

Proposed Roofing Projects
Tribal Forestry (Ronan)
Nkusim Language School (Arlee)

Confederated Salish and Kootenai Tribes—CSKT
Flathead Indian Reservation

National Environmental Policy Act—NEPA
Categorical Exclusion Checklist

January 2010

NEPA COMPLIANCE CHECKLIST

Project Title: Proposed Roofing Projects, Tribal Forestry (Ronan) and Nkusim Language School (Arlee) Confederated Salish and Kootenai Tribes (CSKT), Flathead Indian Reservation, Montana.

This project √ is; is not ___ completely covered by categorical exclusion 10.5 A, and 516 DM 2—Appendix 1 Number 1.7.

Brief Project Description Justifying Categorical Exclusion Claimed: Proposed Roofing Projects, Tribal Forestry (Ronan) and Nkusim Language School (Arlee) (Figures 1 and 2)—

- √ Use construction Best Management Practices (bmps)
- √ Comply with all building codes, laws, OSHA standards, etc.
- √ Tribal Forestry, Ronan, MT
 - Remove degraded urethane foam insulation
 - Perform general inspection
 - Install square edged EPS foam filler strips in the metal roofing valleys.
 - Install 3-inch rigid poly-isocyanurate insulation board using #15 screws with 3-inch washers at manufacturer's recommended spacing
 - Install 1/4 inch DensDeck Roof Board over insulation.
 - Provide pressure-treated 2X nailers at eaves and other appropriate locations
 - Install 24 gauge pre-finished metal fascia, with matching drip edge at eaves.
 - Flash all mechanical units, etc., in accordance with manufacturer's specifications and instructions
 - Provide 60 mil TPO membrane roofing with 15 year-manufacturer warranty.
 - Build to code-various minimum vertical distances between top of mechanical curbs, hoods, vents, etc.
 - Install snow guard
 - Provide pre-finished 24 gauge gutters and downspouts as shown on plans
 - Follow any other instructions from the proponent.
- √ Nkusim Language Building, Arlee, MT
 - Install square edged EPS foam filler strips in the metal roofing valleys.
 - Install 3-inch rigid poly-iso-cyanurate insulation board using #15 screws with 3-inch washers at manufacturer's recommended spacing.
 - Install 1/4 inch Dens Deck Roof Board over insulation.
 - Provide pressure treated 2X nailers at eaves and other appropriate locations.
 - Install 24 gauge pre-finished metal fascia, with matching drip edge at eaves.
 - Flash all mechanical units, etc., in accordance with roofing manufacturer's specifications and instructions.
 - Build to code-various minimum vertical distances between top of mechanical curbs, hoods, vents, etc.
 - Provide 60 mil TPO membrane roofing with 15 year manufacturer's warranty.

- Design, provide, and install snow guards according to plans and manufacturer's requirements.
 - Provide prefinished 24 gauge gutters and downspouts as shown on plans.
 - Follow any other instructions from the proponent.
- √ Other details—
- Sidewalks and buildings would be handicapped-accessible
 - All disturbed areas not covered with concrete, paving, or buildings would be seeded with the following seed mix, appropriate for the US HWY 93 corridor from Arlee to Elmo—

Species	Common Name	Seeding Rate (PLS lbs / acre)
<i>Bromus marginatus</i>	mountain brome	11.0
<i>Elymus trachycaulus ssp. trachycaulus</i>	slender wheatgrass	5.5
<i>Festuca ovina</i>	sheep fescue	1.5
<i>Poa secunda ssp. sandbergii</i>	Sandberg bluegrass	1.0
Total		19.0

Justification—

516 DM 10.5 A follows— “Operation, **Maintenance**, and Replacement of **Existing Facilities**. Examples are normal renovation of buildings, road maintenance, and limited rehabilitation of irrigation structures.”

516 DM 2 Appendix 1 follows— “Departmental Categorical Exclusions. The following actions are CXs pursuant to 516 DM 2.3A(2). However, environmental documents will be prepared for individual actions within these CX if any of the extraordinary circumstances listed in 516 DM 2, Appendix 2, apply.

1.7 Routine and **continuing government business**, including such things as supervision, administration, operations, maintenance, **renovations**, and replacement activities having **limited context and intensity** (e.g., limited size and magnitude or short-term effects).”

516 DM 2-APPENDIX 2—Exceptions—Extraordinary Circumstances (dated 21 June 2005 # 3675):

Extraordinary circumstances exist for individual actions within CXs which may:

2.1 Have significant impacts on public health or safety. NO Yes

Response: The proposed actions would follow construction Best Management Practices (BMPs) and Occupational Safety and Health Administration (OSHA) standards. Proposed renovations would improve health and safety at the project areas. With design features and mitigation measures in place, the proposal would improve infrastructure at the sites. Effects

were determined to be not significant.

2.2 Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas. NO Yes

Response: The proposal would not affect any of the above-listed unique geographic characteristics. The buildings have already been set-aside and developed to provide Tribal services. Therefore, they are already out of agricultural production. Re-roofing the buildings would not affect cultural or historic properties. With design features and mitigation measures in place, the proposal would improve infrastructure at the sites. Effects were determined to be not significant.

2.3 Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA Section 102(2)(E)]. NO Yes

Response: The proposal was planned in cooperation with professional staff from the CSKT Department of Natural Resources and CSKT Administration. Localized renovations, such as the current proposal, are routine and not highly controversial. With design features and mitigation measures in place, the proposal would improve infrastructure at the proposed sites. Effects were determined to be not significant.

2.4 Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks. NO Yes.

Response: Localized renovations, such as the current proposal, are routine and do not have highly uncertain and potentially substantial or unknown effects. With design features and mitigation measures in place, the proposal would improve infrastructure at the proposed sites. Effects were determined to be not significant.

2.5 Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects. NO Yes.

Response: Localized renovations, such as the current proposal, are routine and would not set a precedent for future action. With design features and mitigation measures in place, the current proposal would improve infrastructure at the proposed sites. Effects were determined to be not significant.

2.6 Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects. NO Yes.

Response: Business would still be conducted during the proposed roof renovations. Other actions that may occur in the surrounding areas include agricultural practices, activities within rural towns (Ronan and Arlee), and uses that occur on private rural lands such as small farms or housing developments. All of these activities are already on-going. There would be no measurable significant effects from all of the activities combined. New bus shelters have recently been approved for the Nkusim parking lot (CSKT-Categorical Exclusion Checklist signed 23 Dec 2009), but this would not affect the current proposal.

2.7 Have significant impacts on properties listed, or eligible for listing, on the National Register of

Historic Places as determined by either the bureau or office. NO Yes.

Response: There would be no effects to properties listed or eligible for listing on the National Register of Historic Places. The buildings and parking lots are already in place.

2.8 Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species. NO Yes.

Response: The proposal was reviewed by CSKT Wildlife and Fisheries staff. The buildings and parking lots are already in place. There would be no effects to Endangered or Threatened Species or their habitats.

2.9 Violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment. NO Yes

Response: The project was reviewed by CSKT staff for compliance of Federal, State, local, and tribal laws and requirements. No problems with compliance were noted.

2.10 Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898). NO Yes.

Response: The proposal was designed to improve facilities that serve low income and minority populations located on an Indian Reservation. With design features and mitigation measures in place, there would be no disproportionately high and adverse effects to low income or minority populations. Effects were determined to be not significant.

2.11 Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007). NO Yes.

Response: The proposal was designed to improve infrastructure at existing facilities. It would not limit access to and ceremonial use of any Indian sacred sites. With design features and mitigation measures in place, the proposal would improve infrastructure at the proposed sites. Effects were determined to be not significant.

2.12 Contribute to the introduction, continued existence, or spread of noxious weeds or nonnative invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112). NO Yes.

Response: Any disturbed areas that would not be covered with paving or concrete would be seeded with appropriate native plant seed mixtures (see above). With design features and mitigation measures in place, the proposal would improve infrastructure at the proposed sites. Effects were determined to be not significant.

—end list of exceptions—

If any of the above exceptions receives a “**YES**”, then an Environmental Assessment (EA) must be prepared.

Categorical Exclusion Checklist Prepared by: /s/ Rosemary H. Leach 12 Jan 2010
Signature Date
Title: Rosemary H. Leach, CSKT NEPA Program Manager

Within the spirit and intent of the Council of Environmental Quality's regulations for implementing the National Environmental Policy Act (NEPA) and other statues, orders, and policies that protect resources, I have established the following administrative record and have determined that the project—

Is a categorical exclusion as provided by 516 DM 10 or 516 DM 2, Appendix 1. No further NEPA documentation will therefore be made.

Is not completely covered by the categorical exclusion as provided by 516 DM 10 or 516 DM 2, Appendix 1. An Environmental Assessment (EA) must be prepared.

Signature approval for CSKT Roofing renovations, Tribal Forestry and Nkusim

Julian C. Courville, Superintendent
Bureau of Indian Affairs, Flathead Agency

Date: _____

5/27/04 #3612 Replaces 6/30/03 #3594

—END NEPA COMPLIANCE CHECKLIST—

Attachments

- Figure 1. Arlee Area
- Figure 2. Ronan Area

Scanned Signatures

Categorical Exclusion Checklist Prepared by: Rosemary H. Leach 12 Jan 2010
Signature Date
Title: Rosemary H. Leach, CSKT NEPA Program Manager

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Julian C. Courville
Julian C. Courville, Superintendent
Bureau of Indian Affairs, Flathead Agency

Date: 1-12-10

Figure 1. Arlee

Arlee - Building Locations T16N R20W Sec 2



Legend

-  buildings
-  sections



DATE: 10/5/2009 FILE: \\Pol-nrd-data02\GIS_Y\ncrd\nepa\sam\LangSchool.mxd

Figure 2. Ronan

