

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-N010-2011-0059-DNA

PESTICIDE USE PROPOSAL NUMBER: 11-CO-100-81, 11-CO-100-82, 11-CO-100-83, 11-CO-100-84, 11-CO-100-85

PROJECT NAME: Herbicide application for control of noxious weeds and bare ground treatments along pipeline and associated access roads and right of ways.

LEGAL DESCRIPTION: Western Moffat County. See attached map.

APPLICANT: WD Yards, Inc. (Rockies Express Gas Transmission Pipeline Project)

A. Describe the Proposed Action

Herbicide applications would be made to control vegetation along pipeline route, access roads and right-of-ways. These sites have been previously leveled, graded or disturbed. Treating noxious weeds on these sites would aid in controlling further weed infestations and establishing perennial vegetation. Bare ground herbicide application would aid in fire prevention, operation and maintenance of facilities. Herbicide would be applied by pickup, ATV or backpack sprayers using boom or hand application. In addition to the herbicides a non-ionic adjuvant (Induce) and blue dye (Hi-Light) would be applied to improve action of herbicide and visibility of application. The PUPs describe further details associated with the proposed action.

Noxious and Invasive Weed Control

The proposed action includes 3 PUPs for noxious weed control dependent upon the invasive species present at the site. Each tank mix is shown below. Treatment of the total pipeline project area encompasses about 1,000 acres of which about 200 acres would actually be treated.

PUP #11-CO-100-81

Trade Name	Common Name	Application Rate (Formulated Product)	Application Rate (Chemical)
Tordon 22K / Picloram 22K	picloram	1 qt./ac	0.5 lb ae/ac
2,4-D Amine 4	2,4-D	2 qt./ac	1.9 lb ae/ac

PUP #11-CO-100-82

Trade Name	Common Name	Application Rate (Formulated Product)	Application Rate (Chemical)
Escort XP	metsulfuron methyl	1 oz./ac	0.0375 lb ai/ac
2,4-D Amine 4	2,4-D	2 qt./ac	1.9 lb ae/ac

PUP #11-CO-100-83

Trade Name	Common Name	Application Rate (Formulated Product)	Application Rate (Chemical)
Telar XP	chlorsulfuron	1.0 oz./ac	0.047 lb ai/ac

Bare Ground Treatment

Two PUPs include tank mixes that would be applied at sites to provide total vegetation control around equipment and facilities. Bare ground treatments would cover about 100 acres.

PUP #11-CO-100-84

Trade Name	Common Name	Application Rate (Formulated Product)	Application Rate (Chemical)
Gly Star Plus or Glyphosate 4 Plus	glyphosate	1 gal/ac	3 lb ae/ac
2,4-D Amine 4	2,4-D	2 qt./ac	1.9 lb ae/ac

PUP #11-CO-100-85

Trade Name	Common Name	Application Rate (Formulated Product)	Application Rate (Chemical)
Sahara DG or Mojave 70 EG	Imazapyr	9.0 lb/ac	0.70 lb ai/ac
	Diuron		5.60 lb ai/ac

Application of all herbicides would conform to the stipulations in Attachment #1.

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 is in conformance with the decision of the RMP as weed control will occur in association with all surface disturbing activities and management of the public land. The RMP Oil and Gas objective on page 6 of the ROD provides for the environmentally sound exploration and development of oil and gas resources using balanced multiple use management.

The proposed action also conforms to county use plans.

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

Vegetation Treatments on BLM Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS) (June, 2007).

DOI-BLM-CO-N010-2009-0025-EA, Little Snake Field Office Integrated Pest Management Plan resulted in a Finding of No Significant Impact. This Environmental Assessment considered the options of Integrated Pest Management as outlined in the FEIS and adopted the standard operation procedures for vegetation treatment program implementation in the LSFO.

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. There are no changes from the proposed action analyzed in DOI-BLM-CO-N010-2009-0025-EA, congruent with pesticide use proposal stipulations (see Attachment #1). The Pesticide Use Proposals that are reviewed and approved based on the existing NEPA documents complete the site-specific analysis for these herbicide applications.

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 density of some invasive noxious and undesirable plant species has been reduced in some areas, and although, noxious and undesirable weeds have been identified in new locations, there have been no changes in environmental concerns, interests or resource values since DOI-BLM-CO-N010-2009-0025-EA.

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.

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 current 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 current proposed action are unchanged from those identified in the existing NEPA documents. The Pesticide Use Proposals that are reviewed and approved based on the existing NEPA documents complete the site-specific analysis for these herbicide applications.

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 implementation of the proposed action would remain unchanged from those identified in the existing NEPA documents.

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

Yes. Public outreach through scoping and involvement of the public and other agencies occurred in the development of the RMP/EIS and [DOI-BLM-CO-N010-2009-0025-EA](#).

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

Name	Title	Resource	Initials	Date
Emily Spencer	Ecologist	Air Quality, Floodplains Prime/Unique Farmlands, Water Quality – Surface, Wetlands/Riparian Zones	ES	3/7/11
Ethan Morton	Archaeologist	Cultural Resources, Native American Concerns	EM	3/8/11
Louise McMinn	Realty Specialist	Environmental Justice	LM	3/15/11
Christina Rhyne	Rangeland Management Spec.	Hazardous Materials	CR	3/4/11
Christina Rhyne	Rangeland Management Spec.	Invasive Non-native Species	CR	3/4/11
Hunter Seim	Rangeland Management Spec.	Sensitive Plants, T&E Plant	JHS	3/10/11
Desa Ausmus	Wildlife Biologist	T&E Animal	DA	3/8/11
Marty O'Mara	Geologist	Water Quality - Ground	EMO	3/11/11
Shane Dittlinger	Recreation Specialist	WSA, W&S Rivers	KSD	3/8/11
Standards				
Desa Ausmus	Wildlife Biologist	Animal Communities	DA	3/8/11
Desa Ausmus	Wildlife Biologist	Special Status, T&E Animal	DA	3/8/11
Christina Rhyne	Rangeland Management Spec	Plant Communities	CR	3/4/11
Hunter Seim	Rangeland Management Spec	Special Status, T&E Plant	JHS	3/10/11
Emily Spencer	Ecologist	Riparian Systems	ES	3/7/11
Emily Spencer	Ecologist	Water Quality	ES	3/7/11
Emily Spencer	Ecologist	Upland Soils	ES	3/7/11

Land Health Assessment

This action has been reviewed for conformance with the BLM's Public Land Health Standards adopted February 12, 1997. This action meets Public Land Health Standards. Land health assessments have been conducted in landscapes and watersheds within the Field Office Planning Area. Invasive plants, especially annual weeds have been found to be a problem on many sites and once established are a threat to the herbaceous component of the ecosystems.

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 /s/ Christina Rhyne Date 03/18/11

Signature of NEPA Coordinator /s/ J Hunter Seim Date 03/21/11

Signature of the Authorizing Official /s/ Jeremy Casterson Date 03/22/11

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 #1

DOI-BLM-CO-N010-2011- 0059 DNA

BLM LSFO PUP Stipulations

General Stipulations:

- All herbicide treatments on BLM administered lands will comply with applicable federal and state statutory and regulatory requirements.
 - Manufacturers label directions and guidelines, including but not limited to, application rates, uses, handling instructions, storage and disposal requirements, will be followed
 - All BLM procedures (BLM Handbook H-9011-1 Chemical Pest Control) and Manuals 1112 Safety, 9011 Chemical Pest Control, and 9015 Integrated Weed Management, and any other BLM requirements will be followed. Where more restrictive, BLMs requirements for rates, uses, and handling instructions will apply.
 - Only certified applicators, or those directly supervised by a certified applicator, may apply herbicide on BLM administered public lands.
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To ensure that risks to human health and the environment from herbicide treatments are kept to a minimum, and that all practicable means to avoid or minimize environmental harm have been adopted, the following will apply:

- All herbicide treatments will be consistent with the Standard Operating Procedures (SOPs) presented in the ROD of the 2007 Final *Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS)*.
 - Measures to mitigate potential adverse environmental effects as a result of herbicide treatments as found in the ROD of the PEIS.
 - All conservation measures, designed to protect plants and animals listed or proposed for listing as threatened or endangered under the Endangered Species Act, as found in the Biological Assessment of the PEIS.
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Cultural Resources Discovery

The applicator is responsible for informing all persons who are associated with the 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 project activities, the operator is to immediately stop activities in the immediate vicinity of the find and immediately contact the authorized officer (AO) at (970) 826-5000.

Within five working days, the AO 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 project activities again; and
- Pursuant to 43 CFR 10.4(g) (Federal Register Notice, Monday, December 4, 1995, Vol. 60, No. 232) the holder of this authorization must notify the AO, by telephone at (970) 826-5000, and 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.

SOURCE:

DOI-BLM-CO-N010-2009-0025-EA