

**U.S. Department of the Interior
Bureau of Land Management
Little Snake Field Office
455 Emerson St
Craig, CO 81625**

DETERMINATION OF NEPA ADEQUACY (DNA)

DOI-BLM-CO-N010-2018-0011-DNA

Identifying Information

Project Title: Construction of a buried water pipeline

Legal Description: T6N R94W NW ¼ Sec. 12 (see Attachment 1)

Applicant: Two Bar Sheep Co., LLC (Steve Raftopoulos)

Allotment Name and Number: Lay Peak #04406

Project (RIPS) Name and Number: Lay Peak Pipeline Extension/021235

Conformance with the Land Use Plan

The Proposed Action is subject to and is in conformance (43 CFR 1610.5) with the following land use plan:

Land Use Plan: Little Snake Resource Management Plan and Record of Decision (RMP/ROD) as amended by the Northwest Colorado Greater Sage-Grouse Approved Resource Management Plan Amendment.

Date Approved: October 2011, Amended September 2015

Decision Language:

GOAL A:

“Manage resources, vegetation, and watersheds to sustain a variety of uses, including livestock grazing, and to maintain the long-term health of the rangelands. Objectives for achieving this goal include”:

- Maintain and improve forage species diversity and abundance by managing to meet plant reproductive and physiological needs.
- Minimize conflicts between livestock and other grazing animals in areas of increased pressure on forage and riparian zones.

- Manage plant utilization by all foraging species at a level that maintains plant health and protects watersheds.

GOAL C:

“Contribute to the stability and sustainability of the livestock industry.”

Proposed Action

The applicant is constructing an approximately three mile long water pipeline, to be used to provide water to livestock, on private land within the Lay Peak Allotment #04406. The applicant is requesting that one of the lateral lines be extended on to public lands within the allotment in order to provide more reliable water to an existing pond. The line would be 1.5 inch HDPE-DR11 pipe installed with a vibratory ripper 24 to 48 inches in the ground (see Attachment 2). This type of installation requires no trenching or back-filling as the machine uses a vibrating blade to open up a narrow slit in the soil and immediately places the pipe in the ground. The slit closes in on itself, resulting in a placement that is nearly invisible. Because of this, no seeding or other reclamation activities would be required. Total length would be approximately 415 feet.

Review of Existing NEPA Documents

Name of Document: Little Snake Resource Management Plan and Record of Decision (RMP/ROD) as amended by the Northwest Colorado Greater Sage-Grouse Approved Resource Management Plan Amendment.

Date Approved: October 2011, Amended September 2015

Name of Document: Modification and Expansion of Placer Well #1 Livestock Water System

NEPA Document #: DOI-BLM-CO-N010-2018-0001-EA

Date Approved: December 11, 2017

NEPA Adequacy Criteria

1. Is the new Proposed Action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document? If there are differences, can you explain why they are not substantial?

Yes. While the location of the proposed action differs, it is located in an area with similar climate, soils, and vegetation as described in the above referenced EA. The purpose for the project, providing water for livestock use, is the same. Due to these similarities, the nature of the impact of the proposed action in this DNA has been adequately disclosed in the existing EA.

2. Is the range of alternatives analyzed in the existing NEPA document appropriate with respect to the new Proposed Action, given current environmental concerns, interests, and resource values?

Yes. The EA analyzed two alternatives, the proposed action and no action. These alternatives are sufficient for this project as well.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new Proposed Action?

Yes. There are no threatened or endangered or BLM sensitive species in the vicinity of the project proposed in this DNA that differ from that analyzed in the EA. Both projects are within priority habitat for greater sage-grouse. The EA analyzed the impacts to greater sage-grouse habitat sufficiently to be applicable to the proposed action in this DNA. There is no new information that would alter or change the circumstances relating to the applicability of the analysis in the EA.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new Proposed Action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes. The direct, indirect, and cumulative effects from the proposed type of water development were analyzed in the EA. The primary difference is that the project proposed in this DNA are substantially smaller in scope, nevertheless, the existing analysis is appropriate.

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

Yes. This EA is included in the NEPA log posted on the BLM e-planning web site: https://www.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do

Interdisciplinary Review

The Proposed Action was presented to, and reviewed by, the Little Snake Field Office interdisciplinary team on January 29, 2018. A complete list of resource specialists who participated in this review is available upon request from the Little Snake Field Office. The table below lists resource specialists who provided additional review or remarks concerning cultural resources and special status species.

Name	Title	Resource	Date
Brian Naze	Archaeologist	Cultural Resources, Native American Religious Concerns	2/16/2018
Desa Ausmus	Wildlife Biologist	Special Status Wildlife Species	2/06/2018
Aimee Huff	Rangeland Management Specialist	Special Status Plant Species	2/02/2018
Hunter Seim	Assistant Field Manager	Project Lead	2/21/2018
Kathy McKinstry	Planning and Environmental Coordinator	NEPA Compliance	2/21/2018

Cultural Resources: The National Historic Preservation Act (NHPA) requires federal agencies to consider the effect of federal undertakings on cultural resources that are eligible for inclusion in the National Register of Historic Places (NRHP). BLM will approve construction of that segment of the pipeline on BLM land that will terminate at an existing reservoir, therefore, for BLM-LSFO, the planned project is a federal undertaking. In Colorado, the requirements of the NHPA are implemented under the terms of the Protocol Agreement between the Bureau of Land Management and the State Historic Preservation Officer.

A Class I records review of the cultural resource records maintained at LSFO was completed for the area to be affected by pipeline construction. The existing livestock reservoir and the proposed pipeline route are not located within an area that has been previously surveyed for cultural resources. The route of the proposed pipeline will need to be flagged on the ground by the pipeline proponent or an employee of the NRCS and a Class III cultural resource survey completed for a 100 ft corridor along the pipeline, as well as in an area encompassing the existing livestock reservoir. Potential adverse effects from pipeline construction on any NRHP-eligible historic or prehistoric sites found during survey will need to be avoided through project redesign or adequately mitigated prior to project construction.

Native American Religious Concerns: The National Historic Preservation Act (NHPA) requires federal agencies to consult with Native Americans regarding the effect of federal undertakings on sites that may be of cultural or religious importance to Indian people to ensure that tribal values are taken into account to the extent feasible. In historic times, the Little Snake field area was inhabited by the Utes and the Shoshone. Lacking a formal agreement outlining a consultation process, Little Snake Field Office policy is to consult with relevant tribes when an undertaking is known to be in or near an area of concern to the historic tribes or when an undertaking involves types of sites that experience has shown are usually of concern to native peoples. Such sites include burials, rock art sites, wickiups, stone circle sites, possible vision quest sites, and possible eagle trap sites.

Because approval of the pipeline segment on BLM land is a federal undertaking, the possible effect of pipeline construction on areas or sites of Native American concern was considered. Based on the Class I cultural resource inventory (the records review), the project will not be located within an area known to be of concern to the tribes, nor are any sites of the kind that are usually of concern to native peoples recorded in the area. From the above information, it is concluded that the proposed federal undertaking will not affect sites or areas of concern to Native Americans.

Threatened and Endangered Wildlife Species: Special status, terrestrial and aquatic wildlife were adequately addressed in the original environmental assessment (DOI-BLM-CO-N010-2018-0001-EA). There are no wildlife-related issues or concerns as there will be no change in the grazing system.

Threatened and Endangered Plant Species: The analysis in DOI-BLM-CO-N010-2018-0001-EA remains valid for special status plant species. The proposed project area for this DNA does not contain any threatened, endangered, or BLM sensitive plant species.

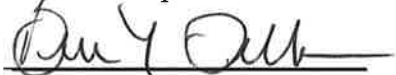
Lands with Wilderness Characteristics: The proposed project does not fall within an area that has been identified as needing to be inventoried for wilderness characteristics.

Tribes, Individuals, Organizations, or Agencies Consulted

None.

Conclusion

Based on the review documented above, I conclude that this proposal conforms to applicable land use plan and that the NEPA documentation fully covers the Proposed Action and constitutes BLM's compliance with the requirements of the NEPA.

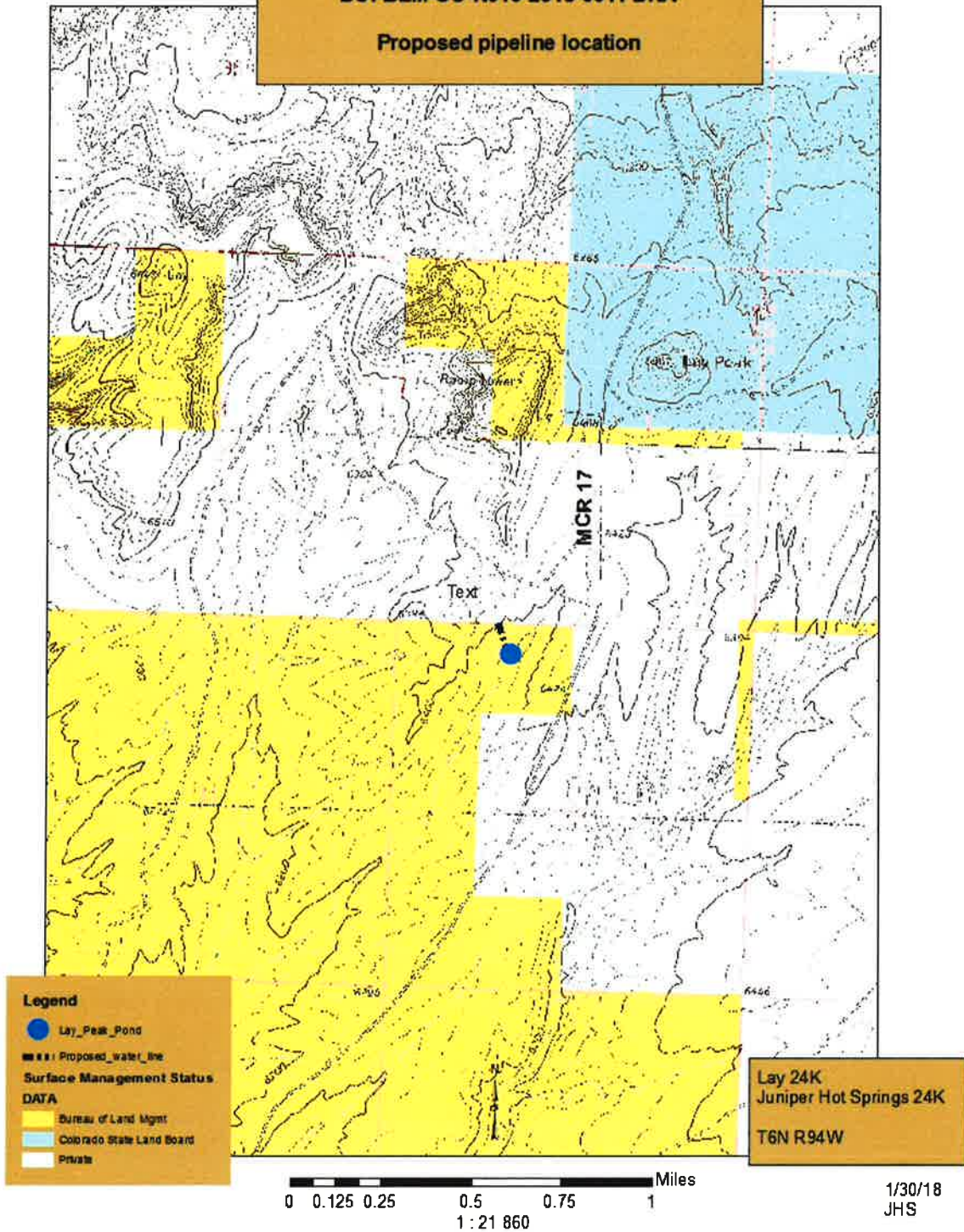


Little Snake Field Manager

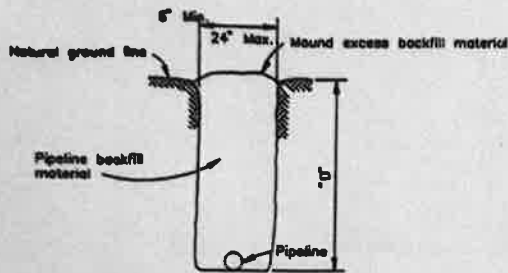
Note: The signed Conclusion of this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

Attachment 1
DOI-BLM-CO-N010-2018-0011 DNA

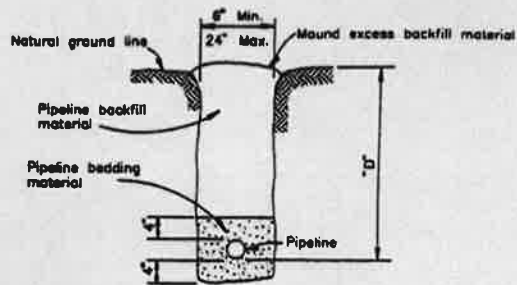
Proposed pipeline location



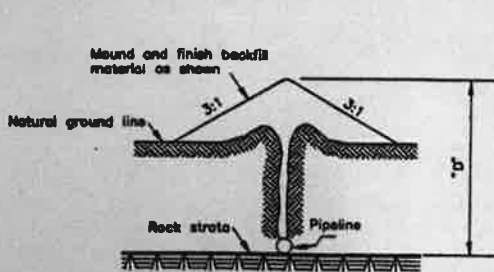
Attachment 2
 DOI-BLM-CO-N010-2018-0011-DNA
 Ripped-Type Pipeline Installation (bottom left)



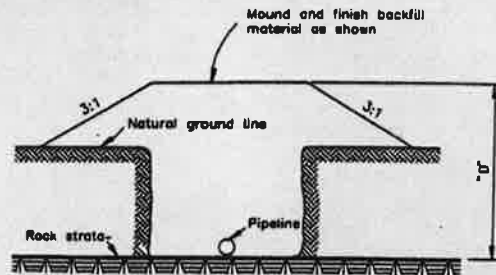
TRENCH-TYPE I INSTALLATION



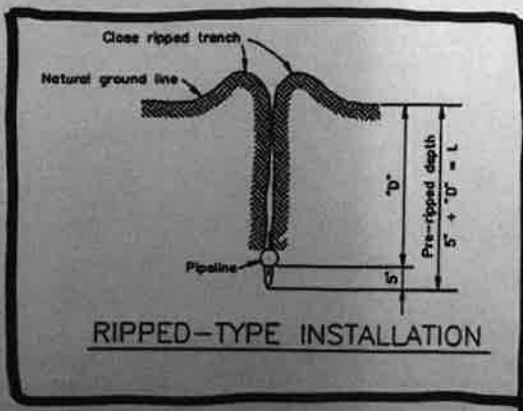
TRENCH-TYPE II INSTALLATION



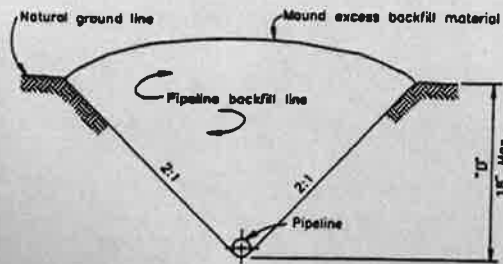
MOUNDED-TYPE A INSTALLATION



MOUNDED-TYPE B INSTALLATION



RIPPED-TYPE INSTALLATION



"V" DITCH-TYPE INSTALLATION

NOTES:

1. Type of trench shall be as required in specifications.
2. "D" is equal to specified depth as shown on the pipeline plan & profile sheets.

ALWAYS THINK SAFETY

UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT DIVISION OF TECHNICAL SERVICES SERVICE CENTER	
PIPELINE INSTALLATION TYPES	
DESIGNED	by others
REVIEWED	<i>[Signature]</i>
APPROVED	<i>[Signature]</i>
DRAWN	SCALE NONE
DATE	JULY 25 1990 SHEET OF
DRAWING NO. 02665-1	