

**U.S. Department of the Interior
Bureau of Land Management
Colorado River Valley Field Office
2300 River Frontage Road
Silt, Colorado 81652**

DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NEPA NUMBER: DOI-BLM-CO-N040-2013-0087-DNA

PROJECT NAME: Cedar Springs Vegetation Treatment

PLANNING UNIT: Garfield County

LEGAL DESCRIPTION: T7S R93W Sec. 22, 23, 24, 25, 26, 27, 34, 35, 36
T8S R93W Sec. 1, 2 (see Figure 1)

APPLICANT: Bureau of Land Management

ISSUES AND CONCERNS: Sagebrush steppe—comprised of sagebrush mixed with secondary shrub species with an understory of grasses and forbs (broadleaf herbaceous plants)—is a key component of winter range for big game ungulates (mule deer and Rocky Mountain elk). Healthy sagebrush stands consist of mixed age classes of shrubs with annual leaf and seed production as well as evidence of regeneration. Healthy sagebrush communities contain a diverse understory of native perennial herbaceous species. Impediments to long-term maintenance of healthy sagebrush communities include encroachment and competition by trees expanding from nearby pinyon-juniper stands and invasion by noxious weeds and other undesirable non-native plants.

Mixed mountain shrublands provide transitional habitat between high-elevation summer range and low-elevation winter range for wild grazers. During mild winters, deer and elk may use mixed shrublands as well as lower elevation sagebrush shrublands for shelter and forage. Common shrubs in the mountain shrub complex in the project area include oakbrush and other tall or mid-height grasses in addition to sagebrush. As stands of mixed shrublands mature, the component species lose some of their value to wildlife. This loss results from reduced leaf and seed production, reduced quantity and quality of herbaceous vegetation as competition and shading by the shrubs increases, and (for tall shrub species) a gradual shift in foliage and shoot production to heights unreachable by smaller individuals of deer and elk. Overly dense stands of tall shrubs can also impede wildlife movement, reducing their value as thermal and escape cover.

Treatments to restore optimal production of shrub foliage and seeds and the growth of understory herbs and to facilitate use as thermal and escape cover by wild ungulates typically result in creation of a mosaic of shrub patches and grassy clearings, mimicking patterns following a natural disturbance. The BLM Colorado River Valley Field Office (CRVFO) has determined that removal and thinning of oakbrush can be an important habitat management tool benefiting a variety of native wildlife, in particular wild ungulates and upland game birds.

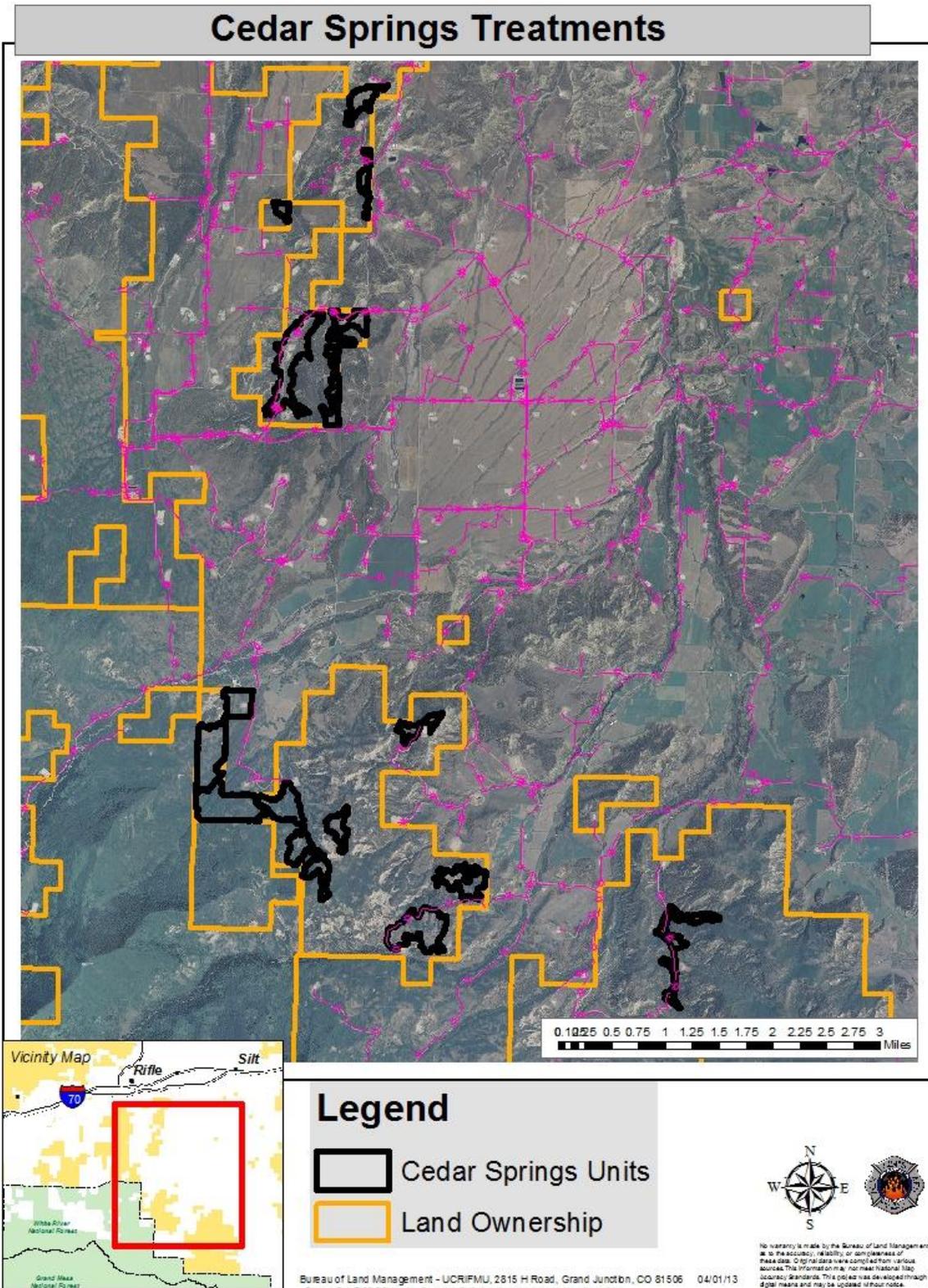


Figure 1. Cedar Springs Vegetation Treatment Units

Habitat treatments to be conducted under this document include removal of encroaching pinyons and junipers and control and cheatgrass and/or other invasive non-native plants. Depending on the quality of

the herbaceous understory, these treatments may be followed by reseeding or interseeding with native perennial grasses and forbs selected on the basis of forage quality, reliability in habitat restoration applications, and potential for long-term suppression of invasive species.

The BLM Colorado River Valley Field Office (CRVFO) has determined that removal and thinning of encroaching pinyon and juniper trees in conjunction with understory treatments can be an important habitat management tool benefiting a variety of native wildlife, in particular wild ungulates and upland game birds.

DESCRIPTION OF PROPOSED ACTION: A variety of treatments are planned for this area totaling approximately 600 acres. Manual treatment involves the use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous and woody species. Chainsaws will be used to remove approximately 135 acres of encroaching pinyon and juniper trees five inches in diameter and smaller and then lop and scatter the plant matter to aid in the decomposition process, to add mulch to the area, and to help buffer possible visual disturbances.

Mechanical treatment involves the use of vehicles such as wheeled tractors, tracked dozers, or specially designed vehicles with attached implements designed to cut, chop, or mulch existing vegetation such as a hydro-axe. Hydro-axing is effective for removing coarse, woody vegetation. This equipment can mulch or lop and scatter plant debris, eliminating the need for post-treatment removal. This method is appropriate where a high level of control and precision is needed. The hydro-axe would be used to remove approximately 25 acres of encroaching pinyon and juniper trees with a diameter at breast height (dbh) of 8 inches and smaller.

Following the removal of the encroaching trees, some areas may be sprayed in order to control cheatgrass. This treatment will occur in between the months of August and November for two consecutive growing seasons and will be performed using a truck mounted boom, a UTV sprayer, or with backpack sprayers. Depending on the composition of the perennial and herbaceous understory following the herbicide application, these treatments may be followed by reseeding with a native seed mix. Monitoring would occur over the following 5 years to evaluate treatment success.

The vegetation of mixed mountain shrublands varies substantially depending on elevation, slope, aspect, and soil. More mesic (moist) sites such as on north-facing slopes and along minor drainage ways are typically dominated by Gambel's oak and serviceberry, while more xeric (dry) sites such as south-facing slopes are typically dominated by mountain-mahogany, bitterbrush, snowberry, and sagebrush. Mechanical treatments can benefit oak woodlands by increasing oak sprouts for ungulate forage, reducing oak dominance to promote the development of forbs and grasses as forage and cover, and protecting oak stands from encroachment by pines to ensure future mast production. Lack of disturbance can limit the distribution, vigor, and growth of Gambel's oak.

The proposed action consists of thinning between 25% and 40% of dense oakbrush stands totaling approximately 240 acres in the Cedar Springs area (Figure 1). The project would involve opening up small pockets in oakbrush stands that contain trees that are less than 4 inches in diameter. To access the areas to be treated and to create a fire break, a swath of trees would be thinned and would be no wider than 30 feet. Areas that are steeper than 30% slope would not be treated. A variety of equipment options are available but the most common and likely to be used would be a large tractor capable of using either a hydro axe or horizontal cutting attachments, however, various equipment could be used as long as the treatment and impacts are the same as the hydro axe. The treatment would result in cutting and shredding of the oak brush and other shrubs into a mulch-like material. The machine cuts and scatters the cut oak brush (mulch) in front of the machine which helps to reduce soil disturbance by providing a matt of material to drive on as the machines travels forward. Monitoring would occur over the following 5 years to evaluate treatment success.

The project area also includes approximately 215 acres of transitional habitat that is a combination of dense oakbrush and encroaching pinyon and juniper trees with a sagebrush understory. A combination of oakbrush thinning and pinyon and juniper removal described above would be implemented in these areas.

Resource surveys, including those for cultural resources, were completed relative to the approval. Additionally, a new raptor nest survey was completed in XXXX. No new raptor nests were located at the time of the survey. Potential habitat exists in the higher elevation treatment areas for one BLM sensitive plant species, Harrington's penstemon (*Penstemon harringtonii*). Surveys for this species shall be conducted within suitable habitat prior to project implementation. Any occupied habitat shall be avoided by mechanized equipment, and woody debris shall be kept clear of Harrington's penstemon plants.

PLAN CONFORMANCE REVIEW: The proposed action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

Land Use Plan and Amendments

- Glenwood Springs Resource Management Plan, Approved in 1984 (Revised in 1988)
- Oil and Gas Plan Amendment to the Glenwood Springs RMP, Approved in 1991
- Oil & Gas Leasing & Development, Record of Decision and RMP Amendment, Approved in 1999

Determination

The proposed action is in conformance with the CRVFO land use plan, as amended, even though it is not specifically provided for, because it is consistent with the land use plan objectives, cited above, of improving existing wildlife habitat conditions (1984 RMP) and mitigating direct and indirect impacts of oil and gas exploration and development on wildlife habitat (1999 RMP Amendment). Habitat treatments such as those incorporated into the proposed action are for the specific purpose of mitigating unavoidable direct and indirect impacts on wildlife from oil and gas activities in big game winter range by and improving existing wildlife conditions. Therefore, the proposed action is in conformance with the current land use plan, as amended, even though it is not specifically provided for.

REVIEW OF EXISTING NEPA DOCUMENTS: Below is listed the existing NEPA document that covers the proposed action.

- DOI-BLM-CO-N040-2009-0078-EA. Integrated Weed Management Plan and Programmatic Environmental Assessment. BLM Glenwood Springs Field Office, Colorado. 2009.
- DOI-BLM-CO-N040-2012-0034-EA. Programmatic Environmental Assessment of the Proposed Wildlife Habitat Mitigation Plan for Oil and Gas Exploration and Development. BLM Colorado River Valley Field Office, Colorado. 2012.

REVIEW OF OTHER RELEVANT DOCUMENTS: The following additional documents are relevant to the proposed action:

- Final Environmental Impact Statement: Vegetation Treatment on BLM Lands in Thirteen Western States. Prepared for the BLM Washington Office by the BLM Wyoming State Office, Cheyenne. 1991.
- Final Programmatic Environmental Report (PER): Vegetation treatments on BLM lands in 17 Western States. Reno, Nevada.

- Land Health Assessment, Battlement Mesa Area, April-May 2000. BLM Glenwood Springs Field Office, Colorado. January 8, 2001.
- Fire Management Plan for Wildland Fire Management and Prescriptive Vegetation Treatment. BLM Glenwood Springs Field Office, Colorado. 2002.

EVALUATION OF NEPA ADEQUACY CRITERIA:

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Documentation of answer and explanation: Yes. The current proposed action was analyzed in the *Programmatic Environmental Assessment Wildlife Habitat Mitigation Plan for Oil and Gas Exploration and Development*. BLM Colorado River Valley Field Office, Colorado. DOI-BLM-CO-N040-2012-0034-EA, signed 2012.

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

Documentation of answer and explanation: Yes. The existing NEPA document analyzed the proposed action and one alternative. No unresolved conflicts concerning alternative uses of available resources were identified through public scoping; therefore, other alternatives were not analyzed. The same applies to the current proposed action given current concerns, interests, and resource values.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Documentation of answer and explanation: Yes to both. In 2000, a formal land health assessment determined that the allotment was meeting all applicable land health standards. New information does not substantially change the analysis of the new proposed action. In 2012, it was determined that implementation of the Programmatic Environmental Assessment Wildlife Habitat Mitigation Plan for Oil and Gas Exploration and Development would result in orderly, effective, and environmentally sound identification and treatment of areas in need of restoration on BLM-administered lands within the CRVFO area. Since then, wildlife improvement projects that would improve overall habitat and prevent further degradation continue to be a priority.

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

Documentation of answer and explanation: Yes. The current proposed action is the same as what was analyzed in the existing NEPA document. The direct, indirect and cumulative impacts would be the same as those identified in the existing NEPA document. The environmental assessment thoroughly reviewed the many specific environmental impacts including vegetation, water resources, air quality, wildlife, cultural, threatened and endangered species, wilderness, and riparian resources.

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

Documentation of answer and explanation: Yes. For the existing NEPA document, the CRVFO made the proposed action available for public review and comment for 30 days by posting on the BLM website, posting announcements in two local newspapers (the Glenwood Springs *Post Independent* and the Rifle *Citizen Telegram*), and notifying selected interested parties by a letter sent via regular mail.

INTERDISCIPLINARY REVIEW: The following individuals participated in the review of the proposed action and provided input to this DNA.

<i>Name</i>	<i>Title</i>	<i>Responsibility</i>
Sylvia Ringer	Wildlife Biologist	Project Lead, Migratory Birds, Aquatic Wildlife, Terrestrial Wildlife, Special Status Fish and Wildlife
Allen Crockett, Ph.D., J.D.	Supervisory NRS/Phys. Sci.	Technical Review, NEPA Review
Judy Perkins, Ph.D.	Ecologist	Areas of Critical Environmental Concern, Vegetation, Special Status Plants
Isaac Pittman	Rangeland Management Specialist	Grazing Management
John Brogan	Archaeologist	Cultural Resources, Native American Concerns
Kimberly Miller	Outdoor Recreation Planner	Wild and Scenic Rivers, Wilderness, Recreation
Rusty Stark	Fuels Specialist	Burn Plan, Prescribed Burning
Shauna Kocman, Ph.D., P.E.	Hydrologist	Air Quality, Water Quality, Soils

REMARKS: The vegetation treatments described in this DNA would be funded using contributions from Encana Oil and Gas (USA) Inc. specifically intended to support wildlife mitigation in conjunction with the Encana South Parachute Geographic Area Plan (SGGAP) (CO140-2006-050-EA).

MITIGATION: Mitigation measures approved in the existing NEPA document would be incorporated and implemented into the proposed action.

NAME OF PREPARER: Sylvia Ringer, Wildlife Biologist

DATE: 06/04/2013