

Posted 3-20-13

U.S. Department of the Interior  
Bureau of Land Management  
Kremmling Field Office  
P O Box 68  
Kremmling, CO 80459

## DETERMINATION OF NEPA ADEQUACY (DNA)

NUMBER: DOI-BLM-LLCON02000-2013-002-DNA

CASEFILE/PROJECT NUMBER:

PROJECT NAME: Independence Mountain Aerial Ignitions

LEGAL DESCRIPTION: T. 12 N., R. 81 W., Sections 19-23 and 26-35;  
T. 11 N., R. 81 W., Sections 2-15, 18, 19, 23-25, and 30;  
T. 11 N., R. 80 W., Sections 11, 13-24, 26-35;  
T. 10 N., R. 80 W., Sections 3-6, 6th P.M.

APPLICANT: BLM

ISSUES AND CONCERNS: None

DESCRIPTION OF PROPOSED ACTION:

To use aerial ignitions, Helitorch or Physical Sphere Device (PSD), to ignite prescribed fires in the areas proposed for prescribed fire in the DOI-BLM-CO-120-2009-0004-EA Independence Mtn. Fuels/Forestry Project. The Prescribed Fire areas are; Trapper Gulch RX, Big Creek RX, Fischer Draw RX, East Independence RX, and Watson Mtn RX.

Design Features:

The Interagency Aerial Ignition Guide PMS 501 March 2012 will set the guidelines for all aerial ignitions and procedures.

Decision to be Made: The decision to be made is whether to use aerial ignition for prescribed fires in the Independence Mountain area.

PLAN CONFORMANCE REVIEW:

Name of Plan: Kremmling Resource Management Plan

Date Approved: 12/19/1984

Decision Number/Page: Decision 6, Page 9, sections b. and c.

DOI-BLM-LLCON02000-2013-002-DNA

Decision Language:

c. Special Implementation Needs: "Fire management support is needed for management of natural and prescribed fire."

REVIEW OF EXISTING NEPA DOCUMENTS:

List by name and date all existing NEPA documents that cover the Proposed Action.

Name of Document: DOI-BLM-CO-120-2009-0004-EA Independence Mtn. Fuels/Forestry Project

Date Approved: 8/25/2010

NEPA ADEQUACY CRITERIA:

1. Is the new Proposed Action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document? 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? If there are differences, can you explain why they are not substantial?

*The proposed action is similar to the proposed action of the previous E.A., fire effects would be similar in both proposed actions. The Independence Mtn. E.A. used ground ignitions. Ground ignitions were done at the time when the dead trees hadn't started to fall and were structurally sound, making it safe for ground personnel. At the current time 30% to 50% of the trees have fallen and the remaining dead trees are not structurally sound and could fall at any time, creating unsafe conditions for ground personnel, the purpose action will create a safer environment for ignitions by ground personnel. The project is within the same analysis area and geographic and resource conditions are the exact same.*

2. Is the range of alternatives analyzed in the existing NEPA document appropriate with respect to the new Proposed Action, given current environmental concerns, interests, and resource values?

*Two alternatives (Proposed Action and No Action Alternative) were analyzed in DOI-BLM-CO-120-2009-0004-EA Independence Mtn. Fuels/Forestry Project. No reasons were identified to analyze additional alternatives and these alternatives are considered to be adequate and valid for the Proposed Action.*

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?

*There is no new information and limited new circumstances since the previous environmental assessment. The limited new circumstances are the fact that the dead trees have become not structurally sound, but this does not change the analysis from the Independence Mountain Fuels/Forestry Project making it still valid.*

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?

*The direct, indirect and cumulative effects that would result from the implementation of the new Proposed Action are substantially similar (both quantitatively and qualitatively) to those analyzed in the Independence Mountain Fuels/Forestry EA.*

1. *Reviewed the project in relation to use of helicopter operations*
2. *There were no additional impacts to wildlife, hydrology, or cultural resources*

5. Is the public involvement and interagency review associated with existing NEPA documents adequate for the current Proposed Action?

*Opportunities for public involvement and interagency review were adequately provided for in the DOI-BLM-CO-120-2009-0004-EA Independence Mtn. Fuels/Forestry Project Environmental Assessment. All agency and adjacent private landowners in the area were notified by a scoping letter during those project timeframes. DOI-BLM-CO-120-2009-0004-EA Independence Mtn. Fuels/Forestry Project Environmental Assessment was posted on the Kremmling Field Office Internet NEPA register and public room NEPA board for public review and comment. Two comments were received from the previous scoping letters and both were positive comments for the projects.*

INTERDISCIPLINARY REVIEW:

The Proposed Action was presented to, and reviewed by, the Kremmling Field Office interdisciplinary team on 02/26/2012. A complete list of resource specialists who participated in this review is available upon request from the Kremmling Field Office. The table below lists resource specialists who provided additional remarks concerning cultural resources and special status species.

Name	Title	Resource	Date
Bill Wyatt	Archaeologist	Cultural Resources, Native American Religious Concerns	2/26/2013
Megan McGuire	Wildlife Biologist	Special Status Plant & Wildlife Species	2/26/2013

REMARKS:

*Cultural Resources:* See DOI-BLM-CO-120-2009-0004-EA.

*Native American Religious Concerns:* Consultation identified in DOI-BLM-CO-120-2009-0004-EA pertains to this Proposed Action.

*Threatened and Endangered Plant and Wildlife Species:* The analysis in DOI-BLM-CO-120-2009-0004-EA pertains to this Proposed Action. No additional impacts or concerns are anticipated.

MITIGATION: None

COMPLIANCE PLAN: On-going compliance inspections and monitoring would be conducted by the BLM Kremmling Field Office staff during and after construction.

NAME OF PREPARER: Kevin Thompson

NAME OF ENVIRONMENTAL COORDINATOR: Susan Cassel

CONCLUSION

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 the NEPA.

SIGNATURE OF AUTHORIZED OFFICIAL:

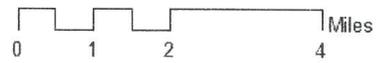
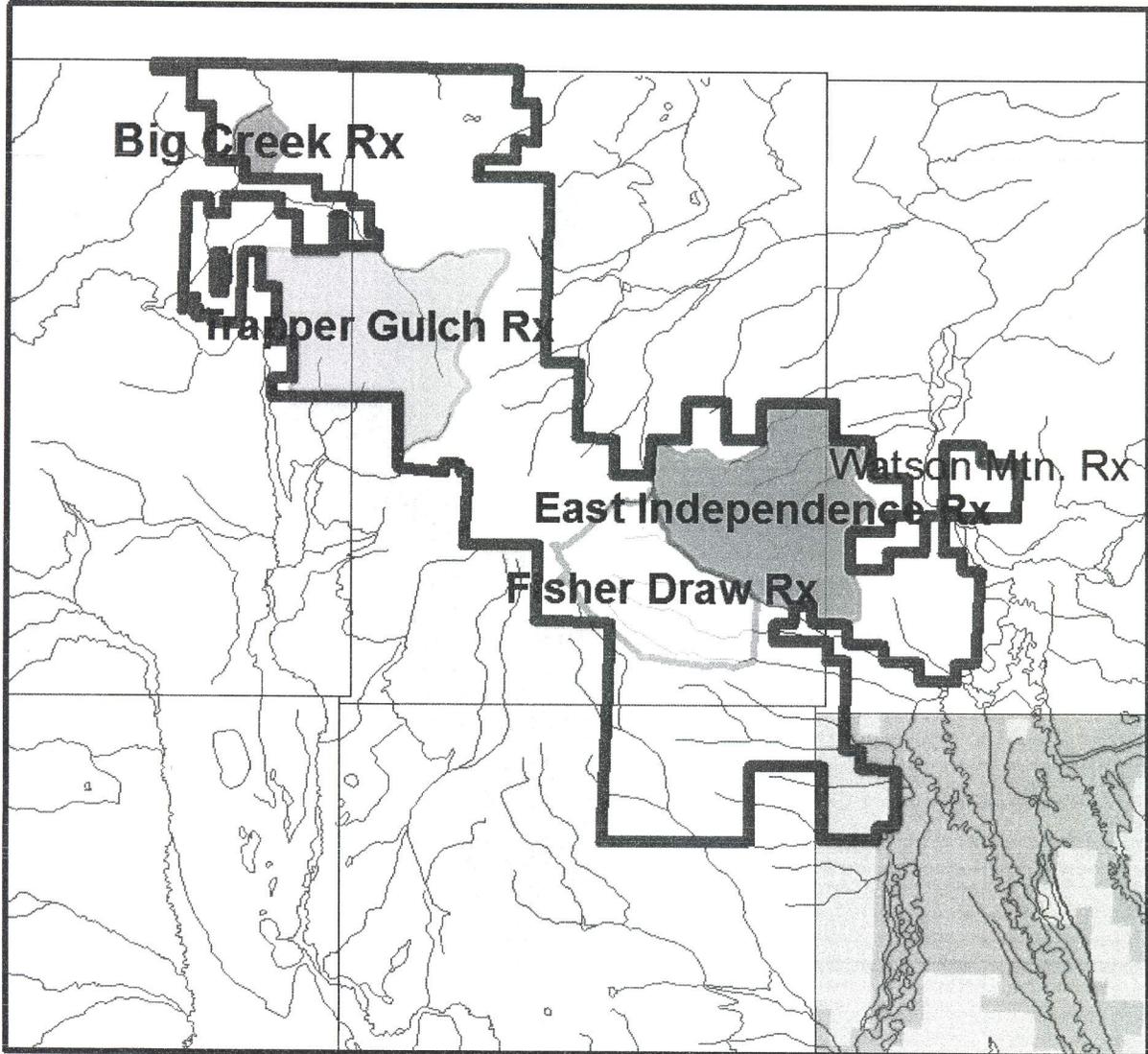
  
Field Manager

DATE SIGNED: 3/20/13

ATTACHMENTS: Map of Prescribed burn areas

Note: The signed Conclusion in this DNA Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

# Independence Mtn. EA Map



- |                          |                    |
|--------------------------|--------------------|
| <b>Legend</b>            | <b>Land Status</b> |
| Independence EA Boundary | Bureau of Land Mgt |
| Watson Mtn Rx Burn Area  | US Forest Service  |
| Trapper Gulch Rx         | Private            |
| East Independence Rx     | State              |
| Big Creek Rx             | State Forest       |
| Fisher Draw MMA          |                    |