Appendix B

FBRWS Phase III Routine O&M Activities Descriptions
Programmatic Environmental Assessment (PEA)

Introduction

The Three Affiliated Tribes (TAT) through the Fort Berthold Rural Water System (FBRWS) has completed the Phase I and Phase II FBRWS construction projects and is proposing to expand the FBRWS with the completion of Phase III projects and activities. Phase III projects and activities have three major components; continued build-out of the FBRWS project as identified in the 2021 FBRWS Master Plan, replacement and upgrades to existing facilities and the identification of future FBRWS O&M activities. Appendix D covers new FBRWS construction and the replacement and upgrades to existing FBRWS facilities. Reclamation replacement, additions and extraordinary (RAX) maintenance activities are undertaken and funded under the FBRWS O&M program. These RAX activities are consider "non-routine" and for the purposes of the PEA, these activities are included in Appendix C.

Appendix D identifies current and future FBRWS routine O&M activities as listed in Table 1. This includes a description of the O&M activities and where they will take place. Most routine O&M activities are in or around existing FBRWS facilities like WTPs, booster stations, and storage tanks. The exception is O&M activities associated with the FBRWS distribution system including pipelines, appurtenances, water service connections, and meters. Table 1 also includes as a routine O&M activity, the use of the PEA in acquiring future FBRWS rights-of-way and easements. The Bureau of Indian Affairs (BIA) requires a NEPA document to be included in all easement application packages. The PEA is intended to satisfy that requirement for new construction easements. FBRW also discovered that some FBRWS features (mostly pipelines) were constructed without recorded easements, so this PEA will also be used to acquire those easements after the fact.

Table 1 – FBRWS Phase III Routine O&M Activities List

	Segment Location	Type of Project or Activity
Routine FBRWS Operation and Maintenance (O&M) Activities		
Routine O&M Activities	Reservation Wide	Minor Repairs
On-Call O&M Contracts		
Electrical On-Call Services Contract	Reservation Wide	Replacements. Repairs or Upgrades as needed
Municipal On-call Services Contract		
O&M On-call Services Contract		
SCADA On-call Services Contract		
Relocation of Existing FBRWS Pipelines and Appurtenances	Reservation Wide	Construction
Use of PEA in Acquiring Future FBRWS Easements		
Easements for New Construction	Reservation Wide	Administrative
Easements for FBRW Missing Easements	Reservation Wide	Administrative

General Description of FBRWS Facilities

Figure 1 shows the Fort Berthold reservation map which coincides with the FBRWS project area. Figure 1 also shows the six political subdivisions (Segments) on the reservation which generally coincide with the six Environmental Protection Agency regulated public water systems on the reservation. The FBRWS is owned by the federal government, however, the Three Affiliated Tribes (TAT) FBRWS program performs the day-to-day operation and maintenance activities under a 93-638 O&M contract between TAT and Reclamation. The scope, location and extent of the OM&R work associated with the FBRWS is described below.

Figure 1 – Fort Berthold Reservation Segment Map

FBRWS Facilities

The FBRWS includes four surface water treatment plants and their respective Missouri River (Lake Sakakawea) intakes, which are situated in four different segments around the lake. The potable water from these plants is distributed through separate water distribution systems to their respective communities (Four Bears, Mandaree, White Shield, and Twin Buttes), rural homes, livestock pasture taps, fill stations, recreation areas, and commercial/industrial connections. The FBRWS includes elevated and ground storage tanks, booster stations, and hundreds of miles of distribution system piping and related appurtenances.

The Four Bears Water Service Area - Figure 2 shows the major water system features of the Four Bears water service area which includes a 700 gpm ultra-filtration (membrane) WTP, two raw water intakes (primary with one slope tube and backup with two slope tubes), two booster stations, two elevated water storage tanks, 276 water service connections, and the distribution system includes approximately 57 miles of pipe. The FBRW Administration and O&M Shop Building is also located in the Four Bears Segment. This segment has the capability to provide water to the McKenzie County Water District but hasn't done so in the last five years.

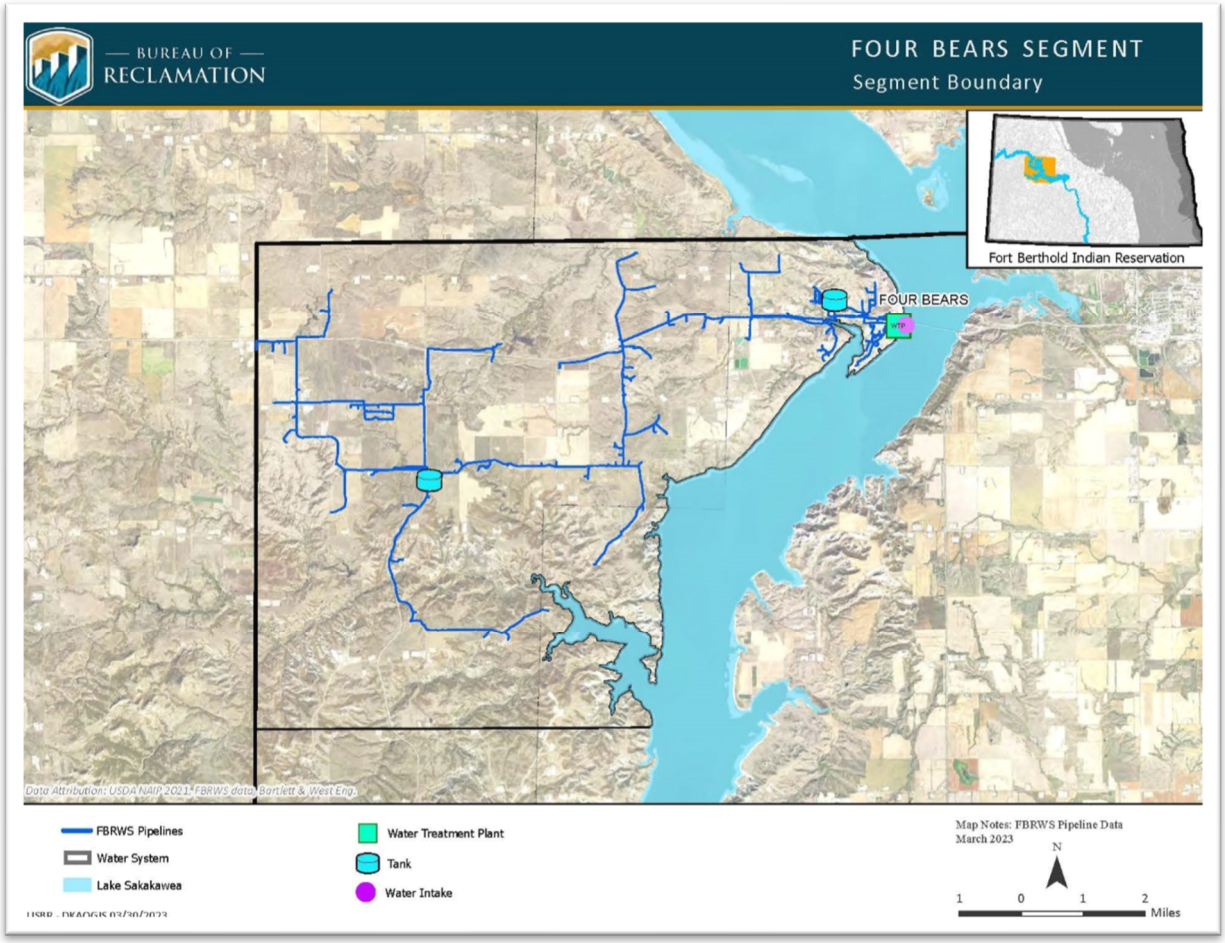

Figure 2 – Four Bears Water Service Area

White Shield Water Service Area - Figure 3 shows the major water system features of the White Shield water service area (East Segment) which includes a 250 gpm conventional WTP, two raw water intakes (primary with one slope tube and backup with two slope tubes), one underground water storage tank, 344 water service connections, and the distribution system includes 144 miles of pipe.

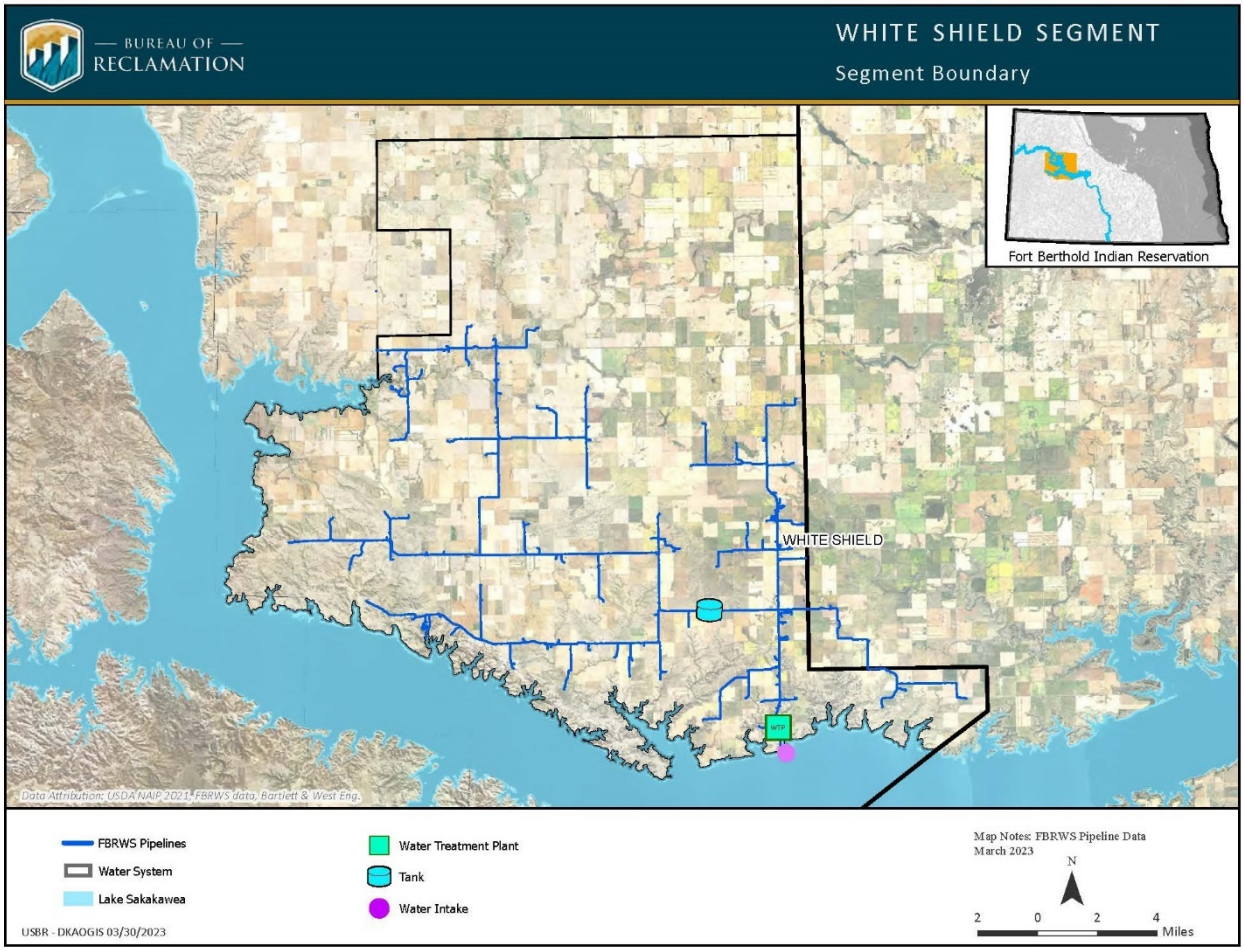

Figure 3 – White Shield Water Service Area

Twin Buttes Water Service Area - Figure 4 shows the major water system features of the Twin Buttes water service area (South Segment) which includes a 350 gpm ultra-filtration (membrane) WTP (expandable to 600 gpm), two raw water intakes (primary with one slope tube and backup with two slope tubes), one ground storage tank, 240 service connections, and approximately 79 miles of pipe.

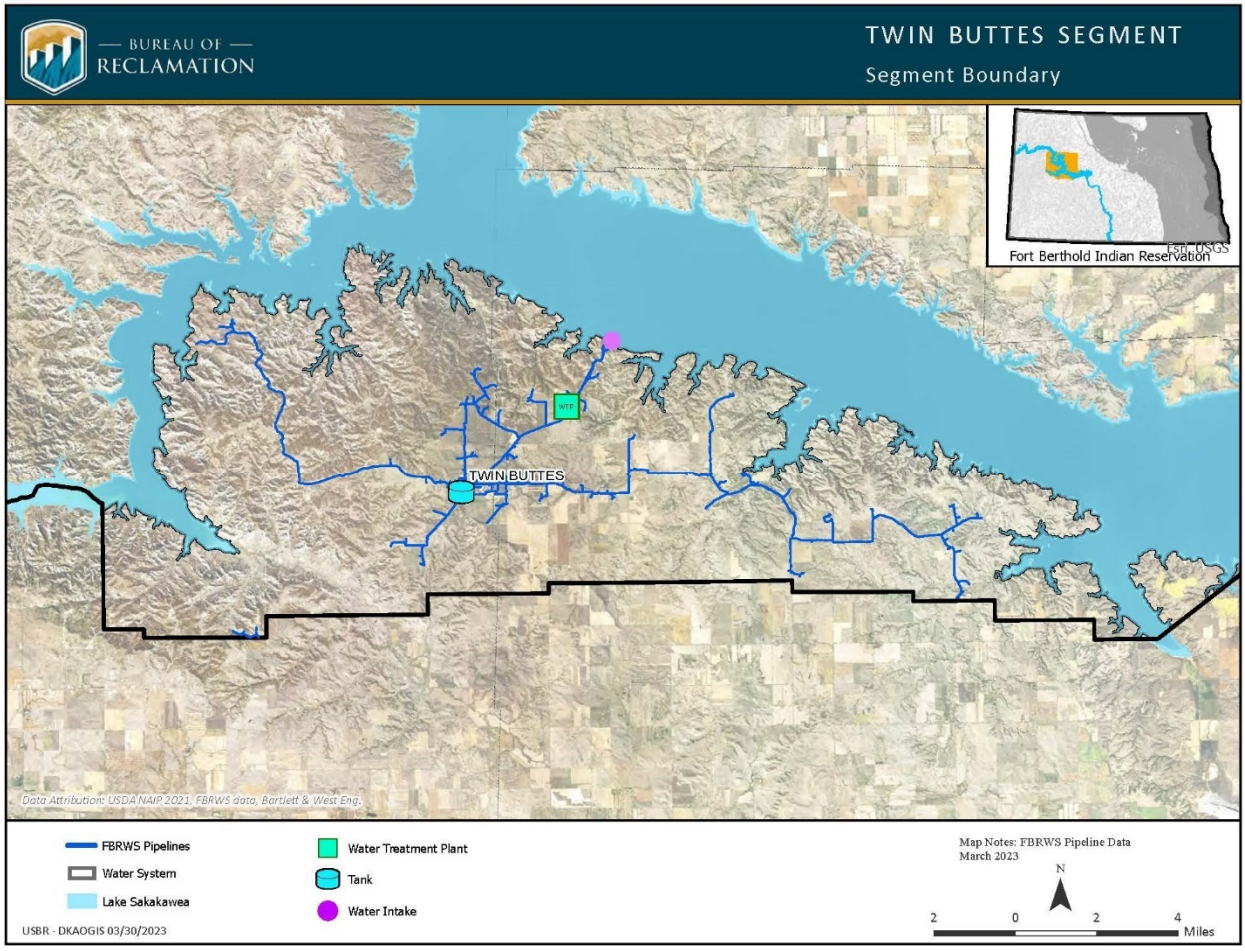

Figure 4 – Twin Buttes Water Service Area

Mandaree Water Service Area - Figure 5 shows the major water system features of the Mandaree water service area (West Segment) which includes 500 gpm ultra-filtration (membrane) WTP, two raw water intakes (primary with one slope tube and backup with two slope tubes), two booster stations, one elevated storage tank, 390 water service connections, and the distribution system includes approximately 149 miles of pipe.

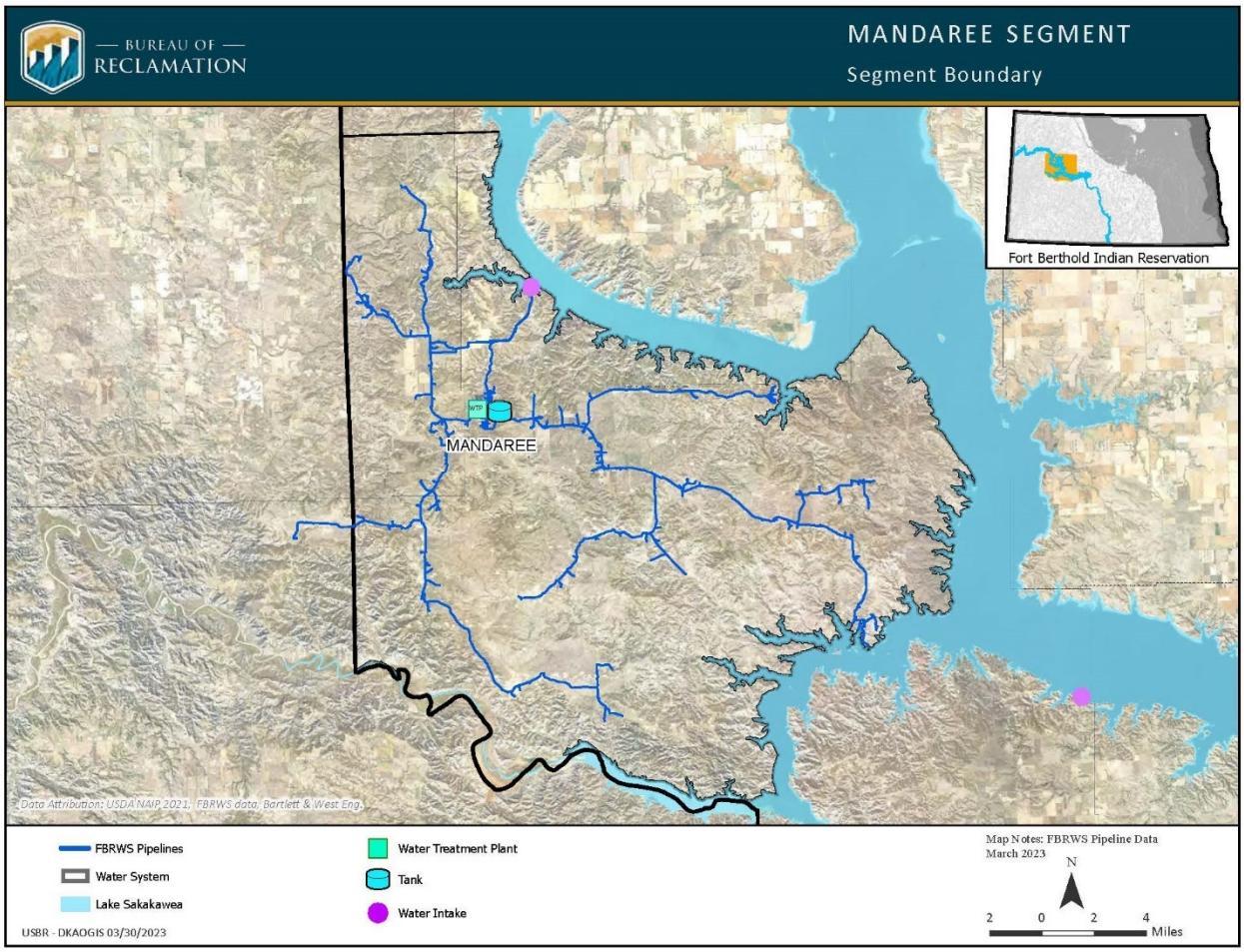

Figure 5 – Mandaree Water Service Area

Little Shell (New Town) Water Service Area - Figure 6 shows the major water system features of the Little Shell water service area (North Segment). Water for this service area is purchased from the city of New Town. The water system includes one booster station, one elevated water storage tank, 385 service connections, and the distribution system includes approximately 122 miles of pipe.

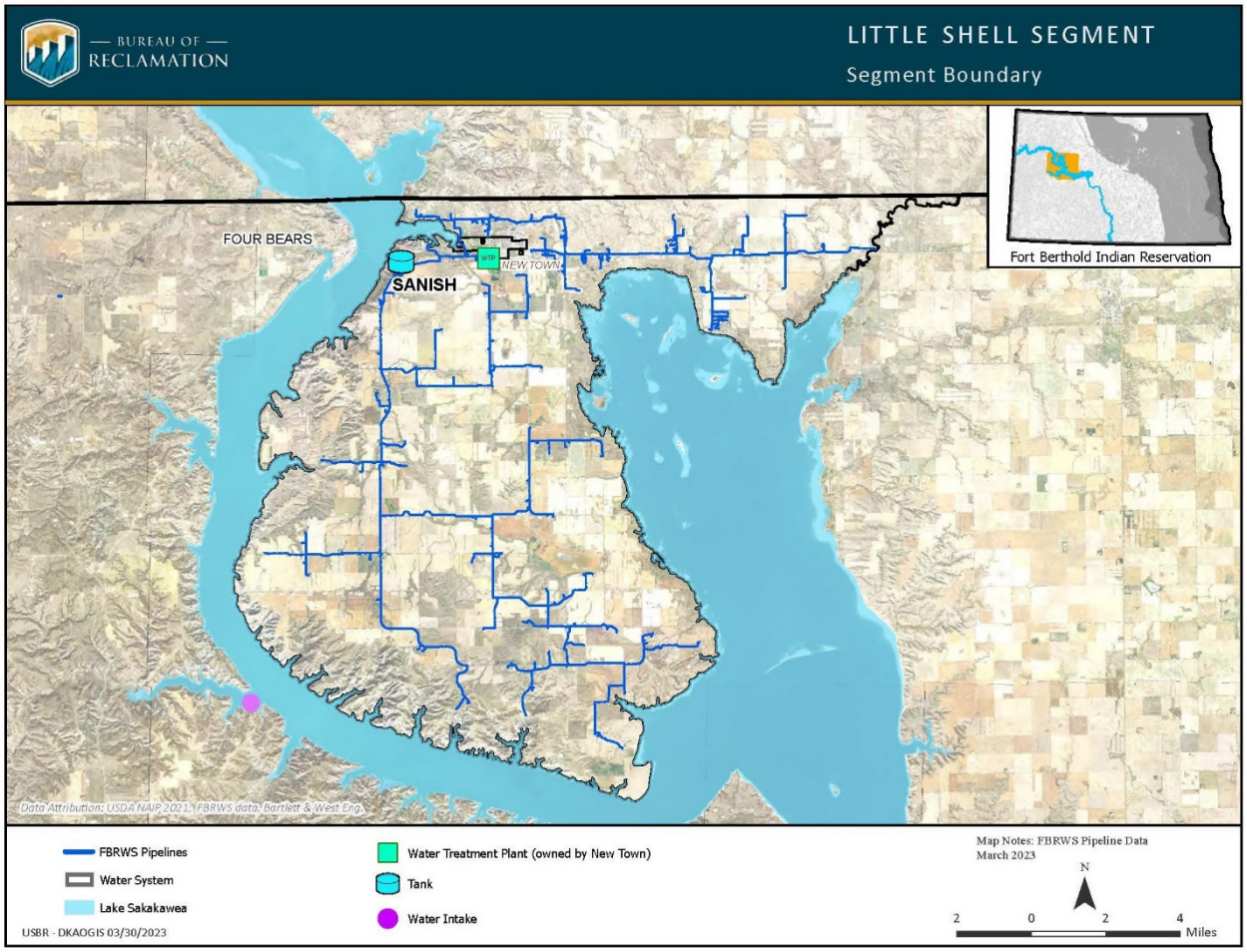

Figure 6 – New Town Water Service Area

The Parshall – Lucky Mound Water Service Area - Figure 7 shows the major water system features of the Parshall – Lucky Mound water service area (Northeast Segment). Water for this service area is purchased from the city of Parshall. The Service area has one elevated water storage tank, 132 service connections, and the distribution system includes approximately 89 miles of pipe.

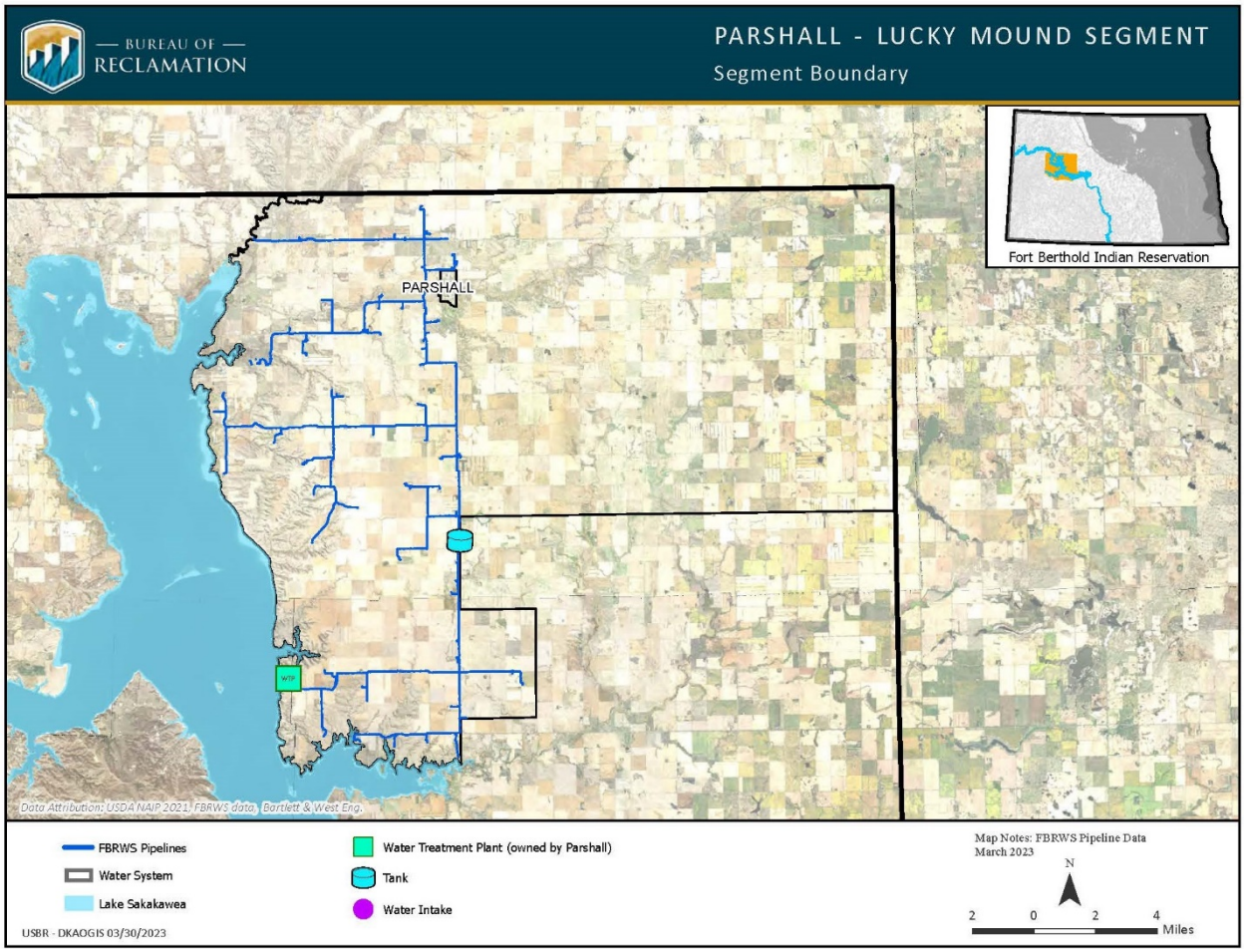

Figure 7 – Parshall – Lucky Mound Water Service Area

The FBRWS main convenience and pipeline distribution system has been completed within the available construction ceiling. There are still unserved areas on the eastern side of the reservation (Parshall and White Shield service areas), but inadequate construction funding is currently available to complete these distribution systems. However, Fort Berthold Rural Water (FBRW) has awarded a series of subsequent users and system improvement construction contracts which along with the Indian Health Service continues to install additional water service connections from the existing FBRWS water distribution systems.

Routine FBRWS Operation and Maintenance (O&M) Activities Performed by FBRW Staff

The FBRWS is responsible for OM&R of treatment plants, intakes, booster station, water meters, master meters, control vaults, storage reservoirs, pipelines, appurtenances, and all equipment associated with those facilities as described below.

1. **Administrative Activities** - The FBRWS OM&R program has about 25 staff and provides all administrative and human resources support to assure FBRW has staff capable of operating and maintaining the FBRWS including holding the EPA required levels of treatment and distribution operator certification.
    a. Evaluation current and future staffing needs and hire staff as needed with the appropriate skills and experience.
    b. Provide training for all staff with particular attention to water treatment and distribution system operators to assure operator certifications are obtained for new staff and maintained or exceeded for existing staff.
    c. Conduct general site surveillance to check facility condition and security.
    d. Monitor to assure that no unauthorized connections to the water system are made.
    e. Document all inspections conducted by the Tribe, FBRWS, others and any corrective actions required and/or taken. This documentation shall be provided to Reclamation within quarterly narrative reports.
    f. Ensure that the requirements of the Safe Drinking Water Act (SDWA) and the Clean Water Act (CWA) are adhered to, as well as perform appropriate and required water sampling and testing. Maintain a record of the results from sample testing. Document and record any corrective action taken as a result of water sample testing within the quarterly narrative reports.
    g. Participate in coordination and planning meetings with Reclamation.
    h. Report all water quality test results to Reclamation, including those deemed for operational purposes only. If the results do not meet, or exceed, drinking water standards, promptly report this information to Reclamation as soon as the results are known.
    i. Participate in all Associated Facility Reviews, Security Reviews, Sanitary Survey, etc.

2. **Equipment Purchases** - Purchase necessary equipment and replacement/repair parts under the terms and conditions of the OM&R P.L. 93-638 contract.

3. **System Security, Safety, and Incident Reporting** – FBRW will safeguard all property and equipment that is purchased by or provided for FBRWS use and/or is under the OM&R program's control. All such facilities, equipment, materials and tools shall be secured when left unattended. All facilities must be provided with adequate means of security and be kept locked to deter theft, vandalism and/or operation by unauthorized persons. Staff from FBRWS will participate with Reclamation in security inspections, where security equipment is checked for functionality, operability, maintenance, and utilization.

4. **OM&R 93-638 Contract Administration**
    a. Administer contract in coordination with Reclamation.
    b. Create work plans, budgets (current and out year), budget support documents associated with the FBRWS OM&R program.

c. Provide financial oversight of budget expenditures for normal operation, maintenance, repair and replacement activities, and RAX items/projects.
d. Provide technical oversight to staff for OM&R program activities; provide technical assistance and information to the tribal council concerning rural water program.
e. Update paper copies of existing as-built drawings and maps to reflect recent additions to FBRWS distribution system; collect GPS data for recent additions to FBRWS distribution system and have this data added to the FBRWS GIS system.
f. To preserve the integrity of the FBRWS and water quality, FBRW will obtain written approval from Reclamation and Three Affiliated Tribes on any and all proposed connections to the FBRWS, before ground disturbing activities start.
g. Administer contract with consulting firms who may assist FBRW with the OM&R of the FBRWS.

5. Maintenance of Moveable Equipment:

a. Maintain inventory of FBRWS movable equipment including all purchase documentation and owner's manuals.
b. Maintain inventory of fluids, filters, and frequently used repairs parts for equipment.
c. Perform (or contract for) routine maintenance activities according to manufacturer's recommendations for each type of equipment including the development of a equipment maintenance record system.
d. Solicit outside entities to perform non-routine equipment repairs.
e. Secure all equipment when left unattended to deter theft, vandalism and/or operation by unauthorized persons. Otherwise, store equipment in designated storage areas or buildings.

6. Water Treatment Plant and Intakes Tasks:

a. The OM&R of the WTPs and associated intakes will be undertaken in a manner that ensures the reliable operation of these facilities through routine maintenance activities. OM&R of the WTP building and associated equipment shall be in accordance with the Safe Drinking Water Act and Operation and Maintenance Manuals for the equipment. Recurring routine OM&R activities include:
    i. Adjusting the treatment type and volume of reagents used to the characteristics of the water or residues
    ii. Ensuring the regular supply of treatment products, their correct storage and maintenance of recipients and dosing devices
    iii. Monitor Supervisory Control and Data Acquisition (SCADA) operations
    iv. Maintenance (servicing, inspection, rehabilitation, repair)
    v. Monitoring water quality (source, through treatment, final)
    vi. Troubleshooting and optimization
    vii. Documentation

b. General:
    i. Maintain inventory list for needed spare parts to assure availability when needed.
    ii. As required by manufacturer's recommendation or as necessity dictates perform Clean in Place (CIP), membrane integrity testing, and process auditing on the WTPs with membrane units.

iii. Replace or maintain membrane filter cartridges as membrane integrity testing indicates.
iv. Repair, replace, calibrate and maintain on-line residual, turbidity, pH and process monitors that are we required for compliance monitoring to meet the provisions of the SDWA.
v. Conduct, monitor and report all monthly, quarterly and annual EPA mandated compliance testing to include but not limited to the following: TCR, lead and copper, VOC's, IOC's, SOC's, asbestos, TTHM's, HAA5, residuals, RADs, sodium and cyanide, Maximum Residual Disinfection Level (MRDL's) Disinfection By-Products (DBP's).
vi. Perform maintenance or replacement of membrane unit valves, actuators, pumps, air compressors, heaters, air supply lines and programmable logic controllers as required.
vii. Update vulnerability assessments and emergency response plans.
viii. Perform preventative O&M, repair or replace all aspects of the WTP feed injection systems, including the chlorine and fluoride feed systems.

c. Daily
i. Record daily equipment run times (SCADA).
ii. Record daily gallons pumped (SCADA).
iii. Check raw and finished water qualities for any changes (SCADA).
iv. Check and remedy all alarms (SCADA).
v. Check and maintain clear well storage and reservoir levels in the distribution system to assure adequate distribution system operation (SCADA).
vi. Conduct WTP walk around; check head of plant for actual water flow, rapid mixers, and flocculation chains/drives.
vii. Check status of filters for proper operation and/or if need, backwash
viii. Run calibrations on chemical feed systems.
ix. Check all chemical pumps for vibration, excessive noise and heat and oil leaks.
x. Check chemical levels and record daily usage.
xi. Check for chemical leaks.
xii. Check pressure (PSI) on chemical feed lines.
xiii. Conduct lab sampling for chlorine, turbidity, fluoride, pH, and alkalinity. Record the results.
xiv. Check WTP pipe work and valves for leaks.
xv. Compare analyzers to lab work.
xvi. Check and recalibrate chlorine analyzer as needed.
xvii. Visual inspections in chlorine room; check for any chlorine leakage.
xviii. Keep WTP clean. Designate an area of the water plant to clean on a daily basis. Some areas will require more cleaning on a daily basis than other areas.
xix. Operate the pumps and controls to provide a reliable source of quality potable drinking water to the distribution system.
xx. Bleed off intake flow meter at the head of plant, finished water and back wash.
xxi. Check panel lights and replace as needed.
xxii. Check back wash filters as needed.
xxiii. Secure the WTP(s) and out-buildings.

d. Weekly
   i. Check oil level in each air compressor.
   ii. Check chlorine container (visually) for any problems.
   iii. Inspect intake pump house and clean.
   iv. Inspect clear well and clean.
   v. Check and clean turbidity analyzers.
   vi. Check oil level in pump motors at intake building and clear well. Check for leaks in pump motors and for any other deficiencies.
   vii. Check the lagoons.
   viii. Blow off the screens at the intakes.
   ix. Check for replacement parts and supplies and order as necessary.

e. Monthly
   i. Check the air lines for leaks.
   ii. Moisture bleed off check valve on the I/P' transducers.
   iii. Pest control.
   iv. Inspect and maintain first aid supplies and equipment in accordance with safety standards.
   v. Exercise valves and filters that are not in use.
   vi. Inspect all reservoirs for leaks or cracks.
   vii. Provide all test results to Reclamation, including those for operational purposes only.
   viii. Monthly bacteriological testing as required by EPA regulations
   ix. Mow grass and weeds around buildings and sludge ponds, etc.

f. Quarterly
   i. Quarterly samples as per EPA regulations.
   ii. Provide narrative performance reports to Reclamation.

7. Water Distribution System Tasks:

The OM&R of the water distribution systems includes upkeep of the pipeline, storage tanks, and pumps that convey water from the WTPs and purchased water sources to the point of delivery. OM&R of the distribution system and associated equipment shall be in accordance with the Safe Drinking Water Act and Operation and Maintenance Manuals. Activities that are part of distribution operation and maintenance include the following:

a. General:
   i. Maintain inventory list for needed spare parts and reorder as necessary.
   ii. Cross connection control and backflow prevention.
   iii. Water line flushing.
   iv. Water main repair/replacement including leak repairs.
   v. Storage tank maintenance.
   vi. Booster pump maintenance.
   vii. Maintain water quality in distribution systems by flushing.
   viii. Disinfection of repaired and new distribution facilities.
   ix. Monitoring of tampering with the water system and/or infrastructure.
   x. Monitoring of illegal connections to the water system.
   xi. Taking EPA required water quality samples.

xii. In early October, check the entire water system to ensure curb stops are operable and accessible.
xiii. Shut off water to seasonally (winter) unoccupied residents or pasture taps.
xiv. In spring, turn water back on to those seasonally unoccupied residents or pasture taps.
xv. Monitor water system distribution system to ensure no unauthorized connections have been made without following the FBRWS policy and procedures including Reclamation's written approval.
xvi. Provide technical oversight of all inspections conducted by Federal agencies, including Associated Facility Reviews, Security Reviews, Sanitary Survey, etc. This documentation shall be made available to Reclamation upon request at any time during the term of the contract.
xvii. Repair, replace and maintain components of the distribution system that are inoperable, including but not limited to the following features and appurtenances: valves, hydrants, meters, ARV's, water mains, distribution piping, pumps and motors and associated electrical equipment, analyzers, tanks, generators, booster stations, buildings and components needed to maintain SCADA systems.
xviii. Maintain automated meter read system to collect water production amounts from the WTPs and to monitor/track water use throughout the distribution system.
xix. Use data acquired from meter reading information to monitor for water loss, leak detection and water conservation purposes.
xx. Gather GPS data on all new and existing service lines, pasture taps or other FBRWS features so the rural water's GIS data can be kept up to date.

b. Daily
i. Test and record disinfectant residuals.
ii. Inspect the distribution system for leaks.
iii. Check air release valves.
iv. Check all hatches and lids.
v. Check pump stations and reservoirs.
vi. Repair and replace valves, meters, water mains and service lines as necessary.
vii. Replace or repair fire hydrants as needed.
viii. Inspect fence and signs around buildings.
ix. Provide assistance to treatment plant operators as needed.
x. Maintain all vehicles and equipment.
xi. Conduct general site inspection and surveillance to check facility condition and security to ensure they have not been compromised.

c. Bi Weekly
i. Clean pump stations.
ii. Take bacterial samples according to the site plans submitted to EPA.

d. Monthly
i. Check automated meter read system to assure all meters reading properly and repair meters as necessary.

ii. Mow around pump stations, reservoirs, valves, manholes and outer boundaries of the water distribution system.

e. Quarterly
   i. Collect and submit water quality samples for EPA compliance.
   ii. Equipment maintenance (heavy equipment)

f. Yearly
   i. Maintain fences around appurtenances, including signs and markers
   ii. Snow removal as needed.
   iii. Mow grass and control weeds around valves, hydrants, air releases and manholes.
   iv. Exercise all valves (in spring and fall) in the distribution system.
   v. Monitor cathodic protection test stations and rectifiers.
   vi. Perform uni-directional and bi-directional flushing of the systems distribution lines.
   vii. Exercise flush hydrants.

8. Backup Power Generators:

a. Weekly
   i. Ensure generator is in AUTO mode, turn on and check for errors.
   ii. Check that you have the correct seasonal diesel fuel and inspect the unit for leaks.

b. Monthly
   i. Remove debris in an around generator including animal nests.
   ii. Check coolant level is in overflow tank.
   iii. Confirm battery is charged, there are no loose wires and terminals are not corroded.
   iv. Check gas lines for any damage.
   v. Run generator on manual to assure reliable operations.

c. Yearly
   i. Conduct full battery diagnostic.
   ii. Inspect induction pipes, drive belts, exhaust, and coolant heater.
   iii. Inspect air conditioner wiring, coolant lines, electrical system, lubrication, and fuel system.
   iv. Change oil filter, fuel filter, generator oil, and spark plugs.
   v. Inspect transfer switch.
   vi. Test and recondition diesel fuel and check for moisture in tank.

9. Water Treatment and Distribution System Electrical and SCADA Tasks

a. Repair electrical, communication and SCADA related equipment as needed.
b. Monitor hours run for all pumps (raw water, clear well, and pump stations).
c. Check and replace building lights.
d. Inspect air exchanger - HVAC systems.
e. Inspect and maintain all associated control systems, sub systems, and power distribution systems.

10. Buildings

a. Inspect interior and exterior building surfaces and repaint as necessary/needed.
b. Maintain, repair, or replace doors, windows, siding, roofing, floors and wall covering, exhaust fans, heating equipment, electrical facilities, lighting system, plumbing (restrooms), work benches, and counters as needed.
c. Inspect and maintain fire safety equipment in accordance with safety standards.
d. Conduct pest control.
e. Clean spills using the proper materials and disposal methods in accordance with the manufacturer's recommendations and Tribal or State Health Department requirements.
f. Maintain, repair, and replace signs as required.
g. Mow grass and remove snow as necessary.
h. Inspect and maintain security fencing.

11. Property and Supply

a. Check inventory quarterly and order building (cleaning, paper products, etc.) supplies as necessary.
b. Check inventory of water system O&M supplies and purchase items as needed.
c. Check O&M related hand tools and equipment and order as needed.

Routine FBRWS Operation and Maintenance (O&M) Activities Performed by On-Call Contractors

On-Call O&M Contracts – FBRW has four (4) current On-call contracts which they use to perform routine repairs on the FBRWS. While the FBRW O&M program staff generally performs the day-to-day O&M activities there are water system repairs that require specialized experience, capability, or equipment that the existing FBRW O&M program can not provide. To expedite access to these specialized O&M services, FBRW has executed four On-call contracts to perform these system repair activities. The four On-call contracts include electrical, municipal, general O&M and Supervisory Control and Data Acquisition (SCADA) as described below.

Electrical On-Call Services Contract - The scope of work generally consists of mobilization and furnishing of all labor, equipment, and materials, for the re-habilitation and upgrade of existing facilities and equipment, troubleshooting malfunctioning equipment, construction of new facilities, startup and commissioning of facilities, and training of FBRW staff on the electrical facilities and equipment integrated with the FBRWS. This work is generally performed with in existing FBRWS administration, shop, storage buildings, WTPs, pumping stations, intake pump buildings, or other FBRWS facilities that have electrical service.

Municipal On-call Services Contract - The scope of work generally consists of mobilization and furnishing all labor, equipment, and materials, for emergency or scheduled repair work, re-habilitation and upgrades to existing facilities and appurtenances including pipelines, water depots, metering and valve vaults, intakes, and replacement of antiquated and/or malfunctioning equipment and pipeline infrastructure integral to the rural water system. This work is performed reservation wide wherever FBRW has pipeline distribution systems.

O&M On-call Services Contract - The scope of work generally consists of mobilization and furnishing (on a requirements basis), of all labor, equipment, and materials, for emergency or scheduled operation and maintenance (O&M) services for rural water system facilities including but not limited to treatment plants, pump stations, or any other above ground facilities and related appurtenances. O&M services shall generally be described as emergency or scheduled; inspection and service of equipment, overhaul of equipment with moving parts (i.e., chemical feed pumps, high service pumps, valves, etc.), and other preventative maintenance of facilities and/or appurtenances. This work is generally performed in existing WTPs, pump stations or any other above ground facilities.

SCADA On-call Services Contract - The scope of work generally consists of providing all labor, equipment, and materials, necessary to maintain and upgrade existing telemetry facilities and equipment. Work shall include any telemetry programing necessary to troubleshoot existing facilities or integrate new equipment and facilities as needed. The Contractor shall also be responsible to supply any needed replacement or new equipment necessary to maintain SCADA controls over existing facilities or to incorporate new facilities into the SCADA network. This work is generally performed with in existing FBRWS administration, WTPs, pumping stations, intake pump buildings, storage tanks or other FBRWS facilities that house SCADA equipment.

Relocation of Existing FBRWS Pipelines and Appurtenances

The FBRWS has approximately 650 miles of installed pipelines. A substantial amount of that pipeline is installed parallel or crossing state, county, tribal roads where a significant portion reservation housing and other water service connections are also located. Oil industry development on the Fort Berthold reservation has created the need to improve the roads on the reservation due to increased traffic. The process of improving these roads has created situations where FBRW now must relocate existing pipelines to allow additional space to accommodate these road improvements. FBRW has relocated several portions of pipeline in recent years due to road improvements and that is expected to continue. FBRWS has also relocated pipelines in communities due to conflicts with planned Tribal developments.

The exact location of these future pipeline relocations is unknown. Generally, in the case of relocations associated with road improvements, FBRW is notified a couple of years in advance of any potential pipeline relocation situations. Pipeline relocations in communities may have shorter notification periods due to the expedience of some community projects. This PEA will address these pipeline relocations in the same manner as new construction.

Use of FBRWS PEA in Acquiring Future FBRWS Rights-of-Way and Easements

Rights-of-way and easements are required to construction FBRWS features including pipelines, water storage tanks, booster stations, valve vaults, etc. FBRW generally acquires easements on three types of land ownership, fee (private ownership), tribally owned and tribal allotted lands. The Bureau of Indian Affairs (BIA) administers the process for acquiring easements on tribally owned and tribal allotted lands. Entities seeking easements must prepare an easement application package and submit that package to the BIA for their review and eventual recording of the easement. The BIA requires a NEPA document to be included in application packages to demonstrate that the activity which needs the easement meets NEPA and cultural resources regulatory requirements. The proposed PEA will be used to satisfy the BIA NEPA document easement application package requirement for new construction.

FBRWS Missing Easements - The FBRW has determined that there are missing easements on tracts of tribally owned and allotted lands in which FBRWS features (primarily pipelines) have already been constructed. FBRW and Reclamation are working in coordination with the BIA to acquire these missing easements by submitting after-the-fact (after construction is completed) easement application packages for these missing easements. The proposed FBRWS PEA will be used to satisfy the BIA requirement that all easement application packages include a NEPA document.