United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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DETERMINATION OF NEPA ADEQUACY (DNA) WORKSHEET

Proposed Action Title/Type:	Aspen Vegetation Enclosure Reconstruction Project
NEPA Register Number:	DOI-BLM-AK-A010-2013-0024-DNA
Case File Number:	AA-085582 (540001)
Location / Legal Description:	Seward Meridian, T 12N, R 3W, Section 3
Applicant (if any):	N/A

A. DESCRIPTION OF THE PROPOSED ACTION

Background

Aspen trees are valuable to wildlife habitat as they, "allow more sunlight to reach through the branches to the ground than other trees, creating all different varieties of plants and shrubs on the forest floor," (Tree Facts, 2009). However, these trees are threatened in the Anchorage bowl by over-browsing by moose. It has been determined that, "…the most prominent effects of [moose] herbivory at the landscape level is the suppression and/or redistribution of preferred trees such as aspen…" (Edenious, et al., 2002).

Furthermore, the exclusion of naturally-occurring wildfires from the Campbell Tract for the past 60 years has resulted in "overmature" aspen stands which were nearing the end of their lives in 2004 (Zaidlicz, 2004). During that time, a particular aspen stand at the Campbell Tract (known institutionally as the "Aspen Ranch") had been thinned to remove competition for habitat and to allow for "root suckering," which is the preferred method of regeneration for aspen stands (Zaidlicz, 2004). For these reasons, it is important to protect the stands of aspen at Campbell Tract.

In 2004, a 250-foot diameter vegetation enclosure was constructed around the "Aspen Ranch" (Attachment A: Pictures 1 and 2). Since construction, many of the natural materials used as fence posts have broken and/or rotted to the point of partial fence collapse, which compromises stability of the structure and the investment made to protect this important stand of trees.

Past volunteer and staff efforts have periodically repositioned and repaired the fence to prevent moose from entering the aspen tree enclosure. Deterioration and rot has compromised the wood fence posts and ultimately, the investment in the structure.

Purpose and Need

The purpose of this action is to construct a new fence around the Aspen and to remove the existing posts. The need for this action is to protect the investment originally produced in 2004, and to provide protection to the juvenile aspen trees that are still maturing. This project will continue the vegetation treatment to enhance forest health on Campbell Tract, with an added benefit of improving wildlife habitat through species and size class diversification.

Proposed Action

During the summer of 2013, work crews would remove 110 old fence posts from the "Aspen Ranch" vegetation enclosure and dispose of them by either:

1. Cutting off old posts at ground level, or toppling and dispersing away from the enclosure and nearby trails (natural materials), or
2. Unearthing and manually removing from the site (old pressure-treated materials, steel fences) to Moose Meadow Trail, with a UTV/ATV transporting refuse back to a facility suitable for disposal.

Work crews would dig 110 new holes to install new pressure-treated posts. This project would occur over a two-week period (Attachment B: Maps). During this time, old wooden posts would be removed and 110 new 4"x4"x10' Alkaline Copper Quaternary (ACQ) pressure-treated posts would be buried three feet into the ground, both outside and inside the perimeter of the current fence. New holes to be excavated for each new post would be one-foot diameter and three-feet deep, amounting to surface disruption of 2.36 ft^3 each hole, for a total of 259.6 ft^3 for the project. This roughly equates to a 13'x13'x 3' deep surface disturbance.

If any cultural resources are unearthed, construction would stop until a continuation clearance is granted by the Cultural Resource Specialist. Old holes would be filled with local materials excavated from new holes. If additional fill is needed to stabilize new posts, 2-4" rocks would be brought from the material storage yard along Science Center Road to the construction site. Prior to transportation, the fill would be inspected to eliminate transport of invasive plant material and propagules. Early Detection and Rapid Response (EDRR) protocols will be utilized to minimize effects of any invasive plant introductions to the area.

A strand of 12ga. wire would be fastened between the posts, which would hold up the approximately 1,000ft. of wire fence (Attachment A, photo 2). Two strands of 12ga. wire would be re-used from the previous fencing to hold the bottom of the wire fencing down, as well as to discourage moose entry into the enclosure. An entry point consisting of a single-section of fence solo-mounted for ease of removal will be incorporated into the north end of the fence to allow for large mammal egress, should one gain entry, as well as to allow for ease of future transplantation.

One section at a time, the old fence would be removed and the new fence would be constructed. This would provide consistent moose protection for trees inside the enclosure. Power tools required to perform the work include post hole auger (to dig holes in rooted soil), and a chainsaw (to clear brush near excavated holes). Careful refueling of power tools would involve having sorbent pads nearby in case of a spill. The wooden posts and wire fence segments were delivered to the construction site in March 2013. The wire and fasteners would be transported to the site the first day of construction, with the remainder of the materials removed from the field on the final day.

The nearest open water source is 100 yards away and the fence post wood preservative is approved for use in boardwalks, piers (Viance, 2013), fence posts, and freshwater and marine pilings (EPA, 2013). According to MSDS, "The wood preservative fungicide and insecticide components of this product are, by design, toxic to wood deteriorating organisms. This product is not expected to leach harmful amounts of preservative into the environment," (APT, 2006).

Of regard to ACQ, the U.S. Forest Service states that, "Studies indicate that the [Chromated Copper Arsenate] CCA alternatives do release measurable quantities of copper and co-biocide into the environment. However, these components have lower mammalian toxicity than does arsenic (in CCA), and they are less likely to raise concerns about environmental impacts," (Lebow, 2004).

Future opportunities associated with construction and subsequent aspen protection include the production of harvestable materials for Campbell Tract Facility landscaping or other vegetation enclosure "starter trees," installation of an interpretive panel to provide context and meaning to passers-by, and an educational site for Science Center groups.

After a minimum of ten years, the option exists to decommission the vegetation enclosure, and to use the construction materials in another location. To determine decommissioning suitability, a monitoring scheme comprised of a yearly photo point data collection, and staff or volunteer stem counts should be implemented. A condition analysis by either the Forester or the Natural Resource Specialist should be conducted and documented every five years starting in 2023 to determine continued maintenance or eventual deconstruction, dependent on recommendations.

B. LAND USE PLAN CONFORMANCE

Applicable Land Use Plan:

Ring of Fire Record of Decision and Approved Management Plan. Approved March 2008.

The proposed action is in conformance with the Ring of Fire Plan, even though it is not specifically provided for, because it is clearly consistent with the following land use plan decisions:

O. Recreation

O-2: Allocations
Retain the existing Campbell Tract SRMA. Management of this administrative site would continue to be guided by *A Management Plan for Public Use and Resource Management on the Bureau of Land Management Campbell Tract Facility* (BLM 1988), and any future amendments to this plan.

Within the 1988 BLM plan, under "B. Total Area Objectives," section 2 states to, "Protect and interpret other resource values, including wildlife, wetlands and cultural resources, consistent with the administrative requirements and maintenance of the natural setting on appropriate portions of the CTF. Enhance those values where it is cost effective and appropriate."

More specifically, under "Other Resource Actions," the 1988 Campbell Tract Management Plan states that the, "BLM will undertake or initiate the following actions." Within these actions, "Action OR-4 Wildlife Projects" states to,

> Allow limited, low impact wildlife enhancement projects for education purposes, including limited vegetation manipulation, nest box and platform construction and placement, small wetland development, and boulder and gabion projects for fisheries enhancement. Projects will be limited in size and scope to preserve the natural setting of the facility. To preserve a natural appearance, best management practices will be followed, such as cutting stumps to ground height and scattering vegetation cut during moose browse enhancement.

C. IDENTIFY APPLICABLE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTS AND OTHER RELATED DOCUMENTS THAT COVER THE PROPOSED ACTION.

The proposed action is covered by Environmental Assessment AK-040-04-EA-030, Case File: AA-085582 (540001), BLM Anchorage Field Office, *Aspen regeneration and hazard tree removal on Campbell Tract, Alaska*, dated June 2004.

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 new proposed action is a feature of the proposed action analyzed in the existing NEPA document (2004 EA, pp. 3-4). The new proposed action is located in the same analysis area, and conducts some of the same actions previously taken.

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 existing NEPA document are appropriate to the new proposed action, and is still aligned with current environmental 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, 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 existing analysis is still valid, as there is no applicable new information pertaining to the project site or associated conditions. It is reasonably conclusive that new information and/or circumstances would not substantially change the analysis of the new proposed action.

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 direct, indirect, and cumulative effects resulting from implementation of the new proposed action would be quantitatively and qualitatively similar to those analyzed in the existing NEPA document. The 2004 NEPA document analyzed a new fence that, "incorporate[d] the material thinned from the site as 'worm fences,'" (2004 EA, pp. 3 and 8). However, the current proposed action would use pressure-treated posts. The description of the current proposed action (noted in Part A of this DNA) explains why this difference is not substantial.

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 interagency review associated with the existing NEPA document is adequate for the current proposed action.

E. PERSONS, AGENCIES, AND BLM STAFF CONSULTED

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

2004 EA Preparers

Donna Redding	Cultural Resources
Jeff Denton	Wildlife Biologist
Rodney Huffman	Realty Specialist
Brian Sterbenz	Fire Management Specialist
Doug Ballou	Outdoor Recreation Planner

2013 DNA Reviewers and Preparers

Jon Gellings	Outdoor Recreation Technician
Kevin Keeler	Outdoor Recreation Planner
Jeff Kowalczyk	Outdoor Recreation Planner
Jenny Blanchard	Archaeologist
Merben Cebrian	Subsistence Resource Specialist
Bruce Seppi	Wildlife Biologist
Laurie Thorpe	Natural Resource Specialist
Merlyn Schelske	Fisheries Biologist
Doug Ballou	Resource Branch Manager

F. CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation identified in Part C of this DNA Worksheet fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

/s/ Alan Bittner, Anchorage Field Manager	May 9, 2013
Signature of the Responsible Official	Date

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 § 4 and the program-specific regulations.

References Cited

American Pole and Timber (APT). 2006. *ACQ Preserve and Preserve Plus Pressure Treated Wood MSDS.* Retrieved from http://www.americanpoleandtimber.com/pdf/ACQ-treated- wood-MSDS.pdf

Edenious, L., Bergman, M., Ericsson, G., Danell, K. 2002. *The Role of Moose as a Disturbance Factor in Managed Boreal Forests.* Silva Fennica 36(1): 57-67.

EPA. 2013. *Chromated Copper Arsenate (CCA): ACQ – An Alternative to CCA.* Retrieved from http://www.epa.gov/oppad001/reregistration/cca/acq.htm

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Tree Facts. 2009. *Aspen Tree.* Retrieved from http://www.tree-facts.com/aspen_tree/aspen_tree.html

Viance LLC. 2013. *Preserve ACQ Applications.* Retrieved from http://treatedwood.com/products/preserve/

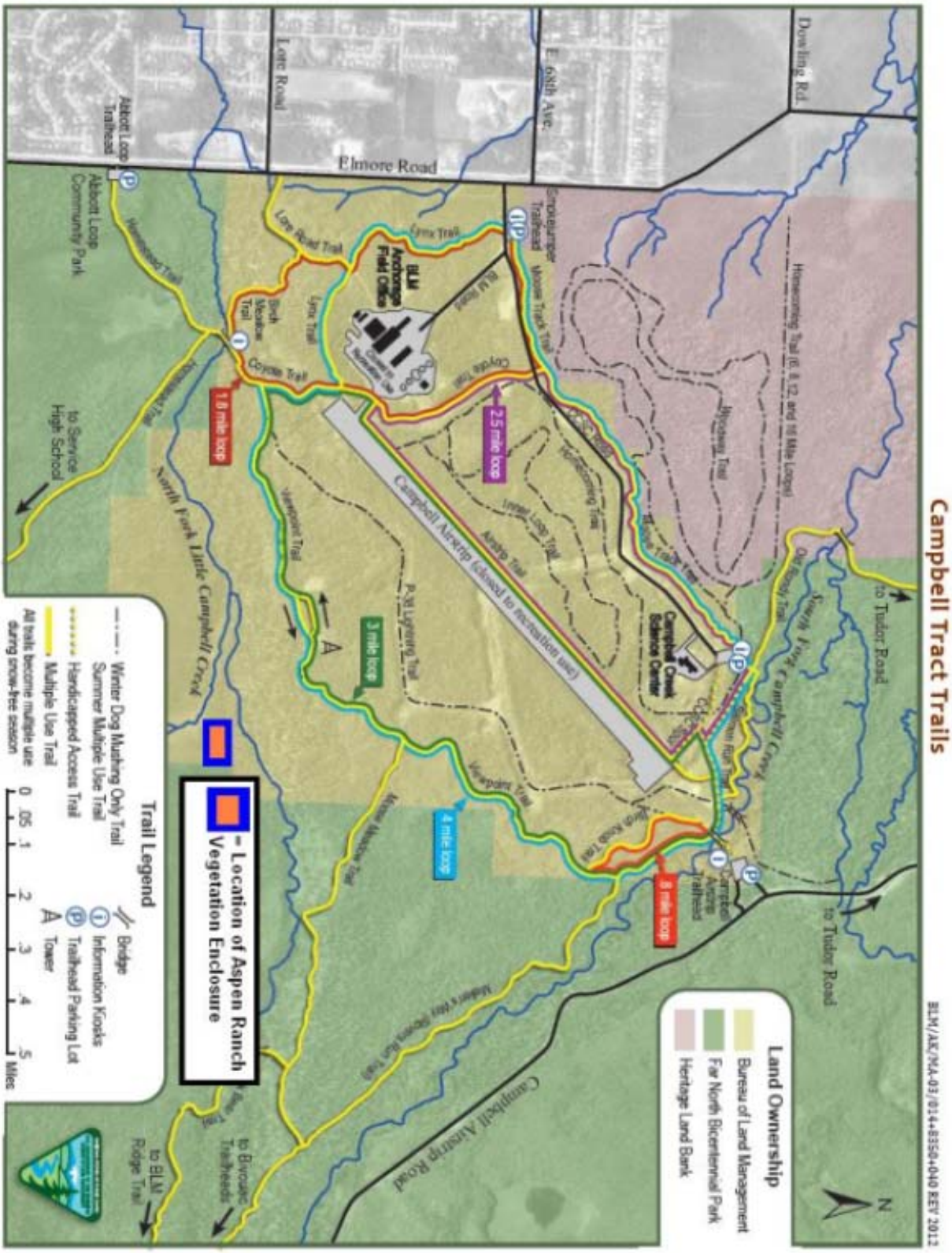
Zaidlicz, M. 2004. *Environmental Assessment: AK-040-04-EA-030*. BLM.

Attachment A

(Picture 1) Aspen Ranch Vegetation Enclosure. (Notice difference in density of Aspen species inside and outside of enclosure.)

(Picture 2) Close up of Aspen Ranch Fencing. One wire holds up the fencing, with two wires below preventing short mammal entry.

Attachment B: Maps



(Fig. 3) Campbell Tract Facility Map and Location of Aspen Ranch Vegetation Enclosure

(Fig. 4) Satellite Photo of Aspen Ranch and Trail System Delineations