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-N010-2014-0025

PROJECT NAME: Horse Gulch Greater Sage-Grouse Habitat Improvement Project

LEGAL DESCRIPTION: T6N, R93W, Sections 19, 20 and 30

APPLICANT: BLM and Colorado Parks and Wildlife (CPW)

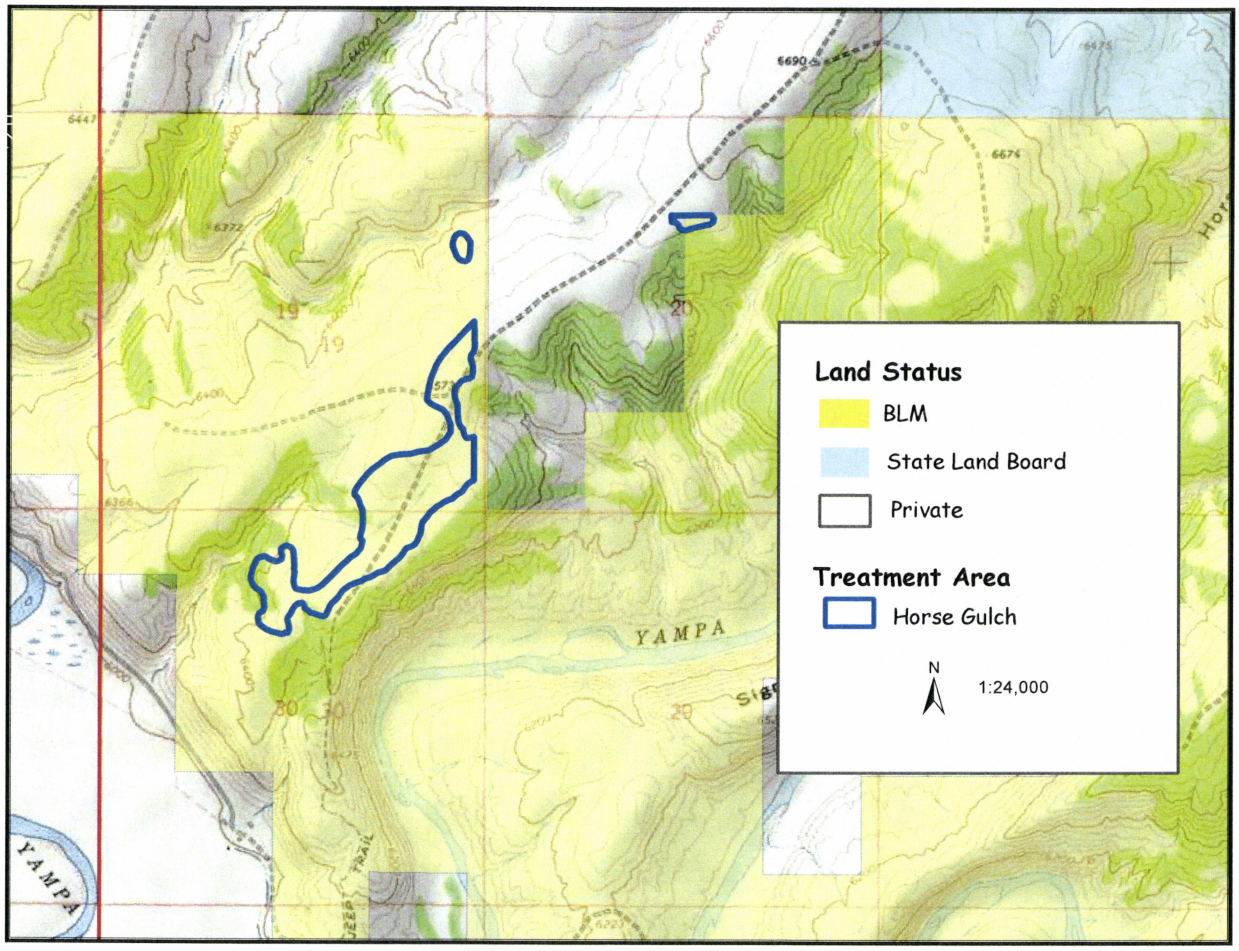
A. Describe the Proposed Action

Proposed Action
The Proposed Action is a joint project between CPW and the BLM, Little Snake Field Office. The Proposed Action is to remove encroaching pinyon and juniper trees on 71 acres of BLM managed lands in the LSFO. Trees would be removed by mulching all pinyon pine and juniper trees *in situ* with a boom-mounted cutting head attached to a tractor, skid steer, Hydro-axe, or equivalent machine equipped with rubber tires or rubber tracks. For very small trees (e.g. < 2 feet tall), hand felling and scattering may be used as the treatment method.

The purpose of this project is to enhance habitat conditions for greater sage-grouse (GRSG). GRSG are believed to avoid areas where conifer trees are encroaching into otherwise suitable sagebrush habitats due to unsuitable structural habitat characteristics and increased vulnerability to predation by raptors utilizing young conifers as hunting perches. The Colorado Greater Sage-grouse Conservation Plan identifies pinyon-juniper encroachment as one potential issue affecting sage-grouse populations in Colorado.

The proposed project area falls within priority habitat for greater sage-grouse and is within 4 miles of three active lek sites. The treatment polygons occur on slopes ≤20% and on ecological sites that support sagebrush. In addition, research conducted by CPW in Axial Basin between 2001 and 2007 showed sage-grouse use of the area immediately surrounding the proposed treatment polygons.

Map of proposed treatment area.



B. Land Use Plan (LUP) Conformance

The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

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

Date Approved: October 2011

Decision Language: The Proposed Action is in conformance with the LUP because it is specifically provided for in the following LUP goals, objectives, and management decisions:

2.6 Special Status Species

Goal C: Identify and initiate restoration and rehabilitation of sagebrush habitat while maintaining a mosaic of canopy cover and seral stages.

Objective: Reduce the encroachment of juniper and other large woody species onto sagebrush habitat.

Section/Page: 2.6 Special Status Species, RMP-23.

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

LSFO Juniper Encroachment Treatment, DOI-BLM-CO-N010-2014-0039-EA.

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. The current prosed action is part of the proposed action in the previously approved Environmental Assessment Record, Little Snake Field Office, LSFO Juniper Encroachment Treatment, DOI-BLM-CO-N010-2014-0039-EA.

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 Environmental Assessment Record for DOI-BLM-CO-N010-2014-0039-EA analyzed the environmental impacts of the Proposed Action. The proposed action in this DNA is a part of the listed activities covered in this EA. The current environmental concerns, interests, and resource values are essentially the same as those analyzed in the 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 project area was evaluated for suitability as lands with wilderness characteristics and did not meet the naturalness criteria. Therefore, the proposed action would not affect lands with wilderness characteristics.

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 Environmental Assessment Record - DOI-BLM-CO-N010-2014-0039-EA methodology and analytical approach are appropriate to this proposed action.

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 Proposed Action are unchanged from those identified in the existing NEPA documents. DOI-BLM-CO-N010-2014-0039-EA analyzed the direct, indirect, and site-specific impacts of the area covered under this present proposed action.

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 the implementation of the Proposed Action would

remain unchanged from those identified in the existing environmental assessment - DOI-BLM-CO-N010-2014-0039-EA. No additional activities have been implemented on either that would change the impacts resulting from the Proposed Action.

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 during the development of the 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	11/3/14
Archaeologist	Cultural Resources, Native American Concerns	10/23/14
Realty Specialist	Environmental Justice	9/29/14
Natural Resource Specialist	Hazardous Materials	10/3/14
Rangeland Management Spec.	Invasive Non-native Species	9/25/14
Rangeland Management Spec.	Sensitive Plants, T&E Plant	10/6/14
Wildlife Biologist	T&E Animal	10/1/14
Biologist	Water Quality – Ground	11/3/14
Recreation Specialist	WSAs, W&S Rivers, LWCs, ACECs	9/29/14
Wildlife Biologist	Animal Communities	10/1/14
Wildlife Biologist	Special Status, T&E Animal	10/1/14
Rangeland Management Spec	Plant Communities	9/25/14
Rangeland Management Spec	Special Status, T&E Plant	10/6/14
Ecologist	Riparian Systems	11/3/14
Ecologist	Water Quality	11/3/14
Ecologist	Upland Soils	10/3/14

Cultural Resources

Federal agencies are mandated by various laws to consider the effect of proposed land use activities on cultural resources (i.e. historic and archaeological sites). The National Environmental Policy Act directs the federal government to preserve important historic and cultural aspects of the national heritage. The National Historic Preservation Act (NHPA) requires federal agencies to take into account the effect of federal undertakings on cultural

resources that are eligible for inclusion in the National Register of Historic Places (NRHP). In Colorado, the requirements of the NHPA are implemented under the terms of the Protocol Agreement between the Bureau of Land Management and the State Historic Preservation Officer. An undertaking may be authorized by a BLM field office if it is determined that there will be "no effect" or "no adverse effect" to eligible sites.

The proposed undertaking will have no effect on sites that are eligible to the NRHP. In spring of 2014, a thorough pedestrian "Class III" cultural resource survey was completed on all areas proposed for juniper reduction (McDonald 2014). A segment of a historic road was identified during the survey, recorded as 5MF7792.1, and determined to be not eligible to the NRHP. Site 5MF7792 is a basically north-south aligned ranch road leading from its intersection with U.S. Highway 40 near Lay, Colorado on the north end to the Yampa River floodplain on its southern end. The road was constructed sometime prior to 1907 and presumably was used to access ranching homesteads.

Reference Cited

McDonald, K.
2014 K Diamond Pinyon-Juniper Encroachment Project 2014, A Class III Cultural Resource Inventory for Colorado Parks and Wildlife in Moffat County, Colorado. Report prepared by Flattops Archaeological Consultants, Carbondale, Colorado for Bureau of Land Management, Little Snake Field Office, Craig, Colorado.

Native American Concerns

A number of laws direct federal land managing agencies to consider the views of Native Americans as part of the process of making land use decisions. The National Environmental Policy Act mandates that the federal government preserve important historic and cultural aspects of the national heritage. Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consult with Native Americans regarding the effect of federal undertakings on sites that may be of cultural or religious importance to Indian people to ensure that tribal values are taken into account to the extent feasible.

Based on available information, the proposed juniper reduction project is not expected to affect sites or areas of concern to Native Americans. In historic times, the Little Snake field area was inhabited by the Utes and the Shoshone. Sites of concern to the tribes usually include burials, rock art sites, wickiups, and vision quest sites. No sites of the above-mentioned varieties are known within the areas to be affected by the proposed project. Also, the project is not located within an area known to be of concern to the tribes. In May of 2013, the Little Snake Field Office sent letters describing federal undertakings planned for upcoming years to the three branches of the Utes and to the Eastern Shoshone. The letters mentioned proposed projects involving mechanical treatment of areas with encroaching pinyon and juniper. No response to the letters was received. From the above information, it is concluded that the proposed undertaking will not affect sites or areas of concern to Native Americans.

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 12/3/14

Signature of NEPA Coordinator Kathy McKinstry Date 12/3/14

Signature of the Authorizing Official _____ Date 12/3/14

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.