Bureau of Land Management
Canyons of the Ancients National Monument
27501 Highway 184
Dolores, CO 81323

Lowry Pueblo Fuels Reduction Project
Short-Form Environmental Assessment (EA)

1.0 INTRODUCTION

EA Number	CO-800-2006-102

The proposed project area is located in Montezuma County, approximately 9 miles west of Pleasant View, CO in Township T38N R19W Section 2 (see attached map). The analysis area consists of 70 acres surrounding Lowry Pueblo in Canyons of the Ancients National Monument. Lowry Pueblo is an Ancestral Puebloan prehistoric archaeological site, and is listed as a National Historic Landmark. The site is the primary developed and interpreted site that the visiting public is directed to in the Canyons of the Ancients National Monument. Developments at the site include a parking lot, an accessible trail, an information kiosk, interpretive signs, a picnic area with tables, and restrooms. The site has been stabilized and has a roof structure that shelters sensitive excavated and stabilized structures.

Lowry Pueblo is identified in the Montezuma County Community Wildfire Protection Plan as a "wildfire hazard" area. Additionally, the Lowry Pueblo fuels project is supported by the San Juan/San Miguel Resource Management Plan, the Monument Proclamation, the National Fire Plan, and the document "Protecting People and Sustaining Resources in Fire Adapted Ecosystems- A Cohesive Strategy." Additionally, the project is consistent with the intent of the Healthy Forests Initiative and Healthy Forests Restoration Act.

2.0 CONFORMANCE WITH APPLICABLE LAND USE PLAN

The proposed action is subject to the following documents:

- *San Juan/San Miguel Planning Area Resource Management Plan* – approved September 1985
- *Proclamation Establishing Canyons of the Ancients National Monument* – June 9, 2000
- *BLM Interim Management for All National Monuments*

The proposed action has been reviewed for conformance with the land use plan terms and conditions as required by 43 CFR 1610.5.

The proposed actions would occur within Emphasis Area F, Emphasis on Cultural Resources, in the San Juan / San Miguel Resource Management Plan (RMP). The proposed actions are in conformance with and are designed to achieve the RMP objective for this emphasis area, which is to protect, preserve, and manage important cultural resources. The proposed project is also in

conformance with the Monument Proclamation and the Interim Management Guidance for All National Monuments.

Relationship to statutes, regulations, and other plans

The Federal Land Policy and Management Act (FLPMA) of 1976 (43 U.S.C. 1701 et seq.:90 Stat. 2743; P.L. 94-579) directs that the public lands be managed in a manner that would protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resources, and archeological values….".

The Healthy Forests Initiative of 2002 and Title 1 of the Healthy Forest Restoration Act of 2003 support fuels reduction projects on lands that are at risk of wildland fire. Because of the proposed herbicide treatment, this project is not being evaluated under the special Categorical Exclusion (CE) authorities of the Healthy Forests Initiative.

Laws governing the management of public lands include the Archeological Resource Protection Act of 1979, National Historical Preservation Act of 1966 as Amended (1980), National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 *et seq.*), 1973 Endangered Species Act, as amended, Bald Eagle Protection Act of 1940 [16 U.S.C. 668; Stat. 250, as amended, P.L. 86-70, 73 Stat. 143 (1959), P.L. 87-884, 76 Stat. 1246 (1962), and P.L. 92-535, 86 Stat. 1064 (1972)], Migratory Bird Treaty Act of 1918 [16 U.S.C. 703711; 40 Stat. 775, as amended, 49 Stat. 1556 (1936), 74 Stat. 866 (1960), 88 Stat. 190 (1974), 92 Stat. 3111-3112 (1978), and Clean Air Act of 1977, as amended, U.S.C. 7401 *et seq.*; 91 Stat. L. 685; Pub; L. 95-95 (Aug. 7, 1977), as amended.

The proposed vegetation manipulation action addressed within this assessment meets the BLMs Standards for Public Land Health, which includes improving upland soil conditions and attaining healthy plant and animal communities.

Section 106 of the National Historic Preservation Act of 1966 (as amended) requires that federal agencies take into account the effects of their undertakings on historic properties and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. This process often requires an intensive field survey to accurately locate and evaluated cultural properties within the undertaking's area of potential effect as defined by regulation (36 CFR8 00).

In compliance with Section 106, an intensive field inventory of cultural resources was completed for the proposed project area in the fall of 2006 and the spring of 2007. A total of 9 prehistoric sites (including 3 prehistoric roadway sites) were recorded within the potential area of effect for the treatment area, including Lowry Pueblo National Historic Landmark and 2 other major Ancestral-Pueblo habitation sites. As expected, this represents a high site density and which is extremely sensitive to disturbance. In addition, setting is a key contributor to the importance of Lowry Pueblo as a site listed on the National Register of Historic Places (NRHP). Because of the NRHP designation, landscape values such as old-growth pinyon juniper and visual integrity are important management concerns for the area. Most sites recorded are affiliated with the Ancestral Pueblo occupation and include a variety of resources types from multiple habitation/village sites to isolated activity areas associated with resource processing and tool manufacture. One site includes a small historic Navajo sweatlodge associated with early preservation efforts at Lowry

Pueblo and one site is a historic trash dump also from the early excavation/stabilization efforts. The proposed project has been designed to avoid all effects to the cultural resources and to the landscape value or setting (as described in 36 CFR 64) associated with the Lowry Pueblo National Historic Landmark and Lowry National Register Site.

According to the 1997 Programmatic Agreement Among the Bureau of Land management, The Advisory Council on Historic Preservation and The National Conference of State Historic Preservation Officers (Regarding the Manner in Which BLM will Meet its Responsibilities Under the National Historic Preservation Act) and the 1998 Colorado BLM/State PROTOCOL SectionVIII,8,(b),(2), the Colorado State Historic Preservation Office and the President's Advisory Council on Historic Preservation have been afforded reasonable opportunity to comment and have concurred with the agency's finding of "No Adverse Effect" to cultural resources from the proposed undertaking.

3.0 PURPOSE AND NEED FOR THE PROPOSED ACTION

The purpose of this project is to protect the world class archaeological resources and the associated recreation and interpretive facilities around Lowry Pueblo. Creating a buffer of thinned vegetation around the area would enable firefighters to safely and effectively protect the cultural resources and recreation improvements from wildfire. A second purpose of this project is to test the effectiveness of the Plateau herbicide on a 5-acre area containing cheatgrass. If successful, the herbicide would be evaluated for use on cheatgrass at a larger scale.

The project is needed because the Lowry Pueblo area is at risk from high-severity wildfire approaching the area from the south, east, and west. Damage to the cultural resources and ecology of the area from a high-severity wildfire would likely be severe.

The project area consists mainly of dense pinyon-juniper woodlands mixed with mountain shrubs, grasses, and sage. The northern portion of the analysis area contains a pinyon-juniper stand with old-growth characteristics. Within this woodland, approximately 50% of the pinyon is dead as a result of Ips beetle infestation. These trees are beginning to fall over, greatly increasing surface fuel loading. The heavy fuel loading and the vertical arrangement of the fuels in the area are conducive to a rapidly spreading and high-severity wildfire under adverse fire weather conditions. In addition, much of the area around the roof structure and picnic areas contains cheatgrass. Under existing conditions, rapid rates of spread and large flame lengths can be expected from a wildfire burning under adverse conditions. Spotting could occur 0.6 miles ahead of the main flame front.

When implemented, treated areas would likely experience a minimal rate of spread and only isolated pockets of large flame lengths when hit by an intense flaming front. Such fire behavior was observed in thinned pinyon-juniper stands during the 2002 Long Mesa Fire at Mesa Verde National Park and the 2005 Cash Canyon Fire on BLM lands administered by the Dolores Public Lands Office.

4.0 DESCRIPTION OF THE PROPOSED ACTION

The objectives of the project are:

- To alter the fire behavior of an approaching wildfire flame front so that firefighters could successfully and safely defend this valuable cultural resource and popular interpretive site.
- Test the effectiveness of the Plateau herbicide on cheatgrass for possible use on a larger scale.

The proposed treatment alternative for the project would use a combination of hydro-ax mastication and hand-thinning over approximately 40 acres of the analysis area. Hand-thinning with chainsaws followed by chipping would be used in select sensitive areas adjacent to the pueblo, developed area, and in and adjacent to other archaeologically sensitive areas. The center core developed and interpretive area would be left as is with the exception of cutting dead brush and trees. The remainder of the area would be thinned with a hydro-ax. Limited pile burning may occur in some remote and non-sensitive areas. Treatment units would be seeded with a native mix prior to mechanical implementation. See ecologist report for seed mix.

It is further recommended that the fine grassy fuels in the center core area get cut annually to help protect the area from a fast moving fire. Herbicide treatment of about five acres would also occur around the roof structure and picnic areas. The small treatment would test the effectiveness of Plateau herbicide for cheatgrass control in a larger field situation, and to evaluate the impacts of the spray on other species growing intermixed with the cheatgrass. The limited scale of the proposed spaying would minimize any adverse impacts to a very small area. The herbicide would be applied by truck or ATV mounted spray equipment between August 1 and November 30, 2007. Follow-up herbicide applications would be made for about five years. The treatment location has remnant stands of native perennial plants, thus seeding of the proposed treatment area is not proposed.

The thinning prescription would be as follows:

- Cut and mulch dead pinyon and juniper. Leave 1-2 juniper snags per acre and some downed logs for wildlife and to help prevent erosion.
- Cut and mulch 50 % of live pinyon / juniper where canopy is dense.
    - Focus on removing mistletoe infested trees, stressed trees, and trees showing signs of insect infestation.
    - Leave a diversity of species and size classes.
    - Favor leaving healthy pinyon.
    - Use a mix of 16 feet canopy spacing and mosaic clumps (1/10 acre in size, round shape).
    - Flush cut stumps close to the ground.
- Cut 50% of mountain shrub in areas where shrubs are dense.
- Cut 30% of sage near pueblo and developed area and up to 50% of sage in other areas. Cut sage back 25-50 feet in an undulating line on SW corner of pueblo.

5.0 OTHER ALTERNATIVES CONSIDERED

No Action Alternative
Hazardous fuel reduction and the vegetative manipulation of the proposed project area would not occur. The resource management "status quo" would continue. The potential for a wind driven, high-severity, canopy fire event would not be mitigated. The world class archaeological resources and associated recreation and interpretive facilities would remain at high risk from wildfire. Potential damage from such a stand replacing fire could be severe and would impact the cultural resources and ecology of the area. The safety risk of firefighters responding to a wildfire in the area and the recreating public would not be mitigated.

6.0 ALTERNATIVES CONSIDERED BUT NOT TAKEN FORWARD

6.1 Hand-thinning and Chipping Alternative
A hand-thinning and chipping alternative was considered by the ID team. It was determined that the surface disturbance caused by intensive foot traffic associated with hand crews operating chainsaws and dragging limbs and sticks across the site would be substantial. The heavy foot traffic repeated numerous times across the same piece of ground would be followed by towing a chipper with an ATV or pick-up across the area to mulch activity fuels. A hydro-ax with large floatation rubber tires can treat the area with minimal surface disturbance under dry or frozen soil conditions. The hydro-ax would also leave a mulch layer across the area as it works, which would help to stabilize soils. Limited pile burning may occur in some remote and non-sensitive areas. Treatment units would be seeded with a native mix prior to mechanical implementation. Fine grassy fuels in the center core area would get cut annually. Herbicide treatment of about five acres would occur around the roof structure and picnic areas.

6.2 Hand-thinning and Pile Burning Alternative
A hand-thinning and pile burning alternative was also considered by the ID team. This alternative was not chosen because pile burning would result in pile burn scars across the soils of the area, potential scorching and scarring of desirable trees left on the site, and the increased potential of erosion across the area. The archaeologist determined that it is desirable to leave a layer of chips in treated areas to help stabilize the soils adjacent to important archaeological sites. Limited pile burning may occur in some remote and non-sensitive areas. Treatment units would be seeded with a native mix prior to mechanical implementation. Fine grassy fuels in the center core area would get cut annually. Herbicide treatment of about five acres would occur around the roof structure and picnic areas.

7.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

The following table summarizes the potential environmental impacts that have a reasonable potential to be associated with the proposed action.

Critical Element	Affected by proposed Action?			Critical Element	Affected by proposed Action?	
	Yes	No			Yes	No
Air Quality		X		Native American Religious Concerns		X
Areas of Critical Environmental Concern (ACEC)		X		Threatened or Endangered (T&E) Species		X
Cultural Resources		X		Hazardous or Solid Waste		X
Environmental Justice		X		Water Quality (Surface and Ground		X
Farm Lands (Prime & Unique)		X		Wetlands & Riparian Zones		X
Floodplains		X		Wild & Scenic Rivers		X
Invasive, Non-Native Species	X			Wilderness		X
Migratory Birds		X				

7.1 Description of Impacts (Quantitative):

No impacts to any of the above Critical Elements, except invasive, non-native species, would be expected from the proposed action.

No impacts to any of the critical elements, except cultural resources, would be expected from the No Action Alternative. If no action is undertaken, a high-severity wildfire could severely damage this cultural resource.

Under the proposed action, overall land health would be improved and wildfire hazards at Lowry Pueblo would be mitigated, resulting in long-term benefits to all resources. Impacts from mechanical fuels reduction (mastication) were analyzed in the programmatic environmental assessment entitled *Wildland-Urban Interface Hazardous Fuels Reduction* (CO-SJPLC-03-044 EA) in 2004. The no impact determination (above) was reached using the information in that document, which can be reviewed at the Dolores Public Lands Office.

In the Draft Environmental Impact Statement (DEIS) *Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States* (BLM 2005), BLM evaluated 24 herbicide active ingredients for potential environmental impacts. Imazapic, the active ingredient in Plateau, was evaluated to assess the potential for risks to human health and the environment. The following impacts are condensed from the DEIS, which can be reviewed at the Dolores Public Lands Office.

Soil Resources. Imazapic is moderately persistent in soils and has not been found to move laterally with surface water. Imazapic has a half-life of 120 to 140 days in soil, with most imazapic lost through biodegradation. Runoff would be negligible in relatively arid environments as well as sandy or loam soils.

Water Resources and Quality. Imazapic is not known as a groundwater or surface water contaminant. In aquatic systems, imazapic will rapidly photodegrade, with a half-life of 1 to 2 days.

Vegetation. Imazapic is a selective, systemic herbicide used on annual and perennial broadleaf weeds and grasses. Imazapic is quite active with only small concentrations required to kill target plants. Due to its activity, imazapic may be highly effective, particularly with spot applications, in controlling aggressive invasive species that have not responded to other herbicides or treatment methods. Several short-term studies have shown that preemergent/fall application of imazapic can be effective in controlling invasive species while improving the establishment of native grassland plants. However, despite its selectivity, studies have found that if some supposed tolerant plants are directly sprayed by imazapic at typical application rates, they are likely to be injured. Accidental direct spray and spill scenarios result in low risk to terrestrial plants at the typical application rate and moderate risk at the maximum application rate.

Special Status Plant Species. Of the active ingredients evaluated in the DEIS, the herbicide with the lowest risk to terrestrial plants is imazapic, which can be broadcast sprayed by ground methods 25 feet from a sensitive plant without risk. Imazapic also poses no risk to sensitive plants via surface runoff when applied at typical application rates. Additionally, no sensitive plant species are known to occur in the vicinity of the Lowry Pueblo treatment area.

Wildlife Resources. Risk quotients for terrestrial wildlife were all below the most conservative level of concern of 0.1 (acute endangered species), indicating that direct spray of imazapic is not likely to pose a risk to terrestrial animals. Therefore, use of imazapic would primarily affect wildlife through habitat modification. Its use in forested rangeland and other wildlife habitat areas could benefit wildlife by controlling invasive plant species and promoting the establishment and growth of native plant species that provide more suitable wildlife habitat and forage.

Cultural Resources. It is unlikely that cultural artifacts protected by soil or plant cover would be adversely affected by chemical treatments. The effect of herbicide treatments on cultural resources depends on the method of herbicide application and the herbicide type used. Standing wall masonry structures and organic materials can be impacted by chemical treatments to the extent that the chemical used alters the chemistry of the application site and of course if surface-disturbing application methods are utilized, these have the potential to impact cultural resources and must be considered. If a controlled surface application is used where minimal soil penetration occurs and application is directed away from standing wall masonry, these impacts can be avoided. Chemicals may affect the surface of exposed artifacts, but important artifacts can be point located, removed prior to treatment and replaced afterwards if this is the case. The impact of chemical treatment would also vary directly with the extent to which plants, important to maintaining traditional lifeways, are the target plants for treatment or are associated with treatment plants. In the case of cheatgrass, this is not the case. There are no known traditional Native American uses for cheatgrass.

Recreation. The Human Health and Safety section of the DEIS describes the potential risks imazapic would have on recreationists.

Over the long term, herbicide treatments would have a positive effect on recreation. Removal of weedy vegetation would return public lands to a more “natural” or “desirable” condition, which

hikers and nature enthusiasts would likely value over that of degraded lands. In addition, the increased aesthetic value of treated sites would benefit most recreational users. In some instances, treated sites could become more desirable as destinations for outdoor activities, making them more popular to recreational users. In addition, fuels reduction treatments would reduce the likelihood of future wildfires on public lands used for recreation. As a result, recreationists would be provided with safer conditions, and there would be less of a chance that a wildfire would destroy a large acreage of lands used for recreation.

Human Health and Safety. Risk to two types of human "receptors" was evaluated: occupational receptors and public receptors. Occupational receptors included those workers that mix, load, and apply herbicides and operate transport vehicles. Public receptors included those members of the public most likely to come into contact with applied herbicides.

Imazapic applications do not present risk to any receptors when applied in routine use situations at either the typical or maximum application rate. Accidental scenarios involving dermal contact with direct spray or vegetation or dietary exposure were not calculated because imazapic has not been shown to have acute dietary or dermal effects in hazard analyses conducted by the US Environmental Protection Agency.

The single critical element that would be affected by the proposed action is invasive, non-native species. An objective of this project is to test the effectiveness of the Plateau herbicide on cheatgrass. Therefore, if the herbicide is successful, cheatgrass densities would be reduced on the 5-acre test area.

7.2 Residual Impacts (cumulative, irreversible, and irretrievable impacts)

1. Cumulative

Treatment of hazardous fuels in the project area is expected to improve the health of the plant communities. Benefits to these communities would result from decreased effects of severe wildfires and decreased importance of invasive species. The hazardous fuels treated for this project would combine with past, present, and future fuels treatments across the landscape for a cumulative effect in fuels reduction and restoration of fire to a fire-adapted ecosystem

If the Plateau herbicide is successful in reducing the amount of cheatgrass, the herbicide could be used on a larger scale, which would mean this project would cumulatively contribute to the reduction of cheatgrass. If the Plateau herbicide is not successful, there would be no cumulative contribution.

2. Irreversible and Irretrievable Impacts

No irreversible or irretrievable commitments would result from the proposed action. Under the No Action alternative, a high severity wildfire under adverse weather conditions could cause severe, irreversible damage to the cultural resources in the project area.

8.0 DESIGN CRITERIA

Archaeology

- If subsurface cultural resources are unearthed during operations, activity in the vicinity of the cultural resource would cease and a BLM representative notified immediately. Pursuant to 43 CFR 10.4 the holder of this authorization must notify the authorized officer, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, the operator must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

- The operator is responsible for informing all persons associated with this project that they will be subject to prosecution for knowingly disturbing Native American Indian shrines, historic and prehistoric archaeology sites, or for collecting artifacts of any kind, including historic items and/or arrowheads and pottery fragments from Federal lands.

- "Visually sensitive areas" adjacent to Lowry Pueblo and along the road approaching the parking area would receive minimal hand thinning (no more than 30% of the sage and dead pinyon and juniper trees not left as desirable snags) and chipping. Thinned materials would be hand carried outside the "visually sensitive area" and chipped and scattered. No mechanized equipment would be allowed within this "visually-sensitive area". In addition, fragile archaeological features and artifact scatters within this "visually-sensitive area" would be flagged with pink/black-striped flagging for total avoidance. No foot traffic would be allowed across these areas. Any seeding done in "visually sensitive area" must be completed by hand.

- Outside the "visually sensitive area" a vertical-shaft hydro-axe would be allowed during completely-dry or completely-frozen conditions only. Fragile archaeological/historic resources within this treatment area would be included in a mosaic of "leave areas" flagged in pink/black-striped flagging for avoidance. Chips and mulch from the mowing activity can be scattered across these leave areas from outside the flagged boundary.

- Within the flagged "leave areas" hand thinning would be done to reduce hazardous fuels. Shrubs and trees less than 8" in diameter would be cut and transported by hand to outside the "leave area" boundary and chipped. There may be small areas with fragile features where foot traffic would not be allowed. These areas would be "ringed" with pink/black-striped flagging.

- All old-growth trees will be protected. This is a stipulation to protect the landscape values that are part of the" setting and association" eligibility criteria that make Lowry eligible to the NRHP.

- An agency archaeologist would monitor treatment as appropriate but on a weekly basis at a minimum to assure flagging remains intact and that appropriate protection measures are implemented. Two-week notice is required prior to the start-up of operations to enable the agency archaeologist to implement the monitoring strategy. Should any deviation from the

treatment plan be observed or threats increased, monitoring intensity will be increased accordingly.

- Prevent direct spray of herbicide, or herbicide drift, from coming into contact with the standing wall structures.

Wildlife

- Where possible, avoid any vegetation removal and/or treatment from May 15 to July 15 to protect nesting migratory birds.

- Maintain 1-2 of the largest snags and a few downed logs per acre for wildlife and to prevent erosion.

- Maintain a mosaic of pinyon-juniper clumps. Maintain clumps to approximately 1/10th acre in size and rounded in shape.

Ecology

- Clean all equipment with a power wash before entry onto public land to remove noxious weed seed. All equipment must be inspected by the COR or designated project inspector before entry onto public lands.

- Any seeding would use the approved seed mix specified for this project. Seeding would be done prior to the hydro-ax treatment and prior to any hand treatments to incorporate the seed into the soil.

- Consider effects of wind, humidity, temperature inversions, and heavy rainfall on herbicide effectiveness and risks.

Recreation and Human Health and Safety

- Access to the treatment area would be restricted during herbicide application. A sign would be prominently posted at the site one week prior to treatment, and one week following treatment. The sign would state the date of herbicide application, herbicide used, and phone number of the BLM Weed Management Coordinator.

- Appropriate personal protective equipment would be worn during herbicide application, and all herbicide label requirements would be followed.

9.0 OTHER PERSONS/AGENCIES CONSULTED

The project has been published in the quarterly issues of the San Juan Public Lands Schedule of Proposed Actions since October 2006. A news release of the proposal was issued to media outlets

on November 27, 2006 and was published in the Southwest Colorado Fire Information Clearinghouse on November 27, 2006; in the Cortez Journal on December 2; in the Dolores Star on December 1; and in the Dove Creek press on November 30. The news release was heard on KVFC AM 740 out of Cortez on November 28, 2006. Further collaboration occurred with the Colorado State Forest Service, Montezuma County Commissioners, and the Montezuma County Sheriff.

The Lowry Pueblo area was initially identified as a fire hazard area in 2001 with the completion of the Montezuma County Community Fire Plan. The area was further identified in more detail in the supplement to the Montezuma County Community Fire Plan, which includes detailed GIS polygons of wildfire hazard areas and written descriptions of area fuels and topography. The Lowry Pueblo fuels project falls into the Cross Canyon group polygon. This area is classified by the plan as a "B" polygon which falls into the following description. "These are areas where wildfires are undesirable under the current conditions. Fires in these areas can pose threats to public safety or may be difficult to contain. Management objectives for B polygons will include suppression and prevention efforts. Prescribed fires and large scale mechanical fuels reduction efforts will be concentrated in these areas in an effort to achieve more desirable conditions." This plan was a product of collaboration between the Montezuma County Sheriff, five Montezuma County fire protection districts, the Colorado State Forest Service, the San Juan Public Lands (USFS and BLM), the Ute Mountain Ute Tribe, and Mesa Verde National Park.

Dr. Richard Lee, Integrated Pest Management Specialist for BLM, and Dr. Jennifer Vollmer, Environmental Resource Specialist with BASF (manufacturer of Plateau herbicide), were consulted regarding the appropriate use of Plateau herbicide on the Lowry Pueblo test plot.

A comment letter from the San Juan Citizens Alliance regarding the Lowry Pueblo fuels project was received and is on file in the project folder. Concerns were addressed during a field trip to the site on 4/23/2007.

Copies of all scoping information are included in the project file.

10.0 PREPARERS AND DATE PREPARED

Todd S. Gardiner, Natural Resource Specialist (Fuels); 04/2007
Eric G. La Price, Biological Scientist/NEPA Coordinator; 06/2007

11.0 INTERDISCIPLINARY TEAM MEMBERS

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References

USDI Bureau of Land Management, 2005. Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States, Programmatic Environmental Impact Statement (Draft).

USDI Bureau of Land Management, 2004. Wildland-Urban Interface Hazardous Fuels Reduction, Programmatic Environmental Assesment. San Juan Public Lands Center (CO-SJPLC-03-044 EA).