

Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

Office: Andrews Resource Area, Burns District Office

Tracking Number (DNA #): DOI-BLM-OR-B070-2015-0037-DNA

Case File/Project Number: 018480 Krumbo Mountain Well

Proposed Action Title/Type: Krumbo Mountain Well, Pipeline, Trough, and Power Supply within Fenced Area

Location/Legal Description: Krumbo Mountain Allotment #6032, Krumbo Mountain #2 Pasture, Willamette Meridian, Oregon, T. 31 S., R. 32.75 E., section 33, NW1/4 NE1/4.

Applicant: Bureau of Land Management (BLM)/Krumbo Mountain Allotment Permittee

A. Description of the Proposed Action and Project Design Elements

The proposed action is for the BLM or the Krumbo Mountain Allotment permittee to drill and case a new water well (Krumbo Mountain Well 018480), pipeline, trough, and power supply within a fenced area in Krumbo Mountain #2 Pasture of Krumbo Mountain Allotment #6032. The water well would be located in W.M., T. 31 S., R. 32.75 E., section 33, NW1/4 NE1/4. The water well would provide water to a trough through a 500-foot pipeline. It would include a power supply (generator or solar) in a fenced area (20 feet by 20 feet).

The project would not result in an increase in permitted animal unit months (AUM), nor would it alter grazing management specified in the allotment management plan (AMP). This well would ensure that there is a continuous source of water for wildlife and livestock.

Access for well-drilling equipment would use existing roads and ways. Any needed materials (rocks or soil) would be hauled in with a dump truck. Roads needed for access may receive spot maintenance in accordance with the transportation plan (TP) and transportation management plan (TMP), which would generally consist of removing rocks and tree limbs or trees in order to provide for safe passage by vehicles. The well site would consist of an original disturbance area of approximately 100 by 100 feet, within approximately 30 feet of a route. The entire disturbed area would be seeded with a native/non-native seed mix to increase the rate of recovery. Following seeding/rehabilitation of the disturbed site, the permanent footprint would be no more than 20 by 20 feet. In general, an 8- to 12-inch diameter hole would be drilled at the well site to accommodate six-inch casing (pipe). Casing would be used for the entire depth of the hole unless solid rock is encountered. Pump size would be dependent upon depth of well and location of storage tank (if needed). The pump in the well would be powered using solar power, a fuel generator, or both. The well and power source would be fenced. The fence would be the minimum needed to protect the well and power source. Vegetative and topographic screening would be utilized as much as possible to minimize visual disturbance.

Panels for solar energy would be installed using a tractor with an auger. Poles would be eight inches in diameter and concreted in the ground; solar panels would be mounted upon the poles. Pole height would be as low as possible, while still allowing panels to clear vegetation. The well

and solar panels would be fenced to protect them from wild horses, livestock, and large wildlife species. The fence would follow the design features previously outlined, and would be no more than 0.1 mile in length. The smallest total area would be used. Solar panels vary in size from 16 to 40 inches in length by 40 to 70 inches in width. Solar panels would only be utilized if they would meet the power requirements of the pump, dependent on well depth and water production. This determination would be made by an engineer or other expert.

Fuel-powered generators would be 5,000 kilowatts, or smaller, with the exact size determined by well characteristics and availability. Generators would either be located within a small trailer. The generator would be covered or enclosed to protect the generator and reduce noise pollution. Generators would be expected to run four to 16 hours a day depending on water consumption, and may be audible up to one-quarter mile under some conditions. Technology is now available to use satellites to start, stop, and notify users when problems arise with the generators; timers are also available to control times when generators operate. This technology may be used if appropriate and feasible. To limit the amount of time the generator operates, level switches could be installed in the storage tank (if present). These would only turn the generator on when the storage tank went below one-half full and would turn off when full. When wells are not in use, generators would be removed.

Pipeline trenches would be constructed using a steel-tracked crawler, with ripper and plastic pipe laying apparatus, within approximately 30 feet of a route. A trench would be dug with a simple ripping tooth, as deep as possible, up to 36 inches, and approximately three inches wide. A two inch black plastic (polyethylene) pipe would then be placed in the trench. All disturbed areas would be reseeded after construction, using a native/nonnative mix. In some areas, it may not be possible to trench in the pipeline due to a rock layer. In these areas, a portion of the black plastic pipe may lie directly on the ground or just beneath the ground's surface. Efforts would be made to cover the pipe, as much as possible, without creating a dirt berm. Valve covers and vents would not be more than six inches above ground and would consist of a vertical piece of culvert with a lid. The trough will be a 30 foot bottomless trough that holds 10,000 gallons of water.

Project Design Elements (PDEs) were developed to aid in meeting project goals and objectives. These PDEs start on page 29 of the South Steens AMP EA. These features are nonexclusive and are subject to modification based on site-specific terrain characteristics (topography and vegetation). All range improvements would follow the PDEs outlined below unless specifically provided for in the alternative descriptions. The locations of all proposed range improvements are estimated locations. Exact, on-the-ground locations of any proposed range improvements would be determined, following clearances, by those responsible for constructing the proposed developments, just prior to actual construction. The exact location of any proposed range improvements not currently shown within WSAs, or wilderness, would remain outside WSAs and wilderness areas. All range improvements would occur within one-quarter mile of the current proposed location.

- Proposed rangeland improvement sites would be surveyed for cultural values prior to implementation. Where cultural sites are found, their condition and National Register of Historic Places (NRHP) eligibility would be evaluated. If sites are determined to be NRHP eligible, and under threat of damage, mitigation

measures to protect cultural materials would be determined. Mitigation plans would be developed in consultation with the Oregon State Historic Preservation Office (SHPO), as necessary. Mitigation measures can include protective fencing, surface collection and mapping of artifacts, subsurface testing, and complete data recovery (full-scale excavation).

- Proposed rangeland improvement sites would be surveyed for plant SSS prior to implementation. Plant SSS sites would be avoided.
- New livestock facilities (livestock troughs, fences, corrals, handling facilities) would be constructed at least one kilometer (0.6 mile) from leks, in order to avoid concentration of livestock near leks, and reduce collision hazards to flying birds.
- All proposed wire fences, constructed within 1.25 mile of an active lek or known seasonal use area, would include anti-strike markers on the wires to reduce potential mortality from Greater Sage-Grouse striking the fence.
- No project construction or major maintenance activities would occur April 1 through June 15 during Greater Sage-Grouse nesting. Annual fence maintenance would still be allowed to occur during this period.
- Proposed range improvement sites would be surveyed for noxious weed populations prior to implementation. Weed populations identified in or adjacent to the proposed project sites would be treated using the most appropriate methods, in accordance with the 1998 Burns District Noxious Weed Management Program EA/Decision Record (DR) OR-020-98-05 or subsequent decision.
- The risk of noxious weed introduction would be minimized by ensuring all equipment (including all machinery, All-Terrain Vehicles (ATVs), and pickup trucks) is cleaned prior to entry to the sites, minimizing disturbance activities, and completing follow-up monitoring, to prevent new noxious weed establishment. Should noxious weeds be found, appropriate control treatments would be performed in conformance with the 1998 Burns District Noxious Weed Program Management EA/DR OR-020-98-05 or subsequent decision.

B. Land Use Plan (LUP) Conformance

Steens Mountain Cooperative Management and Protections Area Record of Decision (ROD) and Resource Management Plan (RMP) Date Approved: August 2005

The proposed action is in conformance with the LUP/RMP, even though it is not specifically provided for, because it is clearly consistent with the following LUP/RMP decisions (objectives, terms, and conditions):

“Implement administrative solutions and rangeland projects to provide proper management for livestock grazing while meeting resource objectives and requirements for S&Gs [Standards and

Guides]” (Grazing Management Program, August 2005, Steens Mountain Cooperative Management and Protection Area ROD/RMP, Page 53).

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

- Andrews/Steens Proposed RMP and Final Environmental Impact Statement (EIS), 2004
- South Steens AMP EA, DOI-BLM-OR-06-027-060-EA, 2014
- Krumbo Mountain Allotment Management Plan, 1991
- Krumbo Mountain Allotment Evaluation, 2000

D. NEPA Adequacy Criteria

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

The proposed action for Krumbo Mountain Well is a feature of and essentially similar to the proposed action analyzed in the South Steens AMP EA, DOI-BLM-OR-06-027-060-EA, 2014. South Steens AMP EA analyzed the proposed action to drill and case a new water well (W-13) and included a power supply (generator or solar) in a fenced area at Lauserica Road within the Steens # 2 Pasture of the South Steens Allotment, located on page 44 of the EA. The well analyzed in South Steens AMP EA did not result in an increase in permitted AUMs, nor did it alter grazing management specified in the AMP. In addition, all the project design elements identified in the South Steens AMP EA would also be required for the Krumbo Mountain Well (see section A. above).

The Krumbo Mountain Well is not in the same analysis area however, the geographic and resource conditions are sufficiently similar. They are both at 5600-5800 feet in elevation, in salt-desert shrub grassland habitat with Wyoming big sagebrush, located more than one mile away from the nearest lek, and located in preliminary priority habitat (PPH) for sage-grouse; all of which factors were fully analyzed in the South Steens AMP EA in Chapter 3, pages 134-145.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

The South Steens AMP EA analyzed seven alternatives listed in Chapter 2, pages 39-55; a no action alternative, the proposed action alternative, maximum water distribution alternative, edge developments alternative, reduced grazing with no development alternative and complete removal of livestock alternative. The no action alternative would not drill a new well and install associated range improvements. The proposed action alternative would drill and case a new well within South Steens Allotment. The well would provide water to one 30-foot bottomless trough (or smaller) with no more than a half mile of pipeline. The bottomless troughs would have a two

to four feet concrete apron around the troughs. The project would not result in an increase in AUMs during the authorized period of use, nor would it alter grazing management specified in the AMPs. The maximum water distribution alternative would include spring development, well, pipeline, and trough installation, maintenance and abandonment of existing reservoirs, and new reservoir construction.

Yes, the range of alternatives from the South Steens AMP EA is appropriate given the current environmental concerns, interests and resource values and based on the nature of this proposed action. The same equipment, staff, timelines, and project design features would be required for the Krumbo Mountain Well as those analyzed in the South Steens AMP EA, listed on pages 29-32 of the South Steens AMP EA. No issues were identified in the existing South Steens AMP EA that would have generated additional alternatives and none were identified for this proposed action for the Krumbo Mountain Well.

Issues and current environmental concerns have not changed since the South Steens AMP decision was signed in 2014 nor have they changed since the 2000 Allotment Evaluation of Krumbo Mountain Allotment such as lack of water for livestock resulting in poor distribution in Krumbo Mountain # 2 pasture; lack of reliable water sources in this pasture results in heavy use in the northern portion of this pasture. Interdisciplinary team meetings and scoping meetings with the permittee raised no new issues.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and 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?

The South Steens AMP EA DR was signed on July 16, 2014; there has been no new information or circumstance since that would substantially change the analysis of the new proposed action for Krumbo Mountain Well. Both the South Steens AMP EA and the Krumbo Mountain well are located in Sage-Grouse PPH and the nearest leks are more than one mile away from the wells in both locations. The only new information needed for the Krumbo Mountain Well would be a botanical and cultural survey or waiver. The survey or a project waiver would be conducted in 2015 prior to project activities occurring. If any botanical or cultural concerns are identified, avoidance of the area of concern will be required. There are no streams affected by the new proposed project, which means water quality, riparian areas, or fish would not be affected.

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

The location for W-13 well, and the proposed Krumbo Mountain well, are both in similar areas in regards to elevation, vegetation types (Wyoming big sage desert salt shrub), sage-grouse habitat (PPH), distance from nearest sage-grouse lek (greater than one mile), and disturbance regime. The direct, indirect, and cumulative effects of the current proposed action are unchanged from those identified in the South Steens AMP EA. There are no known reasonability foreseeable future actions in the Krumbo Mountain Well project area.

The EA sufficiently documents the site-specific impacts related to the current proposed action. The site-specific impacts can be found in chapter 3 of the EA starting on page 197.

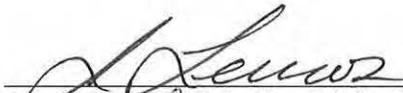
5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes, public involvement is adequate: the South Steens AMP EA included public notices both in the newspaper and posted on the BLM website.

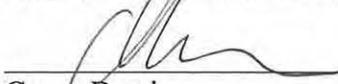
Yes, the South Steens AMP EA went through a 30-day comment period and 45-day protest and appeal period in 2014. There were no protests or appeals of the proposed decision.

The Krumbo Mountain Well had an IDT look at the project which determined there were no new issues. In addition, the Burns BLM met with the permittee to address any concerns or issues; there were none identified. This DNA and Decision Record (DR) will be posted on the BLM Burns District website at: <http://www.blm.gov/or/districts/burns/plans/index.php>.

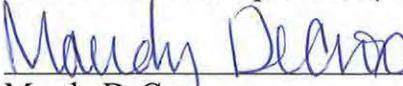
E. Interdisciplinary Analysis: Identify those team members conducting or participating in the NEPA analysis and preparation of this worksheet.


Jarod Lemos, Fisheries Biologist

7/20/15
Date


Caryn Burri,
Natural Resource Specialist (NRS) - Botany

7-13-15
Date


Mandy DeCree,
Outdoor Recreation Planner

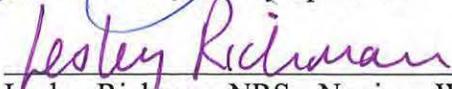
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Date


Andy Daniels, Wildlife Biologist

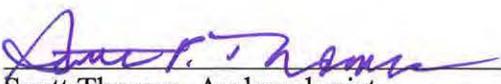
7/13/2015
Date


Tara McLain, Realty Specialist

8/3/15
Date


Lesley Richman, NRS - Noxious Weeds

7/27/2015
Date


Scott Thomas, Archaeologist

7/20/2015
Date

Note: Refer to the EA for a complete list of the team members participating in the preparation of the original EA or planning documents.

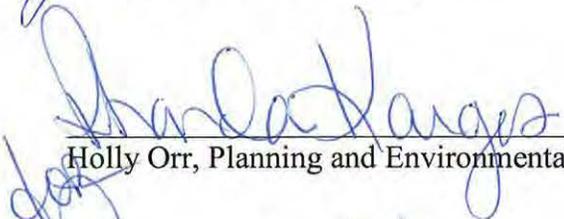
F. Others Consulted:

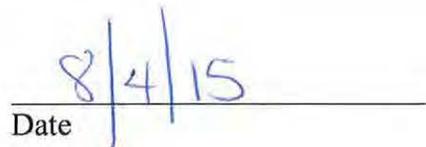
Oregon Department of Fish and Wildlife (ODFW) and the Reicken's Corner Allotment permittee were consulted about this proposed project.

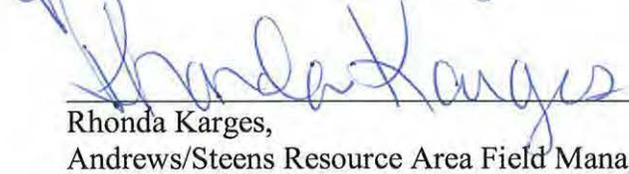
Conclusion: Based on the review documented above, I conclude that this proposal conforms to the applicable LUP and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

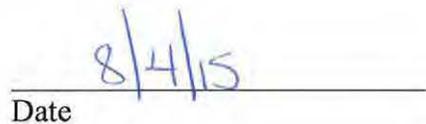

Justin DeCroo, Project Lead


Date


Holly Orr, Planning and Environmental Coordinator


Date


Rhonda Karges,
Andrews/Steens Resource Area Field Manager


Date

Proposed Decision: It is my proposed decision to implement the proposed action with PDEs as described above.

PROTEST AND APPEAL PROCEDURES

Any applicant, permittee, lessee, or other interested public may protest a proposed decision under Section 43 Code of Federal Regulations (CFR) 4160.1 and 4160.2, in person or in writing to Burns District Office, 28910 Highway 20 West, Hines, Oregon 97738, within 15 days after receipt of such decision. The protest, if filed, should clearly and concisely state the reason(s) as to why the proposed decision is in error.

In the absence of a protest, the proposed decision will become the final decision of the authorized officer without further notice unless otherwise provided in the proposed decision. Any protest received will be carefully considered and then a final decision will be issued.

Any applicant, permittee, lessee, or other person whose interest is adversely affected by the final decision may file an appeal in accordance with 43 CFR 4.470 and 43 CFR 4160.4. The appeal must be filed within 30 days following receipt of the final decision. The appeal may be

accompanied by a petition for a stay of the decision in accordance with 43 CFR 4.471, pending final determination on appeal. The appeal and petition for a stay must be filed in the office of the authorized officer, Rhonda Karges, Andrews/Steens Resource Area Field Manager, 28910 Highway 20 West, Hines, Oregon 97738.

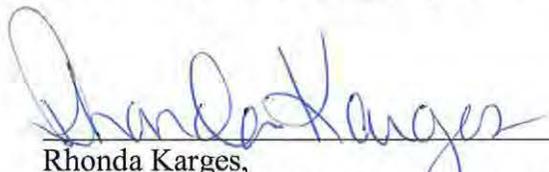
The appeal must state the reasons, clearly and concisely, why the appellant thinks the final decision is in error and otherwise comply with the provisions of 43 CFR 4.470. The appellant must serve a copy of the appeal by certified mail on the Office of the Solicitor, U.S. Department of the Interior, 805 SW Broadway, Suite 600, Portland, Oregon 97205, and on any person(s) named (43 CFR 4.421(h)) in the Copies sent to: section of this decision.

Should you wish to file a petition for a stay, see 43 CFR 4.471 (a) and (b). In accordance with 43 CFR 4.471(c), a petition for a stay must show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

The appellant requesting a stay bears the burden of proof to demonstrate that a stay should be granted.

Any person named in the decision who receives a copy of a petition for a stay and/or an appeal may see 43 CFR 4.472(b) for procedures to follow if that person wishes to respond.

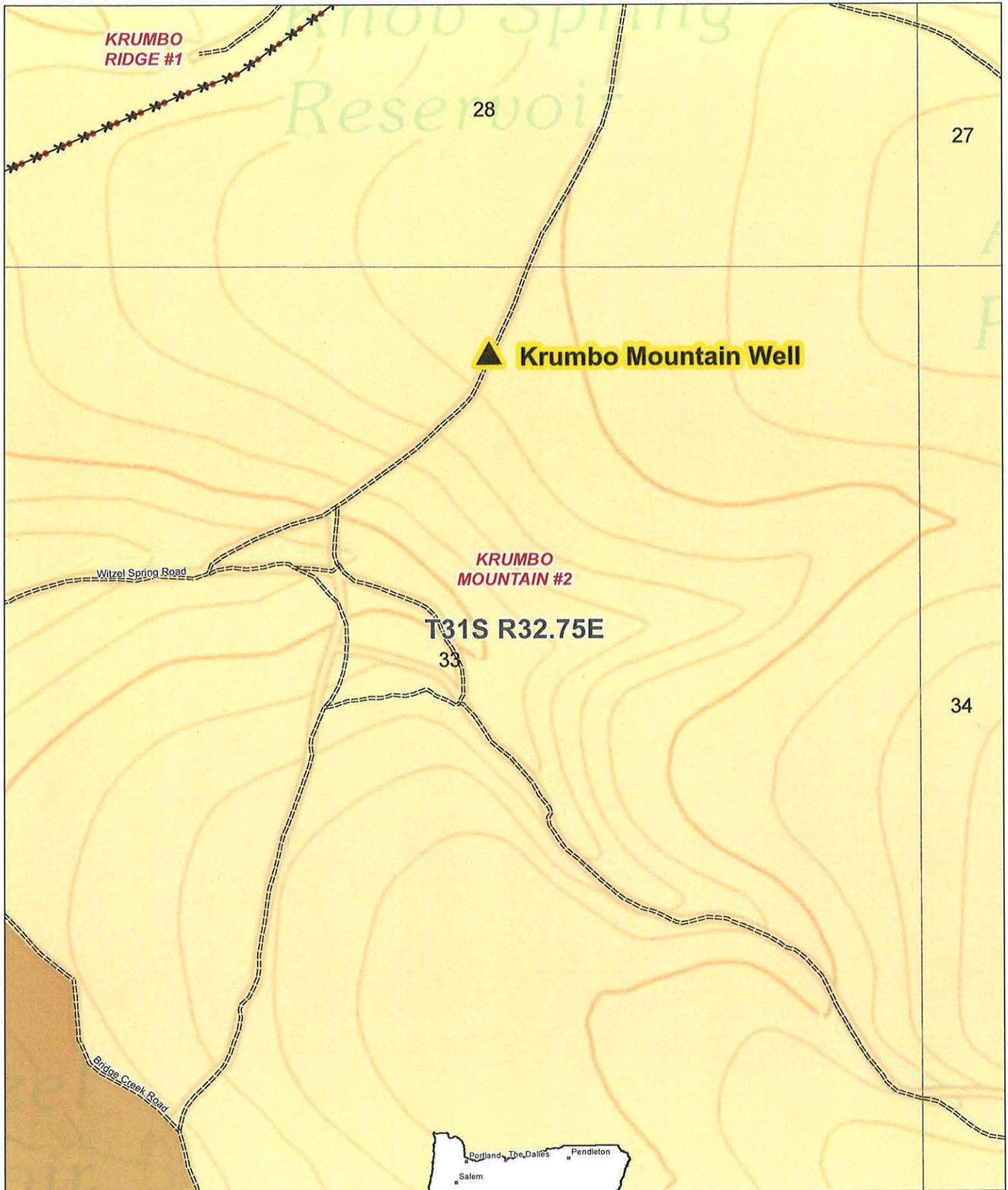


Rhonda Karges,
Andrews/Steens Resource Area Field Manager

8/4/15

Date

Krumbo Mountain Well DNA



-  Well-Water
-  Pastures
-  Fence
-  BLM Wilderness Study Area
-  Primitive/Unknown Surface
-  Bureau of Land Management




 US DEPARTMENT OF THE INTERIOR
 Bureau of Land Management
 Burns District, Oregon
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