

**U.S. Department of the Interior  
Bureau of Land Management  
Kremmling Field Office  
P O Box 68  
Kremmling, CO 80459**

## **DETERMINATION OF NEPA ADEQUACY (DNA)**

NUMBER: DOI-BLM-LLCON02000-2015-0021-DNA

PROJECT NAME: Reed Creek Units 21, 22, & 23

LEGAL DESCRIPTION:

Grand County, Colorado, 6th PM;  
T. 1 N., R. 77 W., Sec. 11.

APPLICANT: BLM

ISSUES AND CONCERNS:

All issues and concerns can be found in the Reed Creek Sanitation Harvest and Pre-Commercial Thinning EA, DOI-BLM-CO-120-2010-0048-EA, which is hereby incorporated by reference.

DESCRIPTION OF PROPOSED ACTION:

The BLM is proposing to use mechanical treatments to cut and remove dead and windthrow susceptible trees in 3 units totaling approximately 5 acres (see map).

The treatment units are comprised mainly of dead lodgepole pine, although a few scattered live trees remain. The units may also contain live, small diameter lodgepole pine, as well as varying amounts of subalpine fir, Engelmann spruce and aspen.

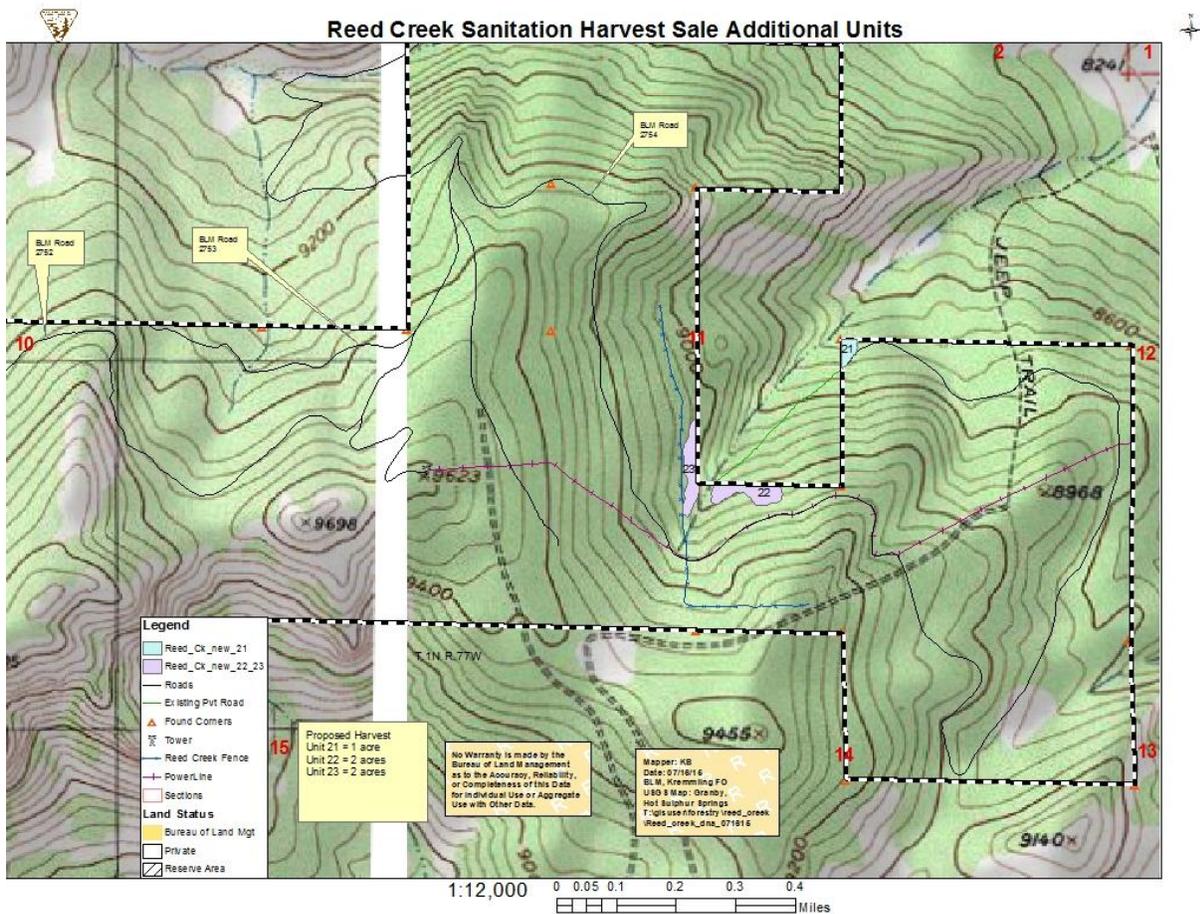
All lodgepole pine trees that are five inches DBH or greater would be cut. Larger subalpine fir, Engelmann spruce, and other conifer species, 9 inches DBH and greater, would also be harvested. Harvest would be implemented with conventional, ground-based, logging equipment. Smaller diameter lodgepole pine (4 inches DBH and less), and other conifer trees (8 inches DBH and less), as well as aspen, would be retained where feasible.

Slash from harvest operations would be piled for later burning by the BLM. Alternatively, slash could be lopped and scattered with prior approval of the contracting officer. A burn plan would be prepared and approved and smoke permits would be obtained from the Colorado Air Pollution Control Division prior to any pile burning.

An existing private road off of BLM Road 2754 accesses Units 22 and 23. Unit 21 is located at the east terminus of BLM Road 2754. Approximately 0.67 miles of existing roads would be maintained under this DNA.

Post-harvest treatments would include a release and weed/thinning treatment (i.e. felling of residual undesirable live trees), and noxious weed control. The BLM would monitor disturbed areas for noxious weeds for two growing seasons after project completion. If noxious weed control is found necessary, then actions would be coordinated by the BLM

The Reed Creek Sanitation Harvest and Pre-Commercial Thinning EA Decision Record, signed on August 4, 2011, authorized the harvest of approximately 244 forested acres and an estimated 9.8 miles of road maintenance. This DNA would add approximately 5 acres of harvest treatment, 5 acres of Release & Weed, and an estimated 0.67 miles of road maintenance to those authorized actions. All design features from the Reed Creek Sanitation Harvest and Pre-Commercial Thinning EA, DOI-BLM-CO-120-2010-0048-EA would be followed, although the design feature pertaining to active goshawk nests would be modified to read as follows: If an active goshawk nest is located within a timber sale unit, a ½ mile buffer around the nest would be required.



Decision to be Made:

The BLM will decide whether or not to authorize the implementation of the Proposed Action, and if so, under what terms and conditions.

## 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):

Name of Plan: Kremmling Record of Decision and Approved Resource Management Plan (ROD/RMP)

Date Approved: July 8, 2015

Decision Number/Page: ARMP Section 2.2.1, Pages 41 and 42

Decision Language: The goal listed under Forestry is to, “Use a variety of silvicultural techniques and harvest systems in order to manage for healthy forests and woodlands while, at the same time, offering a variety of forest products on a sustainable basis.”

Management actions cited include, “Implement immediate salvage or accelerated harvests following adverse events (MPB and spruce beetle infestations, other insect outbreaks, disease, blow down, wildfire) in order to regenerate stands and to capture the economic value of forest products before that value is lost. Accelerate harvest of lodgepole pine killed or threatened by MPB for the next 10 years to 15 years in order to salvage commercial value....”.

## REVIEW OF EXISTING NEPA DOCUMENTS:

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

Name of Document: Reed Creek Sanitation Harvest and Pre-Commercial Thinning EA: DOI-BLM-CO-1202010-0048-EA

Date Approved: 8/4/11

## 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?

*This Proposed Action is essentially similar to the Proposed Action authorized in the Decision Record of the Reed Creek Sanitation Harvest and Pre-Commercial Thinning EA, DOI-BLM-CO-120-2010-0048-EA. The Proposed Action is within the same analysis area.*

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?

*Two alternatives (Proposed Action and No Action Alternative) were analyzed in the Reed Creek Sanitation Harvest and Pre-Commercial Thinning. No issues were brought forward that required the development and analysis of additional alternatives. These alternatives are considered to be adequate and valid for this 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?

*The Reed Creek Sanitation Harvest and Pre-Commercial Thinning EA, DOI-BLM-CO-120-2010-0048-EA was completed and the Decision Record signed on August 4, 2011 and is still valid. There has not been any new information or circumstances that would substantially change the analysis.*

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 direct, indirect and cumulative effects of implementing the new Proposed Action would be similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document. The new Proposed Action adds a minor amount of road maintenance and timber harvest to the actions authorized in the Decision Record for the Reed Creek Sanitation Harvest and Pre-commercial Thinning EA.*

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

*In addition to Tribal consultation, a scoping letter describing the existing condition, purpose and need, and the proposed action was sent to 65 adjacent property owners, grazing permittees, Right-of-Way grant holders, communications-use lease holders, and other interested parties on March 4, 2011. The EA and Decision Record were posted on August 4, 2011.*

#### INTERDISCIPLINARY REVIEW:

The Proposed Action was presented to, and reviewed by, the Kremmling Field Office interdisciplinary team on 7/21/2015. A complete list of resource specialists who participated in this review is available upon request from the Kremmling Field Office. The table below lists resource specialists who provided additional remarks.

Name	Title	Resource	Date
Bill Wyatt	Archaeologist	Paleontological Resources, Cultural Resources, Native American Religious Concerns, and Paleontology	7/30/2015
Darren Long	Wildlife Biologist	Special Status Plant and Wildlife	8/6/2015

		Species, Terrestrial Wildlife, Fisheries	
Ken Belcher	Forester	Forest and Woodland Vegetation, Forestry and Woodland Products	7/28/2015
Kevin Thompson	Fuels Specialist	Fire Management	8/4/2015
Paula Belcher	Hydrologist	Soil, Water, Air, and Riparian Resources	8/10/2015
Zach Hughes	NRS	Weeds, Vegetation, Livestock Grazing	08/06/2015

**REMARKS:**

*Cultural Resources:* A Class III inventory BLM #CR-15-31 was conducted for the proposed action. No sites or isolated finds were recorded within the area of potential affect. The project is a no effect, there are no historic properties affected.

*Native American Religious Concerns:* Tribal consultation is initiated and to date no tribe has identified any area of traditional cultural or spiritual concern.

*Threatened and Endangered Wildlife Species:* There are no known or documented occurrences or occupation of any listed Threatened or Endangered wildlife species or their habitat in or near the project area. This project would not affect Threatened, Endangered or any other special status species reserving legal protections.

*Paleontology:* There is no potential to affect paleontological resources.

**COMPLIANCE PLAN:** On-going compliance inspections and monitoring will be conducted by the BLM Kremmling Field Office staff. Specific design criteria developed in this document will be followed as will the design features in the Reed Creek Sanitation Harvest and Pre-commercial Thinning EA

**NAME OF PREPARER:** Kenneth Belcher

**NAME OF ENVIRONMENTAL COORDINATOR:**

**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 the NEPA.

**SIGNATURE OF AUTHORIZED OFFICIAL:** Stephanie Odell  
Field Manager

**DATE SIGNED:** 08/10/2015

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.