

**UNITED STATES DEPARTMENT OF THE INTERIOR**  
**Bureau of Land Management**  
Tucson Field Office  
3201 E Universal Way  
Tucson, Arizona 85756

**DETERMINATION OF NEPA ADEQUACY WORKSHEET**

DOI-BLM-AZ-G020-2026-0005-DNA

**Proposed Action Title/Type:** Las Cienegas National Conservation Area (LCNCA) Empire-Cienega Allotment Range Improvements

**Location of Proposed Action:** Empire-Cienega Allotment within Las Cienegas National Conservation Area

**Applicant:** Ian Tomlinson (Empire-Cienega Grazing Lessee)

**A. DESCRIPTION OF THE PROPOSED ACTION**

The Empire-Cienega grazing lessee proposes to install above-ground storage tanks (5,000 gallons each), drinkers (800 gallons each), and pipelines to connect wells to storage tanks and drinkers on the Empire-Cienega allotment within Las Cienegas National Conservation Area (LCNCA). Additionally, solar panels and pumps will be installed at the Irrigation Well and Johnson Tank well sites. Locations of the improvements are in Table 1 and Figure 1. The number of storage tanks, drinkers, and estimated length of pipeline at each site is in Table 2. These range improvements will provide clean drinking water to maintain and improve livestock health and growth rates.

The drinkers and storage tanks will be installed near existing dirt tanks in areas devoid of vegetation. Drinkers will replace dirt tanks for watering cattle except for Cottonwood Tank. Dirt tanks at the other sites will be retired from cattle use. Heavy machinery will level the ground for placement of the storage tanks and drinkers. The disturbance will be minimal and limited to the diameter of the storage tanks and the drinkers. Each solar pump will require erecting two or three solar panels at the well site and wiring from the panels to the pump. Poles for solar panels would be up to 15 feet tall and have a dull finish to minimize visual impacts. A trench no wider than four feet and no deeper than 2 feet will be dug for the water pipelines. The length of the water pipelines varies by site (Table 2). The completion of range improvements at each site will require one to two weeks.

*Table 1. Locations of range improvements within the Empire-Cienega allotment in LCNCA.*

Site Name	Latitude	Longitude
Cottonwood Tank	31.761209	-110.619608
Karens Tank	31.791610	-110.636839
Johnson Tank	31.730956	-110.607085
Lane Tank	31.783896	-110.580381
Irrigation Well Tank	31.821174	-110.588973
Upper Cienega Ranch Tank	31.830129	-110.579571



Figure 1. Map of locations of range improvement sites found in Table 1.

**Table 2.** List of improvements at each site within the Empire-Cienega allotment in LCNCA.

Site Name	Pasture	Number of Proposed Storage Tanks (5,000 gallons)	Number of Proposed Drinkers (800 gallon)	Estimated Length of Proposed New Pipeline (feet)	Install of Solar Pump (Y/N)
Cottonwood Tank	Cottonwood	2	3	300	N
Karens Tank	North and Empire	3	4	500	N
Johnson Tank	Johnson	2	3	500	Y
Lane Tank	Springwater	2	3	0	N
Irrigation well Tank	East Macs Sacaton	2	3	400	Y
Upper Cienega Ranch Tank	East Macs Sacaton	2	3	600	N

Stipulations

Prior to project implementation, a Class III cultural resource survey will be conducted at each site as required under Section 106 of the National Historic Preservation Act (NHPA). All known or newly recorded cultural resource sites will be avoided during project operations. Additional cultural resource surveys will be required if the project location is changed or additional surface disturbing operations are added to the project after the initial survey. Any such survey shall be completed prior to commencement of operations.

Cultural resource sites will be protected by relocating ground disturbing activities. All work in the area shall stop immediately, and the Tucson Field Office Archaeologist shall be notified immediately if the following should occur:

- 1 if any archaeological, historical artifacts, human remains or vertebrate fossils discovered during operations, project or construction activities; they shall be left intact and undisturbed;
- 2 if any human remains, funerary objects, sacred objects or objects of cultural patrimony as defined in the Native American Graves Protection and Repatriation Act (P.L. 101-601; Stat. 3048; 25 U.S.C. 3001) are discovered; work shall cease in the immediate area of the discovery and protect the remains and objects.

Clearance by a BLM biologist is also required prior to construction and placement of storage tanks, drinkers and water pipelines. Construction and installation of range improvements at Cottonwood Tank, Karens Tank, Irrigation Well, Lane Tank, and Upper Cienega Ranch Tank are not permitted from May 25 to September 30 without additional coordination with BLM and the U.S. Fish and Wildlife Service. The above sites fall in or near critical habitat for the yellow-billed cuckoo. Johnson Tank is outside the critical habitat and is exempt from this restriction.

Storage tanks and troughs would have color tones that meet visual resource management (VRM) requirements for Class II. All installed drinkers will have approved wildlife escape ramps. At sites without an associated wildlife pond, at least one drinker will have with an approved small wildlife access ramp made of natural rock and concrete only.

No trees will be removed during construction and installation activities.

No new roads will be created during project implementation. Use of administrative roads for temporary access requires written approval.

## **B. LAND USE PLAN CONFORMANCE**

LUP Name: Las Cienegas Resource Management Plan Date Approved: July 2003

It is specifically provided for in the following LUP decision(s):

### *Empire-Cienega Allotment Livestock Grazing Management Actions*

Construct the range improvement projects summarized in Tables 9 and 10 and shown on Map 16. Additional range improvements might be proposed and constructed in the future based on results of ecological monitoring and/or livestock management needs. (GM20) (Page 57)

## **C. NEPA AND OTHER RELATED DOCUMENTS**

Environmental Assessment (EA):

Programmatic aquatic special status species reintroductions at Las Cienegas National Conservation Area (DOI-BLM-AZ-G020-2011-0028), BLM Tucson Field Office, Las Cienegas National Conservation Area, May 2012.

Biological Opinion:

BLM Proposed Modification and Use of Livestock Watering Facilities for the Release of Aquatic Threatened and Endangered Species on Las Cienegas National Conservation Area (2026-0017304-S7-001) in Santa Cruz and Pima Counties, Arizona. January 2026.

Reinitiation of Biological Opinion on the Las Cienegas National Conservation Area Resource Management Plan (22410-2002-F-0162) in Pima and Santa Cruz Counties, Arizona. February 2012.

## **D. NEPA ADEQUACY CRITERIA**

### **1. Is the new proposed action a feature of, or essentially like an alternative analyzed in the existing environmental document(s)?**

Yes, the proposed action outlined in this DNA is a feature of the proposed action outlined in the EA (The Programmatic aquatic special status species reintroductions at Las Cienegas National Conservation Area (DOI-BLM-AZ-G020-2011-0028)). The programmatic EA requires DNAs for site specific actions (page 5). Additionally, the EA only covers sites that have already been developed for livestock watering.

The EA proposed action identifies basic project elements under A. Stock Pond Site Modification and Improvement including solar water systems and drinkers (Page 11). The proposed action in this DNA provides the required site-specific details for the action covered

under the EA (DOI-BLM-AZ-G020-2011-0028). Mitigation measures are listed on pages 5-10 and impacts are described on pages 21-29 of the EA.

- 2. Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing environmental document(s)? If there are differences, can you explain why they are not substantial?**

Yes, the analysis area for this project has not changed. This DNA covers six of the 24 sites listed on page 15 of the EA.

- 3. Is the *range* of alternatives analyzed in the existing environmental document(s) appropriate with respect to the new proposed action, given current environmental concerns and resource values?**

Yes, the alternatives analyzed in the EA are still appropriate. The alternatives analyzed in the EA are the proposed action alternative which has not changed and the no action alternative. The resource conditions analyzed in the EA are consistent with current conditions across LCNCA for the sites listed in this DNA.

- 4. Is existing analysis valid considering any new information or circumstances relevant to the proposed action (such as, rangeland health standards assessment, recent endangered species listings, updated list of BLM sensitive species)? Can you reasonably conclude that new information and new circumstances do not warrant substantial change to the analysis of the new proposed action?**

Yes, the current analysis is valid. The biological opinion in which this action is covered under was completed on January 7, 2026. Stipulations regarding endangered species and critical habitat are included in the EA proposed action to mitigate proposed action. The proposed action also requires archaeological clearance before any project can be implemented.

- 5. Are the environmental effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

Yes, the impacts that would result from implementation of the proposed action are identical to those analyzed in the EA. Impacts of the proposed action in the EA are ACEC, Wildlife/Migratory Birds/Threatened and Endangered Species, Water Quality and Quantity, Wetlands and Riparian Vegetation, Vegetation, Recreation, Wild and Scenic Rivers, Air Quality, Cultural Resources, Native American Religious Concerns, Soils, Noxious Weeds, Range, Visual Resources, and cumulative impacts related to ground water and drought. The impacts analyzed in the document reflect current conditions (pages 18-28).

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

Yes, public involvement and interagency review is still adequate for proposed action since the proposed action in this DNA is a feature of the proposed action in the EA. The proposed project was presented and discussed annually beginning in 2006 with the Sonoita Valley Partnership and at annual Biological Planning meetings for LCNCA. These meetings also included visits to sites in this DNA to discuss specific issues. Empire-Cienega allotment grazing lessee was included when drafting the proposed action. Tribes were consulted prior to the publication of the EA on ePlanning (<https://eplanning.blm.gov/>).

#### E. BLM STAFF CONSULATED

Reviewer	Title	Date Reviewed
Joan Breiner	Assistant Field Manager	February 26, 2026
Hannah Pierce	Wildlife Biologist	February 23, 2026
Ralph Burrillo	Archaeologist	February 3, 2026
Kristen Duarte	Range Management Specialist	February 6, 2026

Project Lead: Christina Perez (Fisheries Biologist) Date: 2/27/2026

#### F. CONCLUSION

##### Determination of NEPA Adequacy:

- 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 the NEPA documentation fully covers this proposal and constitutes BLM's compliance with the requirements of the NEPA

Responsible Official: COLLEEN DINGMAN Digitally signed by COLLEEN DINGMAN  
 Date: 2026.03.06 14:34:16 -07'00'  
 Colleen Dingman  
 Field Manager, Tucson Field Office

**Note:** The signed CONCLUSION on this worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, other authorization, or action based on this DNA may be subject to protest and/or appeal under 43 CFR Part 4 or program-specific regulations.