

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

DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: DOI-BLM-CO-N010-2009-0098-DNA

CASEFILE/ALLOTMENT NUMBER: 0503708/04417, 04419, 04420

PROJECT NAME: Renewal of the grazing permit on the Jesse Flats #04417, Cinder Knob #04419, and Coal Mountain #04420 Allotments.

LEGAL DESCRIPTION: see Allotment Maps, attachments 1a-c

Jesse Flats Allotment #04417

T5N R94W por. secs. 17-21, 29

980 acres BLM
153 acres State Land Board
2,715 acres private
3,848 acres total

Cinder Knob Allotment #04419

T5N R95W por. secs. 25-27, 34-36

1,178 acres BLM
96 acres State Land Board
487 acres private
1,761 acres total

Coal Mountain Allotment #04420

T5N R94W por. secs. 30 and 31
T5N R95W por. secs. 25, 34-36
T4N R95W por. secs. 10-16, 21 and 22

1,264 acres BLM
905 acres private
2,169 acres total

APPLICANT: Efficiency Lodge, Inc.

A. Describe the Proposed Action

Renew the grazing permit on the Jesse Flats #04417, Cinder Knob #04419, and Coal Mountain #04420 Allotments for a period of ten years, expiring February 28, 2019. The permit would be reissued with the same terms and conditions as the expiring permit which are as follows:

Allotment Name and Number	Livestock Number and Kind	Grazing Period		%PL	AUMs
		Begin	End		
Jesse Flats #04417	150 Cattle	05/10	06/11	31	50
	150 Cattle	09/08	10/10	31	50
				Suspended	<u>20</u>
			Total		120
Cinder Knob #04419	150 Cattle	06/12	07/10	100	143
Coal Mountain #04420	150 Cattle	07/10	09/10	51	158

The above permit would be subject to the following Special Terms and Conditions:

- 1) The permittee is allowed five days flexibility in pasture movements, including in to and out of the allotments, as long as the amount of specified grazing use (AUMs allowed) is not exceeded.
- 2) In even years, cattle will move through Cinder Knob/Coal Mountain beginning on the north end of the Cinder Knob Allotment. In odd years, cattle will move through Cinder Knob/Coal Mountain beginning on the north end of the Coal Mountain Allotment. Roughly half the grazing season will be spent in each allotment.
- 3) The allowed season of use for both the Cinder Knob and Coal Mountain Allotments is 6/12-9/10 to provide for the rotational grazing system.

The above permit 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 permit 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 of Public Land Health for the Axial Basin Watershed, 2007.

Federal Land Policy and Management Act, Section 402 as amended (43 USC 1752).

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

Environmental Assessment CO-016-LS-99-24, 4417/4419/4420 grazing permit renewal/transfer.

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 Jesse Flats #04417, Cinder Knob #04419, and Coal Mountain #04420 Allotments were analyzed in the RMP/EIS (page A8-12) and were all designated as “M” (Maintain) allotments. The Proposed Action received additional site-specific analysis in Environmental Assessment CO-016-LS-99-24, 4417/4419/4420 Grazing Permit Renewal/Transfer. This EA analyzed reductions in grazing use and the rotations that are 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 Jesse Flats #04417, Cinder Knob #04419, and Coal Mountain #04420 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 Jesse Flats #04417, Cinder Knob #04419, and Coal Mountain #04420 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) adequate 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. A public notice was also sent to interested publics and published in the *Craig Daily Press* and *Steamboat Pilot* newspapers to determine the level of public interest, concern, and resource conditions on the grazing allotments included in the EA.

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

Name	Title	Resource	Initials	Date
Hunter Seim	Rangeland Management Spec.	Air Quality, Floodplains Prime/Unique Farmlands, Water Quality – Surface	JHS	8/17/09
Robyn Morris	Archaeologist	Cultural Resources, Native American Concerns	RWM	9/15/09
Louise McMinn	Realty Specialist	Environmental Justice	LM	8/18/09
Hunter Seim	Rangeland	Hazardous Materials	JHS	8/17/09

	Management Spec.			
Hunter Seim	Rangeland Management Spec.	Invasive Non-native Species	JHS	8/17/09
Hunter Seim	Rangeland Management Spec.	Sensitive Plants, T&E Plant	JHS	8/17/09
Tim Novotny	Wildlife Biologist	T&E Animal	TMN	8/19/09
Jennifer Maiolo	Geologist	Water Quality - Ground	JM	8/24/09
Hunter Seim	Wildlife Biologist	Wetlands/Riparian Zones	JHS	8/17/09
Kim Miller	Outdoor Recreation Planner	WSA, W&S Rivers	KMM	8/17/09
Standards				
Tim Novotny	Wildlife Biologist	Animal Communities	TMN	8/19/09
Tim Novotny	Wildlife Biologist	Special Status, T&E Animal	TMN	8/19/09
Hunter Seim	Rangeland Management Spec.	Plant Communities	JHS	8/17/09
Hunter Seim	Rangeland Management Spec.	Special Status, T&E Plant	JHS	8/17/09
Tim Novotny	Wildlife Biologist	Riparian Systems	TMN	8/19/09
Hunter Seim	Rangeland Management Spec.	Water Quality	JHS	8/17/09
Hunter Seim	Rangeland Management Spec.	Upland Soils	JHS	8/17/09

Land Health Assessment

This action has been reviewed for conformance with the BLM’s Public Land Health Standards adopted February 12, 1997. This action will not adversely affect achievement of the Public Land Health Standards. Standard Assessments were conducted June 24, 2003 by five rangeland management specialists and two wildlife biologists and again on August 19, 2009 by a rangeland management specialist and a wildlife biologist.

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 constitutes 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-N010-2009-0098-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.
- I) The terms and conditions of this permit may be modified if additional information indicates that revision is necessary to conform with 43 CFR 4180.

ATTACHMENT #3
DOI-BLM-CO-N010-2009-0098-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.

All three allotments are meeting this standard. Throughout all three allotments, upland soil infiltration and permeability rates are appropriate for these sites and adequate vegetative cover is present to protect the soil surface from hydrologic influences. Grazing use as proposed would not change from the previous permit, which has not precluded these allotments from meeting this standard.

STANDARD 2. Riparian systems associated with both running and standing water functions properly and has 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.

The riparian systems associated with the drainages on public lands within these three allotments are limited. Those at the upper end of the drainages are fed by spring sources and do not have defined channels. All lentic and lotic systems are functioning within their capability. Although snow melt can be substantial, flow within these systems is relatively small and is not causing erosion or bank cutting. Spring flows are primarily subsurface with water being piped to water tanks.

The proposed action on all three allotments would maintain or enhance riparian systems. By maintaining the shortened duration of grazing and alternating periods of grazing use during the growing season, riparian vegetation associated with a higher water table would have a chance to recover from grazing use each year. Additional riparian vegetation would flourish, enhancing the potential of the sites, while maintaining an elevated water table and reducing the effects of runoff. Overall, the riparian standard would be met with the implementation of the proposed action on all three allotments.

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.

This standard is not being met in portions of the Jesse Flats and Cinder Knob Allotments. Some areas in the Jesse Flats Allotment have an overabundance of cheatgrass and some areas in the Cinder Knob Allotment have decadent stands of big sagebrush with closing canopies that are decreasing the abundance of perennial herbaceous species. While the closing-canopy sagebrush coupled with decreases in herbaceous plant diversity is related to a lack of natural disturbance in those sagebrush-dominated communities, the cheatgrass abundance is related to historic livestock management. Current management, as described by this proposed action, prescribes a rotation of

grazing and stocking rates that, based on monitoring, are appropriate. It is unlikely that any change in current management would, in itself, have an appreciable effect on areas where this standard is not being met. Other actions, such as prescribed fire or mechanical treatments coupled with integrated pest management practices; along with the continuation of current livestock management as prescribed by the proposed action would move these allotments towards meeting this standard for plant communities.

The Coal Mountain Allotment is currently meeting this standard with adequate diversity, vigor, and abundance of desirable species. For plant communities, this standard would continue to be met under the proposed action on this allotment.

These grazing allotments provide valuable productive wildlife habitat that are capable of supporting a variety of wildlife species at various times of the year including big game severe winter range. The proposed grazing within these allotments will not degrade wildlife habitats. For wildlife, this standard is currently being met and would continue to be met in the future under the proposed action

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.

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

The Jesse Flats Allotment provides nesting and brood rearing habitat for greater sage grouse, a BLM Special Status Species. This allotment is providing productive habitat for greater sage grouse. The proposed grazing system has been in place for the previous ten years and has not resulted in degradation to greater sage-grouse habitats within this allotment. This standard is currently being met and would continue to be met in the future under the proposed action.

Neither the Cinder Knob nor the Coal Mountain Allotments contain any habitat for Special Status wildlife species. For wildlife, this standard does not apply.

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.

The proposed action would meet this standard on all three allotments. All affected stream segments are supporting classified uses and none are listed as impaired.

* Standard Assessments were conducted on May 31 and June 1, 2007 by three rangeland management specialists, one wildlife biologist, and on natural resource specialist.

ATTACHMENT #4
DOI-BLM-CO-N010-2009-0098-DNA
Cultural Resource and Native American Concerns

Cultural Resources

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 September 15, 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)
04417	1	3847	.02%	0	102	30
04419	2	1759	.1%	0	46	14
04420	46	2122	1.4%	0	57	17

*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.

Two cultural resource inventories were within the Jesse Flats Allotment #04417 resulting in the complete coverage inventory of one acre and the recording of no cultural resources. The 1881 GLO T5N R94W plat shows no features. The 1905 GLO T5N R94W shows a wagon road that follows a modern road in Sections 17, 19, 31, and 32.

Two cultural resources inventories were conducted within the Coal Mountain Allotment #04420 resulting in the complete coverage inventory of 46 acres and the recording of two cultural resources. Both are isolated prehistoric finds that are not eligible. The GLO plats show no resources.

One cultural resource inventory was conducted within the Cinder Knob Allotment #04419 resulting in the complete coverage inventory of one acre and the recording of no cultural resources. The GLO plats show no features.

Based on available data, a low potential for historic properties occurs in the Cinder Knob #04419 and Coal Mountain #04420 Allotments due to the prevalence steep slopes within these allotments. The Jesse Flats Allotment #04417 has a higher potential due to more flat ground. Subsequent cultural resource inventories will be conducted in areas where livestock concentrate. Subsequent field inventories are to be completed within ten year period of the permit.

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 concentration areas may cause substantial ground disturbance and cause irreversible adverse effects to historic properties.

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

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

Name of specialist and date: Robyn Watkins Morris 9/15/09

Native American Religious Concerns

A letter was sent to the Eastern Shoshone, Uinta and Ouray Tribal Council, Southern Ute Tribal Council, Ute Mountain Ute Tribal Council on May 26, 2009. The letter listed the FY2010 projects that the BLM would notify them on and projects that would not require notification. A follow up phone call was performed on July 26, 2009. 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 9/15/09