

City of Craig South Distribution Line Improvements Project

Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain and Wetland

To: All interested Agencies, Groups and Individuals

This is to give notice that the City of Craig, serving as the Responsible Entity under 24 CFR Part 58, has conducted an evaluation as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management, and Executive Order 11990 – Section 2(b), implemented by 24 CFR 55.20(b) for wetland protection, to determine the potential affect that its activity in the floodplain and wetland will have on the human environment for the Craig South Distribution Line Improvements Project under Grant Number B-24-CP-CO-0417. The proposed project location is from the City of Craig Water Treatment Plant (WTP) south and west to County Road 394 in Craig, Moffat County.

The purpose of the proposed Craig South Distribution Line Improvements Project (Project) is twofold: Action 1 is to extend the City's water distribution system to the south side of the Yampa River to promote economic development, provide future service to a defined service area, in addition to providing future service to the following community facilities: Loudy Simpson Park, Yampa Valley Golf Course, and Moffat County Airport. Action 2 for the Project is to install a redundant water line tying into the existing water distribution system to protect consistent safe drinking water access to the 8,930 users already served by the City of Craig WTP.

The proposed activity for Action 1 is to bore a sleeved water main line from the south floodplain of the Yampa River, under the river, and surface on the north floodplain of the Yampa River at the location of the Craig WTP. A temporary, 5-foot-wide open trench would then travel from the bore pit on the south floodplain of the Yampa River to State Highway 394 to allow for the installation of the water line. The proposed activity for Action 2 is to temporarily excavate a 5-foot-wide open trench from the Craig WTP 885 linear feet north and then continue 1,625 linear feet west to tie into the existing water distribution system at Ranney Street. Proposed work for both Action 1 and Action 2 would involve ground disturbing activities such as vegetation clearing, motorized vehicle traffic, excavation, and installation of the water line. Both Action 1 and Action 2 would be mitigated in situ – wetland topsoil would be set aside during excavation, and the open trenches would be backfilled, topped with the preserved wetland topsoil and returned to the original grade once the water line installation is complete. The proposed Project would have no impact on floodplain footprint, elevation or function, because construction would take place entirely below ground level. A total of 0.89 acres of U.S. Army Corps of Engineers (USACE) jurisdictional wetlands and 4.97 acres of floodplain would be temporarily impacted. No permanent wetland or floodplain impacts or alterations to base flood elevation are anticipated.

The City of Craig has considered the following alternatives and mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values:

Identification and evaluation of practicable alternatives:

Action 1

The following parameters were considered by the City in selecting an alignment option for Action 1:

- a) Action 1 for the Project must expand water distribution system limits to allow for development south of the Yampa River
- b) Provide consistent water quality for the Yampa Valley Golf Course, Loudy Simpson Park and Moffat County Airport
- c) Minimize effects on wetlands, floodplains and yellow-billed cuckoo habitat
- d) Minimize disturbance of land not owned by the City or Moffat County
- e) Minimize road disturbance to avoid vehicular inconvenience
- f) Avoid existing infrastructure.

The City analyzed six alignment options (**Figure 1a**) for Action 1 in terms of the goals listed above and reviewed or considered through the lenses of natural, social, and economic values explained at 24 CFR 55.20(c)(2).

Figure 1a. Map of the Six Alignment Options Considered for Action 1 (located in South AOI)



- Alternative Alignment Options 2, 4 & 5: The elevation of the Ranney St. bridge over the Yampa River lies within the 100-year floodplain, therefore the waterline would not be out of the floodplain if hung from this bridge. Additionally, these alternative alignment options would require extensive disturbance to land not owned by the City or Moffat County, as well as requiring disturbance to the Ranney St. bridge.
- Alternative Alignment Options 3 & 6: These alternative alignment options would require significant disturbance to wetlands and yellow-billed cuckoo habitat. Alternative alignment option 6 would also disturb existing infrastructure (the City's boat ramp).
- No Action Alternative: The No Action Alternative would satisfy parameters c-f, above, but would fail to expand the water distribution system limits to allow for development south of Yampa River and would not provide consistent water quality for the Yampa Valley Golf Course, Loudy Simpson Park and Moffat County Airport.
- Preferred Alignment – Option 1: Alignment Option 1 is the Preferred Alignment Option because it is the only option that satisfies all the above parameters (a-f); minimizes impacts to wetlands and yellow-billed cuckoo habitat, does not intrude on private land, minimizes road disturbance, and avoids existing infrastructure.

Action 2

The following parameters were considered by the City in selecting an alignment option for Action 2:

- a) Action 2 for the Project must install a redundant water line tying into the existing distribution system to protect consistent safe drinking water access to the 8,930 users already served by the City.
- b) Minimize effects on wetlands, floodplains and yellow-billed cuckoo habitat
- c) Minimize disturbance of land not owned by the City or Moffat County
- d) Minimize road disturbance to avoid vehicular inconvenience
- e) Avoid existing infrastructure.

The City analyzed two alignment options (**Figure 1b**) in terms of the goals listed above and reviewed or considered through the lenses of natural, social, and economic values explained at 24 CFR 55.20(c)(2).

Figure 1b. Map of the two Alignment Options Considered for Action 2 (located in North AOI)



- **Alternative Alignment Option 2 (blue):** This alternative alignment option would require significant disturbance to wetlands, yellow-billed cuckoo habitat, and disturbance of land not owned by the City or Moffat County.
- **No Action Alternative:** The No Action Alternative would satisfy parameters b-e, above, but would fail to install a redundant water line tying into the existing distribution system to protect consistent safe drinking water access to the 8,930 users already served by the City.
- **Preferred Alignment – Option 1 (red):** Alignment Option 1 is the Preferred Alignment Option for Action 2 because it is the only option that satisfies all the above parameters (a-e); minimizes impacts to wetlands and yellow-billed cuckoo habitat, minimizes intrusion onto private land, minimizes road disturbance, and avoids existing infrastructure to the extent possible.

Identification of Potential Direct and Indirect Impacts Associated with Wetland or Floodplain Development:

Action 1 is to install a new water line comprised entirely of below-ground (and below BFE) infrastructure; Action 2 is to install a redundant water line comprised entirely of below-ground (and below BFE) infrastructure. Both Action 1 and Action 2 activities would install infrastructure entirely beneath the base flood elevation. Both Action 1 and Action 2 activities would be scheduled during low-flow season and conditions. Neither Action 1 nor Action 2 would alter BFE. Neither Action 1 nor Action 2 would require permanent wetland or floodplain impacts.

Action 1

The proposed installation of 2,594 linear feet of water line (**Figure 2a**) would temporarily impact 0.317 acres of Wetland H, 0.003 acres of Wetland I, 0.327 acres of Wetland J, and 0.005 acres of non-wetland WotUS, in addition to 0.30 acres of floodplain. These wetland and floodplain impacts would result from the temporary excavation of a linear, open trench approximately five feet wide. Temporary impacts to wetlands would total 0.647 acres and would be mitigated in situ. Swamp mats would be temporarily placed over Wetland H to minimize disturbance and soil compaction resulting from staging boring equipment. Wetland and floodplain topsoil would be set aside during excavation, and the open trench would be backfilled, topped with the preserved wetland and floodplain topsoil and returned to the original grade once the water line installation is complete. No permanent wetland or floodplain impacts are anticipated.

Action 2

The proposed installation of 2,510 linear feet of water line (**Figure 2b**) would temporarily impact 0.179 acres of Wetland A and 0.063 acres of Wetland B, in addition to 0.29 acres of floodplain. These wetland and floodplain impacts would result from the temporary excavation of a linear, open trench approximately five feet wide. No impacts to Wetlands C-G or the intermittent stream channel would be necessary. Temporary impacts to wetlands would total 0.24 acres and would be mitigated in situ. Wetland and floodplain topsoil would be set aside during excavation, and the open trench would be backfilled, topped with the preserved wetland and floodplain topsoil and returned to the original grade once the water line installation is complete. No permanent wetland or floodplain impacts are anticipated.

Table 1: Wetland and WotUS Impacts of Proposed Actions 1 and 2

Proposed Action	AOI	Wetland / WotUS	Acreage	Impacts (ac)			Total Impacts per Resource
				Trench	Buffer	Staging	
Action 2	North	Wetland A	0.372	0.044	0.135	-	0.179
Action 2	North	Wetland B	0.287	0.015	0.048	-	0.063
Action 2	North	Wetland C	0.02	-	-	-	0
Action 2	North	Wetland D	0.116	-	-	-	0
Action 2	North	Wetland E	0.085	-	-	-	0
Action 2	North	Wetland F	0.648	-	-	-	0
Action 2	North	Wetland G	0.569	-	-	-	0
Action 2	North	Stream	0.04	-	-	-	0
Action 1	South	Wetland H	0.332	0.004	0.04	0.273	0.317
Action 1	South	Wetland I	0.111	-	0.003	-	0.003
Action 1	South	Wetland J	0.686	0.03	0.297	-	0.327
Action 1	South	Ditch	0.011	0.0004	0.0046	-	0.005
Totals:			3.277	0.0934	0.5276	0.273	0.894

Where practicable, design or modify the proposed action to minimize the potential adverse impacts to lives, property, and natural values within the wetland or floodplain, and preserve the values of the wetland or floodplain:

- a) **Preserving Lives:** Action 1 is to install a new water line comprised entirely of below-ground (and below BFE) infrastructure; Action 2 is to install a redundant water line comprised entirely of below-ground (and below BFE) infrastructure. Both Action 1 and Action 2 activities would install infrastructure entirely beneath the base flood elevation. Both Action 1 and Action 2 activities would be scheduled during low-flow season and conditions. Neither Action 1 nor Action 2 would alter BFE. Neither Action 1 nor Action 2 would require permanent wetland or floodplain impacts. Furthermore, neither Actions for the Project involve the construction of habitable structures within the floodplain of the Yampa River. Therefore, the potential for the Project to endanger lives during flood events is minimal.
- b) **Preserving Property:** The Project area is owned by the City, and neither Actions 1 or 2 would increase flood elevations up or downstream.
- c) **Preserving Natural Values and Minimizing Impacts:** As discussed in Step 3 above, the preferred alignment options for both Actions 1 and 2 were selected in order to minimize impacts to wetlands, yellow-billed cuckoo habitat, and to avoid alterations to the base flood elevation.

Re-evaluation of the Alternatives:

Action 1

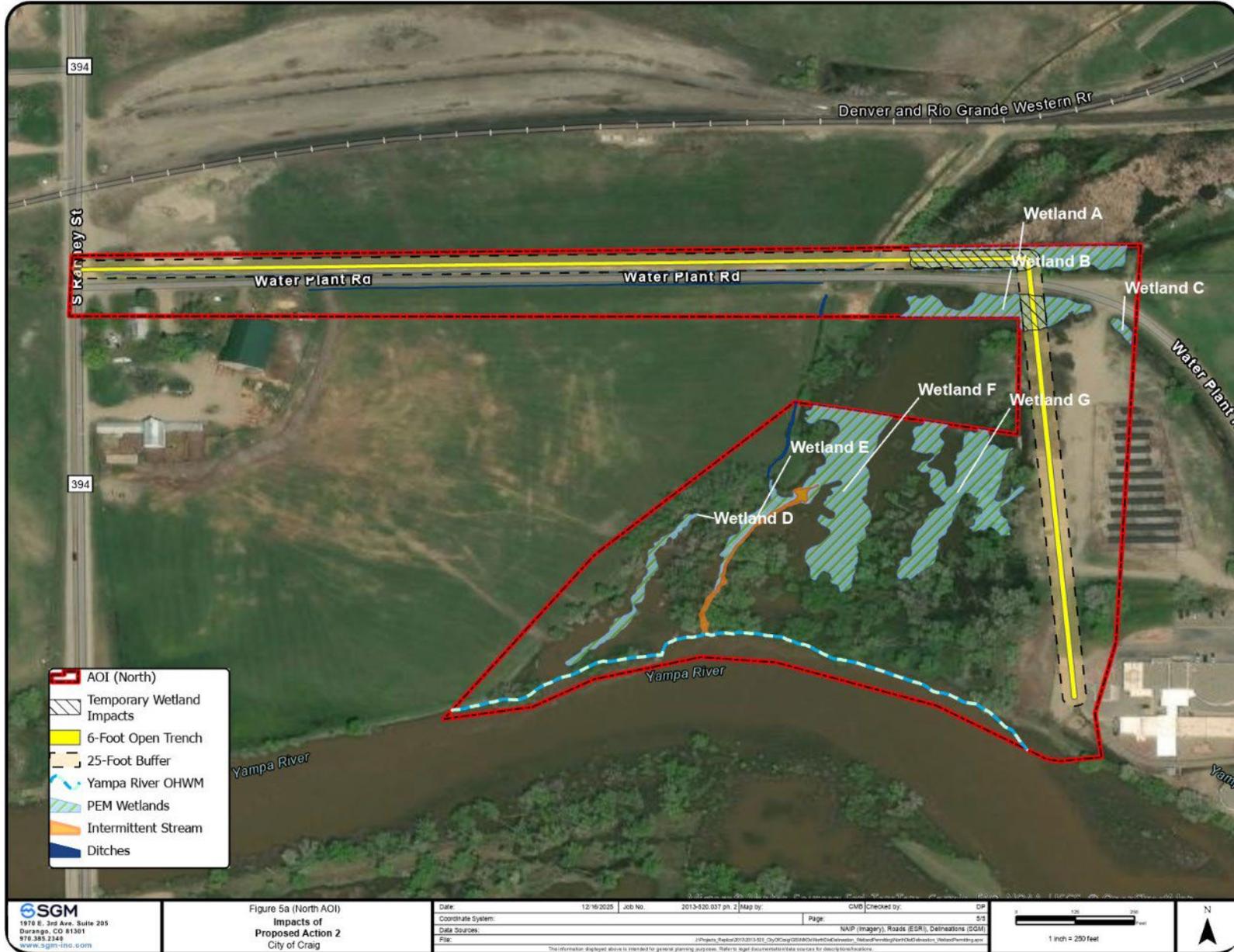
Though the No Action Alternative for Action 1 avoids impacts to wetlands and floodplains, it would fail to expand the water distribution system limits to allow for development south of Yampa River and would not provide consistent water quality for the Yampa Valley Golf Course, Loudy Simpson Park and Moffat County Airport. Alternative alignment options 2, 4 & 5 would not meet the goals of minimizing disturbance to privately owned land, avoiding existing infrastructure (the Ranney St. bridge), and minimizing road disturbance to avoid vehicular inconvenience. Alternative alignment options 3 & 6 fail to meet the goal of minimizing impacts to wetlands and yellow-billed cuckoo habitat. Therefore, the proposed action on the preferred alignment meets the City's water distribution system expansion needs with minimal impacts to wetlands and floodplains while satisfying the remaining goals.

Action 2

Though the No Action Alternative for Action 2 avoids impacts to wetlands and floodplains, it would fail to install a redundant water line tying into the existing water distribution system to protect consistent safe drinking water access to the 8,930 users already served by the City. Alternative alignment option 2 would not meet the goals of minimizing disturbance to privately owned land and avoiding impacts to wetlands and yellow-billed cuckoo. Therefore, the proposed action on the preferred alignment meets the City's water distribution system needs with minimal impacts to wetlands and floodplains while satisfying the remaining goals.

The City of Craig has reevaluated the alternatives to building in the floodplain and wetlands and has determined that it has no practicable alternative. This activity will have no significant impact on the environment for the following reasons:

Figure 2b. Wetland Impacts of Proposed Action 2 (North AOI)



Determination of No Practicable Alternatives:

Action 1

The planning and design process for Action 1 has identified the Preferred Alignment (Option 1) as the most practical option for meeting the City's need to expand the water distribution system to reach the south side of the Yampa River while minimizing wetland and floodplain impacts. It is our determination that there is no practicable alternative. This is due to: 1) the extent of wetlands and the 100-year floodplains proximal to the Craig Water Treatment Plant; (2) the need to minimize disturbance to roads, existing infrastructure and private property.

Action 2

The planning and design process for Action 2 has identified the Preferred Alignment (Option 1) as the most practical option for meeting the City's water distribution system needs while minimizing wetland and floodplain impacts and avoiding disturbance to yellow-billed cuckoo and its habitat. It is our determination that there is no practicable alternative. This is due to: 1) the extent of wetlands, yellow-billed cuckoo habitat and the 100-year floodplains proximal to the Craig Water Treatment Plant; (2) the need to minimize disturbance to roads, existing infrastructure and private property.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and wetlands and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the floodplain and wetlands, alternative methods to serve the same project purpose, and methods to minimize and mitigate project impacts on the floodplain and wetlands. Second, an adequate public notice program can be an important public education tool. The dissemination of information and request for public comments about floodplain and wetlands can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplains and wetlands, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City Manager's office at the following address on or before April 17, 2026: City of Craig, 300 West 4th Street, Craig, CO 81625 and 970-826-2031, Attention: Peter Brixius, City Manager. A full description of the project may also be viewed from 8:00am-5:00pm at the address above. Comments may also be submitted via email at pbrixius@cityofcraig.org.

Objections must be prepared and submitted via email in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be sent to the Regional Environmental Officer Email, at CPFenvironmental@hud.gov. Potential objectors should contact CPFenvironmental@hud.gov to verify the last day of the objection period.

Date: 3/31/2026