RECLAMATION

Managing Water in the West

Environmental Assessment and Finding of No Significant Impact

Stony Gorge Reservoir Fire Management Plan
Orland Project
Glenn County, California

U.S. Department of the Interior
Bureau of Reclamation
Mid-Pacific Region
Northern California Area Office

December 2007

ENVIRONMENTAL ASSESSMENT FOR THE IMPLEMENTATION OF A FIRE MANAGEMENT PLAN, STONY GORGE RESERVOIR, COLUSA COUNTY, CALIFORNIA NC-07-05

Responsible Parties:

Lead Agency: Department of the Interior
Bureau of Reclamation, Mid-Pacific Region
Northern California Area Office, Shasta Lake, CA
Brian Person, Area Manager

Cooperating Agency: California Department of Forestry and Fire Protection
Tehama-Glenn Unit
604 Antelope Boulevard, Red Bluff, CA 96080
Will Darnall, Chief, Batallion 4

Proposed Action

Reclamation proposes to implement a Fire Management Plan (FMP) at Stony Gorge Reservoir in Glenn County, California for the purpose of meeting Department of the Interior guidelines and to guide a range of fire management activities permitted by policy at Stony Gorge Reservoir for a 10-year period. The California Department of Forestry and Fire Protection (CAL FIRE) has an agreement with Reclamation to conduct fire suppression and, together with other fire management agencies, can conduct prescribed fire activities to be conducted according to the FMP.

Contacts

For further information regarding this Environmental Assessment, please contact the following individuals:

Brian Person, Area Manager, 530-275-1554
16349 Shasta Dam Boulevard, Shasta Lake, CA 96019-8400

Basia Trout, Natural Resource Specialist, 530-528-0512
P.O. Box 159, Red Bluff, CA 96080

Comments

Written comments regarding this action are due 14 days from the date defined in the press release and may be sent to:

Bureau of Reclamation
P.O. Box 159
Red Bluff, CA 96080
530-528-0612 (fax)
btrout@mp.usbr.gov

U.S. Department of the Interior
Bureau of Reclamation
Mid-Pacific Region
Northern California Area Office
Shasta Lake, California

FINDING OF NO SIGNIFICANT IMPACT

Implementation of a Fire Management Plan at Stony Gorge Reservoir by the Bureau of Reclamation in Cooperation With the California Department of Forestry and Fire Protection and Other Fire Management Agencies

FONSI No. NC-07-08

Recommended: _____ 1-7-08
Donald R. Reck — Date
Chief, Environmental and Natural Resources Division
Northern California Area Office

Concur: _____ 1/2/08
Buford R. Holt, Ph.D. — Date
Environmental Specialist
Northern California Area Office

Approved: _____ Jan. 7, 2008
Brian Person — Date
Area Manager
Northern California Area Office

FINDING OF NO SIGNIFICANT IMPACT

Background

The Bureau of Reclamation has prepared an Environmental Assessment (EA) to evaluate the effects of implementing a Fire Management Plan (FMP) at Stony Gorge Reservoir, Glenn County, California.

The purpose of implementing the FMP is to meet Department of the Interior directives and to guide a range of fire management activities permitted by policy at Stony Gorge Reservoir for a 10-year period.

The proposed action is for the California Department of Forestry and Fire Protection (CAL FIRE) to perform fire management activities at Stony Gorge Reservoir in accordance with the current agreement between Reclamation and the California Department of Forestry, this FMP, operating plans for fire suppression, and individually prepared and approved fire burn plans for prescribed fires that may be conducted by CAL FIRE or other fire management agencies, such as the U.S. Fish and Wildlife Service or private organizations. All fire management activities will be in accordance with Reclamation's, CAL FIRE's, and other fire management agencies' current safety standards. A contingency plan for uncontained fire will be in place.

Findings

In accordance with the National Environmental Policy Act of 1969, as amended, the Northern California Area Office, Mid-Pacific Region, Bureau of Reclamation finds that the proposed action is not a major Federal action that would significantly affect the quality of the human environment and that an Environmental Impact Statement is, therefore, not required for implementation of the proposed action.

This Finding of No Significant Impact is based on the following:

1. There would be no effects on federally-listed threatened or endangered species.

2. The FMP will not have highly uncertain environmental effects or involve unique or unknown environmental risks.

3. Impacts to physical, biological, and socio-economic aspects of the terrestrial environment would be absent or, where present, would be minor due to temporary changes in air quality and degraded aesthetics due to burn residue prior to regrowth. Water quality would not be affected.

Environmental Assessment for Implementation of a Fire Management Plan at Stony Gorge Reservoir, Glenn County, California in Cooperation With the California Department of Forestry and Fire Protection and Other Fire Management Agencies

PURPOSE AND NEED

The Department of the Interior Department Manual (620 DM 1.4B, effective date April 10, 1998) states: "Every area with burnable vegetation must have an approved Fire Management Plan. Fire management plans must be consistent with firefighter and public safety; values to be protected; land, natural, and cultural resource management plans; and must address public health issues. Fire management plans must also address all potential wildland fire occurrences and include the full range of wildland fire management actions. Bureau of Reclamation fire management plans must be coordinated, reviewed, and approved by responsible agency administrators to insure consistency with approved land management plans."

This Fire Management Plan (FMP) is being developed to guide a range of fire management activities permitted by policy at Stony Gorge Reservoir, Glenn County, California for a 10-year period. The FMP emphasizes a program using fire suppression and prescribed fire activities. The FMP is intended to reduce hazards on Stony Gorge Reservoir's lands administered by Reclamation and to provide resource management benefits. With the completion of the FMP, Stony Gorge Reservoir's fire management program would employ a variety of activities with the assistance of the California Department of Forestry and Fire Protection (CAL FIRE) and other fire management agencies, where appropriate, to accomplish land and resource management objectives and to reduce the risk of unwanted fire in and adjacent to Stony Gorge. Stony Gorge Reservoir is located at T20N 6W S14,15,21,22,27,28,33,34 and T19N 6W S3,10 MDPM.

PROPOSED ACTION AND ALTERNATIVES

Proposed Action

The proposed action is for Reclamation to implement an FMP to guide fire management activities. Wildland fires will be aggressively controlled under the constraints of a general operating plan and this FMP, using minimum impact suppression tactics unless there is imminent danger to life or property. Heavy equipment will not be allowed in riparian or wetland areas unless there is an immediate threat to human life or property or approved by a resource advisor on a case-by-case basis.

Prescribed fire activities will be conducted in accordance with this FMP and individual burn plans. Prescribed fires are desired to (1) enhance habitat by removing excess plant litter,

(2) reduce the fuel load for pre-fire protection, and (3) control invasive weeds to encourage native perennial grass growth.

For an FMP to be covered under this Environmental Assessment, the FMP must:

1. Not have a significant effect on the quality of human environment.

2. Not involve unresolved conflicts concerning alternative uses of available resources.

3. Not have significant adverse effects on public health or safety.

4. Not have an adverse effect on unique geological features such as wetlands, wild or scenic rivers, refuges, floodplains, rivers placed on the Nationwide River Inventory, or prime or unique farmlands.

5. Not have highly controversial environmental effects.

6. Not have highly uncertain environmental effects or involve unique or unknown environmental risks.

7. Not establish a precedent for future actions.

8. Not be related to other actions with individually insignificant but cumulative significant environmental effects.

9. Not affect properties listed or eligible to be listed in the National Register of Historical Places.

10. Not threaten to violate Federal, state, local, or Tribal law or requirements imposed for protection of the environment.

11. Not adversely affect a species listed or proposed to be listed as endangered or threatened.

No Action

The no-action alternative would consist of CAL FIRE's continued ability to conduct wildfire suppression activities with no constrictions or constraints by Reclamation and with no operating plan. Prescribed burns would not be allowed, as individual burn plans could not be prepared without an approved FMP.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Physical Resources

No impacts associated with water or air quality are anticipated as a result of implementing the FMP other than temporary minor decreases in air quality when wildlfires exist or prescribed burns are conducted. Water quality will not be affected as the techniques used in fire management would be minimally invasive to the environment, i.e., fuel used in the drip torches would burn off immediately, leaving no residue. Heavy equipment would not be allowed in riparian areas unless approved on a case-by-case basis by a resource advisor or when there is imminent danger to human life or property. The FMP would not have an adverse affect on unique geological features such as wetlands, wild or scenic rivers, refuges, floodplains, rivers placed on the Nationwide River Inventory, or prime or unique farmlands. Prescribed fires would improve wetland habitats for sensitive species and enhance the rangeland.

Biological Resources

No negative impacts to plants or wildlife are anticipated from wildlife suppression activities as the effects of the FMP wildfire suppression activities would be temporary in nature, reduce the threat to plants or wildlife as a result of wildland fires, and the operating plan would provide constrictions to protect the sensitive areas as much as possible unless there was imminent threat to life and property. No negative impacts to plants or wildlife are anticipated as a result of prescribed fire activities as the FMP-prescribed fire activities will be conducted under individual burn plans and at a time that plants are dormant and wildlife such as waterfowl/wetland bird species/raptors and tule elk and deer species are in the pre-nesting/pre-birthing season. Prescribed fires would be used to enhance habitat for wildlife.

Steps would be taken to ensure no species listed or proposed to be listed as endangered or threatened would be affected by fire suppression or prescribed fire activities. A U.S. Fish and Wildlife Service (Service) species list was obtained for the Elk Creek Quadrangle which contains the project area, and a search was conducted in the California Natural Diversity Database for listed species. Currently, there are no listed species known to occur in the project area. See Appendix A. The bald eagle (*Haliaeetus leucocephalus)* has been known to nest on the west side of the reservoir, but was recently delisted. In any case, prescribed burns would occur outside of the nesting season and would protect identified nesting trees. Fire suppression activities would occur as quickly as possible in the areas of the nesting trees. Nesting trees would be identified to the fire management agencies in the operating plan as an area to be protected.

Cultural Resources

Stony Gorge Dam was completed in 1928 as a component of the Orland Project: the first Reclamation project in California. The dam holds a reservoir capacity of approximately 55,000 acre-feet and stores surplus water for irrigation purposes. The minimum pool

requirement for Stony Gorge Reservoir is 5,000 acre-feet. Releases and spills from the reservoir flow down Stony Creek for storage in Black Butte Lake, approximately 25 miles downstream. The dam is a concrete, slab and buttress structure with a structural height of 139 feet and a crest length of 868 feet. Total storage at elevation 841 feet is 50,000 acre-feet.

The proposed preferred alternative to adopt the fire management plan for East Park Reservoir has no potential to affect historic properties pursuant to 36 CFR Part 800.3(a)(1). See Appendix B.

Indian Trust Assets

The United States has a trust responsibility to protect and maintain rights reserved by, or granted to, federally-recognized Tribes and individual Indians by treaties, statutes, and executive orders. These rights are sometimes further interpreted through court decisions and regulations. The trust responsibility requires that all Federal agencies, including Reclamation, take all actions reasonably necessary to protect Indian Trust Assets (Reclamation 1994, Reclamation 1993).

Indian Trust Assets are legal interests in property held in trust by the Federal Government for federally-recognized Indian Tribes or individual Indians. "Assets" are anything owned that has monetary value. "Legal interest" means there is a property interest for which there is a legal remedy such as compensation or injunction, if there is improper interference. Indian Trust Assets do not include things in which a Tribe or individual Indians have no legal interest (Reclamation 1994, Reclamation 1993).

Indian Trust Assets can be real property, physical assets, or intangible property rights such as a lease or a right to use something. Indian Trust Assets cannot be sold, leased, or otherwise alienated without approval of the United States. While most Indian Trust Assets are located on-reservation, they can also be located off-reservation. Examples of things that can be Indian Trust Assets are land, minerals, hunting and fishing rights, water rights, and instream flows. Off-reservation cultural resources located on non-trust land are usually not Indian Trust Assets (Reclamation 1994, Reclamation 1993).

The nearest Indian Trust Assets to this proposed action are located on 120 acres held in trust by the United States for Grindstone Indian Rancheria, located approximately 5 miles north of Stony Gorge Dam. Stony Creek flows through the Grindstone Rancheria from west to east.

No Federal, state, local, or Tribal law or requirements imposed for protection of the environment would be violated.

Socio-Economic Resources

The FMP would not have a significant affect on the quality of human environment, involve unresolved conflicts concerning alternative uses of available resources, or have significant adverse affects on public health or safety. The area has no major metropolitan areas. The small

community of Elk Creek and individual ranches are located nearby. Air quality will be affected temporarily during wildfires and during prescribed burns. Aesthetics will be temporarily degraded as the burned vegetation is replaced with regrowth. Any prescribed burns would be authorized under specific conditions set by the Air Quality Board/County Air Pollution Control District and CAL FIRE or other fire management regulations. Water quality would not be affected as the constraints to use of heavy equipment would be in place.

The FMP is consistent with the Department and CAL FIRE safety and environmental guidelines and will not preferentially favor nor discriminate against any socio-economic group.

Project Operations

Reclamation has determined that there would be no identifiable impacts to the Orland Project or Central Valley Project (CVP) operations as a result of the FMP. Therefore, no impacts associated with water delivery or other impacts to Orland Project or CVP operations are anticipated.

Cumulative Impacts

The FMP will not establish a precedent for future actions. Wildfire suppression will use an aggressive approach with constraints dependent on the wildfire conditions. Similar actions may be used at different areas of the reservoir should monitoring the effects of individual prescribed burns indicate an increase in habitat quality. Prescribed fires may be repeated once the vegetation returns to a decadent stage. The FMP would not have highly controversial or uncertain environmental affects or involve unique or unknown environmental risks, nor would it be related to other actions with individually insignificant but cumulatively significant environmental affects.

CONSULTATION AND COORDINATION

This EA was prepared in consultation with the Service by accessing their database regarding species in the Stony Gorge Reservoir area (Elk Creek and Fruto Quadrangles) that may be listed as endangered or threatened. No species listed as endangered or threatened in the Stony Gorge area are known to occur. The Service has responsibility for enforcement of the Endangered Species Act (ESA) for species other than marine mammals and anadromous fish.

Review of the California Natural Diversity Database Rarefind 3 reveals the bald eagle, Brandegee's eriastrum, and the adobe lily as the only sensitive (unlisted) species in the vicinity of the Stony Gorge area.

Because Black Butte Dam and other facilities block the creek at several locations from the Sacramento River, no listed anadromous species are in the vicinity, and no consultation with the National Marine Fisheries Service pursuant to section 7 of the ESA was required.

Appendix A

U.S. Fish and Wildlife Service Species Lists for Stony Gorge Reservoir Elk Creek and Fruto Quads

Sacramento Fish & Wildlife Office

Federal Endangered and Threatened Species
that Occur in or may be Affected by Projects in the
ELK CREEK (580D)
U.S.G.S. 7 1/2 Minute Quad

Database Last Updated: June 9, 2007

Document Number: 070726021214

Species of Concern - The Sacramento Fish & Wildlife Office no longer maintains a list of species of concern. However, various other agencies and organizations maintain lists of at-risk species. These lists provide essential information for land management planning and conservation efforts. See www.fws.gov/sacramento/es/spp_concern.htm for more information and links to these sensitive species lists.

Red-Legged Frog Critical Habitat - The Service has designated final critical habitat for the California red-legged frog. The designation became final on May 15, 2006. See our map index.

Listed Species

Invertebrates

Branchinecta lynchi

vernal pool fairy shrimp (T)

Desmocerus californicus dimorphus

valley elderberry longhorn beetle (T)

Fish

Hypomesus transpacificus

delta smelt (T)

Oncorhynchus mykiss

Central Valley steelhead (T) (NMFS)

Oncorhynchus tshawytscha

Central Valley spring-run chinook salmon (T) (NMFS)

winter-run chinook salmon, Sacramento River (E) (NMFS)

Amphibians

Rana aurora draytonii

California red-legged frog (T)

Birds

Strix occidentalis caurina

northern spotted owl (T)

Candidate Species

Fish

Oncorhynchus tshawytscha

Central Valley fall/late fall-run chinook salmon (C) (NMFS)

Key:

- (E) *Endangered* - Listed (in the Federal Register) as being in danger of extinction.
- (T) *Threatened* - Listed as likely to become endangered within the foreseeable future.
- (P) *Proposed* - Officially proposed (in the Federal Register) for listing as endangered or threatened.
- (NMFS) Species under the Jurisdiction of the National Marine Fisheries Service. Consult with them directly about these species.
- *Critical Habitat* - Area essential to the conservation of a species.

- (PX) *Proposed Critical Habitat* - The species is already listed. Critical habitat is being proposed for it.
- (C) *Candidate* - Candidate to become a proposed species.
- (X) *Critical Habitat* designated for this species

Sacramento Fish & Wildlife Office

Federal Endangered and Threatened Species
that Occur in or may be Affected by Projects in the
FRUTO (579C)
U.S.G.S. 7 1/2 Minute Quad

Database Last Updated: June 9, 2007

Document Number: 070726021407

Species of Concern - The Sacramento Fish & Wildlife Office no longer maintaina a list of species of concern. However, various other agencies and organizations maintain lists of at-risk species. These lists provide essential information for land management planning and conservation efforts. See www.fws.gov/sacramento/es/spp_concern.htm for more information and links to these sensitive species lists.

Red-Legged Frog Critical Habitat - The Service has designated final critical habitat for the California red-legged frog. The designation became final on May 15, 2006. See our map index.

Listed Species

Invertebrates

Branchinecta lynchi

vernal pool fairy shrimp (T)

Desmocerus californicus dimorphus

valley elderberry longhorn beetle (T)

Lepidurus packardi

vernal pool tadpole shrimp (E)

Fish

Hypomesus transpacificus

delta smelt (T)

Oncorhynchus mykiss

Central Valley steelhead (T) (NMFS)

Oncorhynchus tshawytscha

Central Valley spring-run chinook salmon (T) (NMFS)

winter-run chinook salmon, Sacramento River (E) (NMFS)

Amphibians

Rana aurora draytonii

California red-legged frog (T)

Candidate Species

Fish

Oncorhynchus tshawytscha

Central Valley fall/late fall-run chinook salmon (C) (NMFS)

Key:

- (E) *Endangered* - Listed (in the Federal Register) as being in danger of extinction.
- (T) *Threatened* - Listed as likely to become endangered within the foreseeable future.
- (P) *Proposed* - Officially proposed (in the Federal Register) for listing as endangered or threatened.
- (NMFS) Species under the Jurisdiction of the National Marine Fisheries Service. Consult with them directly about these species.
- *Critical Habitat* - Area essential to the conservation of a species.

- (PX) *Proposed Critical Habitat* - The species is already listed. Critical habitat is being proposed for it.
- (C) *Candidate* - Candidate to become a proposed species.
- (X) *Critical Habitat* designated for this species

Important Information About Your Species List

How We Make Species Lists

We store information about endangered and threatened species lists by U.S. Geological Survey 7½ minute quads. The United States is divided into these quads, which are about the size of San Francisco.

The animals on your species list are ones that occur within, or may be affected by projects within, the quads covered by the list.

- Fish and other aquatic species appear on your list if they are in the same watershed as your quad or if water use in your quad might affect them.
- Birds are shown regardless of whether they are resident or migratory. Relevant birds on the county list should be considered regard-less of whether they appear on a quad list.

Plants

Any plants on your list are ones that have actually been observed in the quad or quads covered by the list. Plants may exist in an area without ever having been detected there. You can find out what's in the nine surrounding quads through the California Native Plant Society's online Inventory of Rare and Endangered Plants.

Surveying

Some of the species on your list may not be affected by your project. A trained biologist or botanist, familiar with the habitat requirements of the species on your list, should determine whether they or habitats suitable for them may be affected by your project. We recommend that your surveys include any proposed and candidate species on your list.

For plant surveys, we recommend using the Guidelines for Conducting and Reporting Botanical Inventories. The results of your surveys should be published in any environmental documents prepared for your project.

Your Responsibilities Under the Endangered Species Act

All plants and animals identified as listed above are fully protected under the Endangered Species Act of 1973, as amended. Section 9 of the Act and its implementing regulations prohibit the take of a federally listed wildlife species. Take is defined by the Act as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect" any such animal.

Take may include significant habitat modification or degradation where it actually kills or

injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or shelter (50 CFR §17.3).

Take incidental to an otherwise lawful activity may be authorized by one of two procedures:

- If a Federal agency is involved with the permitting, funding, or carrying out of a project that may result in take, then that agency must engage in a formal consultation with the Service.

  During formal consultation, the Federal agency, the applicant and the Service work together to avoid or minimize the impact on listed species and their habitat. Such consultation would result in a biological opinion by the Service addressing the anticipated effect of the project on listed and proposed species. The opinion may authorize a limited level of incidental take.

- If no Federal agency is involved with the project, and federally listed species may be taken as part of the project, then you, the applicant, should apply for an incidental take permit. The Service may issue such a permit if you submit a satisfactory conservation plan for the species that would be affected by your project.

  Should your survey determine that federally listed or proposed species occur in the area and are likely to be affected by the project, we recommend that you work with this office and the California Department of Fish and Game to develop a plan that minimizes the project's direct and indirect impacts to listed species and compensates for project-related loss of habitat. You should include the plan in any environmental documents you file.

Critical Habitat

When a species is listed as endangered or threatened, areas of habitat considered essential to its conservation may be designated as critical habitat. These areas may require special management considerations or protection. They provide needed space for growth and normal behavior; food, water, air, light, other nutritional or physiological requirements; cover or shelter; and sites for breeding, reproduction, rearing of offspring, germination or seed dispersal.

Although critical habitat may be designated on private or State lands, activities on these lands are not restricted unless there is Federal involvement in the activities or direct harm to listed wildlife.

If any species has proposed or designated critical habitat within a quad, there will be a separate line for this on the species list. Boundary descriptions of the critical habitat may be found in the Federal Register. The information is also reprinted in the Code of Federal Regulations (50 CFR 17.95). See our critical habitat page for maps.

Candidate Species

We recommend that you address impacts to candidate species. We put plants and animals on our candidate list when we have enough scientific information to eventually propose them for listing as threatened or endangered. By considering these species early in your planning process you may be able to avoid the problems that could develop if one of these candidates was listed before the end of your project.

Wetlands

If your project will impact wetlands, riparian habitat, or other jurisdictional waters as defined by section 404 of the Clean Water Act and/or section 10 of the Rivers and Harbors Act, you will need to obtain a permit from the U.S. Army Corps of Engineers. Impacts to wetland habitats require site specific mitigation and monitoring. For questions regarding wetlands, please contact Mark Littlefield of this office at (916) 414-6580.

Updates

Our database is constantly updated as species are proposed, listed and delisted. If you address proposed and candidate species in your planning, this should not be a problem. However, we recommend that you get an updated list every 90 days. That would be October 24, 2007.

Appendix B

Cultural Resources Documentation

From: Adam Nickels
To: Trout, Basia
Date: 8/13/2007 4:17:40 PM
Subject: FMP EA

Project No. 07-NCAO-326

Basia,

The proposed action alternative in the EA to Implement the Fire Management Plan for Stoney Gorge Reservoir has no potential to affect historic properties pursuant to 36 CFR part. 800.3(a)(1).

The action is simply to implement and adopt the FMP for a 10 year period at Stoney Gorge Reservoir. The individual actions within the FMP, when executed, may have the potential to affect historic properties. Reclamations cultural resources staff would like to have the opportunity to review those actions, under a non-emergency scenario, before they are implemented.

I concur with the findings in the EA that the proposed action alternative will not have the potential to affect historic properties. The EA is titled:

Draft Environmental Assessment and Finding of No Significant Impact: Stony Gorge Reservoir Fire Management Plan Orland Project, Glenn County California. This concurrence applies to a final EA as well.

Location: Stoney Gorge Reservoir, Glenn County California.

This concludes the Section 106 process for this undertaking. Please retain a copy of this concurrence with the CEC file. Thank you for providing the opportunity to comment.

Sincerely,

Adam Nickels

Adam M. Nickels
Archaeologist
U.S. Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way, MP-153
Sacramento, CA 95825
916-978-5053
anickels@mp.usbr.gov

From: Patricia Rivera
To: Trout, Basia
Date: 8/7/2007 9:14:44 AM
Subject: Re: review of draft EA and Indian trust assets documentation- requested

Basia,

I have reviewed the proposed action to implement a Fire Management Plan at Stony Gorge Reservoir in Glenn County, California for the purpose of meeting Department of the Interior guidelines and to guide a range of fire management activities permitted by policy at Stony Gorge Reservoir for a 10-year period. The California Department of Forestry and Fire Protection (CAL FIRE) has an agreement with Reclamation to conduct fire suppression and, together with other fire management agencies, can conduct prescribed fire activities to be conducted according to the FMP.

I concur the proposed action does not affect Indian Trust Assets. The nearest ITA to the proposed site is approximately 5 miles North and it is the Grindstone Rancheria.