

U.S. Department of the Interior
Bureau of Land Management
Little Snake Field Office
455 Emerson Street
Craig, CO 81625-1129

DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: DOI-BLM-CO-N010-2009-0114-DNA

CASEFILE/ALLOTMENT NUMBER:

0501051 / 04602

0501060 / 04604

0501199 / 04133

PROJECT NAME: Renewal of the grazing permits on the Long Gulch Allotment #04602, and the Kendall Allotment #04604 and renewal of the grazing lease on the Upper Horse Gulch Allotment #04133.

PLANNING UNIT: All three allotments are contained within Management Unit (MU) 1, Eastern Yampa River.

LEGAL DESCRIPTION: Also see allotment maps (Attachment #1).

#04602 Long Gulch

T5N R91W part of Sections 7, 18, 19, 20, 30, 29, 31 and 32
T5N R92W part of Sections 12 and 13

1,659 acres BLM
2,271 acres Private
3,930 acres total

#04604 Kendall

T5N R91W parts of Sections 32 and 33

30 acres BLM
162 acres Private
192 acres Total

#04133 Upper Horse Gulch

T5N R90W part of Sections 17, 18, 19, 21 and 22
T5N R91W parts of Section 13

1,583 acres BLM
9 acres Private
1,592 acres Total

APPLICANT(S): Mead Ranch LLC (Long Gulch, #04602), Danny and Marsha Jeffcoat (Kendall, #04604), Jacob and Calista Hamill (Upper Horse Gulch, #04133).

A. Describe the Proposed Action

Renew grazing permit #0501051 on the Long Gulch Allotment #04602 held by Mead Ranch LLC until February 28, 2020. There would be no changes to the existing permit.

Allotment Name and Number	Livestock		Dates		%PL	AUMs
	Number	Kind	Begin	End		
Long Gulch #04602	43	C	05/16	10/01	100	197

No special terms or conditions apply to this permit.

Renew grazing permit #0501060 on the Kendall Allotment #04604 held by Danny and Marsha Jeffcoat until February 28, 2020. There would be no changes to the existing permit.

Allotment Name and Number	Livestock		Dates		%PL	AUMs
	Number	Kind	Begin	End		
Kendall #04640	20	C	06/01	09/01	10	6

No special terms or conditions apply to this permit.

Renew grazing lease #0501199 on the Upper Horse Gulch Allotment #04133 held by Jacob and Calista Hamill until February 28, 2020. There would be no changes to the existing lease.

Allotment Name and Number	Livestock		Dates		%PL	AUMs
	Number	Kind	Begin	End		
Upper Horse Gulch #04133	22	C	05/15	11/15	100	134

No special terms or conditions apply to this lease.

The above lease and permits would be subject to the Standard and Common Terms and Conditions, see Attachment #2.

B. Land Use Plan (LUP) Conformance

LUP Name: Little Snake Resource Management Plan and Record of Decision (ROD)

Date Approved: April 26, 1989

Final RMP/EIS, September 1986

Draft RMP/EIS, February 1986

Other Documents:

Standards for Public Land Health and Guidelines for Livestock Grazing in Colorado
Date Approved: February 12, 1997

The Federal Land Policy and Management Act of 1976, as Amended (43 USC 1752)

Rangeland Reform Final Environmental Impact Statement, December 1994.

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions.

The Proposed Action implements the Resource Management Plan Livestock Grazing Management objective on page 10 of the ROD to improve range conditions through proper utilization of key forage plants and adjust livestock stocking rates. Also, as stated on page 11 of the ROD, the goal of the livestock management program is to improve the rangeland forage resource by managing toward a desired plant community, and states “In the future, allotment categorization, levels of management, and lease modifications could be made if additional information suggests that this is warranted in order to achieve or make significant progress toward achieving the Colorado Standards for Rangeland Health” (43 CFR 4180). The proposed action has been reviewed for conformance with this plan (43 CFR 1610.5 BLM 1617.3). The proposed action of renewal of the grazing permits and lease is in conformance with the Little Snake RMP/ROD.

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

Rangeland Program Summary (RPS), Little Snake Resource Area, November 15, 1990

Standard Terms and Conditions (See Attachment 2)

Standards for Public Land Health and Guidelines for Livestock Grazing in Colorado
Date Approved: February 12, 1997

FLPMA, Section 402 as amended (43 USC 1752)

Colorado Public Land Health Standards, Decision Record and Finding of No Significant Impact and Environmental Assessment, March 1997.

Environmental Assessment CO-016-LS-99-022 Renewal of the ten-year grazing permit for the Upper Horse Gulch Allotment; the Renewal of the ten-year grazing permit for the Kendall Allotment; the Renewal of the ten-year grazing lease for the Long Gulch Allotment.

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document?

Yes. The public lands within the Long Gulch #04602, Kendall #04604 and Upper Horse Gulch #04133 Allotments were analyzed in the RMP/EIS (page A8-14). Both the Upper Horse Gulch and Kendall Allotments were designated as “C” (Custodial) allotments, while the Long Gulch Allotment was designated as an “I” (Improve) allotment. The Proposed Action received additional site-specific analysis in the Environmental Assessment CO-016-LS-99-022. This EA analyzed the grazing use that is to be continued under the current proposal.

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

Yes, the multiple use alternatives analyzed in the valid NEPA documents are still appropriate. The current environmental concerns, interests, and resource values are essentially the same as those in 1999. No new alternatives have been proposed by the public to address current or additional issues or concerns.

3. Is the existing analysis valid in light of any new information or circumstances?

Yes. The Proposed Action would have no disproportionate impacts on minority populations or low income communities per Executive Order (EO) 12898 and would not adversely impact migratory birds per EO 13186.

Resource conditions on the Long Gulch #04602, Kendall #04604 and the Upper Horse Gulch #04133 Allotments meet objectives and goals. The previous analysis remains valid. No new, threatened or endangered plant or animal species have been identified on the allotments. Data reaffirms that the RMP identified all resource concerns for these allotments.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Yes, the methodology and analytical approach used in the existing NEPA documents continue to be appropriate for the Proposed Action. Impacts to all resources were analyzed.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?

Yes. Direct and indirect impacts of the Proposed Action are within the parameters of those identified in the existing NEPA documents. Impacts regarding the Proposed Action to authorize

livestock grazing on the Long Gulch #04602, Kendall #04604 and Upper Horse Gulch #04133 Allotments at the current grazing intensity and period of use are within the scope of the existing analysis. Monitoring data, including an allotment specific analysis of resource conditions, assure that these allotments are in compliance with the Colorado Public Land Health Standards. No adverse site specific impacts were identified in this analysis (see Attachment 3).

The Proposed Action would provide for at least the minimum legal requirements for cultural resources management and protection and would generally result in benefits through cultural resource data acquisition resulting from required cultural resource survey work.

Previously identified sites and new sites recorded and evaluated as eligible and/or need data sites during a Class III survey will need to be monitored. Initial recordation of new sites and reevaluation of known sites will establish the current condition of the resource and help in developing a monitoring plan for all of these sites. Some sites will have to be monitored more often than others. Sites that are found to be impacted by grazing activities will need physical protection or other mitigative measures developed (see Attachment 4).

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current Proposed Action substantially unchanged from those analyzed in the existing NEPA document(s)?

Yes. The cumulative impacts that would result from the implementation of the Proposed Action would remain unchanged from those identified in the existing NEPA documents. No additional activities have been implemented on either that would change the impacts resulting from the Proposed Action.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current Proposed Action?

Yes. Extensive public outreach through scoping and involvement of the public and other agencies occurred during the development of the RMP/EIS and Environmental Assessment CO-016-LS-99-022.

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

Name	Title	Resource	Initials	Date
Kathy McKinstry	Natural Resource Specialist	Air Quality, Floodplains Prime/Unique Farmlands, Water Quality – Surface	KLM	10/28/09
Robyn Morris	Archaeologist	Cultural Resources, Native American Concerns	RWM	11/06/09
Louise McMinn	Realty Specialist	Environmental Justice	LM	11/04/09
Kathy McKinstry	Lead Preparer NEPA	Hazardous Materials	KLM	10/28/09
Kathy	Natural Resource	Invasive Non-native Species	KLM	11/04/09

McKinstry	Specialist			
Hunter Seim	Rangeland Management Spec.	Sensitive Plants, T&E Plant	JHS	10/28/09
Tim Novotny	Wildlife Biologist	T&E Animal	TMN	10/29/09
Marty O'Mara	Geologist	Water Quality - Ground	EMO	11/2/09
Kathy McKinstry	Natural Resource Specialist	Wetlands/Riparian Zones	KLM	10/28/09
Gina Robison	Recreation Specialist	WSA, W&S Rivers	GMR	10/29/09
Standards				
Tim Novotny	Wildlife Biologist	Animal Communities	TMN	10/29/09
Tim Novotny	Wildlife Biologist	Special Status, T&E Animal	TMN	10/29/09
Kathy McKinstry	Rangeland Management Spec	Plant Communities	KLM	09/14/09
Hunter Seim	Rangeland Management Spec	Special Status, T&E Plant	JHS	10/28/09
Kathy McKinstry	Natural Resource Specialist	Riparian Systems	KLM	10/29/09
Kathy McKinstry	Natural Resource Specialist	Water Quality	KLM	10/29/09
Kathy McKinstry	Natural Resource Specialist	Upland Soils	KLM	10/28/09

Land Health Assessment

This action has been reviewed for conformance with the BLM's Public Land Health Standards adopted February 12, 1997. This action would not adversely affect achievement of the Public Land Health Standards. Standards Assessments for the Long Gulch #04602, Kendall #04640 and Upper Horse Gulch #04133 Allotments were completed in June 2006 by an interdisciplinary team consisting of specialists from wildlife biology, rangeland management and soil, water and air, as part of the Williams Fork Watershed Assessment. Long Gulch #04602 was assessed as Williams Fork Site #30; Kendall #04640 was assessed as Williams Fork Site #26; and Upper Horse Gulch #04133 was assessed as Williams Fork Site #17. Each of the assessment locations within the allotments are meeting all standards with the exception of #17 in the Upper Horse Gulch Allotment. This site is failing Standard 3, the healthy vegetation standard due to the high levels of the noxious/invasive weed houndstongue (*Cynoglossum officinale*). Current livestock management is not a causal factor of the non-attainment of this standard.

Cultural Resources Review

The Proposed Action would provide for at least the minimum legal requirements for cultural resources management and protection and would generally result in benefits through cultural resource data acquisition resulting from required cultural resource survey work.

Previously identified sites and new sites recorded and evaluated as eligible and/or need data sites during a Class III survey will need to be monitored. Initial recordation of new sites and reevaluation of the known sites will establish the current condition of the resource and help in

developing a monitoring plan for all of these sites. Some sites will have to be monitored more often than others. Sites that are found to be impacted by grazing activities will need physical protection and other mitigative measures developed (see Attachment #4).

Conclusion

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

Signature of Lead Specialist_____ Date_____

Signature of NEPA Coordinator_____ Date_____

Signature of the Authorizing Official_____ Date_____

Note: The signed Conclusion on this document is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.

ATTACHMENT #2
DOI-BLM-CO-N010-2009-0114-DNA
TERMS AND CONDITIONS

Standard Terms and Conditions

- 1) Grazing permit or lease terms and conditions and the fees charged for grazing use are established in accordance with the provisions of the grazing regulations now or hereafter approved by the Secretary of the Interior.
- 2) They are subject to cancellation, in whole or in part, at any time because of:
 - a. Noncompliance by the permittee/lessee with rules and regulations;
 - b. Loss of control by the permittee/lessee of all or a part of the property upon which it is based;
 - c. A transfer of grazing preference by the permittee/lessee to another party;
 - d. A decrease in the lands administered by the Bureau of Land Management within the allotment(s) described;
 - e. Repeated willful unauthorized grazing use;
 - f. Loss of qualifications to hold a permit or lease.
- 3) They are subject to the terms and conditions of allotment management plans if such plans have been prepared. Allotment management plans **MUST** be incorporated in permits and leases when completed.
- 4) Those holding permits or leases **MUST** own or control and be responsible for the management of livestock authorized to graze.
- 5) The authorized officer may require counting and/or additional or special marking or tagging of the livestock authorized to graze.
- 6) The permittee's/lessee's grazing case file is available for public inspection as required by the Freedom of Information Act.
- 7) Grazing permits or leases are subject to the nondiscrimination clauses set forth in Executive Order 11246 of September 24, 1964, as amended. A copy of this order may be obtained from the authorized officer.
- 8) Livestock grazing use that is different from that authorized by a permit or lease **MUST** be applied for prior to the grazing period and **MUST** be filed with and approved by the authorized officer before grazing use can be made.
- 9) Billing notices are issued which specify fees due. Billing notices, when paid, become a part of the grazing permit or lease. Grazing use cannot be authorized during any period of delinquency in the payment of amounts due, including settlement for unauthorized use.

- 10) Grazing fee payments are due on the date specified on the billing notice and MUST be paid in full within 15 days of the due date, except as otherwise provided in the grazing permit or lease. If payment is not made within that time frame, a late fee (the greater of \$25 or 10 percent of the amount owed but not more than \$250) will be assessed.
- 11) No member of, or Delegate to, Congress or Resident Commissioner, after his/her election of appointment, or either before or after he/she has qualified, and during his/her continuance in office, and no officer, agent, or employee of the Department of Interior, other than members of Advisory committees appointed in accordance with the Federal Advisory Committee Act (5 U.S.C. App. 1) and Sections 309 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.) shall be admitted to any share or part in a permit or lease, or derive any benefit to arise therefrom; and the provision of Section 3741 Revised Statute (41 U.S.C. 22), 18 U.S.C. Sections 431-433, and 43 CFR Part 7, enter into and form a part of a grazing permit or lease, so far as the same may be applicable.

Common Terms and Conditions

- A) Grazing use will not be authorized in excess of the amount of specified grazing use (AUM number) for each allotment. Numbers of livestock annually authorized in the allotment(s) may be more or less than the number listed on the permit/lease within the grazing use periods as long as the amount of specified grazing use is not exceeded.
- B) Unless there is a specific term and condition addressing utilization, the intensity of grazing use will insure that no more than 50% of the key grass species and 40% of the key browse species current years growth, by weight, is utilized at the end of the grazing season for winter allotments and the end of the growing season for allotments used during the growing season. Application of this term needs to recognize recurring livestock management that includes opportunity for regrowth, opportunity for spring growth prior to grazing, or growing season deferment.
- C) Failure to maintain range improvements to BLM standards in accordance with signed cooperative agreements and/or range improvement permits may result in the suspension of the annual grazing authorization, cancellation of the cooperative agreement or range improvement permit, and/or the eventual cancellation of this permit/lease.
- D) Storing or feeding supplemental forage on public lands other than salt or minerals must have prior approval. Forage to be fed or stored on public lands must be certified noxious weed-free. Salt and/or other mineral supplements shall be placed at least one-quarter mile from water sources or in such a manner as to promote even livestock distribution in the allotment or pasture.
- E) Pursuant to 43 CFR 10.4(g), the holder of this authorization must notify the authorized officer, by telephone, with written confirmation, immediately upon the discovery of

human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

The operator is responsible for informing all persons who are associated with the allotment operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological materials are encountered or uncovered during any allotment activities or grazing activities, the operator is to immediately stop activities in the immediate vicinity and immediately contact the authorized officer. Within five working days the authorized officer will inform the operator as to:

- whether the materials appear eligible for the National Register of Historic Places;
- the mitigation measures the operator will likely have to undertake before the identified area can be used for grazing activities again.

If paleontological materials (fossils) are uncovered during allotment activities, the operator is to immediately stop activities that might further disturb such materials and contact the authorized officer. The operator and the authorized officer will consult and determine the best options for avoiding or mitigating paleontological site damage.

- F) No hazardous materials/hazardous or solid waste/trash shall be disposed of on public lands. If a release does occur, it shall immediately be reported to this office at (970) 826-5000.
- G) The permittee/lessee shall provide reasonable administrative access across private and leased lands to the BLM and its agents for the orderly management and protection of public lands.
- H) Application of a chemical or release of pathogens or insects on public lands must be approved by the authorized officer.

The terms and conditions of these permits/leases may be modified if additional information indicates that revision is necessary to conform with 43 CFR 4180.

**ATTACHMENT #3
DOI-BLM-CO-N010-2009-0114-DNA
Standards and Assessments***

STANDARD 1. Upland soils exhibit infiltration and permeability rates that are appropriate to soil type, climate, land form, and geologic processes. Adequate soil infiltration and permeability allows for the accumulation of soil moisture necessary for optimal plant growth and vigor, and minimizes surface runoff.

Long Gulch #04602 (Williams Fork (WF) Site #30)

Continued livestock use under the Proposed Action would meet this standard. Soils are stable and biological soil crusts are at appropriate levels. Plant diversity and vigor is sufficient to sustain soil stability over the long term. Production is high in this allotment and accumulating surface litter is benefitting the soil resource. Slopes on public land are fairly steep and soil stability is as expected on slopes.

Kendall #04640(WF #26)

Continued livestock use under the Proposed Action would meet this standard. Soils are stable and biological soil crusts are at appropriate levels. Plant diversity and vigor is sufficient to sustain soil stability over the long term. Perennial grass composition and density is low, but overall production is high and accumulating surface litter is benefitting the soil resource. Slopes on public land within this allotment are generally flat.

Upper Horse Gulch #04133 (WF #17)

Continued livestock use under the Proposed Action would meet this standard. This standard is currently being met. Soil characteristics are stable and plant growth and vigor demonstrate this. There is little to no movement of soils; the site is very stable.

Name of Specialist and date: Kathy McKinstry, 09/14/09

STANDARD 2. Riparian systems associated with both running and standing water function properly and have the ability to recover from major disturbances such as fire, severe grazing, or 100-year floods. Riparian vegetation captures sediment and provides forage, habitat, and biodiversity. Water quality is improved or maintained. Stable soils store and release water slowly.

Long Gulch #04602(WF #30)

There are no riparian resources on the public land within this allotment. This standard does not apply.

Kendall #04640(WF#26)

There are no riparian resources on the public land within this allotment. This standard does not apply.

Upper Horse Gulch #04133(WF#17)

There is a seasonal spring which lies within an ephemeral drainage and a shallow pond which supports emergent vegetation and cattails. This allotment is used in a 5 pasture rotation grazing system which will continue to benefit riparian systems by varying the time of use and allowing

vegetation to regrow during the growing season. This standard is currently being met and would continue to be met under the Proposed Action.

Name of Specialist and date: Kathy McKinstry, 10/28/09

STANDARD 3. Healthy, productive plant and animal communities of native and other desirable species are maintained at viable population levels commensurate with the species and habitat potential. Plants and animals at both the community and population levels are productive, resilient, diverse, vigorous, and able to reproduce and sustain natural fluctuations and ecological processes.

Plants:

Long Gulch #04602(WF#30)

This standard is currently being met and the Proposed Action to continue livestock grazing on this allotment would meet this standard. Herbaceous plant vigor and production is high within the allotment. Canopy cover is high and invasive species are within an acceptable level. Wildlife habitat quality is acceptable to support viable populations.

Kendall #04640 (WF#26)

The plant community within this allotment is very productive and high in diversity. Some weedy forbs are present but are intermixed with a healthy component of native and desirable perennial grasses. The key species are appropriate for the allotment. Wildlife habitats are acceptable to promote diverse and viable populations. This standard would continue to be met with the Proposed Action.

Upper Horse Gulch #04133(WF#17)

This allotment failed to meet this standard due to the high levels of the noxious weed houndstongue. The presence of this weed is widespread throughout the area, but its presence is not a result of current livestock management. Due to the confinement of the gulch and moisture content, the vegetative cover and understory is noted for wildlife habitat. Other aspects of the plant community are healthy and provide quality habitat. The Proposed Action would not preclude the standard from being met in the future.

Name of Specialist and date: Kathy McKinstry, 09/14/09

Animals:

The three allotments provide healthy productive habitats for pronghorn antelope, elk and mule deer. A variety of small mammals, song birds and reptiles may be found on these allotments as well. The allotments have numerous historical nesting sites for golden eagles and red tailed hawks. The Proposed Action provides grazing systems that would maintain habitat conditions within the allotments in their current condition. Habitats in these allotments would be capable of supporting healthy productive wildlife populations in the future. Under the Proposed Action, this standard is currently being met and would continue to be met in the future.

Name of Specialist and date: Timothy Novotny, 10/29/09

STANDARD 4. Special status, threatened, and endangered species (federal and state), and other plants and animals officially designated by BLM, and their habitats are maintained or enhanced by sustaining healthy native plant and animal communities.

Animals:

There are no threatened or endangered species or habitats for such species present in the three allotments. The Long Gulch Allotment contains nesting habitat for Columbian sharp-tailed grouse, a BLM special status species. The Proposed Action provides grazing systems that would ensure nesting habitat for Columbian sharp-tailed grouse remains healthy. This standard is currently being met and would continue to be met in the future on all three allotments.

Name of specialist and date: Timothy Novotny, 10/29/09

Plants:

There are no federally listed threatened or endangered or BLM sensitive plant species present on any of the allotments. For plants, this standard does not apply.

Name of Specialist and date: Hunter Seim, 10/28/09

STANDARD 5. The water quality of all water bodies, including ground water where applicable, located on or influenced by BLM lands will achieve or exceed the Water Quality Standards established by the State of Colorado. Water Quality Standards for surface and ground waters include the designated beneficial uses, numeric criteria, narrative criteria, and anti-degradation requirement set forth under State law as found in 5 CCR 1002-8, as required by Section 303 of the Clean Water Act.

Long Gulch #04602

The water quality standard for healthy rangelands would continue to be met under the Proposed Action. Runoff from snow melt and summer storms drain from the affected lands directly into stream segments that are supporting classified uses. No stream segments in the area are listed as impaired. The water quality standard for healthy rangelands would continue to be met under the Proposed Action.

Kendall #04640

The water quality standard for healthy rangelands would continue to be met under the Proposed Action. Runoff from snow melt and summer storms drain from the affected lands directly into stream segments that are supporting classified uses. The water quality standard for healthy rangelands would continue to be met under the Proposed Action.

Upper Horse Gulch #04133

Water quality of the Williams Fork River, below the bridge at Hamilton to its confluence with the Yampa River, needs to support Aquatic Life Warm 2, Recreation 1a, Water Supply, and Agriculture. Horse Gulch, which is a tributary to the Williams Fork River, has a specific classified use and needs to have water quality that supports Aquatic Life Warm 2, Recreation 1b, and Agriculture. The water quality standard for healthy rangelands would continue to be met under the Proposed Action. Runoff from snow melt and summer storms drain from the affected lands directly into stream segment that supports classified uses. No stream segments in the allotment are listed as impaired.

Name of Specialist and date: Kathy McKinstry, 09/14/09

Attachment #4
NEPA Ref. DOI-BLM-CO-N010-2009-0114 / Heritage Rpt. #10.3.2010
Cultural Resource and Native American Concerns

Affected Environment: Grazing authorization renewals are undertakings under Section 106 of the National Historic Preservation Act. During Section 106 review, a cultural resource assessment was completed for each allotment on November 4, 2009 by Robyn Watkins Morris, Little Snake Field Office Archaeologist. The assessment followed the procedures and guidance outlined in the 1980 National Programmatic Agreement Regarding the Livestock Grazing and Range Improvement Program, IM-WO-99-039, IM-CO-99-007, IM-CO-99-019, and IM-CO-01-026. The results of the assessment are summarized in the table below. Copies of the cultural resource assessments are in the field office archaeology files.

Data developed here was taken from the cultural program project report files, site report files, and base maps kept at the Little Snake Field Office as well as from General Land Office (GLO) maps, BLM land patent records, An Overview of Prehistoric Cultural Resources Little Snake Resource Area, Northwestern Colorado, Bureau of Land Management Colorado, Cultural Resources Series, Number 20, and An Isolated Empire, A History of Northwestern Colorado, Bureau of Land Management Colorado, Cultural Resource Series, Number 2 and Appendix 21 of the Little Snake Resource Management Plan and Environmental Impact Statement, Draft February 1986, Bureau of Land Management, Craig, Colorado District, Little Snake Resource Area.

The table below is based on the allotment specific analysis developed for the allotments in this DNA. The table shows known cultural resources, eligible and need data, and those that are anticipated to be in each allotment.

Allotment Number	Acres Surveyed at a Class III Level	Acres NOT Surveyed at a Class III Level	Percent of Allotment Inventoried at a Class III Level	Eligible or Need Data Sites- Known in Allotment	Estimated Sites for the Allotment *(total number)	Estimated Eligible or Need Data Sites in the Allotment (number)
04602	266	3664	6.7	4	104	31.0
04604	0	192	00.0	0	6	1.5
04133	1	1591	.006	0	42	12.0

*Estimates of site densities are based on known inventory data. Estimates should be accepted as minimum figures which may be revised upwards based on future inventory findings.

Eleven cultural resource inventories were conducted within Allotment #04602 resulting in the complete coverage inventory of 266 acres and the recording of 5 cultural resources. One is an historic outbuilding, one is an historic highway, and three are prehistoric open lithic scatters. The General Land Office (GLO) plats were reviewed for this area; nothing was found on the 1879 or 1918 GLO plats.

One cultural resource inventory was conducted within Allotment #04133 resulting in the complete coverage of 1 acre and the recording of no cultural resources. The GLO plats were reviewed for this area. Nothing was found on the 1879 or 1918 GLO plats.

No cultural resource inventory has been previously conducted within Allotment #04604 and no cultural resources have been recorded. The GLO plats were reviewed for this area. Although nothing was identified on the T5N R91W 1879 GLO plat, there is an historic road on the 1918 GLO plat for the same area.

Based on available data, a high potential for historic properties occurs in Allotment #04602 and a low potential exists for historic properties in Allotments #04604 and #04133. Subsequent cultural resource inventories will be conducted in areas where livestock concentrate. Subsequent field inventory is to be completed within the ten year period of the permit and/or lease.

1. In Allotment #04133, approximately 22 acres will be surveyed along Horse Gulch due cattle concentrating near water.

If historic properties are located during the subsequent field inventory, and BLM determines that grazing activities will adversely impact the properties, mitigation will be identified and implemented in consultation with the Colorado SHPO.

Environmental Consequences: The direct impacts that occur where livestock concentrate, during normal livestock grazing activity, include trampling, chiseling, and churning of site soils, cultural features, and cultural artifacts, artifact breakage, and impacts from standing, leaning, and rubbing against historic structures, above-ground cultural features, and rock art. Indirect impacts include soil erosion, gullyng, and increased potential for unlawful collection and vandalism. Continued livestock use in these concentration areas may cause substantial ground disturbance and cause irreversible adverse effects to historic properties. The BLM managed lands within the allotments are typically steep and dry and are not expected to have many cultural resources. Areas where cultural resources and cattle concentration are expected will be surveyed.

Standard Stipulations for cultural resources are included in Standard and Common Terms and Conditions (Attachment 2).

Mitigation Measures: None

Name of Specialist and date: Robyn Watkins Morris, 11/06/09

NATIVE AMERICAN RELIGIOUS CONCERNS

A letter was sent to the Uinta and Ouray Tribal Council, Southern Ute Tribal Council, Ute Mountain Ute Tribal Council on May 5, 2008. The letter listed the FY08 and FY09 projects that the BLM would notify them on and projects that would not require notification. A followup phone call was performed on June 16, 2008. No comments were received (Letter on file at the Little Snake Field Office). This project requires no additional notification.

Name of specialist and date: Robyn Watkins Morris, 11/06/09