

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-N010-2014-0046-DNA

PESTICIDE USE PROPOSAL NUMBER: CON010-14-010-P; CON010-14-011-P

PROJECT NAME: Herbicide application for bare ground treatment and control of noxious weeds at oil and gas facility locations.

LOCATION:

Danforth Hills Field, Maudlin Gulch Field (list of locations attached to PUP)
T11N R91W Sec 9, T12N R91W Sec. 33, T12N R96W Sec. 31

APPLICANT:

Hedges Spraying for Wesco Operating, Inc
Hedges Spraying for True Oil LLC

A. Describe the Proposed Action

Herbicide applications would be made to control noxious weeds and vegetation along right of ways, access roads and well pads. These sites have been previously leveled, graded or disturbed and may be in various stages of reclamation. Bareground herbicide application would aid in fire prevention, operation, and maintenance of facilities. Noxious weed control helps prevent establishment and spread of weed species of concern. Herbicide would be applied by handgun as well as truck, tractor or ATV mounted boom sprayers. In addition to the herbicides, BLM approved surfactants and dyes may be used. The PUP forms describe further details associated with the proposed action.

PUP # CON010-14-010-P; CON010-14-011-P

Trade Name	Common Name	Application Rate (Formulated Product)	Application Rate (Chemical)
Round-up Pro	Glyphosate	2 qts/ac	1.5 lb ae/ac
Rifle	Dicamba	2 pts/ac	1 lb ae/ac
2,4-D LV6	2,4-D	2 2/3 pt/ac	1.85 lb ae/ac
Escort XP	Metsulfuron methyl	1 oz/ac	0.0375 lb ai/ac
Sahara DG	imazapyr	12 lb/ac	0.93 lb ai/ac
	diuron		7.47 lb ai/ac
Telar XP	Chlorsulfuron	1 oz/ac	0.469 lb ai/ac
Tordon 22K	Picloram	1 qt/ac	0.5 lb ae/ac
Plateau	imazapic	4 oz/ac	0.0625 lb ae/ac

Applications under this PUP would be made during various dates throughout the year. Approximately 60 acres would be treated for each company.

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

Applicants will be responsible for all required certifications and permits necessary to apply herbicides in the State of Colorado.

B. Land Use Plan (LUP) Conformance

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

Date Approved: October, 2011

Final RMP/EIS, August, 2010

Draft RMP/EIS, January, 2007

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 Vegetation Goals and Objectives on page RMP-16 of the RMP to reduce the occurrence of noxious weeds and undesirable plant species by ensuring that all land use actions that could potentially increase the occurrence of noxious weeds are conducted by using BMPs and applying principles of integrated pest management. Additionally, weed management will be integrated across landscape and ownership boundaries by pursuing whenever possible, the use of cooperative agreements to coordinate weed management actions and identify ways of partnering with resource users and other stakeholders to reduce the occurrence of noxious weeds. The proposed action has been reviewed for conformance with this plan (43 CFR 1610.5, BLM MS 1601.03). The proposed action of approving a Pesticide Use Proposal is in conformance with the Little Snake Record of Decision and Approved Resource Management Plan.

Other Documents:

Colorado Public Land Health Standards and Guidelines for Livestock Grazing
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 also conforms with 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.

Subject to WO-IM 2011-154 and in accordance with BLM policy, the proposed project areas fall

outside areas greater than 5000 acres which may be suitable as lands with wilderness characteristics. The proposed action may impact but not impair wilderness characteristics; however, actions to control the expansion of invasive exotic species are appropriate and consistent with applicable requirements of law and other resource management considerations, and are approved by the field manager.

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.

Title	Resource	Date
Rangeland Management Spec.	Air Quality, Floodplains Prime/Unique Farmlands, Water Quality – Surface, Wetlands/Riparian Zones	07/07/14
Archaeologist	Cultural Resources, Native American Concerns	07/11/14
Realty Specialist	Environmental Justice	06/30/14
Environmental Coord. NEPA	Hazardous Materials	07/07/14
Rangeland Management Spec.	Invasive Non-native Species	07/07/14
Rangeland Management Spec.	Sensitive Plants, T&E Plant	07/10/14
Wildlife Biologist	T&E Animal	06/30/14
Assoc. FM/Geologist	Water Quality – Ground	07/08/14
Recreation Specialist	WSAs, W&S Rivers, LWCs, ACECs	07/14/14
Wildlife Biologist	Animal Communities	06/30/14
Wildlife Biologist	Special Status, T&E Animal	06/30/14
Rangeland Management Spec	Plant Communities	07/07/14
Rangeland Management Spec	Special Status, T&E Plant	07/10/14
Rangeland Management Spec.	Riparian Systems	07/07/14
Rangeland Management Spec.	Water Quality	07/07/14
Rangeland Management Spec.	Upland Soils	07/07/14

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 annuals 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_____ Date_____

Signature of NEPA Coordinator_____ Date_____

Signature of the Authorizing Official Timothy J Wilson Date 7/18/14

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

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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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Stipulations for Cultural Resources and Native American Concerns

To protect archaeological sites, spraying with boom sprayers mounted on trucks, tractors, or ATVs must be conducted *only* when ground is dry. Any damage to archaeological sites resulting from violation of this stipulation must be mitigated at the expense of the operator/applicator in a manner determined by the BLM under authority of the Archaeological Resources Protection Act (ARPA).

Operators and applicators must inform all employees that collection of historic and archeological artifacts from BLM land is illegal under ARPA and that violators are subject to prosecution.

In conformance with the Native American Graves Protection and Repatriation Act, any human remains discovered during weed spraying operations should not be disturbed. Spraying in the vicinity of the discovery should cease and the BLM should be immediately informed of the discovery by calling (970) 826-5000.

SOURCE:

Brian Naze, LSFO Archaeologist
7/11/2014