



United States
Department of
Agriculture

Forest
Service

February 2011



Environmental Assessment

Glorieta Mesa Target Shooting Closure

**Pecos - Las Vegas Ranger District, Santa Fe National Forest
San Miguel County, New Mexico**

Township 15 North, Range 11 East, Sections 20, 21, 28 and 29



Santa Fe National Forest
11 Forest Lane
Santa Fe, NM 87508



The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

Table of Contents

Introduction	1
Introduction	1
Background	2
Purpose and Need for Action	1
Proposed Action	2
Decision Framework	2
Public Involvement	3
Issues	3
Alternatives, including the Proposed Action	5
Alternatives	5
Mitigation Common to All Alternatives	8
Comparison of Alternatives	8
Environmental Consequences	8

Chapter 1 – Purpose and Need

Introduction

The Forest Service has prepared this environmental assessment (EA) in compliance with the National Environmental Policy Act (NEPA) of 1969 and other relevant Federal and State laws and regulations. This EA discloses the direct, indirect, and cumulative environmental impacts that would result from the implementation of the proposed action and alternatives, and considers the best available science. An interdisciplinary analysis on the proposed action is documented in a project record. This EA summarizes the project record to make the analysis results as clear as possible. Additionally, comments received during a 30-day comment period (as required by the Forest Service's 36 CFR 215 notice, comment, and appeal regulations) were considered by the Forest Service specialists in finalizing the proposed action on their effects analysis.

Purpose and Need for Action

The purpose of this project is to protect public safety and prevent litter associated with target shooting around residential private property on the northwest side of Glorieta Mesa and the Ojo de la Vaca areas near County Road (CR) 51 and along FR 326.

Existing Condition

Residents in this area expressed perceived threats associated with target shooting near their homes and visits by Forest Service personnel [PR#03] to the area showed that private residences were within established lines of fire and there is a litter problem associated with target shooting.

Area homeowners reported concerns for public safety related to target shooting in the area for several years, although no formal complaints were filed with local, county, state, or Forest Service law enforcement. The Forest Service began to formally investigate the situation beginning in 2008. A field trip in 2008 [PR#03] documented that at least one private residence was in the established line of fire and that there was a chronic litter problem. The size of the Mesa lends itself to dispersing recreational shooting to other areas that won't affect private landowners. Consultation with Game and Fish and the Santa Fe Sheriff's Office in 2009 resulted in both supporting the closure.

A one-year target shooting closure for the analysis area was issued on April 30, 2008 and extended for a year on April 10, 2009 and again on April 10, 2010. The closure continues through April 31, 2011. Following the closure residents indicated that shooting in the area had been reduced and resident's safety improved. Today there are still reports of isolated incidents occurring in the analysis area.

The Santa Fe National Forest Plan contains Management Area (MA) Prescriptions for all areas of the forest. All resources are considered in those prescriptions. The Management Area identified for this area is MA G.

The proposed Glorieta Mesa Target Shooting Closure Project area is identified as Management Area G in the Santa Fe National Forest Plan. The Forest Plan emphasis in this area is on key wildlife habitat protection, habitat improvement, and forage and firewood production. Recreational opportunities are dispersed and consist of firewood and piñon nut gathering, hunting and recreational driving.

Desired Condition

This project complies with Forest Plan direction to "Provide safety for Forest visitors through the use and enforcement of appropriate laws, closures, or other management techniques". [p. # 22, Forest Plan]

Background

Shooting sports, including hunting and target practice, are commonly enjoyed pastimes on National Forests across the country including the Santa Fe National Forest. The Santa Fe National Forest is scattered with private land inholdings. Glorieta Mesa is approximately 89,500 acres comprised of National Forest System land (79,029 acres) and interspersed privately-owned land (10,535 acres).

Proposed Action

The Pecos/Las Vegas Ranger District of the Santa Fe National Forest is proposing to prohibit the discharging of firearms, air rifles or gas guns on approximately 2,500 acres of the northwest side of Glorieta Mesa, specifically Township 15 North, Range 11 East, Sections 20, 21, 28, and 29 for the purpose of protecting public safety (see attached map). This action is pursuant to Title 36 CFR 261.53 Special Closures, Which states that when provided in an order it is prohibited to go into or be upon any area which is closed for the protection of: (e) public health and safety. This order does not pertain to the lawful pursuit of protected game species, in season, by an individual in possession of a proper and valid hunting license. There is a sign kiosk at the forest boundary along FR 51 and 326 that displays the closure order. Carsonite "Area Closed to Shooting" signs are posted along FR 326 and at target shooting sites within the analysis area. Signs will also be posted at boundaries of the closure area along CR 51 along FR 326. The Pecos/Las Vegas Ranger District hopes to implement this project no later than April 2011.

Notice of the Closure Order will be posted along access points to the restricted area, and at known target shooting locations within the restricted area. A copy of the Closure Order will be posted at the Santa Fe National Forest Supervisor's Office and at the Pecos-Las Vegas Ranger District. Additionally, a notice of the Closure Order will be submitted for publication in the Albuquerque Journal, the newspaper of record.

Decision Framework

Given the purpose and need, the deciding official reviews the proposed action and the other alternatives in order to make the following decisions:

- Whether or not to close approximately 2,500 acres of Glorieta Mesa for target shooting.

Public Involvement

The proposal was listed in the Schedule of Proposed Actions (SOPA) beginning April 2010 and has been listed quarterly since.

The proposed action was mailed to 49 members of the public and other agencies including the Santa Fe New Mexican who published information about it in a news brief on September 11, 2009. The proposed action was also made available on the Santa Fe National Forest webpage. The 30-day comment period began on September 11, 2009.

Eleven comment emails and one phone call were received during the public comment period. Three of these were either supportive or requested a copy of the proposed action. The remaining nine comments were considered by the interdisciplinary team and used to develop the list of issues.

Issues

Public involvement is used to identify issues with the proposed action that are then addressed in this EA. Comments received during the scoping process were examined by Forest Service specialists for issues to address. The Forest Service separated the issues into two groups: key issues and other issues. Key issues were defined as those directly or indirectly caused by implementing the proposed action. Other issues were identified as those: 1) outside the scope of the proposed action; 2) already decided by law, regulation, Forest Plan, or other higher level decision; 3) irrelevant to the decision to be made; or 4) conjectural and not supported by scientific or factual evidence.

Key Issue: Closing the entire proposed area to target shooting reduces opportunities for easily accessible target shooting and adds a burden of travelling a much farther distance to get to an area where target shooting would be allowed. The closure can be effectively achieved by posting signs near residences or closing a smaller area.

Other Issues:

- *If the area is closed to target shooters it should also be closed to hunters.* The area is being closed to target shooters because adjacent residents are threatened by stray bullets. They can cause harm to life or private property. Hunters are still allowed to hunt in the area because hunting is authorized by the New Mexico Department of Game and Fish during specific time frames.
- *Install more signs on range facilities, private land, or roads leading to private land to protect these areas from target shooters or other vandalism.* Signs other than those indicating where the closure starts are outside the scope of this project and the Forest Service has no jurisdiction to post signs on private property.

- *Ban shooting over a larger area or only allow in designated areas to allow better protection of public health and safety.* Closure orders outside of the project area identified in this EA, as well as identifying areas specifically for target shooting could be the substance for future environmental analyses but are outside the scope of this project.
- *Target shooting in the project area is not a threat and a few people should not dictate the activities of others on public lands.* The threat to residences was documented on several occasions [PR#03, 32, 33, 35, 40] and the Forest Service has the legal authority to close or restrict the use of areas over which we have jurisdiction and deem is necessary. This project complies with Forest Plan direction to “Provide safety for Forest visitors through the use and enforcement of appropriate laws, closures, or other management techniques”. [p. # 22, Forest Plan]
- *Instead of the closure order, increase law enforcement.* The proposed closure would provide law enforcement with an enforceable order and they would continue to monitor the area for compliance.

Chapter 2 - Alternatives

This chapter describes and compares the alternatives considered for the Glorieta Mesa Target Shooting Closure Project and it includes a description of each alternative considered. This section also presents the alternatives in comparative form, sharply defining the differences between each alternative and providing a clear basis for choice among options by the decision maker and the public.

Alternatives

Alternatives Eliminated from Detailed Analysis

Alternatives not considered in detail may include, but are not limited to, those that fail to meet the purpose and need, are technologically infeasible or illegal, or would result in unreasonable environmental harm.

Smaller Area Alternative

Some people commented that the closure area in the proposed action required people to drive much further to reach an area where target shooting was allowed. Therefore, people suggested that the closure area should be smaller, perhaps instead being based on a set distance from private dwellings. Based on these comments, an alternative was considered that would base the closure area on a distance of ½ mile (880 yards) from the private residences in Township 15 North, Range 11 East, Sections 28 and 29, residences that were directly being threatened by target shooting. This alternative would result in a closure area consisting of about 1,875 acres comprised of all of Section 28 and 29 and the Southern half of Sections 20 and 21.

This alternative was not carried forward into further analysis because there is the potential to threaten private residences located in section 28 and 29. Therefore, this alternative does not meet the purpose and need for the project. In addition, the difference in the time it would take to move past the closure area to where target shooting was allowed in this alternative was not much different from the proposed action.

Alternatives Considered in Detail

Alternative 1 - No Action

Under the no action alternative, target shooting would be allowed to around residential private property on the northwest side of Glorieta Mesa and the Ojo de la Vaca areas near CR 51 and along FR 326.

Under the no action alternative, the forest plan would continue to guide management of the area.

Alternative 2 - Proposed Action

To protect public health and safety of nearby private residences, the discharge of firearms, air rifles or gas guns would be prohibited on approximately 2,500 acres of the northwest side of Glorieta Mesa (Township 15 North, Range 11 East, Sections 20, 21, 28, and 29)(Figure 1), except for when used for the lawful pursuit of protected games species, in season, by an individual in possession of a proper and valid hunting license. Signs indicating there is a closure order to target shooting will be posted at the sign kiosk at the boundary of the analysis area along CR 51 and FR 326.

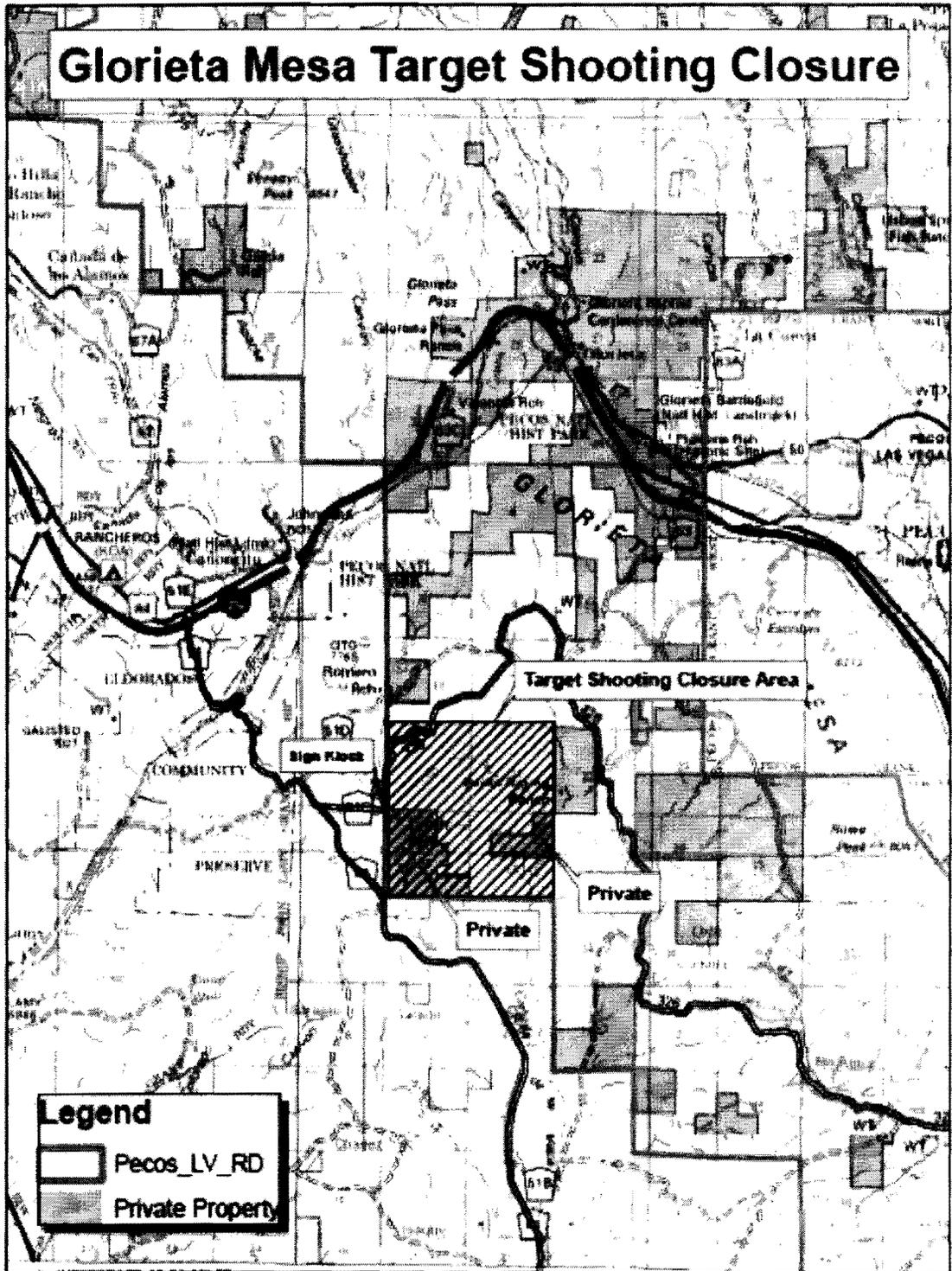


Figure 1. Glorieta Mesa Target Shooting Closure Project Area

Mitigation Common to All Alternatives

Signs will be installed on “T” or carsonite posts in the Glorieta Mesa Target Shooting Closure to avoid post holes and prevent damages to heritage resources.

Comparison of Alternatives

This section provides a summary of the effects of implementing each alternative. Information in the table is focused on activities and effects where different levels of effects or outputs can be distinguished quantitatively or qualitatively among alternatives.

Table 1. Comparison of Alternatives

	Alternative 1	Alternative 2
Recreation	Existing uses of target shooting would continue for forest users.	Forest users would have to find alternate target shooting areas, or cease operations.
Wildlife	No effect to Federally threatened or endangered species, sensitive species, Management Indicator Species or Migratory birds. No changes to habitat or individuals/populations.	No effect to Federally threatened or endangered species, sensitive species, Management Indicator Species or Migratory birds. No changes to habitat or individuals/populations.
Heritage Resources	No adverse effect on sensitive and non-sensitive cultural sites.	No adverse effect on sensitive and non-sensitive cultural sites.
Social/Economics	Residents along FR 326 would continue to be subject to risk of their health, safety, and property from weapons lawfully discharged in the analysis area.	Residents along the closure boundary would have reduced risks with their safety, and property associated with target shooting in the analysis area.
Environmental Justice	Selection of this alternative would not result in adverse or disproportionate effects on low income or minority populations.	Selection of this alternative would not result in adverse or disproportionate effects on low income or minority populations.

Chapter 3 – Environmental Consequences

Chapter 3 summarizes the physical, biological, social, and economic environments of the analysis area and the potential changes (direct, indirect, or cumulative) to these environments if the alternatives were implemented. Chapter 3 also presents the scientific and analytical basis for the comparison of alternatives, as presented in table 1. Chapter 3 complies with the implementing regulations (40 CFR 1500-1508) of the NEPA for analytic and concise environmental documents (40 CFR 1502.2). The project record contains copies of the effects analysis for the resources analyzed. An index to the project record can be found in Appendix A. The analysis of effects for the proposed action under each resource is described with the assumption mitigation measures described in chapter 2 would be applied. This project was developed in consideration of the best available science and is consistent with the Santa Fe National Forest Plan.

Cumulative Effects Analysis

A cumulative effect is the effect on the environment that results from the incremental effect of the action when added to the effects of other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes the other actions and regardless of land ownership on which the other actions occur (40 CFR 1508.7). An individual action when considered alone may not have a significant effect, but when its effects are considered in sum with the effects of other actions, the effects may be significant.

Cumulative effects were assessed in terms of how the alternatives would add to the past, present, and reasonably foreseeable future activities, within and around the analysis area (Table 2). Existing conditions by resource reflect the past and present actions that have occurred on the analysis area. The specialists¹ identified reasonably foreseeable future activities that overlap in time and location of each alternative. The incremental effect of the action when added to the alternative was then analyzed.

Table 2. Past and Present Activities In and Around the Analysis Area

Past and Current Activity Name	Timeframe	Location	Comments
Livestock grazing	1920s to present	Spring Grazing Allotment	Glorieta Mesa Target Shooting Closure Area is in the Spring Allotment. Cattle grazing would continue in the area, but could be displaced or injured where there is shooting elsewhere on the Mesa.
Forest product and fuelwood gathering	ongoing	Glorieta Mesa	Fuelwood gathering would still be allowed in the Glorieta Mesa Target Shooting Closure Area. Fuelwood gatherers could be

¹ An interdisciplinary team is composed of specialists that evaluate the physical, biological, social and economic factors appropriate to the scope and issues of the project.

Past and Current Activity Name	Timeframe	Location	Comments
			displaced because of target shooting elsewhere on the Mesa.

Recreation

Glorieta Mesa is approximately 89,500 acres and is comprised of National Forest System Land (79,029 acres) and interspersed privately owned land (10,535 acres), and is used by many people in a variety of ways.

The Closure area is within the western portion of the Pecos-Las Vegas Ranger District which receives light recreational use compared to other portions of the district. The Glorieta/Rowe Mesa has three primary ingress and egress opportunities for vehicular access, CR 51A to the northwest, CR 63 directly north and CR 34 to the northeast portion of the Mesa. Forest Roads 326, 612, 87, 324, & 594 create loops off county roads with additional user created roads (non forest system roads) throughout the Mesa. County road 51A is the primary access route to the closure area and is accessible by low clearance vehicles. Forest Road 326 and secondary roads are inaccessible by low clearance vehicles and all roads are impassable during bad weather conditions. There is also a small network of user-created Off-Highway-Vehicle (OHV) trails within the closure area; however, these are not sanctioned or maintained by the Forest Service. There has been a Temporary Special Use Target Shooting Closure Order approved and maintained in the project area since April 30, 2008.

Target Shooters

Shooting firearms is a legal activity on public land where it poses no threat to lives and property. The project area has been used for years to shoot targets and shooting activity has increased in more recent years. Large quantities of spent shotgun shells can be found in the project area and is an indication to the amount of target shooting taking place. Shooting activity increases during the summer months and immediately prior to and during open hunting seasons.

Hunters

The Mesa experiences a moderate amount of hunting activities such as hunting for birds, deer, elk, and fur bearing animals. Authorized permitted hunting by the NM Game and Fish Department will continue to be administered under their authorities.

There is dispersed camping throughout the Mesa, camping primarily occurs during the fall and winter months primarily for hunting purposes.

Recreationists

Recreational activities in the project area can be categorized into distinct activity uses such as motorized OHV use, fuelwood collecting, hiking, equestrian use, dispersed camping, and hunting.

Alternative 1 – No Action

Under this alternative, 2,500 acres of Glorieta Mesa would remain open for target shooting. Residents in the vicinity and recreationist in the project area would continue to have their safety and property threatened by stray rounds of ammunition.

Alternative 2 – Proposed Action

The proposed action to close approximately 2,500 acres of the Glorieta Mesa to target shooting would have minimal affects to OHV use, fuelwood collecting, hiking, equestrian use, dispersed camping, hunting, and/or recreational special uses because these uses will be able to continue on other portions of the Mesa, District and/or the Santa Fe National Forest. The area has been closed the past 3 years and minimal conflicts between the affected users have occurred. The size of the Mesa lends itself to dispersing this type of recreational shooting in other areas that won't affect private landowners.

Cumulative Effects

Since current management is expected to result in very little direct or indirect effects to recreational use of the proposed project area, no cumulative effects from the proposed action.

Wildlife**Federally Endangered, Threatened and Proposed Species**

Proposed, threatened and endangered species are managed under the authority of the Federal Endangered Species Act (ESA), (PL 93-205, as amended in 1973) and the National Forest Management Act (PL 94-588). The ESA requires federal agencies to ensure that all actions, which they “authorize, fund, or carry out”, are not likely to jeopardize the continued existence of any threatened and endangered species.

The following list of Federally Threatened & Endangered and Proposed species for San Miguel County was obtained by the USFWS website on April 15, 2011. These species were eliminated from evaluation and/or consideration based upon: lack of potential habitat; or the project area is not included in historic or current range of the species; or extirpation of the species without current feasibility for reintroduction. These species include: Mexican Spotted Owl, Mexican Spotted Owl designated critical habitat, Southwestern willow flycatcher, Black footed ferret, Rio Grande silvery minnow, and Holy Ghost Ipomopsis.

Potential for Effects

Suitable habitat for the species having Federal listing would not be altered or removed by this project. Since no federally threatened, endangered or proposed species occur in the gun closure area there is no effect to the species listed above.

Regional Forester's Sensitive Species

There are 31 species on the Regional Forester's Sensitive Species list that potentially occur on the Pecos-Las Vegas District of the Santa Fe National Forest. The following is a list of species that have habitat or have the potential to occur within the project area: Baird's sparrow, gray vireo, Burrowing owl, Pale Townsend's big eared bat, Gunnison's prairie dog, and New Mexico banner tailed kangaroo rat.

Habitat for species listed above occurs within the project area. Implementation of the gun closure will not change or remove habitat. Implementation of the closure would reduce impacts by minimizing noise disturbances such as displacement of birds on the nest, animals may abandon burrows, and interruption of the breeding cycle. There is no further discussion of these sensitive species.

Management Indicator Species (MIS)

The Santa Fe National Forest Plan, adopted in 1987, identified 8 MIS. The Rocky Mountain bighorn sheep, Mexican spotted owl, Rio Grande cutthroat trout, Hairy woodpecker were eliminated from evaluation in this document based upon lack of potential habitat within the project area.

Management Indicator Species designated in the Santa Fe National Forest Plan EIS that have the probability of occurring within the Glorieta Mesa Target Shooting Closure area are: Merriam's turkey, Rocky Mountain elk, Mourning dove, and Piñon jay. Habitat for these species occurs within Glorieta Mesa Target Shooting Closure project area. Implementation of this project would not change or remove habitat and would have no effect to these species. There is no further discussion of these MIS species.

Migratory Birds

All migratory birds and their habitat are protected under the federal Migratory Bird Treaty Act of 1918. The Forest Service's Southwest Region 3 currently analyzes impacts to migratory birds by addressing the following: (1) effects to "Highest Priority" species as identified by New Mexico Partners in Flight (2001), (2) effects to Important Bird Areas (IBAs), and (3) effects to important overwintering areas.

Habitat used by migratory birds ranges widely from early to late successional stages, from prairie to forest. Migratory birds use these areas for feeding, roosting, and nesting. The Project area project area provides essential habitat components used by some migratory birds. The Santa Fe National Forest Migratory Bird Assessment was referenced for this analysis (USDA-FS 2001).

New Mexico Partners in Flight lists priority species of concern by vegetation type. Species of concern for piñon-juniper vegetation type was reviewed for this project. The Bendire's Thrasher and Gray Flycatcher are both known to occupy this vegetation type. Implementation of the Glorieta Mesa Target Shooting Closure Area would not change or remove habitat. There is no further discussion of these migratory bird species.

Potential for Effects

Suitable habitat for the Regional Forester's sensitive species, management indicator species and migratory birds would not be altered or removed by this project. Reduction in noise disturbance by implementing this closure order would not lead towards the federal listing of, or result in the loss of viability of any Forest Service sensitive species, cause changes in trends for populations or habitat for MIS species or affect migratory bird habitats.

Heritage Resources

The Glorieta Mesa Target Shooting Closure Project is considered a non-undertaking since it has a very low likelihood of affecting historic properties. It is exempt from further review and consultation per the Region 3 First Amended Programmatic Agreement Regarding Historic Property Protection and Responsibilities (Appendix A. II. M. & Q.) Therefore, scoping/consultation letters were not sent to the twenty-six tribes who are regularly consulted with on proposed projects on the Pecos/Las Vegas Ranger District. The Glorieta Mesa Target Shooting Closure Project has been listed on the Santa Fe National Forest Schedule of Proposed Actions since April 2010.

Environmental Consequences

Alternative 1 (No Action)

Shooting activity in the Glorieta Mesa area has a limited or no potential to affect historic properties since the Glorieta Mesa Targets Shooting Closure is a non-undertaking. There would be no direct, indirect, or cumulative effects on historic properties.

Alternative 2 (Proposed Action)

This alternative is primarily an administrative change that does not recommend any ground-disturbing or other actions that have the potential to affect historic properties. The installation of a few signs in the Glorieta Mesa area to inform the public of the safety closure will be accomplished by placing them on "T" or carsonite posts. This type of activity is exempted from further review or consultation per the PA (Appendix A. II. M.).

The proposed action would have no direct, indirect, or cumulative effects on historic properties.

Social/Economics

The residents of Glorieta Mesa are familiar with multiple use management, including the use of firearms associated with various shooting sports. Hunting and target practice are common. Over the last ten years there has been an increase in recreational target shooting on the northeast side of Glorieta Mesa – Ojo de la Vaca where County Road 51 meets Forest Service Road 326.

The Glorieta Mesa Target Shooting area is interspersed with private land inholdings and shooting poses a threat to public safety and nearby residences. One particular residence lies within a forested area and is not visible to shooters. Therefore, unknowingly, they may be shooting in the direction of the residence, putting residents in danger. Residents have reported holes in their fences and shots so close they can here the bullets whizzing by.

Environmental Consequences

Alternative 1 – No Action

Target shooting activity in the project area would have a continued impact on residents and private property on the northwest side of Glorieta Mesa and the Ojo de la Vaca areas in the CR 51, CR 51C and FR 326 corridor. Direct impacts include the continued risk or potential for residents adjacent to CR 51, CR 51C, and CR 326 to be injured, killed, or have their property damaged by stray bullets.

Alternative 2 – Proposed Action

Residents along CR 51, CR 51C, and FR 326 would have reduced risks to their safety and private property from target shooting in the project area. Target shooters who previously used the area would have to find other locations on Glorieta Mesa or the Forest for this activity. The size of the Mesa lends itself to dispersing this type of recreational shooting in other areas that won't affect private landowners. They would have to travel no more than 15 minutes outside the closure area to find another place on the forest to target shoot.

The potential exists for illegal use of the analysis area. Such use could result in damage to other recreationist, residents' safety and private property along the FR 326 corridor but would be punishable by applicable laws and regulations.

Environmental Justice

Executive Order 12898 (1994) requires Federal agencies to address environmental justice of their actions on minority and low-income populations. This analysis considers demographic, economic, and human health risk factors. A specific consideration of equity and fairness in resource decision-making is encompassed in the issue of environmental justice and civil rights. As required by law and Executive Order, all Federal actions should consider potentially low-income or minority communities within the study area due to the proposed action should be considered. Where possible, measures should be taken to avoid negative impacts to these communities or mitigate the adverse effects.

Native Americans have been present in the area for at least the past 2,000 years and Spanish settlers arrived in the area almost 500 years ago. Many families in the study area trace their ancestry back to these original inhabitants. As such, there are strong ties to the land and a reliance on the natural resources of the forest.

All the communities within the Pecos, Glorieta and Rowe would fall under the minority and/or low-income populations identified in the Environmental Justice Executive Order 12898. Generally environmental justice is concerned with identifying these communities and ensuring that they are involved in and understand the potential effects of the proposed action. The people in the study area communities are interested in maintaining their historic and subsistence lifestyle, using the surrounding area to gather resources needed.

An initial analysis strongly suggests that the proposed action does not impact civil rights of target groups or otherwise place an inordinate or disproportionate burden on minority groups, women, consumers or other protected classes. [PR#28]