

**U.S. Department of the Interior
Bureau of Land Management
Little Snake Field Office
455 Emerson Street
Craig, CO 81625**

DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: DOI-BLM-CO-N010-2013-0070

PROJECT NAME: Little Snake River CR10 Salt Cedar and Russian Olive removal project

LEGAL DESCRIPTION: T7N R98W Parts of Sec. 9, 16, 17, 20, 29, 32
(Also see map Attachment #1)

APPLICANT: Little Snake Field Office BLM

A. Describe the Proposed Action

The project is to improve the riparian area along the Little Snake River that is currently infested by salt cedar and Russian olive, both of which are state listed noxious woody invasive species. Depending on infestation levels, these trees would be removed by hand or using track-based heavy equipment along approximately 5.5 river miles on both sides of the Little Snake River immediately above and below the CR 10 bridge. Hand removal methods would be used in lightly infested or difficult to access areas and would include the use of a chain or hand saw and would cause negligible surface disturbance. In heavily infested and easily accessible sites, a lightweight mini-excavator would selectively pull individual trees from the base. A “thumb” attached to the bucket would then remove most of or the entire root ball. Holes up to 18” deep and other surface disturbance (track and drag marks) would occur during this process, but would be re-contoured following the removal of the tree/ root ball. Tree excavation would occur in the spring or fall when soil moisture is most advantageous for removing as much of the intact root ball as possible (not too wet and not too dry). An ATV with a harrow would be used to turn dropped branches and prevent resprout in the treatment area.

Infestations are very dense above the CR10 bridge, especially within the State Land Board parcel. These infestations extend away from the wide and braided river channel. Infestations are much lighter and more scattered below the bridge. Access would be granted in areas clear of archaeological sites for the excavator and along the river corridor. There are only minimal understory herbaceous weed infestations within the project area. Additionally, throughout the infestation areas there are many desirable woody species present within the vegetation

community; therefore, the need for active restoration would be minimal and may only include some light seeding and/or herbicide application within the State Land Board parcel.

The biomass of the removed invasive trees would be piled in locations as the area is cleared. Piles would be designed to be burned at a point in the future (3-4 years post treatment) as policy and land ownership allows. A separate burn plan and required protocol would be completed prior to the piles being burned.

Stump removal has proven to be a successful mechanical treatment for these woody invasive species. Control rates are typically over 85% with minimal need for treatment of resprouts. If re-treatment is needed herbicides would be used following appropriate BLM protocol.

Yampa beardtongue (*Penstemon acaulis* var. *yampaensis*), a rare plant species, is known to be in the project area. In order to mitigate any adverse impacts to the existing population, the area was flagged for avoidance. The area will be surveyed for plant presence next spring while the plant is flowering (late May to early July) to determine if seed collection from a nearby population is necessary to reseed the project area. Treatment by heavy equipment and burning would be avoided near the known rare plant populations.

The project would comply with requirements listed in Attachment #2 as applicable.

B. Land Use Plan (LUP) Conformance

LUP Name: Little Snake Record of Decision and Resource Management Plan (RMP)

Date Approved: October, 2011

Final RMP/EIS, August, 2010

Draft RMP/EIS, January, 2007

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

The proposed action is consistent with the Little Snake Record of Decision and Resource Management Plan, Vegetation goals to reduce the occurrence of noxious weeds and undesirable plant species by ensuring that all land use actions that could potentially increase the occurrence of noxious weeds are conducted using BMPs and applying principles of integrated pest management. Additionally, weed management will be integrated across landscape and ownership boundaries by pursuing whenever possible, the use of cooperative agreements to coordinate weed management actions and identify ways of partnering with resource users and other stakeholders to reduce the occurrence of noxious weeds.

Section/Page: 2.4 Vegetation/RMP-16

Other Documents:

Colorado Public Land Health Standards and Guidelines for Livestock Grazing
Date Approved: February 12, 1997

The Federal Land Policy and Management Act of 1976, as Amended (43 USC 1752)

Rangeland Reform Final Environmental Impact Statement, December 1994.

The proposed action also conforms with county use plans.

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

Vegetation Treatments on BLM Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS) (June, 2007).

DOI-BLM-CO-N010-2009-0025-EA, Little Snake Field Office Integrated Pest Management Plan resulted in a Finding of No Significant Impact. This Environmental Assessment considered the options of Integrated Pest Management as outlined in the FEIS and adopted the standard operation procedures for vegetation treatment program implementation in the LSFO.

D. 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?

Yes. There are no changes from the proposed action analyzed in DOI-BLM-CO-N010-2009-0025-EA, congruent with pesticide use proposal stipulations (see Attachment #1). The Pesticide Use Proposals that are reviewed and approved based on the existing NEPA documents complete the site-specific analysis for these herbicide applications.

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?

Yes. The density of some invasive noxious and undesirable plant species has been reduced in some areas, and although, noxious and undesirable weeds have been identified in new locations, there have been no changes in environmental concerns, interests or resource values since DOI-BLM-CO-N010-2009-0025-EA.

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

Yes. The Proposed Action would have no disproportionate impacts on minority populations or low income communities per Executive Order (EO) 12898 and would not adversely impact migratory birds per EO 13186.

Subject to WO-IM 2011-154 and in accordance with BLM policy, the proposed projects are in areas that did not meet the minimum size requirements for inventory finding of the presence of lands with wilderness characteristics. Size requirements are based on whether parcels are within roadless areas greater than 5,000 acres or are directly adjacent to designated wilderness or WSAs.

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

Yes. The methodology and analytical approach used in the existing NEPA documents continue to be appropriate for the current proposed action. Impacts to all resources were analyzed.

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. Direct and indirect impacts of the current proposed action are unchanged from those identified in the existing NEPA documents. The Pesticide Use Proposals that are reviewed and approved based on the existing NEPA documents complete the site-specific analysis for these herbicide applications.

6. Can you conclude without additional analysis or information that 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. The cumulative impacts that would result from implementation of the proposed action would remain unchanged from those identified in the existing NEPA documents.

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

Yes. Public outreach through scoping and involvement of the public and other agencies occurred in the development of the RMP/EIS and DOI-BLM-CO-N010-2009-0025-EA.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

Title	Resource	Date
Ecologist	Air Quality, Floodplains Prime/Unique Farmlands, Water Quality – Surface, Wetlands/Riparian Zones	ES 07/25/13
Archaeologist	Cultural Resources, Native American Concerns	KR0 09/06/13
Realty Specialist	Environmental Justice	LM 07/29/13
Environmental Coord. NEPA	Hazardous Materials	CR 08/12/13
Rangeland Management Spec.	Invasive Non-native Species	CR 08/12/13
Rangeland Management Spec.	Sensitive Plants, T&E Plant	ARH 09/03/13
Wildlife Biologist	T&E Animal	DA 07/25/13
Mining Engineer	Water Quality – Ground	JAM 09/09/13
Recreation Specialist	WSAs, W&S Rivers, LWCs, ACECs	GMR 08/12/13
Wildlife Biologist	Animal Communities	DA 07/25/13
Wildlife Biologist	Special Status, T&E Animal	DA 07/25/13
Rangeland Management Spec	Plant Communities	CR 08/12/13
Rangeland Management Spec	Special Status, T&E Plant	ARH 09/03/13
Ecologist	Riparian Systems	ES 07/25/13
Ecologist	Water Quality	ES 07/25/13
Ecologist	Upland Soils	ES 07/25/13

Land Health Assessment

This action has been reviewed for conformance with the BLM’s Public Land Health Standards adopted February 12, 1997. This action meets Public Land Health Standards. Land health assessments have been conducted in landscapes and watersheds within the Field Office Planning Area. Invasive plants, especially annuals weeds have been found to be a problem on many sites and once established are a threat to the herbaceous component of the ecosystems.

Cultural Resources

The implementation of chemical applications, mechanical treatments, drill seeding, certain hand treatments and similar projects are considered undertakings subject to compliance with Section 106 of the National Historic Preservation Act (NHPA). The BLM has the legal responsibility to consider the effects of its actions on cultural resources. BLM Manual 8100 Series; the Colorado State Protocol; and BLM Colorado Handbook of Guidelines and Procedures for Identification, Evaluation, and Mitigation of Cultural Resources provide guidance on Section 106 compliance requirements to meet appropriate cultural resource standards. In Colorado, the BLM's NHPA obligations are carried out under a Programmatic Agreement (PA) among the BLM, the Advisory Council on Historic Preservation, and the State Historic Preservation Officer (SHPO).

Should an undertaking be determined to have “no effect” or “no adverse effect” by the BLM-LSFO archaeologist, the undertaking may proceed under the terms and conditions of the PA. If the undertaking is determined to have “adverse effects,” project-specific consultation is then initiated with the SHPO.

Cultural resources assessment of the area of potential effect (APE) was conducted by BLM-LSFO archaeologists. The APE is defined as the treatment area—the active channel and embankment of the Little Snake River—and project area access points between existing roads and the riverbed. Class 1 (archival) data reviewed were obtained from BLM-LSFO cultural program files, site reports, and atlases, in addition to BLM-maintained General Land Office (GLO) plats and patent records. Electronic files also were reviewed through online cultural resource databases including *Compass* (maintained by the Colorado Office of Archaeology and Historic Preservation) and the National Register Information System (NRIS; maintained by the National Park Service).

Online satellite/aerial imagery was inspected to determine the potential for extant historic-age structures and/or buildings, and also assist in defining survey “exclusion areas” where vegetation and/or topography would significantly limit or prohibit field inventory. Approximately 2/3rds of the overall APE was determined as unsurveyable including the entirety of the treatment area across a State Land Board parcel (north of CR 10) due to heavy vegetation and the lack of visibility/access. Likewise, most of the river’s eastern flank south of CR 10 and both sides of an approximately 1-mile-long steep-walled canyon were excluded from field inspection. Thus, Class 3 (intensive pedestrian) inventory was limited to defining vehicle/equipment access points between existing roads and the riverbed.

Background data identified three previously documented archaeological sites within or immediately adjacent to the APE, however, none of the known sites are within the proposed treatment area and would not be subject to potential impacts. Furthermore, no cultural resources were identified within the defined access routes as a result of field inspection. Should alternative access/uses become necessary, BLM-LSFO archaeologists will inspect and/or advise on project modifications accordingly.

Although additional cultural resources may exist within the overall APE (i.e., the river corridor), the proposed treatment poses limited potential to affect historic properties and defined access routes were found to contain no evidence of cultural resources. As such, the proposed action may proceed with a project affect determination of *no historic properties affected*. No additional assessments or consultations are currently required. The standard cultural resources discovery stipulations apply (see Attachment #2).

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 NEPA.

Signature of Lead Specialist _____

Date _____

Signature of NEPA Coordinator _____

Date _____

Signature of the Authorizing Official /s/ Wendy Reynolds _____

Date 09/17/13

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

Little Snake River CR 10 Russian Olive and Tamarisk Treatment Proposal

Inventory

- olive, Russian
- saltcedar
- Digitized infestation area
- Project area - river line

Surface Management Status

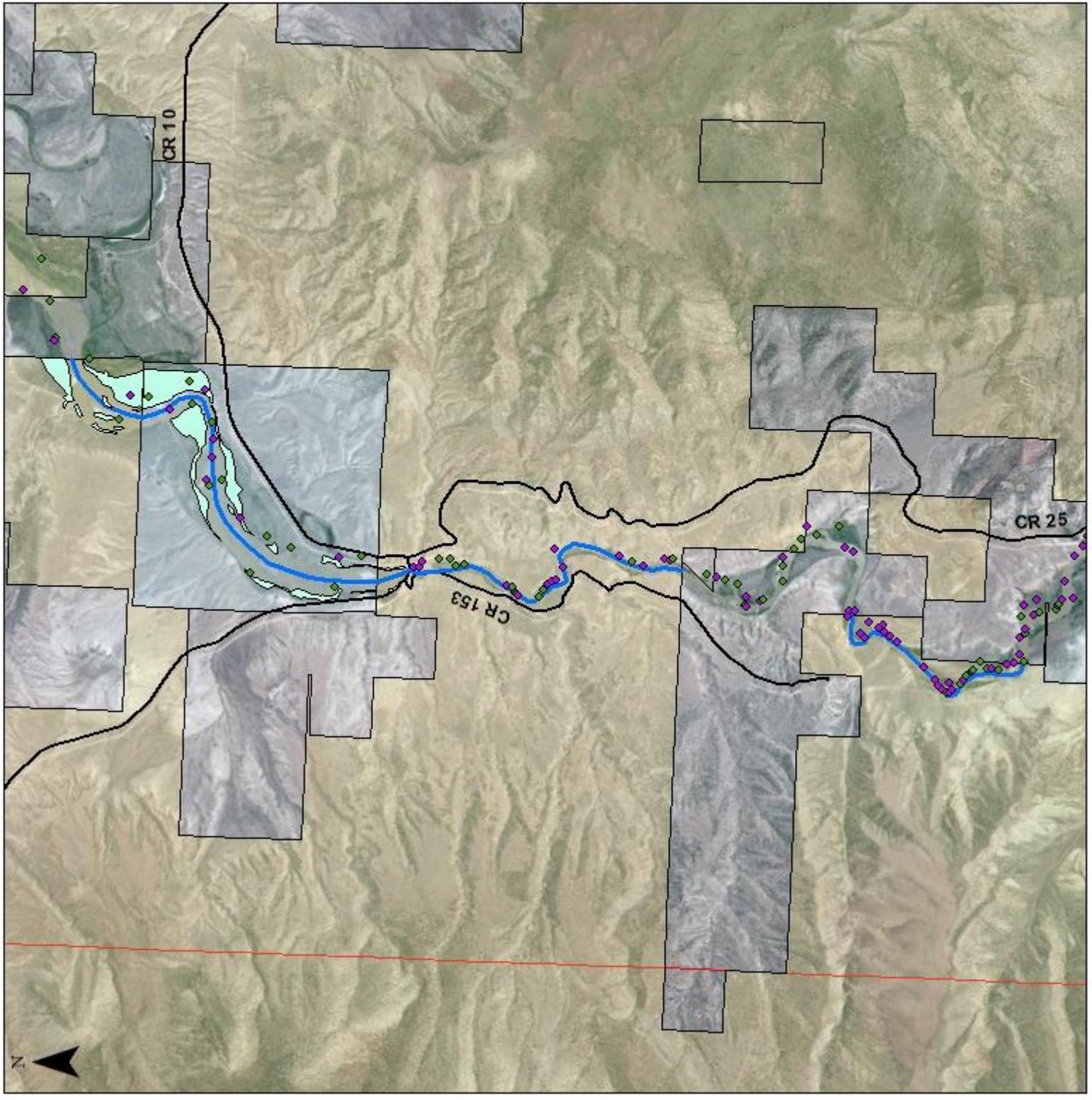
- Private
- State Land Board
- US BLM
- US NPS

Digitized Infestation N of CR 10

BLM	11 acres
State Land Board	61 acres
Total	72 acres

River Miles in Project Area

BLM	2.9 mi
State Land Board	1.5 mi
Total	4.4 mi



Lone Mountain
Twelvemile Mesa



1:35,000



Map produced by LSFO BLM.
No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregation use with other data. All boundaries are an approximate representation.

Attachment #2

DOI-BLM-CO-N010-2013-0070 DNA

BLM LSFO PUP Stipulations

General Stipulations:

- All herbicide treatments on BLM administered lands will comply with applicable federal and state statutory and regulatory requirements.
 - Manufacturers label directions and guidelines, including but not limited to, application rates, uses, handling instructions, storage and disposal requirements, will be followed
 - All BLM procedures (BLM Handbook H-9011-1 Chemical Pest Control) and Manuals 1112 Safety, 9011 Chemical Pest Control, and 9015 Integrated Weed Management, and any other BLM requirements will be followed. Where more restrictive, BLMs requirements for rates, uses, and handling instructions will apply.
 - Only certified applicators, or those directly supervised by a certified applicator, may apply herbicide on BLM administered public lands.
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To ensure that risks to human health and the environment from herbicide treatments are kept to a minimum, and that all practicable means to avoid or minimize environmental harm have been adopted, the following will apply:

- All herbicide treatments will be consistent with the Standard Operating Procedures (SOPs) presented in the ROD of the 2007 Final *Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS)*.
 - Measures to mitigate potential adverse environmental effects as a result of herbicide treatments as found in the ROD of the PEIS.
 - All conservation measures, designed to protect plants and animals listed or proposed for listing as threatened or endangered under the Endangered Species Act, as found in the Biological Assessment of the PEIS.
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Cultural Resources Discovery

The applicator is responsible for informing all persons who are associated with the operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites or for collecting artifacts. If historic or archaeological materials are encountered or uncovered during any project activities, the operator is to immediately stop activities in the immediate vicinity of the find and immediately contact the authorized officer (AO) at (970) 826-5000.

Within five working days, the AO will inform the operator as to:

- Whether the materials appear eligible for the National Register of Historic Places;
- The mitigation measures the operator will likely have to undertake before the identified area can be used for project activities again; and
- Pursuant to 43 CFR 10.4(g) (Federal Register Notice, Monday, December 4, 1995, Vol. 60, No. 232) the holder of this authorization must notify the AO, by telephone at (970) 826-5000, and with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

SOURCE:

DOI-BLM-CO-N010-2009-0025-EA