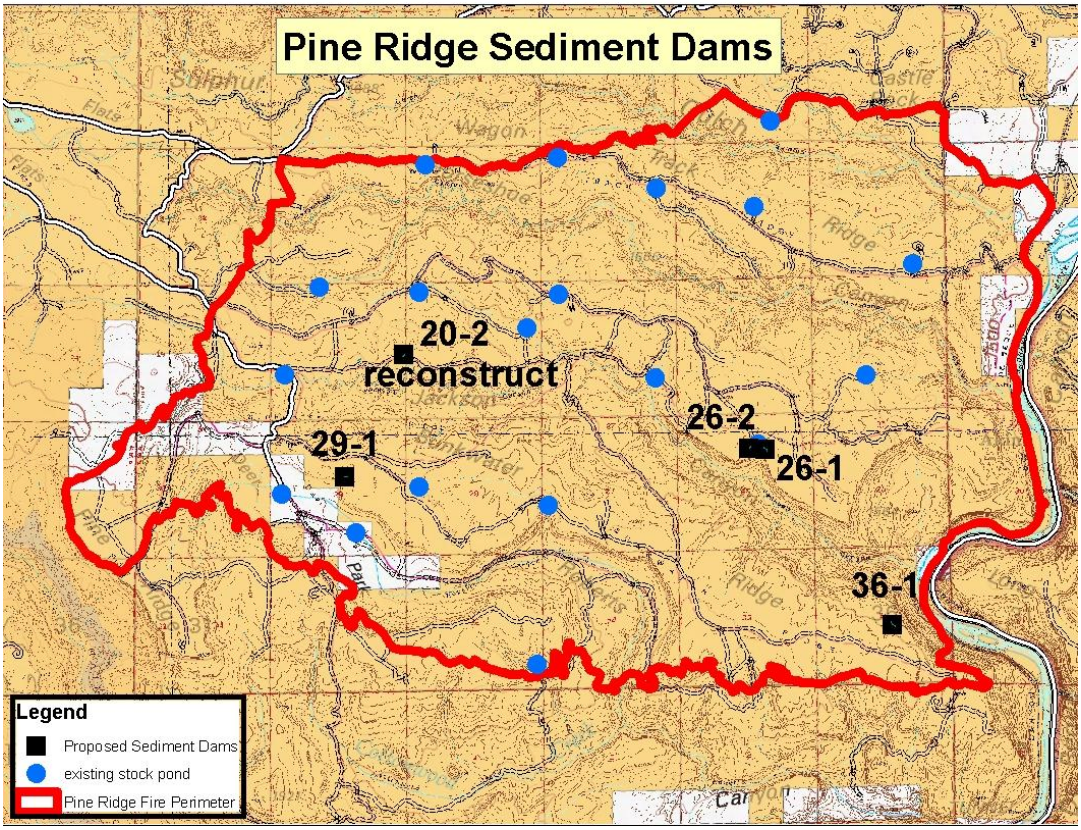
- Construction of up to 4 new sediment retention dams to capture sediment, ash, and other debris in locations with previous cultural surveys and no cultural resources (CRIR 15303-03 and 1012-16)
    - Each dam and area of sediment catchment will disturb up to approximately 2 acres
    - none of the proposed structures would impact wetlands
    - maximum fill or excavation below the plane of the ordinary high water mark would be less than 10 cubic yards.
    - These actions would be authorized under USACE NWP-18 and Colorado DWR Erosion Control Dam permits
    - sediment retention basins will have a storage capacity of less than 10 acre/ft and dam heights less than 10 ft.

- Cleanout of up to 19 existing stock ponds to facilitate capture of sediment, ash, and fire related debris. Existing structures do not require additional cultural work.

    - Sediment would be removed from the existing disturbed pond area and placed on top of the dam.

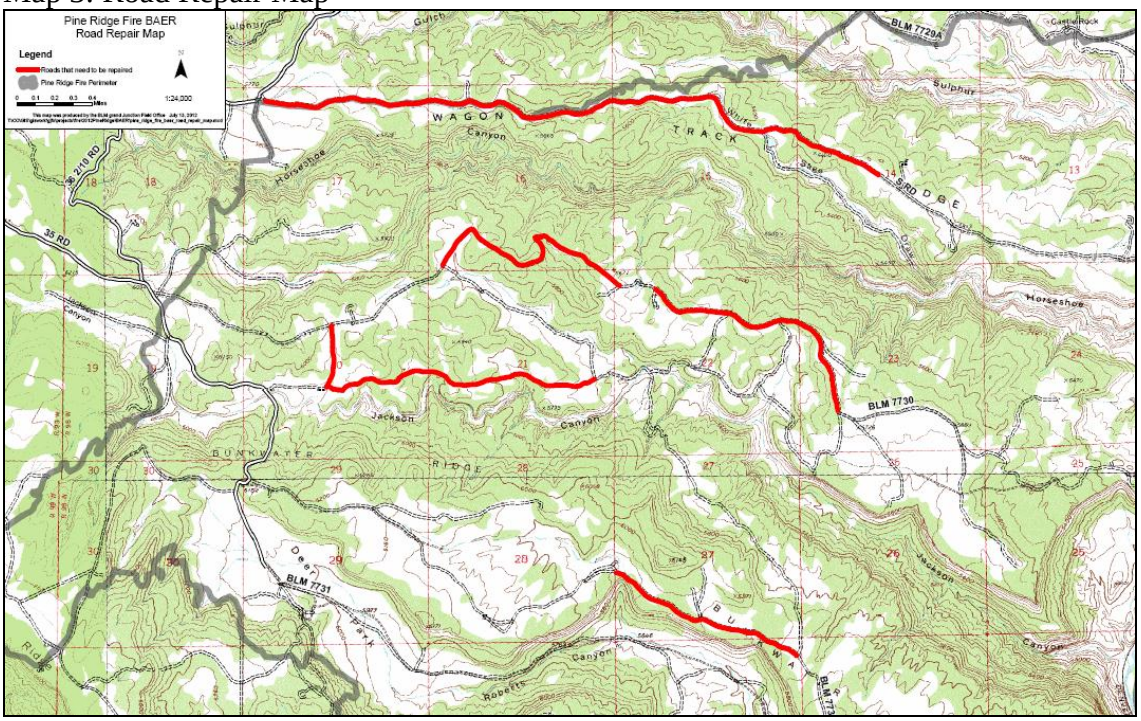
- Reconstruction of 1 existing stock pond to facilitate capture of sediment, ash, and fire related debris

Map 2: Sediment Control Dams



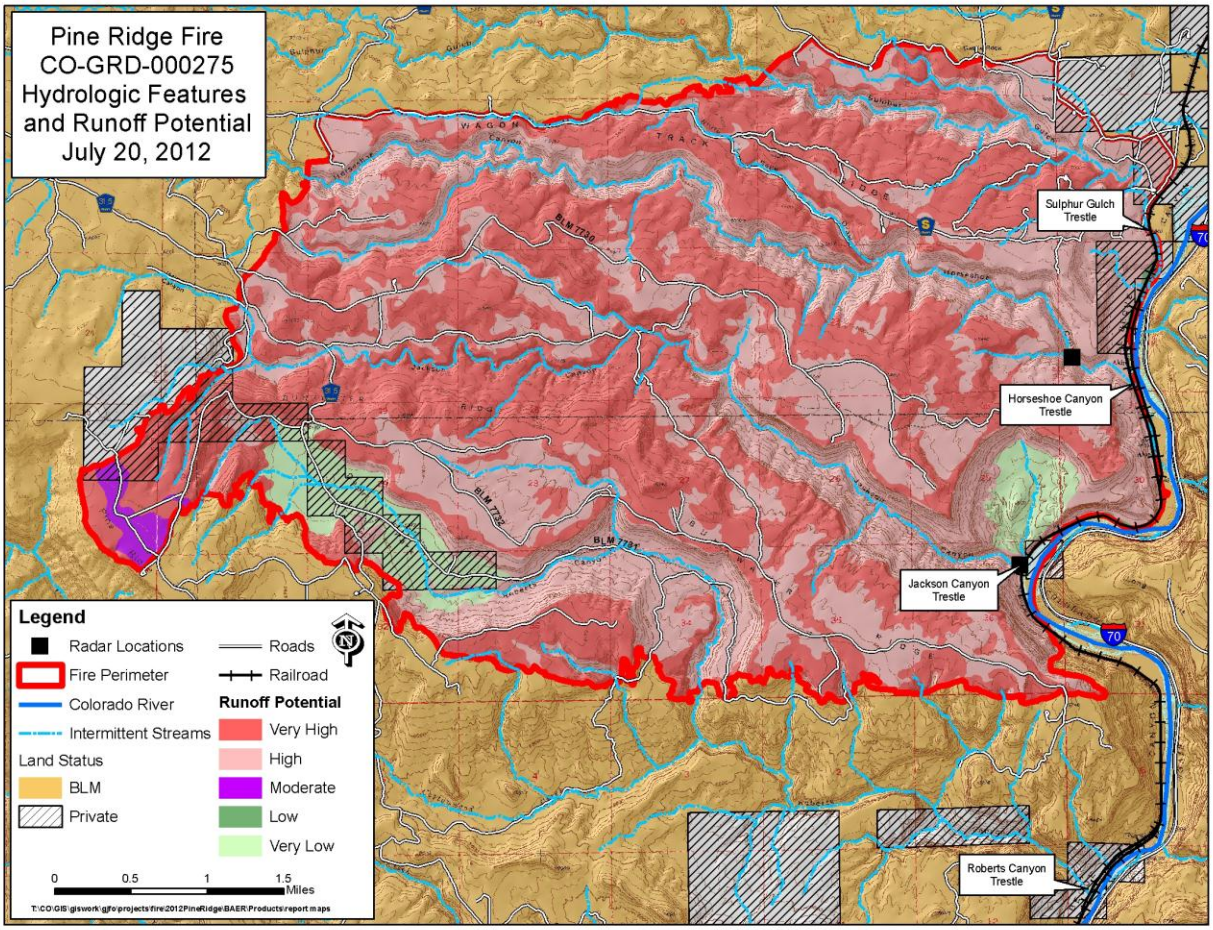
- Road maintenance. 9.2 miles of roads currently need maintenance to limit further gullying and user created reroutes. Additional maintenance may be necessary after future runoff events. These roads are within areas that were previously surveyed (CRIR 2081-14, 883-06, 1106-01m 1483-04, 1003-09, 1102-01, 8206-03, and 15303-03).
    - All maintenance would conform to BLM manual 9113 standards for road shape and drainage features (BLM 2012) or where appropriate BLM Manual Section 9115 standards for primitive roads (BLM 2012b)
    - Drainage crossings do not include culverts – low water crossings will be used

Map 3: Road Repair Map



- Flood warning devices (radar stage recorders) would be installed on Horseshoe and Jackson Canyons to provide early warning of major runoff events that may cause damage to values at risk.
    - The device in Jackson Canyon would be secured to the existing railroad trestle if permission is granted from the railroad. If permission cannot be secured, a concrete pillar (one 10 inch pylon) would be placed in the alluvium to support the device.
    - In Horseshoe Canyon the device will be located further up the canyon, approximately 0.5 miles, and will be anchored by drilling into large boulders in the canyon bottom. These boulders are located in the flood zone of Horseshoe Canyon
    - Construction of radar stage recorders in Jackson and Horseshoe Canyon would be authorized through USACE NWP-5 (Scientific Measurement Devices) given all criteria and general conditions are met. Radar stage recorders would need to be removed once the danger of debris flows from the Pine Ridge fire is mitigated (e.g. 3 years).

Map 4: Radar locations



- If possible, construction and vegetation clearing will occur between July 16 and February 14, to avoid impacts to nesting raptors, any work during nesting season would require raptor nest surveys and avoidance.

- Additional rehabilitation measures such as seeding, herbicide, straw wattles, mulching, etc. are still under consideration. Additional NEPA documentation will be completed prior to implementation of those practices.

C. Land Use Plan (LUP) Conformance

Name of Plan:

1) GRAND JUNCTION Resource Management Plan, JANUARY, 1987

Decision Language:

2 – 4 Maintain or improve existing water quality in the resource area when possible.

2 – 31 To minimize the cost and loss, compliment resource management objectives, and sustain the productivity of the biological ecosystems through fire management.

2) Grand Junction Fire Management Plan 2000 (updated February 2008)

Decision Language: 17, 34, and 83 – 85 Rehabilitation and Restoration - Rehabilitation and restoration efforts will be undertaken to protect and sustain ecosystems, public health, and safety, and to help communities protect infrastructure.

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

Normal Fire Year Rehabilitation Plan and Environmental Assessment (CO-130-2005-79-EA) June, 2005

Decision Language: Fire rehabilitation actions are intended to balance biotic communities and minimize unacceptable change to ecosystem structure and function of public lands.

E. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document?

The Normal Fire Year Rehabilitation Plan and Environmental Assessment authorized sediment control dams and road maintenance for fire rehabilitation in the GJFO.

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 Normal Fire Year Rehabilitation Plan and Environmental Assessment analyzed the effects of many rehabilitation measures in comparison to No Action. The decision was to allow the use of all of the actions considered, including those proposed for the Pine Ridge Fire.

3. Is the existing analysis valid in light of any new information or circumstances?

The analysis is valid, new information such as cultural resources and rare plant surveys were considered and no new significant impacts are expected.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

The analysis in the EA was in accordance with NEPA and remains valid.

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?
The impacts of the proposed action were analyzed in a programmatic manner in the EA. The GJFO ID Team has reviewed the new proposed action and validated that the analysis in the EA sufficiently disclosed/mitigated the effects of the proposed action.

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)?

The impacts of the proposed action were analyzed in a programmatic manner in the EA. The GJFO ID Team has reviewed the new proposed action and validated that the analysis in the EA sufficiently disclosed/mitigated the effects of the proposed action.

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

The 2005 EA was included in the NEPA log available on the website. Several issues were identified and analyzed in the EA. This DNA has been included on the public website as well.

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

Name	Title
Tom Fresques	Fish Biologist
Ken Holsinger	Botanist
Aline LaForge	Archeologist
Collin Ewing	Planning & Environmental Coordinator
Heidi Plank	Wildlife Biologist
Nate Dieterich	Hydrologist

Table 1– Potentially Impacted Resources (Paste from NEPA notification)

NAME OF ENVIRONMENTAL COORDINATOR: Collin Ewing CE

DATE: 7/20/12

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 Werkmeister
Grand Junction Field Manager

DATE SIGNED: 7-20-12

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.

SITE_SPECIFIC STIPULATIONS:

List all COAs, stipulations, mitigation measures

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)).

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

Criteria for Erosion and Sediment Control Structures

1. The planning, design, and construction of erosion/sediment control structures and flood water retarding structures would be done in accordance with BLM Manual 1972, Water Control Structures.

2. Materials used would be of local origin to the greatest extent possible, with installation by local personnel and equipment, as per procurement/contracting procedures.

Sediment Dam sample design