U. S. Department of the Interior
Bureau of Land Management
White River Field Office
220 E Market St
Meeker, CO 81641

DETERMINATION OF NEPA ADEQUACY (DNA)

NUMBER: DOI-BLM-CO-110-2013-0122-DNA

PROJECT NAME: Riparian Improvement – Big Trujillo Site

LEGAL DESCRIPTION: T 2N, R 102W, Sec 36;
T 1N, R 102W, Sec 7;
T 1N, R103W, Sec 12

APPLICANT: Tamarisk Coalition / BLM

ISSUES AND CONCERNS: None.

DESCRIPTION OF PROPOSED ACTION: This Proposed Action is a continuation of the Lower White River Riparian Restoration project. The Tamarisk Coalition (TC) has proposed to hire a contractor to use equipment to remove (masticate/grind) mostly dead tamarisk branches from a 20 foot diameter area around existing riparian shrubs (currants, willows, silver-leaf buffaloberry, rose, cottonwood, etc.) at the Big Trujillo project site (see Maps 1 and 2). Removing this material will improve growth and reproduction opportunity for the native species. Where necessary, future follow-up herbicide treatment of re-sprout material may be completed as described in the environmental assessments listed below. The current proposed mastication or any future similar treatment would be completed when soils are frozen.

Native riparian shrubs and trees have been mapped using a hand held GPS unit. The contractor will navigate to each native shrub using this GIS data. Torrent mulching heads (masticators) mounted on one or two diesel Kubota 90 excavators will be used to masticate dead woody material that is crowding the existing native vegetation. Torrent masticating heads have a cutting width of approximately 40 inches and can be manipulated with precision to minimize impacts to native vegetation. Stumps will be ground down to three inch height or less to reduce hazards. Timing the treatment for when soils are frozen will minimize impacts to soils. One of the excavators has rubber track and the other has steel track.

If BLM chooses to do any follow-up foliar herbicide treatment of re-sprouts Glyphosate with the brand name of Rodeo® by Dow AgroSciences or Isopropoylamine salt of Imazapyr with the brand name of Habitat® by BASF would be used as analyzed and mitigated in CO-110-2005-197-EA. Or if basal bark treatments are done Triclopyr with the brand name of Garlon 3A or Garlon 4 would be used as analyzed and mitigated in CO-110-2010-0005-EA.

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.

17. Where determined to be appropriate, plant desirable riparian species (e. g., willows and cottonwoods) to mitigate soil erosion in treated areas that contain only undesirable plant species. Leave sufficient ground cover (woody debris) to minimize erosion.
18. To virtually eliminate the risk of meaningful levels of herbicide contacting or being carried into the White River system, the following application protocol is to be followed:
    a) Application outside bank-full width: label-approved methods that involve wetting the cut stump or basal bark, but not to the point of drip.
    b) Application within bank-full width: application by wipe methods (i. e. , paint, wipe, dab) where there is no reasonable likelihood for inadvertent contact with surface water, including drippage and/or rising water levels. In those instances where treatment may have potential to contact surface water (e. g. , drippage from application equipment or normal water fluctuations over 1-2 week period), ester formulations of triclopyr would not be used. In these cases, control would be limited to the use of herbicides less toxic in aquatic environments, such as amine formulations of triclopyr (Garlon 3; 300 mg/l LC50), or imazypyr, or glyphosate (both >100 mg/l LC50).

Decision to be Made: The BLM White River Field Office (WRFO) will decide whether or not to authorize the Tamarisk Coalition to hire a contractor to complete this vegetation mastication project and, if so, under what conditions and whether or not to allow follow-up herbicide treatment of resprouts.

PLAN CONFORMANCE REVIEW:

Name of Plan: White River Record of Decision and Approved Resource Management Plan (ROD/RMP).

Date Approved: July 1, 1997

Decision Number/Page: 2-13, Noxious and Problem Weeds

Decision Language: "Manage noxious weeds so that they cause no further negative environmental, aesthetic or economic impact."

REVIEW OF EXISTING NEPA DOCUMENTS:

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

Name of Document: White River Resource Area Proposed Resource Management Plan and Final Environmental Impact Statement (PRMP/FEIS).

Date Approved: June 1996

Name of Document: CO-110-05-197-EA: Stump Treatment of Tamarisk and Russian olive in Scenery, Tschuddi and Blacks Gulches and on the White River near Rangely; CO-110-06-108-EA: Area Wide Tamarisk and Russian Olive Treatment; DOI-BLM-CO-110-2009-0121-DNA.

Date Approved: September 9, 2005, June 3, 2006 and September 12, 2009

Name of Document: CO-110-2010-0005-EA: White River Field Office Integrated Weed Management Plan

Date Approved: March 19, 2010

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

Name of Document: Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Report including the list of Herbicides Approved for Use on BLM Administered Lands and Adjuvants Approved for use on BLM Administered Lands.

Date Approved: June 2007

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?

   Yes, removal of non-native woody vegetation at this project site was analyzed previously. Russian olive and tamarisk were the species previously targeted for removal by the use of chainsaws and large chipping machines. This current treatment proposes to use a mastication head to remove select tamarisk material that has been suppressed by defoliation by tamarisk leaf beetles. Much of the material to be removed is dead. Both Russian olive and tamarisk are non-native, undesirable invasive species that out-compete native vegetation.

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?

   The Proposed Action from existing NEPA analyzed control of Russian olive and tamarisk using cut-stump treatment followed by herbicide application with measures to address

biomass where needed throughout the White River Resource Area. Under the No Action Alternative there would be no attempt to treat tamarisk or Russian olive. Both the Proposed Action and the No Action alternatives were analyzed in CO-110-06-108-EA. The alternatives of No Use of Herbicides and No Action were considered in the Vegetation Treatment on BLM Lands in Thirteen Western States Environmental Impact Statement (EIS). No reasons were identified to analyze additional alternatives for this current project proposal and these alternatives are considered to be adequate and valid for the current 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?

   There are no federal listings of special status animals since the original NEPA that would need to be addressed specific to this action. The White River beardtongue and Graham's beardtongue plant species are currently proposed for listing under the Endangered Species Act. However, their habitat is such that this action would have no effect on them and the previous analysis remains valid and adequate.

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 management of noxious, invasive plant species and the opportunity to benefit native riparian vegetation as proposed is a direct benefit to both the short and long term maintenance of ecosystem function and integrity. Efforts to control exotic vegetation along the White River is small in scale but directly, indirectly and cumulatively any such action provides improved opportunity for the redevelopment of native riparian vegetation and natural successional processes that would promote progression of affected sites and surrounding area of influence toward higher ecological function. The No Action Alternative would not allow for this opportunity to facilitate redevelopment of native riparian vegetation in affected project areas.

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

   The public involvement and interagency review associated with CO-110-05-197-EA and CO-110-06-108-EA are adequate to address this Proposed Action. Additionally this project has received funding from Colorado Parks and Wildlife and the Tamarisk Coalition, both of which have reviewed the applicable aspects of the projects.

INTERDISCIPLINARY REVIEW:

The Proposed Action was presented to, and reviewed by the White River Field Office interdisciplinary team on 09/10/2012. A complete list of resource specialists who participated in this review is available upon request from the White River Field Office. The table below lists

resource specialists who provided additional remarks concerning cultural resources and special status species.

Name	Title	Resource	Date
Michael Wolfe	Archaeologist	Cultural Resources, Native American Religious Concerns	12/02/2013
Lisa Belmonte	Wildlife Biologist	Special Status Wildlife Species	10/26/2013
Baili Foster	Seasonal Ecologist	Special Status Plant Species	09/16/2013

REMARKS:

Cultural Resources: The entire project area was inventoried at the Class III (intensive) level (Bowen 2009). One Isolated Find (5RB6438), a historic well casing, was documented. The Isolated Find, by definition, is evaluated as not eligible to the National Register of Historic Places. Therefore, no "historic properties" were identified within the proposed project area.

Native American Religious Concerns: No Native American Religious Concerns are known in the area, and none have been noted by Northern Ute Tribal authorities. Should recommended inventories or future consultations with Tribal authorities reveal the existence of such sensitive properties, appropriate mitigation and/or protection measures may be undertaken.

Threatened and Endangered Wildlife Species: There are no wildlife-related issues or concerns associated with the Proposed Action. The White River between Rio Blanco Lake and the Utah state line is designated critical habitat for the endangered Colorado pikeminnow. The project area is located within occupied habitat (the White River below Taylor Draw Dam to the Utah State line) of this species. This reach is generally occupied by adult and larger sub-adult Colorado pikeminnow and is used as post-spawning and over-winter habitat. There are no reproductive or rearing habitats associated with the White River in Colorado.

The White River corridor serves as an activity hub for nesting and wintering populations of threatened bald eagles. There are a number of identified nest and winter roost sites associated with the lower White River's mature cottonwood galleries, but no special use features, i. e., identified winter roosts, are located within a minimum 4.5 river miles of the White River treatment site. The White River project area likely receives regular opportunistic foraging use by eagles from November through April.

Maintenance of proper bank, channel, and floodplain function is specifically identified as essential to the continued existence of this fishery. Efforts to control exotic vegetation along the White River, although small in scale, would strongly complement recovery goals for Colorado pikeminnow and improve habitat for bald eagle by promoting the redevelopment of native riparian vegetation and natural successional processes that would eventually provide mature cottonwood habitat for perch or nest use by bald eagle and accommodate proper functioning condition of the river's channel processes as pikeminnow habitat.

Threatened and Endangered Plant Species: There are no plant species listed, proposed, or candidate to the Endangered Species Act, nor plants considered sensitive by the BLM, that are known to inhabit ephemeral washes, upland ponds, or seeps that could potentially be influenced by the Proposed Action. The threatened species Ute lady's tresses orchid (*Spiranthes diluvialis*) is known to occur in sub-irrigated alluvial soils along streams and in open meadows in flood plains. Although it is unknown whether the threatened orchid is found along the White River in Colorado, the 2005 range-wide status review does list the river as containing potential habitat.

The riverbanks in the area are inhabited either by dense riparian graminoids, sedges, and rushes or are shaded by bank-shadowing infestations of Russian olive and/or tamarisk. The woody vegetation tends to be 1-2 meters from the shoreline along this portion of the river if it is not dominating the bank. Both woody and herbaceous plant communities in this area were found to be unsuitable for the orchid, which prefers mid-seral and somewhat open, light-penetrating surrounding vegetation and substrate (alluvial deposits) which are at least a decade old and have advanced into a diverse plant community with good drainage.

Vegetation and plant communities found more than a few meters from the shoreline in the Big Trujillo area are not irrigated and contain dry upland species such as rabbitbrush, prickly pear cactus, and cheatgrass, as the river channel is deeply incised from the floodplain in most areas. Manipulated environments such as irrigated hay meadows, moderately grazed pastures with river access, areas of increased sediment deposits and the isolated intact floodplain areas such as those encountered downstream from the Big Trujillo area, primarily exhibited on private lands, are more likely to contain orchid habitat.

Therefore, no effect to *Spiranthes diluvialis* potential habitat is expected from the Proposed Action. Removal of noxious woody species such as tamarisk, with continued monitoring, would eventually be expected to produce native riparian plant communities that would benefit all riparian corridor plant species and their habitats.

REFERENCES:

Bowen, Kristin

2009 A Class III Cultural Resource Inventory For The Big Trujillo Riparian Restoration (WRFO #09-10-07; RB. LM. R1191). Manuscript on file at WRFO, Meeker, Colorado.

COMPLIANCE PLAN: Sight specific Pesticide Application Records will be completed and filed for each treatment. On-going compliance inspections and monitoring will be conducted by the BLM White River Field Office staff during and after treatment. Specific mitigation developed in this document will be followed. The contractor will be notified of compliance related issues in writing, and depending on the nature of the issue(s), will be provided 30 days to resolve such issues.

NAME OF PREPARER: Mary Taylor

NAME OF ENVIRONMENTAL COORDINATOR: Heather Sauls

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to 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

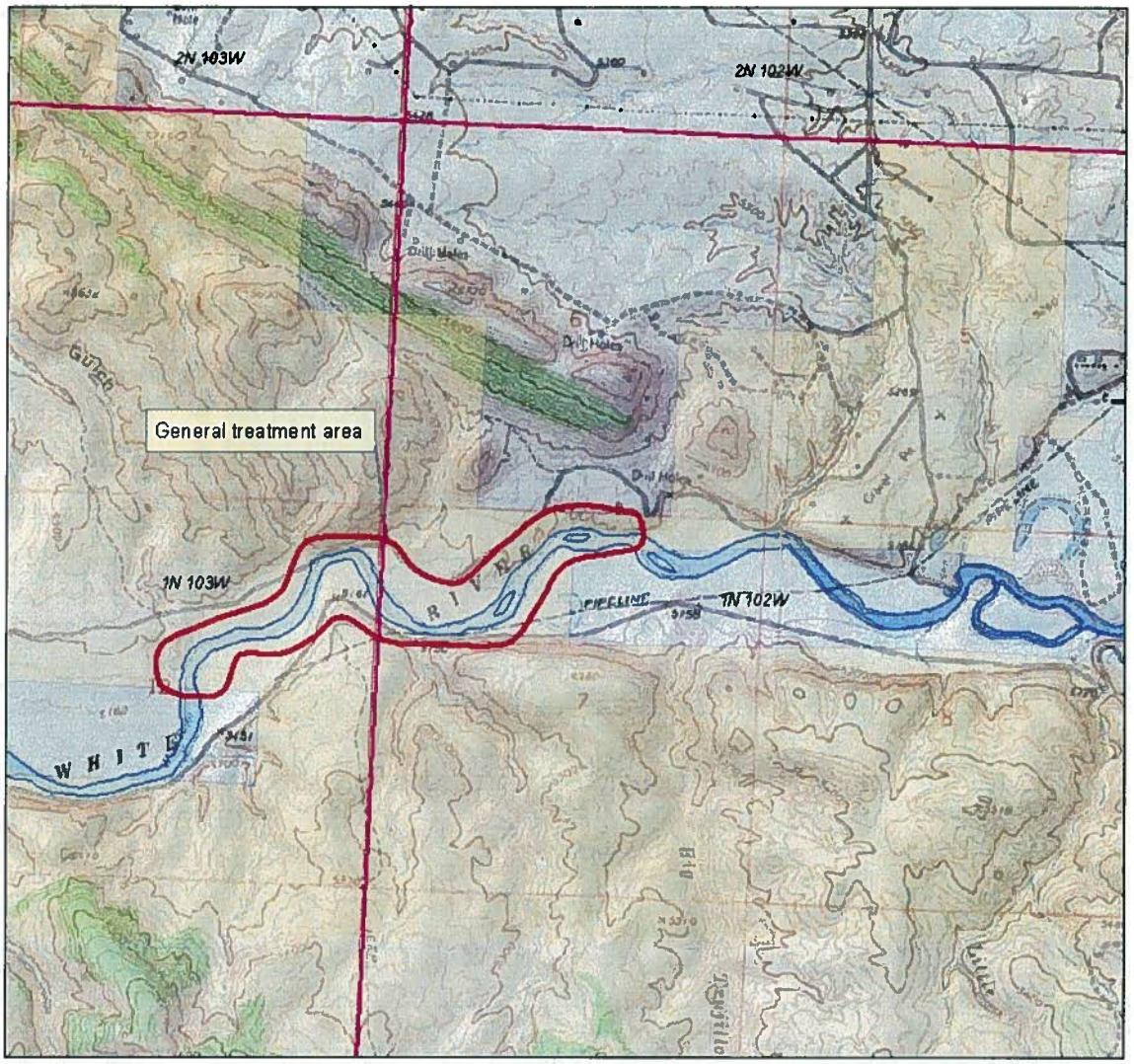
DATE SIGNED: 12/23/13

ATTACHMENTS:

Map 1: Lower White River Riparian Restoration (Big Trujillo)
Map 2: Aerial Photo

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.

Map 1: Lower White River Riparian Restoration (Big Trujillo)



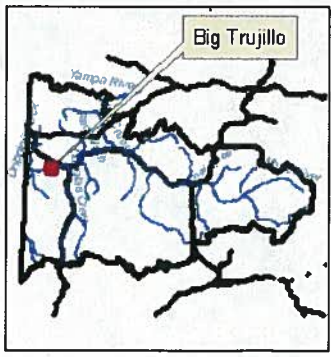
RiversStreams_Major
PLSS_Townships_GCDB2008
FieldOffice_Boundary_WRFO
BLM
PRI

N

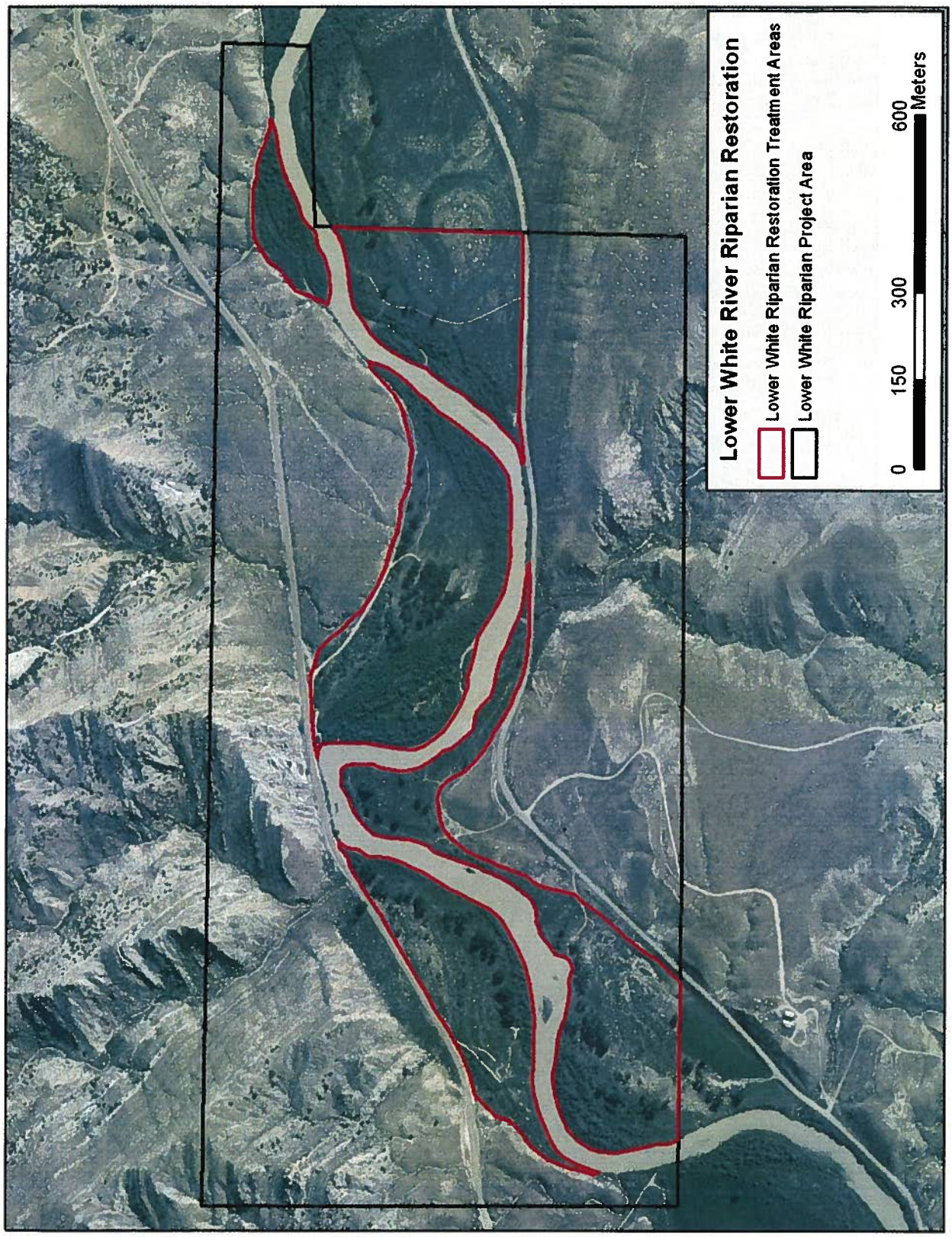
3/11/2009 met

Sources:
BLM, USGS, CDOW, etc.

Disclaimer:
Although the data presented within this map, and the map itself, have been processed successfully on computers of BLM, no warranty, expressed or implied, is made by BLM regarding the use of this map or the data represented, nor does the fact of distribution constitute or imply any such warranty.



Map 2: Aerial Photo Lower White River Riparian Restoration (Big Trujillo)



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DECISION RECORD

PROJECT NAME: Riparian Improvement – Big Trujillo Site

DETERMINATION OF NEPA ADEQUACY NUMBER: DOI-BLM-CO-110-2013-0122-DNA

DECISION

It is my decision to implement the Proposed Action, as mitigated in DOI-BLM-CO-110-2013-0122-DNA, authorizing the use of equipment to remove (masticate/grind) mostly dead tamarisk branches from a 20 foot diameter area around existing riparian shrubs (currants, willows, silver-leaf buffaloberry, rose, cottonwood, etc.) at the Big Trujillo project site. Removing this material will improve growth and reproduction opportunity for the native species. The current proposed mastication or any future similar treatment would be completed when soils are frozen.

If BLM chooses to do any follow-up foliar herbicide treatment of re-sprouts Glyphosate with the brand name of Rodeo® by Dow AgroSciences or Isopropoylamine salt of Imazapyr with the brand name of Habitat® by BASF would be used as analyzed and mitigated in CO-110-2005-197-EA. Or if basal bark treatments are done Triclopyr with the brand name of Garlon 3A or Garlon 4 would be used as analyzed and mitigated in CO-110-2010-0005-EA.

1. All applicable SOPs and mitigation measures from CO-110-2010-0005-EA, (Appendices C and D) would also be applied.
2. Only federally registered and BLM approved herbicides will be used.
3. Herbicides will be applied as per label instructions and restrictions.
4. All individuals associated with the handling or application of herbicides on public lands will be familiar with the chemicals used and emergency procedures to be used in case of herbicide spill.
5. The intake operation of water for mixing will be arranged so that an air gap or reservoir will be placed between the live water intake and the mixing tank to prevent back flow or siphoning of chemical into the water source.
6. Chemical containers will be disposed of as required by the Environmental Protection Agency (EPA).
7. Application will not occur during precipitation or if there is a threat of precipitation.
8. Spray crews will avoid nesting raptors. In the event raptor nest activity is discovered within treatment areas, restrictions on motorized equipment and restrictions on approach to the nest site will be applied until nest functions are complete.
9. Efforts should be taken to avoid or minimize involvement and damage to favorable woody riparian species.
10. The safe use of herbicides includes precautionary measures to prevent accidental spills.

The following written precautions describe measures that will be used to reduce the chance of such accidents.

11. The applicable Federal regulations concerning the storage and disposal of herbicides and herbicide containers will be followed. These are described in the EPAs "Regulations for acceptance and Procedures for Disposal and Storage", Federal Register notices as amended.
12. Precautions will be taken in the loading and stacking of herbicide containers in the transporting vehicle to assure that they will not fall as the vehicle moves.
13. Each day after returning to the field office, all herbicide containers will be inspected for damage and leaks, and the vehicle will be examined for contamination.
14. The applicant is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
15. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the AO. The applicant will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. The applicant, under guidance of the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.
16. Pursuant to 43 CFR 10. 4(g) the holder of this authorization must notify the AO, by telephone, 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.
17. Where determined to be appropriate, plant desirable riparian species (e. g., willows and cottonwoods) to mitigate soil erosion in treated areas that contain only undesirable plant species. Leave sufficient ground cover (woody debris) to minimize erosion.
18. To virtually eliminate the risk of meaningful levels of herbicide contacting or being carried into the White River system, the following application protocol is to be followed:
19. Application outside bank-full width: label-approved methods that involve wetting the cut stump or basal bark, but not to the point of drip.
20. Application within bank-full width: application by wipe methods (i. e., paint, wipe, dab) where there is no reasonable likelihood for inadvertent contact with surface water, including drippage and/or rising water levels. In those instances where treatment may have potential to contact surface water (e. g. , drippage from application equipment or normal water fluctuations over 1-2 week period), ester formulations of triclopyr would not be used. In these cases, control would be limited to the use of herbicides less toxic in aquatic environments, such as amine formulations of triclopyr (Garlon 3; 300 mg/l LC50), or imazypyr, or glyphosate (both >100 mg/l LC50).

COMPLIANCE WITH LAWS & CONFORMANCE WITH THE LAND USE PLAN

This decision is in compliance with the Endangered Species Act and the National Historic Preservation Act. It is also in conformance with the 1997 White River Record of Decision/Approved Resource Management Plan.

PUBLIC INVOLVEMENT

The BLM informed the public about this project by listing it on the online White River Field Office National Environmental Policy Act Register on 09/24/2013 and a copy of the completed Documentation of NEPA Adequacy will be posted on the WRFO website.

RATIONALE

Analysis of the Proposed Action has concluded that there are no significant negative impacts and the proposal meets Colorado Standards for Public Land Health. The extent and scale of this project is limited but will result in positive effects to the overall project area. Allowing actions to further combat noxious and invasive species and provide benefit to native vegetation in this riparian setting is consistent with the White River Record of Decision and Approved Resource Management Plan (ROD/RMP) decision to "Manage noxious weeds so that they cause no further negative environmental, aesthetic or economic impact."

ADMINISTRATIVE REMEDIES

Any appeal of this decision must follow the procedures set forth in 43 CFR Part 4. Within 30 days of the decision, a Notice of Appeal must be filed in the office of the Authorized Officer at White River Field Office, 220 East Market St. Meeker, CO 81641 with copies sent to the Regional Solicitor, Rocky Mountain Region, 755 Parfet St. Suite 151, Lakewood, CO 80215, and to the Department of the Interior, Board of Land Appeals, 801 North Quincy Street, MS300-QC, Arlington, VA, 22203. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals at the above address within 30 days after the Notice of Appeal is filed with the Authorized Officer.

SIGNATURE OF AUTHORIZED OFFICIAL: Kent E. Walter

Field Manager

DATE SIGNED: 12/23/13