Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior

Bureau of Land Management
Royal Gorge Field Office
3028 E. Main
Cañon City, CO 81212

OFFICE: Royal Gorge Field Office

PROJECT NUMBER: DOI-BLM-CO-200-2013-0021 DN

CASEFILE: (if applicable)

PROPOSED ACTION TITLE/TYPE: Trail Gulch Habitat Enhancement and Fuels Reduction Project

LOCATION/LEGAL DESCRIPTION: Sixth Principle Meridian, T. 16 S., R. 70 W., Sec. 7, 8, 16, 17 and 18. T. 16 S., R. 71 W., Sec. 12, 13 and 14.

APPLICANT (if any):

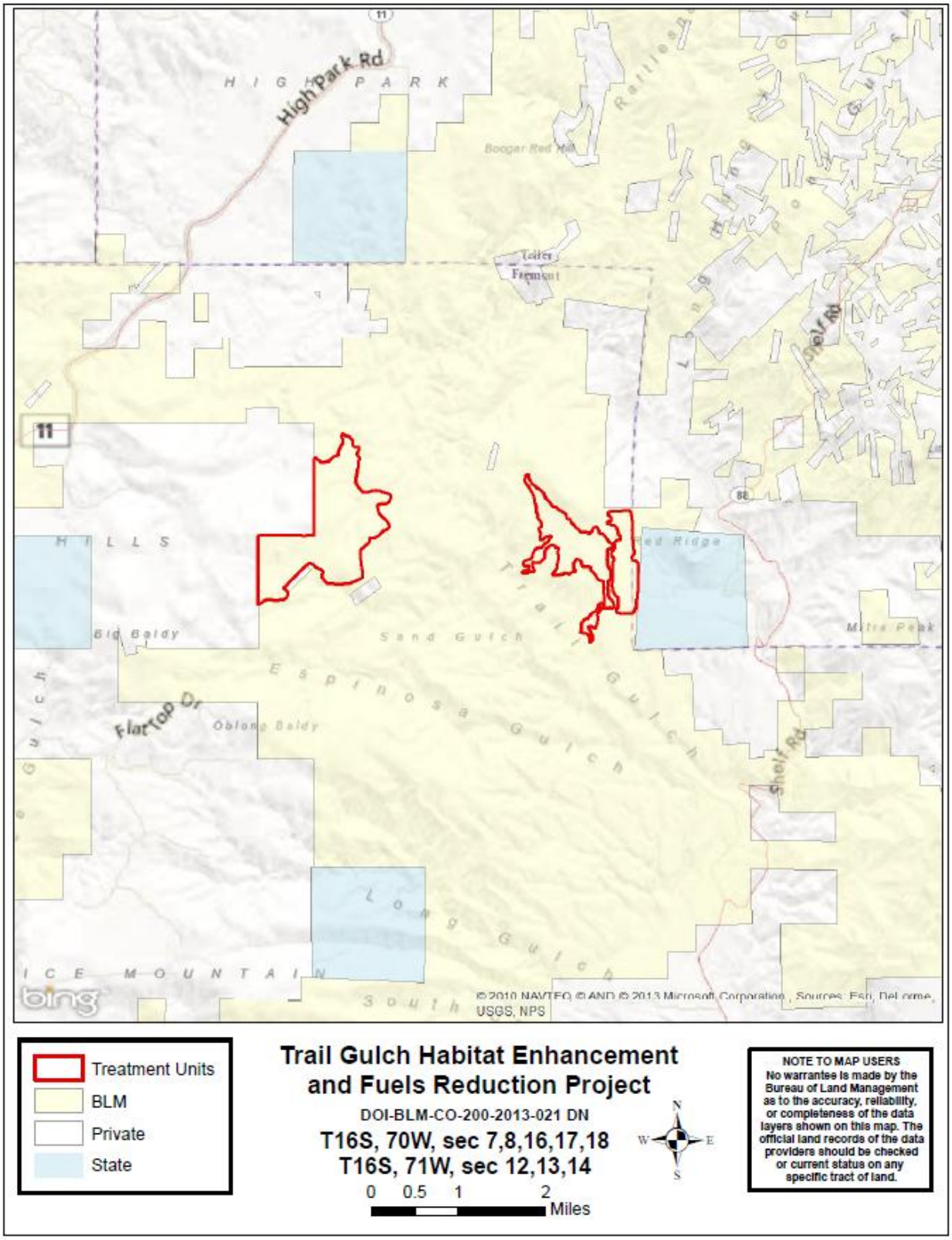
A. Description of the Proposed Action and any applicable mitigation measures

Historically throughout the west, wildfires occurred naturally along with Native Americans using fire for hunting and agriculture. These wildfires played an important ecological role in maintaining the function and pattern of the vegetation on the landscape. Wildland fires reduced natural fuel accumulations, maintained forest health, recycled nutrients, maintained openings and parks, and maintained wildlife habitats. During the settlement of the area, most of the larger trees were removed for infrastructure and energy. Over time fire suppression, timber harvests, and cattle grazing have interrupted the natural frequency and intensity of fires. This has caused the forests to become overstocked, mainly with smaller trees that are generally less fire resistant and provide a ladder for fire to move into the canopy. Most of these dense forests are very susceptible to catastrophic canopy fires. A canopy or crown fire is the most destructive and difficult to control.

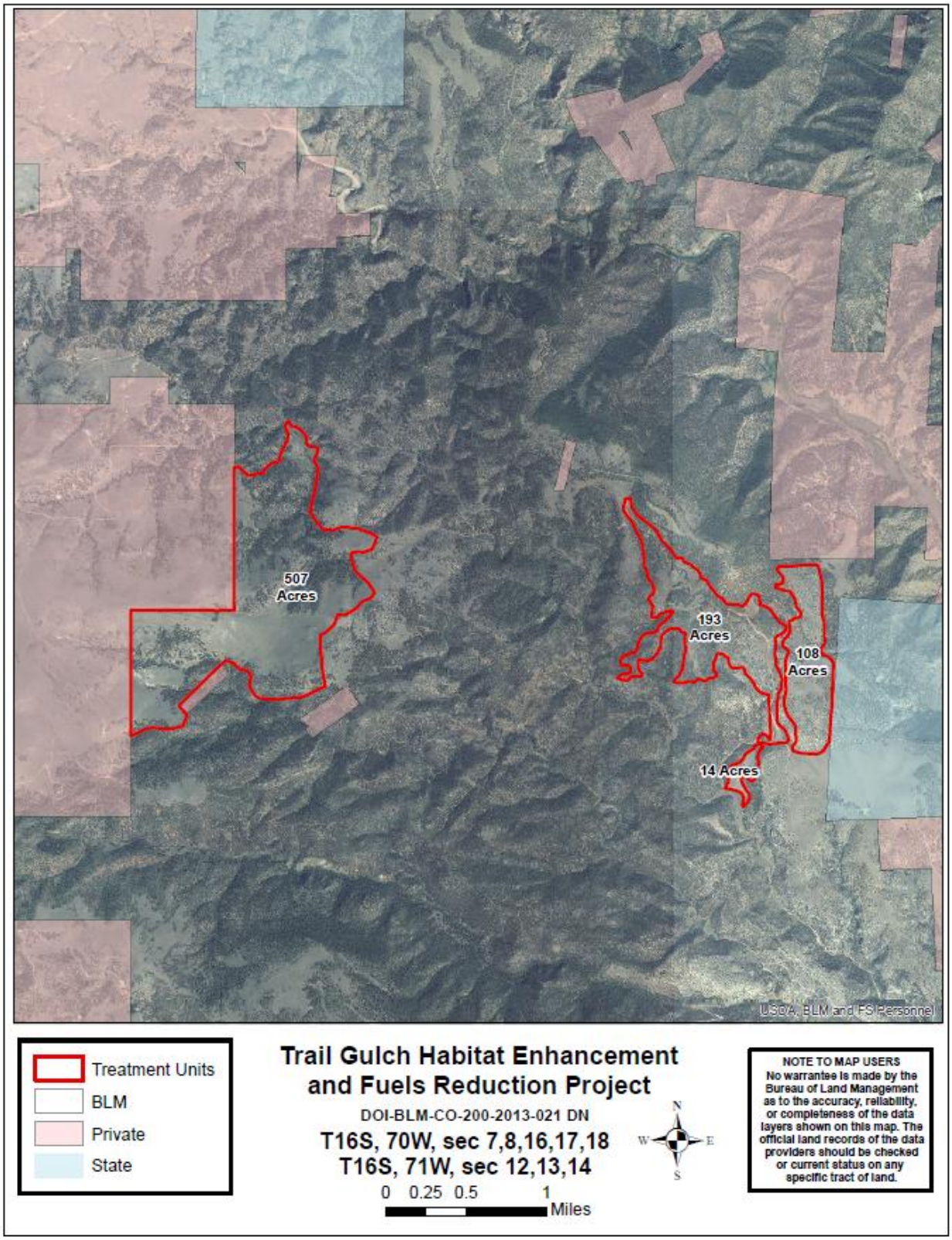
The 2013 Trail Gulch fuels reduction project is part of an on-going project with several phases that started in 2008. Approximately 550 acres have been treated with hyrdoaxe equipment, 133 acres have been hand thinned and piled, and approximately 45 acres by prescribed fire (pile burning). Several BLM programs (fuels, range, and wildlife) are working in conjunction with Colorado Parks and Wildlife, Habitat Partnership Program, and other groups that have contributed funding in the form of grants to the project. This project will improve habitat and forage conditions for livestock and wildlife, forest health, and it would reduce hazardous fuels to lessen the risk of catastrophic wildfire in the area. The ultimate goal of this mechanical treatment is to create a fuel arrangement and amount to be able to return fire back into the ecosystem with the use of prescribed fire in the future. The Goldbelt Fuels Planning EA was completed in 2007 and included the Trail Gulch Thinning treatment area (See Map 1: Trail

Gulch Thinning Overview Map, and Map 2: Trail Gulch Project Map). This project is approximately 822 acres and will consist of areas that will be thinned over the next several years. This project is designed to thin understory and mid-story trees from dense stands of piñon pine, juniper and ponderosa pine on BLM lands. In an effort to return the area to a more Ponderosa pine-dominated stand, a majority of the piñon pine and juniper trees would be removed from the understory in areas where Ponderosa Pine is the dominant species. Approximate spacing in ponderosa pine stands treatment units would be thinned in a manner that would maintain a diverse age and size class stand. Total live stems per acre will be reduced by at least 40-50%. The areas that are dominated by piñon pine and juniper will be thinned in a manner to create a mosaic of openings and clumps of live trees. Some of these areas were chained in the past. These old chaining areas have since grown back, mostly with juniper. This treatment will maintain the old chaining areas to re-create the openings. Older, larger trees would be retained while smaller trees and trees infected with mistletoe or showing signs of other insect and disease infestation would be the main target of removal. The fuel treatments proposed in this project are designed specifically to attempt to reduce fuel quantity, depth and continuity (vertical and horizontal). Treated areas will result in larger trees and stands that are more fire resistant. These treatments will also increase survival and vigor of the older, larger trees, raise crown base heights, and improve forage for cattle and wildlife. The proposed treatment methods include hand crews and chippers; rubber tired hydro-mulching type machines, prescribed fire operations or a combination of these methods. Whenever possible, biomass (in the form of firewood, fencing materials, etc.) will be made available to the public or private contractors. This may require skidding/dragging and decking material in a central location to minimize off road travel by the public. Slash piles may be created in areas where hand-thinning occurs. These piles will be burned at a later date. Slash resulting from hydro-mulching activities will be well distributed in the units.

Map 1: Trail Gulch Overview Map



Map 2: Trail Gulch Project Map



B. Land Use Plan (LUP) Conformance

LUP Name: Royal Gorge Resource Management Plan	Date Approved: 05/13/1996
Other Document	Date Approved
Other Document	Date Approved

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

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

Goldbelt Fuels Planning EA CO-200-2006-0089EA
2009 Trail Gulch Fuels Reduction DNA CO-200-2009-0066
Trail Gulch Prescribed Fire DNA CO-200-2012-0006

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

Public Land Health Assessment 2001 (Four Mile Creek Watershed) & 2012

D. 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?

Yes. The EA covered the impacts of fuel reduction using the above methods and locations. A site specific onsite review was completed for the proposal and the proposal is within the parameters of those analyzed in the approved EA.

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?

Yes. The range of alternatives analyzed in the Gold Belt Fuels Reduction EA are appropriate with respect to the new proposed action. This EA included the proposed action, the no action alternative, and there were some additional alternatives that were considered but not carried forward.

The proposed action contained treatment objectives to reduce fuels to protect communities from wildfire. Another objective is to create/maintain a mosaic of successional stages of vegetation to improve wildlife habitat and forage conditions throughout the landscape. These treatments would be accomplished with mechanical methods and hand tools including, but not limited to, chain saws, skidders, brush hogs, hydro-axes, feller-bunchers, tree spades, and dozers. Prescribed fire, including pile and broadcast burning, would also be used to reduce natural fuel loadings and activity slashes. When vegetative conditions warrant, reseeding of treated areas with a native seed mix would be implemented to enhance the establishment of native vegetation. Along with the treatments themselves, temporary road construction, existing road maintenance or reconstruction, temporary fire line construction, slash treatments and stewardship projects would be utilized to accomplish the objectives. No new permanent roads would be created and no more than 2,500 acres would be treated throughout the planning area per year. Temporary roads and firelines would be closed upon completion of the fuels treatment activity.

Under the no action alternative no fuels reduction projects would be conducted. Vegetation and fuels growth would remain as they are today and continue to accumulate.

Some other alternatives were considered; however, they were not carried forward. Individual Categorical Exclusions and Environmental Assessments using HFI/HFRA initiatives were considered but not carried forward so that a more landscape level analysis could be conducted. Prescribed burning as the only method of treatment was considered but not carried forward due to the accumulation of fuels in areas, as well as, the difficulty in achieving desired results. Mechanical as the only type of treatment was considered, but not carried forward because prescribed fire greatly increases the effectiveness of treatments and is a cost effective way to maintain treatments in the long term. It was determined that the best way to accomplish the objectives was a variety of treatment options as described in 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, 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?

Yes. The information remains valid and germane to the Proposed Action. There is no new information related to this fuels reduction project.

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?

Yes. The proposal is within the parameters of the impacts identified in the EA, and the cumulative impacts analysis remains unchanged.

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

Yes. The public involvement and review remains adequate for this action and will continue. Prescribed fire managers have been and will continue working with local subdivisions, Teller and Fremont Counties, fire officials, and local fire departments prior to and during the implementation of prescribed fire activities.

E. Persons/Agencies /BLM Staff Consulted

INTERDISCIPLINARY TEAM REVIEW			
NAME	**TITLE**	**AREA OF RESPONSIBILITY**	**Initials/date**
Matt Rustand	Wildlife Biologist	Terrestrial Wildlife, T&E, Migratory Birds	MR, 1/30/2013
Jeff Williams	Range Management Spec.	Range, Vegetation, Farmland	
Chris Cloninger	Range Management Spec.	Range, Vegetation, Farmland	CC, 1/17/2013
John Lamman	Range Management Spec.	Range, Vegetation, Farmland, Weeds	
Dave Gilbert	Fisheries Biologist	Aquatic Wildlife, Riparian/Wetlands	DG, 2/4/13
Stephanie Carter	Geologist	Minerals, Paleontology, Waste Hazardous or Solid	SSC, 1/18/13
Melissa Smeins	Geologist	Minerals, Paleontology	----------
John Smeins	Hydrologist	Hydrology, Water Quality/Rights, Soils	JS, 1/16/2013
Ty Webb	Prescribed Fire Specialist	Air Quality	TW, 1/15/2013
Jeff Covington	Cadastral Surveyor	Cadastral Survey	JC, 1/15/2013
Kalem Lenard	Outdoor Recreation Planner	Recreation, Wilderness, LWCs, Visual, ACEC, W&S Rivers	KL, 1/22/2013
John Nahomenuk	River Manager	Recreation, Wilderness, LWCs, Visual, ACEC, W&S Rivers	
Ken Reed	Forester	Forestry	KR, 4/22/13

Martin Weimer	NEPA Coordinator	Environmental Justice, Noise, SocioEconomics	mw, 1/16/2013
Monica Weimer	Archaeologist	Cultural, Native American	----------
Michael Troyer	Archaeologist	Cultural, Native American	MT, 5/9/13
Vera Matthews	Realty Specialist	Realty	vm, 1/30/2013
Debbie Bellew	Realty Specialist	Realty	----------
Bob Hurley	Fire Management Officer	Fire Management	BH, 1/15/2013
Steve Cunningham	Law Enforcement Ranger	Law Enforcement	SC, 1/15/2013

Other Agency Represented:
Colorado Parks and Wildlife Bob Carochi, District Wildlife Manager Canon City North

REMARKS:

Cadastral: The monuments in the project area need to be located and protected. The GCDB reliability for the monuments in T. 16 S., R. 71 W., is +/- 20 feet and the GCDB reliability for the monuments in T. 16 S., R. 71 W., is +/- 300 feet.

Cultural Resources: Although cultural resources were found near the area of potential effect [see report CR-RG- 13-117 (P)], no sites determined to be eligible for the National Register of Historic Places (NRHP) were found. Therefore, the proposed project will have no impact on any historic properties (those eligible for the NRHP).

Native American Religious Concerns: No possible traditional cultural properties were located during the cultural resources inventory (see above). There is no other known evidence that suggests the project area holds special significance for Native Americans.

Minerals: The federal minerals in the proposed project area are open to mineral location, therefore requiring coordination between surface uses as applicable. If there are unpatented mining claims that are active in the proposed project location, any associated claim markers encountered during project implementation cannot be disturbed. However as of January 2013, there are no active claims in these areas.

Threatened and Endangered Species: There are no records of any federally listed or BLM sensitive species within or near the project area. The Proposed Action will not result in impacts to TES species.

Migratory Birds: To be in compliance with the Migratory Bird Treaty Act (MBTA) and the Memorandum of Understanding between BLM and USFWS required by Executive Order 13186, BLM must avoid actions, where possible, that result in a “take” of migratory birds. Pursuant to BLM Instruction Memorandum 2008-050, to reduce impacts to Birds of Conservation Concern (BCC), no habitat disturbance (removal of vegetation such as timber, brush, or grass) is allowed during the periods of May 15 - July 15, during the breeding and brood rearing season for most Colorado migratory birds. An exception to this timing limitation will be granted if nesting surveys conducted no more than one week prior to vegetation-disturbing activities indicate no nesting within 30 meters (100 feet) of the area to be disturbed. Surveys shall be conducted by a qualified breeding bird surveyor between sunrise and 10:00 a.m. under favorable conditions.

If vegetation was cleared prior to May 15, this provision does not apply to ongoing construction or completion activities that are initiated prior to May 15 and continue into the 60-day period.

Forest Management: The Pinyon IPS bark beetle population on lands surrounding Canon City has greatly expanded over the past couple of summers. These are the lower elevation pinyon and juniper (PJ) forests and beetle appears to be moving up in elevation each year. The on-going drought favors the beetle expansion since moisture and sap are the trees main defense to these beetles.

The project lead should consider avoiding pinyon pine cutting activities during the beetle flight period to avoid attracting IPS beetles to the project area and the larger reserve trees through the release of terpenes from any cutting or chipping of green pinyon trees. The pinyon IPS beetle flight period is typically from April 1 to October 1 but this varies depending on seasonal temperatures. Before thinning during the beetle flight period the project area should be visited by a forester or entomologist to determine the beetle population status and if thinning is likely to exacerbate the beetle pinyon tree mortality.

These bark beetles prefer to attack large trees over small trees due to the fact that large trees have more inter-bark than small trees and the beetles feed on the inter-bark. So thinning should favor the retention of all tree size classes and species, maintaining some small and medium sized pinyon is important for maintaining forest diversity and reducing bark beetle impacts.

There are several small pockets or groups of trees currently being affected by root disease in the project area. The proposed action should not exacerbate the spread of the disease. Thinning recommendations are to remove dead and infected trees. Thin healthy trees to the desired spacing and maintain forest age class diversity.

MITIGATION: No habitat disturbance (removal of vegetation such as timber, brush, or grass) is allowed during the periods of May 15 - July 15, during the breeding and brood rearing season for most Colorado migratory birds. An exception to this timing limitation will be granted if nesting surveys conducted no more than one week prior to vegetation-disturbing activities indicate no nesting within 30 meters (100 feet) of the area to be disturbed. Surveys shall be conducted by a qualified breeding bird surveyor between sunrise and 10:00 a.m. under favorable conditions.

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Thinning recommendations are to remove dead and infected trees. Thin healthy trees to the desired spacing and maintain forest age class diversity.

CONCLUSION

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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 PROJECT LEAD: Glenda Torres

SIGNATURE OF NEPA COORDINATOR: /s/ Martin Weimer

SIGNATURE OF NEPA SUPERVISOR: /s/Robert Hurley

SIGNATURE OF THE RESPONSIBLE OFFICIAL: /s/ Melissa K. Garcia for
Keith E. Berger, Field Manager

DATE: 7/25/13

Note: 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. 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.