

U.S. Department of the Interior
Bureau of Land Management
Uncompahgre Field Office
2465 South Townsend Avenue
Montrose, CO 81401

Determination of NEPA Adequacy (DNA)

NUMBER: DOI-BLM-CO-S050-2011-0028DNA

PROPOSED ACTION TITLE: Hanging Flume Replica Construction

LOCATION/LEGAL DESCRIPTION: T 48N, R 17W, NMPM Sec. 30, NW, NW, SW and SW, SW, NW.

APPLICANT: BLM/ Western Colorado Interpretive Association (WCIA)

A. Description of the Proposed Action and any applicable mitigation measures

This proposal, as part of the Hanging Flume Interpretive Program, is to re-build a section of the original flume on the cliff face in its original position. The reconstruction will use new materials but will be built in the same place as a collapsed section of the flume, and will use the original specifications to create a modern replica of the original flume in position.

The construction of this replica will take place on the top of the cliff within the Overlook Interpretive area and on the cliff face below the interpretive site. All materials will be deposited in the parking area of the interpretive site and will be hand carried to the edge of the cliff, where they will be lowered on ropes to crews for Vertical Ascent for assembly and anchoring on the original existing bents and holes drilled for construction of the hanging flume. No heavy equipment will be used, and power for hand tools will be generated by a small portable generator on top of the cliff. Anchor points will be temporary, and all traces will be eradicated by the crews before departure.

B. Land Use Plan (LUP) Conformance

The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5-3, BLM 1617.3):

Name of Plan: San Juan/San Miguel Resource Management Plan and Record of Decision

Date Approved: September 1985

Decision Number/Page: Area F, page 43

Decision Language: "Manage cultural resources for protection, preservation, investigation, and public use (i.e. development and interpretation), where appropriate." "Emphasize management and develop cultural management plans on the following cultural sites/areas: ... Hanging Flume ..."

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): The intent of the LUP language was to develop interpretive sites and programs for the Hanging Flume. This decision was amplified in the interpretive plan for the Flume, which included a detailed plan for reconstruction a portion of the original flume in place. The current proposal is consistent with the LUP decision and the subsequent interpretive plan.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

- 1) Name of Document: EA #CO-150-2009-037 Hanging Flume Confluence Overlook Interpretive Site
Date Approved: September 22, 2009

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 current proposal will be implemented within the area previously analyzed in the existing NEPA document (EA#CO-15-2009-037) and all surface disturbing activities will be conducted within that area. Areas within this proposal which will project outside that area are limited to the vertical cliff face below the proposed interpretive site. No impacts beyond those analyzed in the initial document are anticipated.

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 existing NEPA document analyzes the effects of constructing an interpretive site, parking area and trails on the top of the cliffs above the current project. The analysis presents a comprehensive and appropriate range of alternatives for construction and maintenance given currently available technology. This proposal adds one more element to the interpretive site without substantially changing the scope of the original project. No other alternatives are needed in light of current concerns, interest 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 information and circumstances behind the original analysis are still valid and relevant. No additional information has become available that would change the nature or findings of 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 and indirect effects would be the same as those described in the existing NEPA documents. The construction of this replica will be accomplished with less disturbance than that analyzed in the original EA for the site.

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

The public involvement and review is still adequate, and the public will have further opportunity for review of this DNA as it will be available to the public upon approval.

E. Persons/Agencies /BLM Staff Consulted

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Glade Hadden	Archaeologist	Cultural and Native American Religious Concerns
Robert Bavin	Wildlife Biologist	Wildlife; Threatened, Endangered and Sensitive Species; Migratory Birds
Bruce Krickbaum	Environmental Coordinator	Document Review

REMARKS:

Cultural Resources: The proposed project will take place entirely within the previously inventoried area (EA 2009-037). Further work or additional inventory is not required under the provisions of 8110.23B3.

Native American Religious Concerns: There are none known or anticipated for this project.

Threatened and Endangered Species: The proposed action would have no adverse effects upon any threatened, endangered, or sensitive species or their habitat.

MITIGATION: The following Mitigation will be implemented as outlined in the construction plan (WCIA may 2011):

Protecting the fragile environment at the work site will be a central component of this reconstruction project. The small scale of this demonstration project will, by its nature, limit environmental impact.

Site work will be completed by a crew of 6 to 8 people over a period of up to two weeks (in September 2011).

- Similar to the “leave no trace” ethic of backcountry camping, this project will leave no wood scraps or other evidence at the work area or below the flume, after the completion of the project.
- Tools used will be limited to small hand tools, hand power tools such as circular saws and drills and a small electrical generator.
- All the tools and materials to be used will be carried by hand from the roadside pull off to the construction staging area above the cliff.
- All the anchors used to support worker’s ropes or material to be lowered will be removed from the site.
- All sawdust will be from locally harvested and milled, untreated pine lumber, representing no environmental hazard.
- Sawdust will be directed away from potential watercourses and areas of runoff.
- A portable generator, small enough to be carried by hand (5,000 watts), will be used to provide power for operating portable tools. Some generator noise is to be expected while cutting and drilling but this will be kept to a minimum.
- Generator fuel will be added very carefully and the generator will be maintained well away from any potential watercourse.
- A “port-a-john” will be available for all crew members during the project.

Further precautions will be taken to protect vegetation at the work site and the slopes above, e.g. no trees will be cut, rocks moved, etc.). The site was chosen in part due to the lower angle and accessibility to the highway via the original cart trail, without causing further erosion of fragile soils. The historic cart trail and future interpretive site pullout provides access for carrying equipment and materials to the work staging area without further impacting the soils and vegetation.

We anticipate the participation of volunteer student and community labor to assist in moving materials from the staging area to the drop zone.

In addition to volunteer labor, we will also install and use a temporary cable “tram” system for delivery of small tools, parts and other materials as well as drinking water to the Drop Zone from the Staging Area. This will further mitigate environmental impact to soils and vegetation by reducing the number of trips and foot traffic required to move materials from the Staging Area to the Drop Zone.

Site selection and construction planning have been chosen to avoid archeological sites (e.g., construction camps) and artifacts. We do not anticipate any detrimental effects on water quality or the riparian communities below the work area, because all of the work will be accomplished from above, and not directly over the river.

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.

Project Lead: Glade Hadden

Signature of NEPA Coordinator  Date 8/8/2011

Signature of the Responsible Official 
Barbara Sharrow
Field Manager, Uncompahgre Field Office

Date 8-11-11

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 Part 4 and the program-specific regulations.

References:

WCIA 2011

Stabilizations and Restoration of a Segment of the Hanging Flume, Montrose County, Colorado. Report prepared May 11, 2011 for BLM by Western Colorado Interpretive Association, Anthony and Associates and Vertical Access. On File, BLM Cultural Resources, Uncompahgre Field Office, Montrose.

WCIA and Colorado Historical Society, 2006

The Hanging Flume, Montrose County, Colorado. Western Colorado Interpretive Association, January 2006. State Historical Fund, Project 2004-01-086. Report on file, BLM Cultural Resources, Uncompahgre Field Office, Montrose.