

United States Department of the Interior  
Bureau of Reclamation  
Western Colorado Area Office  
Grand Junction, Colorado

**FINDING OF NO SIGNIFICANT IMPACT**

**SPURLIN MESA LATERAL OF THE CRAWFORD CLIPPER DITCH PIPELINE  
PROJECT, DELTA COUNTY, COLORADO**

In accordance with the National Environmental Policy Act of 1969, as amended, and the Council on Environmental Quality's Regulations for implementing the procedural provisions of the National Environmental Policy Act (40 CFR Part 1500-1508), the Bureau of Reclamation (Reclamation) has prepared an Environmental Assessment (EA) for the Spurlin Mesa Lateral of the Crawford Clipper Ditch Pipeline Project (Project) near Crawford, Colorado. The EA assesses a No Action and Proposed Action alternatives. Based on the following, Reclamation has determined that the proposed action with implemented environmental commitments will not result in a significant impact on the human environment.

**Background**

Reclamation is working with the U.S. Department of Agriculture, the Bureau of Land Management (BLM), and the seven Colorado River Basin states through the Colorado River Basin Salinity Control Program to implement many salinity control projects on the Colorado River. The program's overall goal is to cost-effectively reduce the amount of salinity in the Colorado River.

Reclamation's Basinwide Salinity Control Program opened the program to competition through a 'Funding Opportunity Announcement' process. New salinity control projects are funded through a cooperative agreement between Reclamation and the Project sponsor. The facilities will continue to be owned, operated, maintained, and replaced by the project sponsors.

**Crawford Clipper Ditch Company**

The Crawford Clipper Ditch Company is a private, non-profit irrigation company that manages several miles of water conveyance ditches in Delta County, Colorado. The Crawford Clipper Ditch system diverts water from the Smith Fork River via water released from Crawford Reservoir, which is located in the lower Gunnison River watershed of the upper Colorado River Basin and is part of Reclamation's federal Smith Fork Project. The Crawford Clipper Ditch's average annual diversion from the Gunnison basin is approximately 18,000 acre-feet, and the irrigation season length is averages 173 days. The annual historic depletion associated with these diversions is estimated at approximately 5,776 acre-feet per year.

## **Purpose and Need**

The Colorado River and its tributaries provide municipal and industrial water to about 27 million people and irrigation water to nearly four million acres of land in the United States, and another 2.3 million people and 500,000 acres in Mexico. Elevated salinity concentrations in the River are a major concern in both the United States and Mexico. Elevated salinity levels have impacts to agricultural, municipal, and industrial water users.

In June 1974, Congress enacted the Colorado River Basin Salinity Control Act (Salinity Control Act), Public Law 93-320, which directed the Secretary of the Interior to proceed with a program to enhance and protect the quality of water available in the Colorado River for use in the United States and Republic of Mexico. In October 1984, Congress amended the original act by passing Public Law 98-569 to address wildlife habitat issues, including fish and wildlife values foregone, project funding, and operation and maintenance of habitat.

Public Law 104-20 of July 28, 1995, authorizes the Secretary of the Interior, acting through the Bureau of Reclamation, to implement a basinwide salinity control program. The Secretary may carry out the purposes of this legislation directly, or make grants, enter into contracts, memoranda of agreement, commitments for grants, cooperative agreements, or advances of funds to non-federal entities under such terms and conditions as the Secretary may require.

## **Scoping/Public Involvement**

Reclamation's scoping was primarily limited to the Crawford Clipper Ditch Company, U.S. Fish and Wildlife Service, Colorado Parks and Wildlife, Colorado Water Conservation Board, and the Colorado Historic Preservation Officer. Reclamation had previously funded similar irrigation system improvements in the North Fork area, and previous EAs were also used as a source to identify potential issues and concerns. A draft EA was prepared and distributed on January 27, 2014 to thirteen local, state, and federal agencies and organizations, and nineteen property owners adjacent to the Spurlin Mesa Lateral of the Crawford Clipper Ditch in the project area.

One comment on the draft EA was received by Reclamation.

## **No Action Alternative**

Under the No Action Alternative, Reclamation would not provide funding to the Crawford Clipper Ditch Company to pipe the Spurlin Mesa Lateral of Crawford Clipper Ditch. Seepage from the canal would continue to contribute to salt loading in the Gunnison and Colorado rivers. Riparian and wetland habitats associated with the Spurlin Mesa Lateral would likely remain in place and continue to provide some benefits to local wildlife.

## **Proposed Action Alternative**

Under the Proposed Action Alternative, Reclamation will provide funding to the Crawford Clipper Ditch Company to pipe approximately 3.5 miles of open irrigation ditches. It is

anticipated that implementation of the project will result in a total annual reduction of 1,038 tons of salt in the Colorado River. Reclamation's funding would also be used to develop replacement fish and wildlife habitat as required the Salinity Control Act.

### **Summary of Findings**

Reclamation conducted an analysis on a wide range of environmental criteria for the No Action and Proposed Action alternatives. Below is a summary of the analysis as discussed in the EA.

The No Action Alternative does not meet the purpose and need as described above.

Under the Proposed Action, Reclamation will approve funding of the salinity control project for the Spurlin Mesa Lateral of the Crawford Clipper Ditch Pipeline Project which includes the replacement of approximately 3.5 miles of existing earthen canal with pipe. The Proposed Action is predicted to have no effect on Indian trust assets, environmental justice, recreation, or visual resources. Details of predicted impacts (both beneficial and negative) for other resources are discussed in greater detail below.

Water Rights and Uses – The Proposed Action would provide for improved irrigation system management; however, no changes in water uses are anticipated. Water rights would not be adversely affected. Piping of the lateral is not expected to interfere with operations, as construction will occur outside of the irrigation season when water is not being carried through the lateral.

Water Quality – Implementation of the project is predicted to result in improved water quality. The off-farm improvements included in the Proposed Action are estimated to reduce 1,038 tons of salt annually in the Colorado River. Improvements would also reduce selenium loading in the Gunnison River. However, these selenium reduction benefits haven't been quantified.

Access & Land Use – The project lies entirely on private lands. Crawford Clipper Ditch is responsible for obtaining all needed right-of-ways and landowner consent prior to construction of the project.

Fish and Wildlife Resources – Upland wildlife habitat impacted by the Proposed Action would likely result in minor temporary impacts to wildlife species within the Project Area. Local wildlife may temporarily avoid using portions of the project area during pipeline construction. However, these impacts should be short-term in duration. Key wildlife species such as mule deer, elk, and raptors using the Project Area and adjacent irrigated lands would return to those areas when construction disturbances cease. Impacts to 15.95 acres of adjacent habitats would directly impact those species dependent on these habitat types. Habitat evaluations estimate that 9.99 fish and wildlife habitat units would be affected under the Proposed Action. Replacement habitat will be developed to comply with the requirement of the Colorado River Basin Salinity Control Act, in accordance with a habitat replacement plan approved by Reclamation. A habitat replacement plan has been developed for private lands approximately 1.2 miles upstream from Crawford Reservoir at Hart Ranch. These lands have a permanent conservation easement and

the landowner has entered into agreements with the Crawford Clipper Ditch Company for construction and maintenance. The habitat replacement plan will improve approximately 9.5 acres of wetland habitat and create approximately 15.77 habitat credits. Habitat replacement will include the construction of two wetland potholes, the desilting of an existing pond, and plantings of various riparian species, including narrowleaf cottonwoods, alders, native plums, chokecherry, sumac, and golden currant. Also, the improved water quality would likely benefit downstream aquatic dependent species by reducing salt and selenium loading in the North Fork, Gunnison, and Colorado rivers.

Vegetation and Land Use- An estimated 15.95 acres of wetland and riparian vegetation supported by irrigation canal seepage is predicted to be impacted by the Proposed Action. These vegetation types are classified as non-jurisdictional wetlands and therefore not subject to Section 404 of the Clean Water Act. However, habitat values associated with the losses of these vegetation types were classified and are subject to fish and wildlife habitat replacement. Habitat replacement is a requirement of the Salinity Control Act, and project funding is dependent on habitat replacement. Estimated habitat values lost as a result of the Proposed Action are 9.99 habitat units.

Temporary disturbances within the footprint of the pipeline would also occur during construction. The existing lateral prism will be dewatered and backfilled to preclude water conveyance. Pipeline alignments and construction footprints would be revegetated subject to the easement and agreements between the Crawford Clipper Ditch Company and individual land owners. Construction would follow Best Management Practices to minimize the construction footprint, protect water quality, and minimize soil erosion.

Threatened and Endangered Species – No federally threatened, endangered, or candidate species were documented within the project area. Biological surveys conducted by Rare Earth Science, LLC in 2012 found no suitable habitat for federally listed species within the project area.

Reclamation previously consulted with the Fish and Wildlife Service regarding project depletions associated with the Smith Fork Project in the Gunnison Basin Programmatic Biological Opinion (PBO). No additional Section 7 consultation is required.

Cultural Resources – The Proposed Action will directly impact the Spurlin Mesa Lateral of the Crawford Clipper Ditch, which was determined as eligible for listing in the National Register of Historic Places. Avoidance of the resource is not feasible. To mitigate adverse effects, Reclamation, the Colorado State Historic Preservation Officer (SHPO), and Crawford Clipper Ditch Company entered into a Memorandum of Agreement (MOA) dated December 10, 2013. The agreement stipulates that Level I Documentation, as described in *Historic Resource Documentation, Standards for Level I, II, and III Documentation*, of the Spurlin Mesa Lateral of the Crawford Clipper Ditch is appropriate to mitigate the adverse effects of the Proposed Action. Level I Documentation has been completed and will be sent to the SHPO pursuant to the MOA .

## **Environmental Commitments**

The following environmental commitments will be implemented as an integral part of the Proposed Action. Environmental commitments include:

1. Construction Access – All construction activities would be confined to rights-of-way negotiated between Crawford Clipper Ditch and the landowners. Construction staging (for pipe and equipment) will take place in two staging areas. The north staging area may also serve as materials borrow area if additional material is needed to fill abandoned ditch alignments. Environmental commitments will be included in agreements with private landowners. Any construction activities outside of the inventoried Proposed Action Area would require additional review by Reclamation to determine if the existing surveys and information adequate to evaluate additional impacts outside this corridor. Additional NEPA or ESA compliance activities may be required if determined necessary by Reclamation.
2. Water Quality – Best Management Practices (BMPs) would be implemented to minimize erosion and protect water quality. BMPs are described in greater detail in the Water Quality section of the final EA. BMPs include:
  - a. Crawford Clipper Ditch Company would obtain a CWA Section 402 Storm Water Discharge Permit (NPDES) from the Colorado Department of Public Health and Environment for dewatering the construction area if dewatering is needed. Dewatering will not be necessary, as construction will take place when water conveyances are empty.
  - b. Silt curtains, cofferdams, dikes, straw bales, or other suitable erosion control measures will be used to prevent erosion from entering water bodies during construction.
  - c. Concrete pours will occur in forms and/or behind cofferdams to prevent discharge into waterway. Any wastewater from concrete-batching, vehicle wash down, and aggregate processing will be contained and treated or removed for off-site disposal.
  - d. A spill response plan will be prepared for any area of work where spilled contaminants could flow into water bodies. All employee and workers, including those under separate contract, will be briefed and made familiar with this plan. The plan will be developed prior to initiation of construction. A spill response kit, which includes appropriate-sized spill blankets, shall be easily accessible and onsite at all times.
  - e. Onsite supervisors and equipment operators will be trained and knowledgeable in the use of spill containment equipment.
  - f. Appropriate federal and Colorado authorities will be immediately notified in the event of any contaminant spill.
  - g. Because no federal permit is being issued for the Proposed Action, no Section 401 Water Quality Certification is required; however, BMPs would be implemented to protect all water resources. In the event that during construction, temporary

dewatering of a portion of the construction site is needed, the construction contractor may need to obtain a Construction dewatering permit from the Colorado Department of Public Health and Environment.

3. Irrigation Facilities and Structures – Pursuant to the Cooperative Agreement between Crawford Clipper Ditch Company and Reclamation (Coop No.R12AC40033), Crawford Clipper Ditch Company will permanently dewater, remove from irrigation service, and render incapable of irrigation water delivery those open ditches abandoned as part of the Proposed Action. Crawford Clipper Ditch Company will be responsible for removing all irrigation structures (headgates, drops, etc.) and refilling the abandoned ditch prism with soil.
4. Ground Disturbances – Ground disturbances would be limited to only those necessary to safely implement the Proposed Action. Best Management Practices to reduce disturbances to vegetation resources reduces the amount of planting or reseeding needed. Planting and reseeding disturbed areas, per landowner specifications; monitoring plantings to ensure establishment, control of noxious weeds in disturbed areas, and the use of accepted erosion control measures during construction are all incorporated as environmental commitments for the Proposed Action. During construction, topsoil would be saved and then redistributed after completion of construction activities. All disturbed areas would be smoothed, shaped, contoured, and reseeded to as near their pre-project conditions as practicable. Seeding would occur at appropriate times with appropriate seed mixes per landowner specifications. Weed control will be implemented in accordance with current Delta County weed control standards.
5. Fish and Wildlife Resources – Construction areas would be confined to the smallest feasible area to limit disturbance to wildlife within the Project Area. Open pipeline trenches left overnight would be kept to a minimum to reduce potential entrainment of small animals and public safety problems.
6. Habitat Replacement – Habitat development and/or enhancement to replace the predicted 9.99 fish and wildlife habitat units affected under the Proposed Action are required under the Colorado River Salinity Control Act. Crawford Clipper Ditch is responsible for developing and implementing a Reclamation-approved wildlife habitat replacement plan to replace fish and wildlife values foregone as a result of project implementation. Habitat replacement at Hart Ranch will be implemented concurrently with implementation of the Proposed Action. No additional NEPA, ESA, or Historic Preservation Act compliance is needed to implement the habitat replacement plan at this site. Failure to develop and implement concurrent habitat replacement may result in delays in obligating funding under the Cooperative Agreement.
7. Federally Listed Species – Reclamation previously consulted with the U.S. Fish & Wildlife Service regarding historic water depletions in the Gunnison basin resulting from the operation of Crawford Clipper Ditch facilities, and water quality improvements resulting from the Proposed Action. This consultation is documented in the Gunnison

Basin Programmatic Biological Opinion. In the event that threatened or endangered species are encountered during construction, Crawford Clipper Ditch Company shall stop construction activities to ensure that adequate measures are in place to avoid or reduce impacts to the species.

8. Cultural Resources – Reclamation, the Colorado State Historic Preservation office (SHPO), and Crawford Clipper Ditch Company entered into a Memorandum of Agreement to mitigate the Proposed Action's effects on cultural resources by documentation of the affected segments of the Spurlin Mesa Lateral prior to construction activities in accordance with the guidance for Level I Documentation found in "Historic Resource Documentation, Standards for Level I, II, and III Documentation" (COAHP 2007). The report shall be submitted to the SHPO within one year of the execution of the MOA. In the event that cultural and/or paleontological resources are discovered during construction, Crawford Clipper Ditch Company shall stop construction activities until Reclamation has completed consultation with the SHPO and appropriate measures are implemented to protect or mitigate the discovered resource.
9. Agricultural Resources & Soils – During construction, topsoil would be saved and then redistributed after completion of construction activities. Silt curtains, cofferdams, dikes, straw bales, or other suitable erosion control measures will be used to minimize soil erosion and prevent soil erosion from entering water bodies during construction. All disturbed areas would be smoothed, shaped, contoured, and reseeded to as near their pre-project conditions as practicable. Lands previously in agricultural production will be returned to agricultural production following construction.
10. Hazardous Materials, Waste Management & Pollution Prevention – Environmental impacts from hazardous materials or waste related to the Proposed Action involve potential spills or leaks of motor fuels and lubricants. During construction, the use, storage and disposal of hazardous materials and wastes within the Proposed Action Area will be managed in accordance with all federal, state, and local standards. Any trash or solid wastes generated during the Proposed Action will be properly disposed offsite.

### **Conclusions**

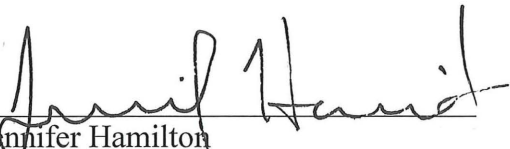
Based on the analysis of environmental impacts, coordination with the Fish & Wildlife Service and other State, Federal and local agencies, and a review of comments received, Reclamation concludes that implementation of the Spurlin Mesa Lateral of the Crawford Clipper Ditch Pipeline Project will not result in significant impacts on the quality of the human environment or the natural resources in the project area.

This Finding of No Significant Impact has, therefore, been prepared and is submitted to document environmental review and evaluation of the proposed action in compliance with the National Environmental Policy Act of 1969, as amended.

**References**

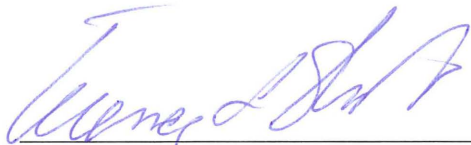
Alpine 2012. Cultural Resource Inventory of the Spurlin Mesa Lateral of the Crawford Clipper Ditch, Delta County, Colorado. Alpine Archaeological Consultants, Inc., February 2013, Montrose, Colorado

Prepared By:

  
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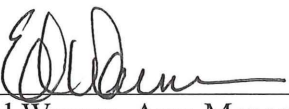
April 24, 2014  
Date

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4-25-14  
Date