U.S. Department of the Interior
Bureau of Land Management
Colorado River Valley Field Office
2300 River Frontage Road
Silt, Colorado 81652

DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NEPA NUMBER: DOI-BLM-CO-N040-2015-0060-DNA

PROJECT NAME: Spruce Creek Oakbrush Thinning

PLANNING UNIT: Garfield County

LEGAL DESCRIPTION: Township 7 South, Range 94 West, Section 16, Sixth P.M.

APPLICANT: Bureau of Land Management

ISSUES AND CONCERNS: Mixed mountain shrublands provide transitional habitat between high-elevation summer range and low-elevation winter range for wild grazers. During mild winters, deer and elk may use mixed shrublands as well as lower elevation sagebrush shrublands for shelter and forage. Common shrubs in the mountain shrub complex in the project area include oakbrush and other tall or mid-height grasses in addition to sagebrush. As stands of mixed shrublands mature, the component species lose some of their value to wildlife. This loss results from reduced leaf and seed production, reduced quantity and quality of herbaceous vegetation as competition and shading by the shrubs increases, and (for tall shrub species) a gradual shift in foliage and shoot production to heights unreachable by smaller individuals of deer and elk. Overly dense stands of tall shrubs can also impede wildlife movement, reducing their value as thermal and escape cover.

Treatments to restore optimal production of shrub foliage and seeds and the growth of understory herbs and to facilitate use as thermal and escape cover by wild ungulates typically result in creation of a mosaic of shrub patches and grassy clearings, mimicking patterns following a natural disturbance. The BLM Colorado River Valley Field Office (CRVFO) has determined that removal and thinning of oakbrush can be an important habitat management tool benefiting a variety of native wildlife, in particular wild ungulates and upland game birds.

The vegetation of mixed mountain shrublands varies substantially depending on elevation, slope, aspect, and soil. More mesic (moist) sites such as on north-facing slopes and along minor drainage ways are typically dominated by Gambel's oak and serviceberry, while more xeric (dry) sites such as south-facing slopes are typically dominated by mountain-mahogany, bitterbrush, snowberry, and sagebrush. Mechanical treatments can benefit oak woodlands by increasing oak sprouts for ungulate forage, reducing oak dominance to promote the development of forbs and grasses as forage and cover, and protecting oak stands from encroachment by pines to ensure future mast production.

DESCRIPTION OF PROPOSED ACTION: The proposed action consists of thinning between 30% and 50% of dense oakbrush stands totaling approximately 100 acres in the Spruce Creek area (Figure 1). The project was identified by Colorado Parks and Wildlife (CPW) and BLM as mitigation for year-round drilling performed by Encana Oil and Gas (USA), Inc. on BLM lands.

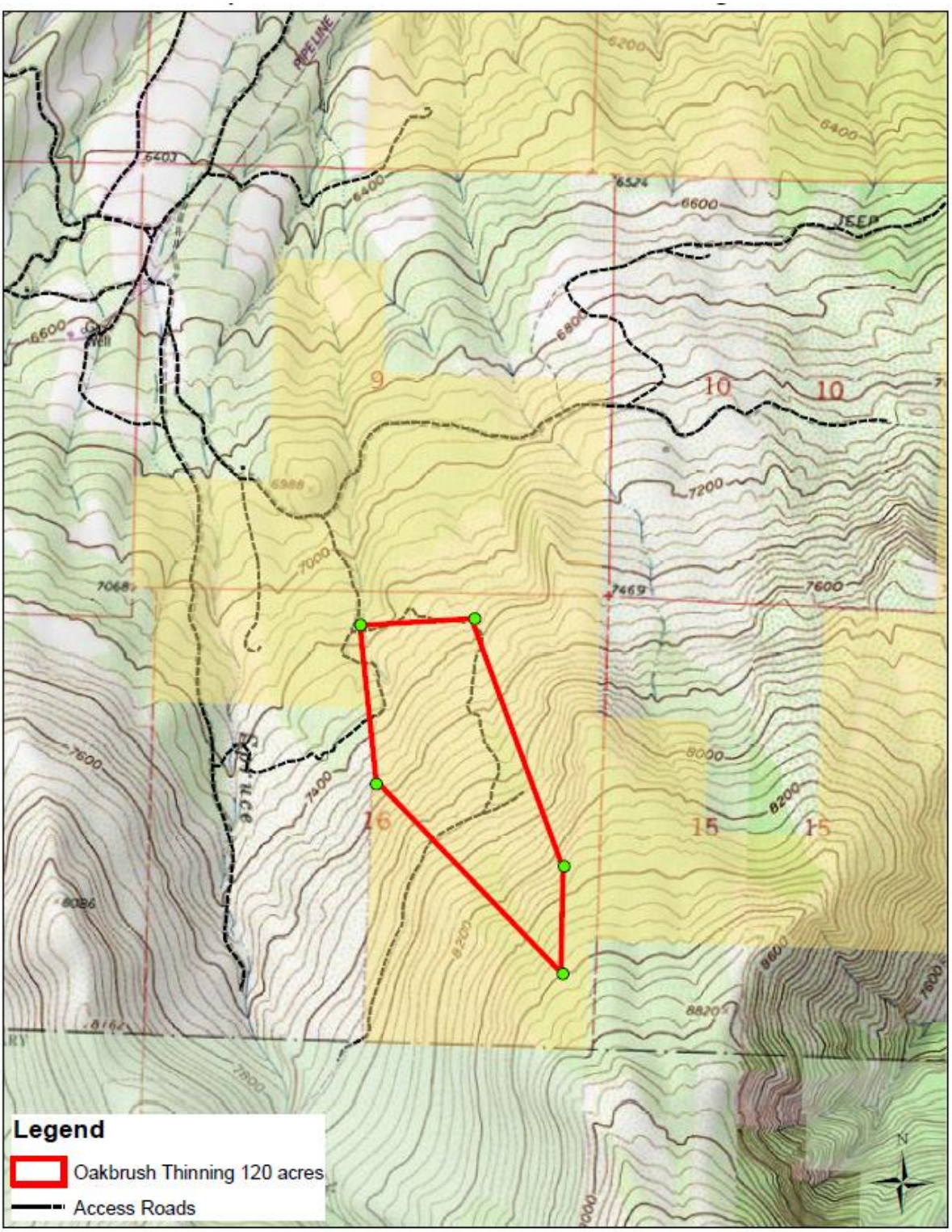

Figure 1. Spruce Creek Oakbrush Thinning Project Area

To access the areas to be treated and to create a firebreak, a swath of trees would be thinned and would be no wider than 30 feet. Areas that are steeper than 30% slope would not be treated. A variety of equipment options are available but the most common and likely to be used would be a large tractor capable of using either a hydro axe or horizontal cutting attachments, however, various equipment could be used as long as the treatment and impacts are the same as the hydro axe. The treatment would result in cutting and shredding of the oak brush and other shrubs into a mulch-like material. The machine cuts and scatters the cut oak brush (mulch) in front of the machine which helps to reduce soil disturbance by providing a matt of material to drive on as the machines travels forward. Monitoring would occur over the following 5 years to evaluate treatment success.

PLAN CONFORMANCE REVIEW: The proposed action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

Land Use Plan and Amendments

- Glenwood Springs Resource Management Plan, Approved in 1984 (Revised in 1988)
- Oil and Gas Plan Amendment to the Glenwood Springs RMP, Approved in 1991
- Oil & Gas Leasing & Development, Record of Decision and RMP Amendment, Approved in 1999

____ The proposed action is in conformance with the LUP because it is specifically provided for in the following LUP decision(s):

_X__ 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): "…to improve existing wildlife habitat conditions, and to increase wildlife species diversity" (1984 RMP, page 18) and "BLM will require reasonable mitigation of the impacts on wildlife habitat that are attributable to both past and proposed oil and gas development within the GAP area…." (1999 RMP Amendment, page 15).

Determination

The proposed action is in conformance with the CRVFO land use plan, as amended, even though it is not specifically provided for, because it is consistent with the land use plan objectives, cited above, of improving existing wildlife habitat conditions (1984 RMP) and mitigating direct and indirect impacts of oil and gas exploration and development on wildlife habitat (1999 RMP Amendment). Habitat treatments such as those incorporated into the proposed action are for the specific purpose of mitigating unavoidable direct and indirect impacts on wildlife from oil and gas activities in big game winter range by and improving existing wildlife conditions. Therefore, the proposed action is in conformance with the current land use plan, as amended, even though it is not specifically provided for.

REVIEW OF EXISTING NEPA DOCUMENT: DOI-BLM-CO-N040-2012-0034-EA. Programmatic Environmental Assessment of the Proposed Wildlife Habitat Mitigation Plan for Oil and Gas Exploration and Development. BLM Colorado River Valley Field Office, Colorado. 2012.

REVIEW OF OTHER RELEVANT DOCUMENTS: The following additional documents are relevant to the proposed action:

- Final Environmental Impact Statement: Vegetation Treatment on BLM Lands in Thirteen Western States. Prepared for BLM Washington Office by BLM Wyoming State Office, Cheyenne. 1991.
- Final Programmatic Environmental Report (PER): Vegetation treatments on BLM lands in 17 Western States. Reno, Nevada.

- Land Health Assessment, Rifle West, April-May 2004. BLM Glenwood Springs Field Office, Colorado. January 8, 2005.
- Fire Management Plan for Wildland Fire Management and Prescriptive Vegetation Treatment. BLM Glenwood Springs Field Office, Colorado. 2002.

EVALUATION OF 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?

   Documentation of answer and explanation: *Yes*. *The current proposed action was analyzed in the Programmatic Environmental Assessment Wildlife Habitat Mitigation Plan for Oil and Gas Exploration and Development. BLM Colorado River Valley Field Office, Colorado. CRVFO DOI-BLM-CO-N040-2012-0034-EA in 2012*.

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?

   Documentation of answer and explanation: *Yes*. *The existing NEPA document analyzed the proposed action and one alternative. No unresolved conflicts concerning alternative uses of available resources were identified through public scoping; therefore, other alternatives were not analyzed. The same applies to the current proposed action given current 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, and updated lists of BLM-sensitive species?

   Documentation of answer and explanation: *Yes*. *In 2003, a formal land health assessment determined that the allotment was meeting all applicable land health standards. A Trend Photo was taken in 2008 showing a general overview of the allotment*. New information does not substantially change the analysis of the new proposed action.

   Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

   Yes. *In 2012, it was determined that implementation of the Programmatic Environmental Assessment Wildlife Habitat Mitigation Plan for Oil and Gas Exploration and Development would result in orderly, effective, and environmentally sound identification and treatment of areas in need of restoration on BLM-administered lands within the CRVFO area. Since then, wildlife improvement projects that would improve overall habitat and prevent further degradation continue to be a priority.*

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?

   Documentation of answer and explanation: *Yes*. *The current proposed action is the same as what was analyzed in the existing NEPA document. The direct, indirect, and cumulative impacts would be the same as those identified in the existing NEPA document. The environmental assessment thoroughly reviewed the many specific environmental impacts including vegetation, water resources, air quality, cultural, threatened and endangered species, wilderness, wildlife, and riparian resources.*

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

   Documentation of answer and explanation: *Yes*. *For the existing NEPA document, the CRVFO made the proposed action available for public review and comment for 30 days by posting on the BLM website, posting announcements in two local newspapers (the Glenwood Springs* Post Independent *and the Rifle* Citizen Telegram), *and notifying selected interested parties by a letter sent via regular mail.*

INTERDISCIPLINARY REVIEW: The following individuals participated in the review of the proposed action and provided input to this DNA.

Name	***Title***	***Responsibility***
Sylvia Ringer	Wildlife Biologist	Project Lead, Migratory Birds, Aquatic Wildlife, Terrestrial Wildlife, Special Status Fish and Wildlife
Allen Crockett	Supervisory NRS/Phys. Sci.	Technical Review, NEPA Review
Judy Perkins	Botanist	Areas of Critical Environmental Concern, Vegetation, Special Status Plants
Isaac Pittman	Rangeland Management Specialist	Grazing Management
John Brogan	Archaeologist	Cultural Resources, Native American Concerns
Kimberly Miller	Outdoor Recreation Planner	Wild and Scenic Rivers, Wilderness, Recreation
Rusty Stark	Fuels Specialist	Burn Plan, Prescribed Burning
Carmia Wooley	Hydrologist	Air Quality, Water Quality, Soils

REMARKS: The oakbrush thinning described in this DNA would be funded using contributions to Colorado Parks and Wildlife from SG Interests specifically intended to support wildlife mitigation in conjunction with the Bull Mountain Pipeline.

The treatment activities would be conducted by Colorado Parks and Wildlife through a contract with Rue Logging.

MITIGATION: Mitigation measures approved in the existing NEPA document would be incorporated and implemented into the proposed action.

NAME OF PREPARER: Sylvia Ringer, Wildlife Biologist

DATE: 04/13/15

CONCLUSION

DOI-BLM-CO-N040-2015-0060-DNA

Based on the NEPA review documented above, I conclude that the proposed action conforms to the land use plan as amended and that the programmatic NEPA documentation previously prepared (DOI-BLM-CO-N040-2012-0034-EA) fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

SIGNATURE OF RESPONSIBLE OFFICIAL: _____
Supervisory Natural Resource Specialist

SIGNED: 4-21-15

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.

DECISION

It has been determined that approval of the proposed action is consistent with the scope of the aforementioned programmatic NEPA document (DOI-BLM-CO-N040-2012-0034-EA). Authorization of the proposed action is subject to specifications identified in the DNA and the previous NEPA. Therefore, it is my decision to authorize implementation of the proposed action as described in this DNA.

SIGNATURE OF RESPONSIBLE OFFICIAL: _____
Supervisory Natural Resource Specialist

SIGNED: 4-21-15