

**United States Department of the Interior
Bureau of Land Management**

Arizona Strip Field Office
Grand Canyon-Parashant National Monument

Environmental Assessment

Imlay/Sullivan Tank AMP Grazing Permit Renewal

EA-AZ-130-2006-0001

I. INTRODUCTION

This Environmental Assessment (EA) analyzes the proposed renewal of the grazing permits for the Imlay/Sullivan Tank allotments, which were combined into one allotment management plan (AMP). The action culminates an evaluation conducted on the allotments under the Arizona BLM Standards for Rangeland Health and Guidelines for Grazing Management (S&Gs). In addition, this EA looks at the present allotment management, and determines if current grazing management practices would maintain desirable conditions and continue to allow improvement of public land resources, or if changes in grazing management for these allotments are necessary. This EA is intended to evaluate the findings of the Imlay and Sullivan Tank assessment as it relates to vegetation conditions and resource values in the allotments. This is done in an effort to balance demands placed on the resources by various authorized uses within the allotments.

Analysis of existing study data indicates that overall trends of most key forage plants were static with a few improving and few down due to drought (1999 to 2004), and past fires on certain key areas (1995 to 1998). Comparing pre-drought monitoring summaries helps to illustrate what influence climate has had on the seven key areas, instead of 17% of the key species showing a downward trend only 2% showed a downward trend. The Interdisciplinary Assessment Team (IAT) determined during the assessment process, that resource conditions on the allotments are making significant progress toward meeting the applicable Standards for Rangeland Health

Purpose and Need

The purpose and need of this action is to renew the grazing permits associated with the Imlay grazing allotment (#4817) and Sullivan Tank grazing allotment (#4816) for a period of ten years. The Imlay and Sullivan Tank grazing allotments are located 30 miles south-southwest of St. George, Utah, in the northwest portion of Arizona. They are both situated partially within the Grand Canyon-Parashant National Monument along the northeast boundary. Approximately two thirds of the AMP area lies within the monument, and is administered by Bureau of Land Managements Grand Canyon-Parashant National Monument.

Conformance with Land Use Plan

This proposal is found to be in conformance with the Arizona Strip District Resource Management Plan (RMP) dated January 1992, as amended. The RMP adopted resource specific activity plans from the Shivwits Grazing EIS (July 1980), including allotment management plans. The Shivwits Grazing EIS proposed that the Imlay/Sullivan Tank allotments should be managed under an intensive management grazing system.

Grand Canyon Parashant National Monument

Most of the public lands within Imlay and Sullivan Tank are within the newly designated Grand Canyon Parashant National Monument. Designation of the monument does not in and of itself, require modification of the current grazing practices. The presidential proclamation states that “Laws, regulations, and policies followed by the Bureau of Land Management in issuing and administering grazing leases on all lands under its jurisdiction shall continue to apply...”. However, Interim Management Guidelines (IM 2002-008, October 11, 2001) have been established to guide management while current planning efforts are under way. These guidelines postpone the implementation of new range improvement projects (fences, pipelines, vegetative treatments) until a new Resource Management Plan (RMP) is completed. Under the Antiquities Act, BLM must protect objects identified in the presidential proclamations that establish national monuments. Therefore, if BLM determines, through the current planning process or otherwise, that any monument objects are harmed by current management, then management (including permit conditions) will be modified accordingly.

Relationships to Statutes, Regulations, or other Plans

This action is in conformance with Arizona’s Standards and Guides, which were developed through a collaborative process involving the Arizona Resource Advisory Council and the Bureau of Land Management State Standards and Guidelines team. The Secretary of the Interior approved the Standards and Guidelines in April 1997. The Decision Record, signed by the BLM Arizona State Director (April 1997) provided for full implementation of the Standards and Guides in all Arizona BLM Land Use Plans

Grazing permit renewals are also provided for in 43 CFRs 4100 where the objectives of regulations are“...to promote healthy, sustainable rangeland ecosystems; to accelerate restoration and improvement of public rangelands to properly functioning conditions; to promote the orderly use,....; to establish efficient and effective administration of grazing of public rangelands;....”, and as provided for in the Land Use Plans in accordance with multiple-use objectives, requirements and provisions of established laws, regulations and BLM policies incorporating Desired Plant Community (DPC) objectives using the Ecological Site Index approach.

Grazing management practices on the Imlay/Sullivan Tank AMP are in conformance with Arizona Standards for Rangeland Health and Guidelines for Grazing Administration. These practices are intended to assist management in meeting the Standards for Rangeland Health.

Renewal of the Imlay and Sullivan Tank permits conforms to the President's National Energy Policy and would not have adverse energy impacts. This action would not deny energy projects, withdraw lands, close roads, or in any other way deny or limit access to mineral materials to support energy actions.

Issues raised relating to Standards for Rangeland Health

Identification of issues for the Imlay S&G evaluation were accomplished by the Rangeland Resources Team (RRT), Interdisciplinary Assessment Team (IAT), and livestock permittee during scoping on January 15, 2003. The issue scoping meeting for the Sullivan Tank portion of the AMP was held on March 31, 2004.

Issues brought forward relating to rangeland health at those meetings were:

- Noxious weeds, scotch thistle.
- Lack of herbaceous plants in old treatments and pinyon juniper stands. Sec 6, 7, & 8 north end of Hobble canyon and Sullivan Draw south of Sullivan Reservoir.
- Erosion in the bottoms. Sec 6, 7, & 8 north end of Hobble canyon and Sullivan Draw south of Sullivan Reservoir.

Current Planning Process

The Arizona Strip District Office is currently involved in a planning process that will result in three stand alone RMPs, one for each new National Monument and one for the Arizona Strip Field Office outside of the monuments. No grazing changes are currently anticipated for the Imlay/Sullivan Tank AMP. However, there may be modifications because of the new RMPs. The 10- year grazing permit, in part, states "This permit is subject to (A) modification, suspension or cancellation as required by land plans and applicable law; (B) annual review and to modification of terms and conditions as appropriate; ...". BLM may use these permit conditions to implement any changes required under the new RMPs.

II. PROPOSED ACTION AND ALTERNATIVES

Proposed Action (Renewal of the 10 Year Grazing Permit on Imlay/Sullivan Tank AMP)

The Proposed Action is to renew the grazing permits on the Imlay/Sullivan Tank AMP for a period of ten years with current terms and conditions. Under this alternative, BLM would:

- Cancel the existing annual permits (Table 2) and reissue term (ten year) grazing permits on the Imlay/Sullivan Tank AMP as listed in Table 1. Livestock grazing would occur during the season of use, and with the number of AUMs, identified in AMP. There would be no change to the current active grazing preference on each allotment.

- Consider, through the NEPA process new range improvements to assist in grazing practices and promote rangeland health.

Table 1 - Proposed Action Term (10 Year) Permit Issuance							
Allotment Name	Allotment Number	Livestock			Active AUMs	Public Land (acres)	% Public Land
		No.	Kind	Season of Use			
Imlay	4817	97	Cattle	10/01-02/28	457	15,534	95%
		97	Cattle	03/01-05/31	279		95%
Sullivan Tank	4816	57	Cattle	10/16-02/28	255	13,390	100%
		57	Cattle	03/01-06/15	201		100%

Table 2 – Annual Grazing Permit to be Cancelled							
Allotment Name	Allotment Number	Livestock			Active AUMs	Public Land (acres)	% Public Land
		No.	Kind	Season of Use			
Imlay	4817	97	Cattle	10/01-02/28	457	15,534	95%
		97	Cattle	03/01-05/31	279		95%
Sullivan Tank	4816	57	Cattle	10/16-02/28	255	13,390	100%
		57	Cattle	03/01-06/15	201		100%

Alternatives Considered But Rejected For Further Analysis

Alternatives are tiered to the Arizona Strip District RMP (January 1992) and the Shivwits Grazing EIS (July 1980) which was adopted into the RMP and are basically the same for this action. The Grazing EIS addressed five alternatives: Full Stocking with Management, Stocking Level by Condition Class, No Vegetation Manipulation, Elimination of Grazing on Public Lands, and Less Intensive Management of Livestock Grazing.

The following three alternatives were considered for this EA but rejected because they were already analyzed in the RMP, to which this document is tiered:

- **Full Stocking with Management alternative** would allow stocking at the estimated livestock carrying capacity of each allotment but otherwise would provide the same management as the proposed action, which is intensive management of 40 allotments and less intensive management on 10 allotments.
- **Stocking Level by Condition Class alternative** would set the stocking level based on the average condition and apparent trend of the allotment.

- **No Grazing Alternative (Elimination of Livestock Grazing on Public Lands).** The decision to authorize livestock grazing in this area and specifically on the Imlay/Sullivan Tank allotments is documented in the approved land use plan. The absence of new information or other land use plan decisions showing that continued livestock grazing would preclude BLM from meeting or making significant progress toward achieving land health standards renders the existing land use plan authorizing grazing valid. A no grazing alternative or not renewing a grazing permit would not conform to the land use plan. A plan amendment would be required before closing an allotment to livestock grazing.

The Grazing System Description for the Imlay/Sullivan Tank AMP

The Imlay AMP initially was developed in 1988 and revised in 1990 when the Sullivan Tank allotment was added to system to make it the Imlay/Sullivan Tank AMP.

The permittees run a cow-calf operation. The Imlay allotment is divided into two pastures (Hobble and Imlay) and is used in conjunction with the Sullivan Tank allotment (one pasture) under the Imlay/Sullivan Tank AMP. As a result, there are three pastures being used no more than three months each year during the grazing season (October to May). The following year the timing of use for each pasture is rotated. This grazing system assures that each pasture receives rest during the spring growing season one year in three. All three pastures are then rested from mid June through September of each year.

The two Grazing allotments combined under the one AMP define the grazing system as:

Allowing 154 Cattle from October 16 to June 9. Livestock may enter the allotments as early as October 1 or remain as late as June 15; however no more than a maximum of 1,190 AUMs may be used.

Terms and Conditions of Grazing Permit

Grazing would be in accordance with the grazing preference, livestock numbers, and season of use specified on the grazing permit. Billing for grazing use would be based on the actual use report, which is due on or before June 15 each year. Livestock may be moved 7 days before or after scheduled move dates, but not before October 1 or after June 15.

Desired Plant Community (DPC)

This EA also incorporates by reference the “Implementation of Standards for Rangeland Health and Guidelines for Grazing Administration, Imlay/Sullivan Tank AMP S&G Assessment” (2005)¹. The Imlay and Sullivan Tank Assessment list and evaluate achievement of the

¹Imlay/Sullivan Tank AMP S&G Assessment, available at the Bureau of Land Management, Arizona Strip Field Office, 345 E.

allotments DPC objectives. These DPC objectives listed below are expressed in species percent composition by weight and percent cover.

Imlay Allotment:

Key Area No. 1, located in the East pasture of Imlay allotment

Increase Sihy to between the range of 5 to 10% CBW
Increase Orhy to between the range of 5 to 10% CBW
Increase Hija to between the range of 10 to 15% CBW
Increase Agsm to between the range of 1 to 5% CBW
Maintain Artr to between the range of 0 to 10% CBW
Maintain Juos to between the range of 0-5% CBW
Maintaining forbs to between the range of 1 to 5% or above CBW
Maintain ground cover above 50%
Increase live vegetation cover (basal cover) to between 3 and 8% on perennial vegetation.
Increase canopy cover to between the range of 10 to 30% on perennial vegetation

Key Area No. 2, located in the Middle pasture of Imlay allotment

Increase Sihy to between the range of 5 to 10% CBW
Increase Orhy to between the range of 5 to 10% CBW
Increase Hija to between the range of 5 to 15% CBW
Increase Agsm to between the range of 10 to 20% CBW
Decrease Artr CBW from 63% to between the range of 1 to 15%
Maintain Juos to between the range of 2 to 5% CBW
Maintaining the forbs to between the range of 5 to 10% or above CBW
Maintain ground cover above 65%
Maintain live vegetation cover (basal cover) to between 5 and 10% on perennial vegetation.
Maintain canopy cover to between range of 25 to 35% on perennial vegetation

Key Area No. 3, located in the West pasture of Imlay allotment

Maintain Sihy to between the range of 5 to 10% CBW
Maintain Orhy to between the range of 1 to 5% CBW
Maintain Hija to between the range of 1 to 10% CBW
Maintaining Artr to between the range of 15 to 25% CBW
Maintaining Juos to between the range of 15 to 20% CBW
Maintaining the forbs to between the range of 1 to 5% CBW or above
Maintain ground cover above 55%
Increase live vegetation cover (basal cover) to between 3 and 8% on perennial vegetation.
Maintain canopy cover at range of 25 to 35% on perennial vegetation

Sullivan Tank Allotment:

Key Area No. 1, located in the east end of Sullivan Tank

Increase Sihy to between the range of 5 to 10% CBW
Increase Orhy to between the range of 5 to 10% CBW
Maintain Hija to between the range of 30 to 50% CBW
Maintain Spcr to between the range of 1 to 3% CBW
Maintain Artr to between the range of 0-15% CBW
Maintaining forbs to between the range of 5 to 10 percent CBW
Maintain ground cover above 65%
Maintain basal cover to between 5 to 10% on perennial vegetation
Increase canopy cover to between the range of 25 to 35% on perennial vegetation

Key Area No. 2, located in the south end of Sullivan Tank

Increase Sihy to between the range of 5 to 10% CBW
Increase Orhy to between the range of 5 to 10% CBW
Maintain Hija to between the range of 25 to 35% CBW
Increase Bogr to between the range of 1 to 5% CBW
Reduce Artr to between the range of 5 to 10% CBW
Maintaining forbs to between the range of 5 to 10 percent CBW
Maintain ground cover above 65%
Maintain basal cover to between 5 and 10% on perennial vegetation
Maintain canopy cover to between the range of 25 to 35% on perennial vegetation

Key Area No. 3, located in the northwest part of Sullivan Tank

Increase Sihy to between the range of 5 to 10% CBW
Increase Orhy to between the range of 5 to 10% CBW
Increase Pofe to between the range of 3 to 7% CBW
Increase Hija to between the range of 3 to 7% CBW
Maintain Artr to between the range of 5- 15% CBW
Maintain Come to between the range of 5 to 10% CBW
Maintaining forbs to between the range of 5 to 10 percent CBW
Maintain ground cover above 80%
Maintain basal cover to between 5 and 10% on perennial vegetation
Maintain canopy cover to between the range of 25 to 35% on perennial vegetation

Key Area No. 4, located in the northern mid part of Sullivan Tank

Maintain Sihy to between the range of 5 to 10% CBW
Increase Orhy to between the range of 5 to 10% CBW

Increase Pofe to between the range of 1 to 5% CBW
Maintain Hija to between the range of 40 to 50% CBW
Maintain Artr to between the range of 1-15% CBW
Maintain Juos to between the range of 1-3% CBW
Maintaining forbs to between the range of 5 to 10 percent CBW
Maintain ground cover above 65%
Maintain basal cover to between 5 and 10% on perennial vegetation
Maintain canopy cover to between the range of 35 to 45% on perennial vegetation

Monitoring

Monitoring would be accomplished to ensure that livestock management actions would result in significant progress toward fulfillment of the standards and significant progress toward conformance with guidelines for Arizona Standards for Rangeland Health (1997), and the criteria for meeting standards of rangeland health exist on the Imlay/Sullivan Tank grazing allotments as indicated by measurable attributes or indicator factors. (See document titled "Arizona Standards For Rangeland Health And Guidelines For Grazing Administration" 1997). Monitor the attributes or indicator factors using mostly the following technical references.

To monitor rangeland health conditions, key areas as defined in the *Monitoring* "Planning for Monitoring", "TR 4400-1", (1984) would be used. The key area would be used as an indicator area to reflect the effect of on the ground management on the site they represent. Each key area would be established based on a Range Site/Ecological Site (developed by the Natural Resource Conservation Service, (NRCS)) with a specific Potential Natural Community (PNC) and specific physical site characteristics. Knowing the PNC of the area, and using the ecological site descriptions as a guide, DPC objectives can be developed. The DPC then becomes the objectives by which management actions would be measured.

Dry Weight Rank (DWR) method of data collection would be used to monitor species composition. In addition, Pace Frequency and Step-Point studies would be used at each key area to detect changes of individual species and vegetative cover, which indicates a trend and status of basal and foliar cover. Pace Frequency, Step-Point and DWR would be completed on each key area every 3-6 years. DWR and Pace Frequency study methods are described in *Sampling Vegetation Attributes*, "Interagency Technical Reference 1734-4" (1996).

Livestock use on forage plants would be determined by conducting grazing utilization studies using the Grazed-Class Method as described in the *Utilization Studies and Residual Measurements* "Interagency Technical Reference 1734-3" (1996). Utilization studies would be completed annually in each grazing unit by BLM prior to and/or after livestock have been removed from the pasture. Study data would be compiled each year. Other information to be collected and compiled is precipitation, actual use, etc. All monitoring data would be used to evaluate current management and assist BLM in making management decisions that helps achieve vegetation objectives on the allotments.

Allotment compliance would be conducted annually on the allotments. Compliance monitoring assures terms and conditions of the permit and any other subsequent requirements attached to range improvement permits are being met.

The Interdisciplinary Assessment Team (IAT), during the assessment process based on analyses of these allotments monitoring data and supporting documentation contained in the Imlay/Sullivan Tank S&G Assessment Report (2005), determined that overall the resource conditions on these allotments are making significant progress toward meeting the applicable standards for rangeland health.

III. AFFECTED ENVIRONMENT

The following critical elements of the human environment or resources are not present or are not affected by the proposed action or alternatives:

- Wilderness
- Wild & Scenic Rivers
- Wetlands/Riparian Areas
- Areas of Critical Environmental Concern (ACEC's)
- Wild Horses and Burros
- Minerals
- Hazardous Materials
- Air Quality
- Native American Religious Concerns
- Water Quality, Drinking or Ground

The Imlay and Sullivan Tank grazing allotments are located 30 miles south of St. George, Utah, in the northwest portion of Arizona. It is situated partially within the Grand Canyon-Parashant National Monument along the northeast boundary. Approximately two thirds of the AMP area lies within the monument, and is administered by Bureau of Land Management's Grand Canyon-Parashant National Monument. These allotments are within the boundaries of T. 37 and 38 N., R. 12 and 13 W. The major topographical feature of the AMP area is Hobble Canyon and Sullivan Draw. Elevation ranges from a high of 6,000 feet in the southeast part of the AMP area to a low of 4,400 feet in the western half near Black Knoll Pond. These allotments produce sagebrush in the draws and juniper-cliffrose on the rolling hills.

The affected environment is tiered to the Arizona Strip District RMP (January 31, 1992), Affected Environment pages III-1 to III-58, and pages 41 to 92 of the Shivwits Grazing EIS (July, 1980) which was adopted into the RMP and are essentially the same for this action. Chapter 2 of the Shivwits Grazing EIS describes the environmental components likely to be impacted by the proposed action. Environmental components discussed in the EIS that might affect or be affected by the proposal are: Climate, Vegetation, Threatened and Endangered Plant Species, Riparian Vegetation, Soils, Water Resources, Animals (wildlife), Cultural Resources, Visual

Resources, and Land Uses including livestock grazing and recreation.

This EA also incorporates by reference the “Implementation of Standards for Rangeland Health and Guidelines for Grazing Administration, Imlay/Sullivan Tank AMP S&G Assessment” (2005)². This S&G Assessment describes the resources and issues applicable to the AMP area. See the Imlay/Sullivan Tank AMP S&G Assessment Appendix for other resource data and associated information.

Issues raised relating to Standards for Rangeland Health

- Noxious weeds, scotch thistle

In 2001, a few plants of scotch thistle were found along side a road in the middle of the Imlay grazing allotment. A field check during 2003 and 2004 for the scotch thistle resulted in none being found.

- Lack of herbaceous plants in old burns and juniper stands.

Concern exists that in some years there is a lack of herbaceous plants in the old burns. Based on the annuals present this was not the case this year. Annual production is based on timing, frequency, and amount of precipitation. As shown in key area number one, which was burned, and additional studies data collected in burned over areas, perennial plants are increasing; it just takes time. In the meantime, annuals usually abound if given adequate amounts of precipitation at the right time.

- Erosion in the bottoms

Some of the valley bottoms had excessive erosion particularly in areas where land treatment such as prescribed fire had taken place. Field examination and comparison of key area study indicated that there is now more ground cover present on these sites and washes are starting to heal. Positive ground cover improvement on these sites showed changes from base year ranging from 33 to 52% on key area #1 on the Imlay allotment, 39 to 66% on key area #1 on Sullivan Tank allotment. On other areas of the Sullivan Tank allotment, that had burned, the ground cover remained static at 92% on key area #3, and 70 to 68% on key area #4.

Climate

Average annual precipitation for most of the AMP area is approximately ~12", with most precipitation occurring during winter, as depicted by the data from two precipitation gauges

² Imlay/Sullivan Tank Allotment S&G Assessment, available at the Bureau of Land Management, Arizona Strip Field Office, 345 E. Riverside Drive, St. George, Utah 84790.

located just off the AMP area at opposite ends. One rain gauge is in on the east boundary between both allotments and the other is ¾ miles west of the northwest boundary of the Imlay allotment, these two nearest gauges are Sullivan Tank and Mud Mountain, which are used to interpret annual rainfall amounts for the AMP area.

The Sullivan Tank rain gauge located in T. 37 N., R. 12 W., Sec. 23, on the east boundary between both the Imlay and Sullivan Tank allotments, has an average precipitation of ~12.78" annually. Approximately 14 percent (1.81") comes in the fall, 38 percent (4.84") in the winter, 18 percent (2.24") in the spring, and 31 percent (3.90") in the summer.

The Mud Mountain rain gauge is located in T. 38 N., R. 14 W., Sec. 24, approximately ¾ miles west of the northwest corner of the Imlay allotment. Average precipitation is 14.05" annually. Approximately 16 percent (2.19") comes in the fall, 41 percent (5.81") in the winter, 17 percent (2.37") in the spring, and 26 percent (3.69") in the summer.

Data shows that drought has played a major role in vegetation changes particularly over the last five years. For the last six years, winter precipitation has been below average for the Sullivan Tank rain gauge. Summer average precipitation has been similar, as has the annual precipitation. The Mud Mountain rain gauge information shows similar drought conditions.

Vegetation

The principal vegetative types³ within these allotments are pinyon-juniper woodlands with associated sagebrush and grass understory then leaning toward the desert shrub type in Hobbie Canyon.

- The pinyon-juniper type includes pinyon, juniper, sagebrush, cliffrose, desert holly, banana yucca, blue grama, sand dropseed, squirrel tail, and a variety of forbs.
- The desert shrub vegetation type consists of some blackbrush, mixed in with pinyon-juniper, sagebrush, cliffrose, desert holly, Mormon tea, banana yucca, prickly pear and Cholla, galleta, sand dropseed, squirrel tail and various forbs.

These vegetative types consist of two dominant ecological sites⁴ that are part of the Major Land Resource Units, as defined by the NRCS. The limestone ridges and slopes are classified as Limestone Slopes 13-17" precipitation zone (pz), Clay Loam Upland (Gravelly) 13-17" pz, and Shallow Loamy 10-14" pz. The draws, swales, and bottoms are classified as Loamy Uplands 10-14" pz, Shallow Upland (Cal) 10-14" pz, and Loamy Bottom 10-14" pz, Shallow Sandy Loam 10-14" pz.

³ Shivwits Grazing Environmental Impact Statement

⁴ An ecological site is a distinctive kind of land that differs from other kinds in its ability to produce a characteristic plant community. Each ecological site is a product of all environmental factors responsible for its development. Each site is capable of producing and supporting a plant community typified by an association of species that differs from other ecological sites in species kind, proportion and total production.

Water Sources

Imlay/Sullivan Tank AMP contains:

- 3 fenced reservoirs
- 3 unfenced reservoirs
- 3 troughs on pipelines
- 1 trough as water haul

Threatened and Endangered (T&E) Species

There is no suitable habitat for any listed threatened or endangered species on these allotments. However, bald eagle (*Haliaeetus leucocephalus*), California condor (*Gymnogyps californianus*), and peregrine falcon (*Falco peregrinus anatum*) may occasionally fly over the area. There are no riparian areas that would provide habitat for the southwestern willow flycatcher (*Empidonax trailii extimus*). An experimental non-essential population (as defined under section 10J of the Endangered Species Act) of California condors was established on the Vermillion Cliffs in 1996. These birds may eventually forage on carrion within the allotments but have not yet been observed doing so.

BLM Sensitive and State Species of Concern

Ferruginous hawks (*Buteo regalis*) are known to forage over grassland habitat similar to that found on these allotments, though specific sightings have not been recorded for the area. Black-crowned night Heron (*Nycticorax nycticorax hoactli*) and snowy egrets (*Egretta thula brewsteri*) have occasionally been observed using stock tanks in the area, but have not been recorded on these allotments. A variety of sensitive bat species have been captured on neighboring allotments including Townsend's big-eared (*Corynorhinus townsendii*), spotted bats (*Euderma maculatum*), small-footed myotis (*Myotis ciliolabrum*), fringed myotis (*Myotis thysanodes*), and big free-tailed bats (*Nyctinomops macrotis*).

No other, federally listed T&E species are known to occur in the area covered by this EA.

Wildlife

Mule deer are the principal big game species. The Imlay and Sullivan Tank grazing allotments lies within the Arizona Game and Fish Department's (AGFD's) Game Management Unit 13B, which is a much larger area and contains a number of grazing allotments. Unit 13B extends east-west from the Nevada state line to the western edge of the Hurricane Rim and extends north-south from the Utah state line to the Colorado River. AGFD manages mule deer on a Game Management Unit, not an allotment basis. Their population data also is collected on a unit-wide basis.

Unit 13B is probably the most desirable unit for trophy mule deer hunters from which to draw a permit in Arizona and possibly in the intermountain west. This year, (2005) there were 72 general mule deer hunting permits. For the past several years, some of the largest bucks harvested in Arizona have been harvested in Unit 13B. Hunting is allowed in the Grand-Canyon-Parashant National Monument and most of these allotments lie within this monument.

In general, for the last several years the mule deer population has been considered stable to slightly increasing. The AGFD supplied deer count data in the past was obtained from a helicopter until 2002. Not using a helicopter in 2002, plus the current drought, may be reflected in the most recent 13B count, as the numbers appear slightly down (Appendix E.). In any event, the current deer population is much less than it was in the 1960s and 70s.

Non-game and small game wildlife found on these allotments are typical of the area, including a variety of small mammals, grassland birds, raptors, and reptiles. In late summer, large flocks of pinyon jays are often noted. Coyotes, bobcats, and mountain lions can be found in these allotments. All waters within this arid region are important for wildlife.

These allotments support a wide variety of wildlife. Common or notable species would include desert cottontail, black tailed jackrabbit, pinyon jays, golden eagles and red-tailed hawk, plus a variety of reptiles and small birds.

Migratory Birds

Migratory birds may occur seasonally on these allotments. However, a list of migratory birds has not been developed for these specific allotments. The Arizona Strip DEIS lists Special Status bird species that could occur in the GCPNM that are considered migratory. Mostly seasonal migrants, this list includes the northern goshawk (*Accipiter gentilis apache*), Western burrowing owl (*Athene cunicularia hypugea*), Ferruginous hawk (*Buteo regalis*), Peregrine falcon (*Falco peregrinus anatum*), California condor (*Gymnogyps californianus*), Bald eagle (*Haliaeetus leucocephalus*), Loggerhead shrike (*Lanius ludovicianus*), White-faced ibis (*Plegadis chihi*), Mexican spotted owl (*Strix occidentalis lucida*).

Soil

The only soils monitoring data for this area is the Phase 1 Watershed Conservation and Development Inventory of 1971-1973 (See Field Office Files 7300). It was based upon a general soils map and thus ended up as broad interpretations and averages over large areas. Other more specific and detailed soils information is as follows:

Soils (623) and ecological sites:

- 08 Barx fine sandy loam, 1 to 5 percent slopes, (fan terraces), mixed; Loamy Upland, 9" to 13"

- 18 Childers-Rizno association, 4 to 15 percent slopes, (plateaus), limestone and sandstone; Childers-Shallow Upland (calcareous), 9" to 13"ppt
- 38 Hobog-Tidwell family complex, 8 to 35 percent slopes, (plateau, mesa, ridge), limestone; Hobog and Tidwell-Limey Upland, 6" to 9"
- 45 Mellenthin-Rock outcrop-Torriorthents complex, 10 to 70 percent slopes (hills) Kaibab; Mellenthin-Shallow Loamy, 9" to 13"; Torriorthents-Breaks, 9" to 13"
- 51 Meriwhitica-Rock outcrop-Strych complex, 35 to 70 percent slopes, (cliffs, canyons) Callville & Redwall limestones; Meriwhitica-Breaks, 9" to 13"; Strych-Loamy Upland, 9" to 13"
- 60 Pocum-Childers-Ubank complex, 1 to 10 percent slopes, (mesa), basalt Shallow Upland (calcareous), 9" to 13" ppt
- 63 Radnik loam, 1 to 5 percent slopes (floodplain) mixed; Loamy Bottom, 9" to 13" ppt
- 73 Strych very gravelly loam, 2 to 10 percent slopes (fan) mixed; Loamy Upland 9" to 13"
- 73 Tanbark fam-Strych fam-RO complex, 10 to 40 percent slopes (mesa) Moenkopi, basalt; Tanbark and Strych Basalt Slopes (calcareous), 9" to 13"
- 93 Yumtheska-Katzine-Rock Outcrop complex, 2 to 30 percent slopes (hills) limestone; Yumtheska-Limestone Slopes (PJ-Woodland), 13" to 17"; Katzine-Loamy Upland (gravelly) PJ-Woodland, 13" to 17"
- 95 Yumtheska-Natank complex, 10 to 45 percent slopes (plateau, mesa) Yumtheska-Limestone Slopes (PJ-Woodland), 13" to 17"; Natank-Clay Loam Upland (gravelly) PJ-Woodland, 13" to 17"

Lithology:

The Imlay allotment consists of slopes from 2 to 70 percent. The east portion of Imlay is composed of limestone mesas. The extreme southwest is made up of basalt. The north and west parts are rock outcrops and consist of pinyon juniper forests.

The Sullivan Tank allotment consists of a plateau dissected by canyons and ravines in Kaibab limestone and shale

Cultural/Historical

Prehistoric and Historical sites exist throughout these allotments.

Visual Resources

Most of the allotments are in Visual Resource Management Class (VRM) Class IV, as classified by the 1992 RMP. VRM Class IV represents lands with low visual resource values when compared to others in the region. The very northwest tip of the Imlay allotment (1/3 mile wide by 3 miles long) is in a VRM Class II. Class II lands are categorized as having high visual resource value.

Livestock Grazing

The Imlay grazing allotment (#4817) is comprised of 15,534 acres of federal BLM land, and 480 acres of state land. The total number of active AUMs on the allotment is 734. The current season of use is 10/01 to 05/31.

The Sullivan Tank grazing allotment (#4816) is comprised of 13,390 acres of federal BLM land. The total number of active AUMs on the allotment is 456. The current season of use is 10/16 to 06/15.

Recreation Resources

The AMP area is considered to have recreation values for its geology, scenic view sheds, and remoteness. General recreation activities might include sightseeing, horseback riding, hiking, camping, hunting, photography, bird watching, and nature study.

Off Highway Vehicles: This AMP area falls in an area classified as Limited to Existing Roads and Trails.

Recreation Opportunity Spectrum: This AMP area was classified as having the following Recreation Spectrum Classes in it: Semi Primitive – Non Motorized, Semi Primitive - Motorized, and Roded Natural

Noxious Weeds

In 2001, a few scotch thistle plants were identified along a road in the middle of the Imlay allotment. No plants have since been found. These areas are monitored annually and any noxious weeds would be treated upon detection.

Socio/Economic

The economic revenue generated from the Arizona Strip has historically been ranching with a few gypsum/selenite mines and uranium operations. Nearby communities are supported by tourism (including outdoor recreation), construction and light industry. The social aspect involves remote, unpopulated settings with moderate to high opportunities for solitude.

IV. ENVIRONMENTAL IMPACTS

Only impacts that may result from implementing the proposed action are described in this EA. If an ecological component is not discussed, it should be assumed that the resource specialists have considered effects to the component and found the proposed action or alternatives would have minimal or no effects.

General effects from projects similar to the proposed action alternative are also described in the documents to which this EA is tiered.

This document incorporates by reference the Imlay/Sullivan Tank AMP S&G Assessment (2005), which provides a complete discussion, analysis, and summaries of the range resources and associated issues. Also, see the Imlay and Sullivan Tank S&G Assessment Appendix for specific resource data and other associated information.

Issues raised relating to Standards for Rangeland Health

- Noxious weeds, scotch thistle

In 2001, a few plants of Scotch thistle were found and treated, however, none were found during this evaluation process. However, implementing the Proposed Action would continue annual field checks for scotch thistle, and if found the field office has an aggressive weeds program and any occurrences of scotch thistle would receive treatment.

- Lack of herbaceous plants in old burns

The Imlay allotment S&G field visit on August 27, 2003, determined that there was an almost continuous presence of forbs at key area #1, which had been burned approximately six years ago. Key areas 2 & 3 contained 33% and 39% CBW for forbs in the 2003 monitoring studies, but were not old burns. In previously burned non-key areas seen from the road, especially going in to key area #1, the grass coverage looked very good and appeared to be expanding. The recent fires have removed much of the overstory shrubs and pinyon/juniper.

Annual production is based on timing, frequency, and amount of precipitation. As shown in key area number one, which was burned, and additional studies data collected in burned over areas, perennial plants are increasing. Annuals usually abound if given adequate amounts of precipitation at the right time.

A similar determination was made for the rest of the AMP area on the field trip to the Sullivan Tank allotment on June 30, 2004.

The IAT felt that these sites were meeting Standard Number One. The IAT did feel that due to land treatments, drought, sagebrush and pinyon-juniper encroachment that Standard Number 3 was not being met at many sites. However, new DPC objectives were established at the time of this assessment based on the site potential at each key area. Many of these objectives would not be attainable for several years. The IAT felt that lack of attainment for DPC objectives was due to vegetation treatments and drought. Current livestock grazing was not precluding attainment. Implementation of the Proposed Action would result in a positive short term as well as long-term benefit to the development of herbaceous plants in the old burn areas.

- Erosion in the bottoms

As a result of the field visits on August 27, 2003, and June 30, 2004, and examination of the monitoring data the IAT made the determination that erosion in the bottoms was decreasing. This decrease in erosion is due in part to vegetation treatments. The IAT also made the determination that these areas were meeting Standard Number One, but are not meeting Standard Number Three, based on the new DPC objectives established at the time of this assessment; but progression towards attainment was being made. Further, current livestock management is not precluding attainment, but the extended drought and other climatic influences are the major factors, which may necessitate adjustment to livestock numbers and season of use during drought periods. Implementation of the Proposed Action would not preclude attainment of the DPC objectives.

Climate

Implementing the Proposed Action would have no effect on the climate. However, the Proposed Action would allow affected resources to respond to the climate with improvement to these resources, as mentioned below in the vegetation section.

In response to drought conditions, BLM may modify the terms and conditions of a grazing permit (ie. number of cattle, turn out dates, removal dates, etc.) temporarily or on a more long-term basis. Most modifications are accomplished on a cooperative basis with the livestock permittee. However, if a permittee disagrees with BLM's assessment of the resource conditions or the necessary modifications, BLM may nevertheless issue a Full Force and Effect Grazing Decision to protect resources.

Vegetation

Grazing impacts on vegetation under the Proposed Action are mitigated by timing of use, duration of grazing, adjusting of stocking rates, and conformance with Standards and Guidelines for Grazing Management. The Proposed Action would have an established grazing rotation designed to allow each pasture a different season of rest during growing cycles, let cool and warm season grasses and browse to elongate their apical buds, build vigor, and achieve seed ripe.

The major vegetation component consists mainly of scattered pinyon-juniper with an associated understory of sagebrush, cliffrose, desert holly, blue grama, squirrel tail, sand dropseed, and a variety of forbs of the rolling hills, and sagebrush in the draws typical of the Great Basin ecological zone on the west side of the Arizona Strip District. The lower elevation area falls into Mojave Great Basin transition zone picking up some blackbrush, mixed in with pinyon-juniper, sagebrush, cliffrose, desert holly, Mormon tea, banana yucca, prickly pear, and cholla, galleta, sand dropseed, squirrel tail and various forbs.

Monitoring data (1981 to 2004) of the Imlay/Sullivan Tank AMP indicates that drought and fires have had impacts on trends. Fire has been an influence on key area #1 (1995) in the Imlay allotment, and key area #1 (1998), #3 (1998), and #4 (1995 & 1998). Drought (1999 to 2004)

has been an influence on all key areas. Still on the 7 key areas, 5 key forage species showed improving trends, 30 remained static, and 7 were down. Ground cover showed an improving trend on 5 of the 7 key areas and remaining static on 2. Live vegetative cover trend improved on 1 key area and remained static on the remaining 6. Comparing this data to the pre-drought monitoring summaries helps to illustrate what influence climatic has had on the seven key areas. Pre-drought summaries showed improving trend on 13 key forage species, 28 were static, with only 1 being in a downward trend.

Five to seven years of data even with the influence of fire suggest that current management has not precluded achievement of static to improving trends on key forage species, but that climatic change is a factor. Current management coupled with precipitation would allow objectives for the vegetation components to be met on these allotments. These vegetation components constitute the ecological sites upon which DPC objectives are based. Key areas are established on ecological sites and monitored to determine the species composition, the frequency of plant species, and the vegetative ground cover on the site.

PACE FREQUENCY TREND ANALYSIS						
ALLOTMENT:	IMLAY					
PASTURE:	EAST					
5/27/2005	KEY AREA	1				
COVER CATEGORIES	years plots were read					
	1982	1985	1988	1992	2003	Trend
Vegetation (basal cover)	2	3	7	6	1	Static
% Ground Cover	33	22	38	32	52	Up
FREQUENCY OF KEY SPECIES						
Orhy	2	17	6	6	0	Static
Sihy	11	36	11	12	1	Down
Agsm	1	3	2	3		Static
Hija	14	27	15	20	12	Static
Spcr		18	10	11	1	Static

PACE FREQUENCY TREND ANALYSIS								
ALLOTMENT:	IMLAY							
PASTURE:	MIDDLE							
5/27/2005	KEY AREA	2						
COVER CATEGORIES	years plots were read							
	1982	1984	1985	1989	1992	1997	2003	Trend
Vegetation (basal cover)	5	4	5	3	4	6	4	Static
% Ground Cover	46	55	46	42	41	46	82	Up
FREQUENCY OF KEY SPECIES								
Orhy	1	3	9	6	6	6		Static
Sihy	17	31	34	29	30	18	2	Down

Agsm	4	9	8	9	10	8		Down
Hija	7	11	10	18	20	24	0	Down
Spcr			1					Static

PACE FREQUENCY TREND ANALYSIS							
ALLOTMENT:	IMLAY						
PASTURE:	WEST						
5/27/2005	KEY AREA 3						
COVER CATEGORIES	years plots were read						
	1982	1985	1988	1992	1997	2003	Trend
Vegetation (basal cover)	4	2	4	4	6	3	Static
% Ground Cover	48	58	52	49	49	73	Up
FREQUENCY OF KEY SPECIES							
Orhy		4	6	7	9		Static
Sihy		19	14	15	17	10	Up
Hija		2	3	4	6	2	Static
Come	1	1	1	2	3		Static

PACE FREQUENCY TREND ANALYSIS							
ALLOTMENT:	SULLIVAN TANK						
PASTURE:							
5/27/2005	KEY AREA 1						
COVER CATEGORIES	years plots were read						
	1981	1985	1990	1993	2000	2004	Trend
Vegetation (basal cover)	7	9	8	7	3	4	Static
% Ground Cover	39	43	42	43	48	66	Up
FREQUENCY OF KEY SPECIES							
Orhy			1	1	2		Static
Sihy		11	14	13	16	2	Static
Agcr						0	Static
Poa						0	Static
Hija	74	54	52	56	56	46	Down
Spcr		8	9	10	9	1	Static
Bogr		3	5	4	3		Static

PACE FREQUENCY TREND ANALYSIS							
ALLOTMENT:	SULLIVAN TANK						
PASTURE:							
5/27/2005	KEY AREA 2						
COVER CATEGORIES	years plots were read						

	1981	1984	1985	1988	1993	2000	2004	Trend
Vegetation (basal cover)	7	9	8	7	6	6	6	Static
% Ground Cover	38	50	43	50	49	49	66	Up
FREQUENCY OF KEY SPECIES								
Orhy		1	4	4	4	2	1	Static
Sihy	6	21	16		8	22	9	Static
Agsm				2			1	Static
Seeded		11	6	7	3	10		Static
Hija	44	40	53	40	44	48	44	Static
Spcr	2	8		3	3	6		Down
Bogr		1		3	4	2		Static

PACE FREQUENCY TREND ANALYSIS							
ALLOTMENT:		SULLIVAN TANK					
PASTURE:							
5/27/2005	KEY AREA	3					
COVER CATEGORIES	years plots were read						
	1981	1985	1988	1993	2000	2004	Trend
Vegetation (basal cover)	3	3	7	8	8	3	Static
% Ground Cover	92	82	84	82	71	92	Static
FREQUENCY OF KEY SPECIES							
Orhy		2	5	6	4	1	Static
Sihy	1	20	18	20	23	9	Up
Agsm		0					Static
Poa	3	4	5	5	6	2	Static
Hija			2	4	2	0	Static
Spcr		3					Static
Epne					2		Static
Come	8	8	9	11	7	3	Static

PACE FREQUENCY TREND ANALYSIS							
ALLOTMENT:		SULLIVAN TANK					
PASTURE:							
5/27/2005	KEY AREA	4					
COVER CATEGORIES	years plots were read						
	1981	1984	1987	1993	2000	2004	Trend
Vegetation (basal cover)	4	9	7	8	7	9	Up
% Ground Cover	70	60	57	54	57	68	Static
FREQUENCY OF KEY SPECIES							
Orhy	1	5	8	10	12	8	Up
Sihy	6	34	49	52	49	26	Up

Poa	11	16	15	17	16	3	Down
Hija	43	42	33	37	33	58	Up
Spcr		2	1	2	2		Static
Bogr	1	0		1	2		Static

Utilization data from 1982-2000 has been compiled for this evaluation. The Key Species Grazed Class method was used to collect the data. Utilization is read at or around the designated key area for each pasture.

Utilization in excess of allowable levels (45% prior to AMP development in 1988 and 50% after) has decreased from the 1980's through the 1990's and into the 2000's. This change in utilization levels is contributed to better management under the AMP. The grazing system developed in 1988 on the Imlay allotment, which later in 1990 was revised adding the Sullivan Tank allotment to the system provided better management, changing the season-of-use from yearlong to winter spring and incorporated additional pasture rotations.

The table's below shows the highest utilization levels recorded on key plant species for the year the studies were completed and the potential AUMs. The shaded area shows where the limits were exceeded. Note that since the implementation of the 1990 AMP utilization has been at or below the authorized level.

Imlay Allotment																		
Key Area	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1997	1998	1999	2000	
1	23%	41%	40%	68%	72%	53%	36%	41%	47%	47%	45%	10%		30%			31%	
2	23%	32%	54%	58%	66%	36%	51%	53%	50%	44%	43%	32%			35%	27%	43%	
3		52%	63%	55%	48%	50%	45%	49%	49%	38%	41%	30%	17%		30%	29%	35%	
Actual AUMS (Potential AUMs*)				472 (347)	610 (424)	706 (666)	734 (720)	296 (279)	290 (290)	634 (674)	155 (172)	90 (141)	199 (585)	311	461 (768)	174 (249)	678 (1,169)	367 (427)

*Potential AUMs are developed using only the highest utilized key plant species. Authorized AUMs is equal to 734.

However, on the Imlay allotment the overall utilization for each key area for the evaluation period was key area #1, 33%; #2, 34%; and #3, 36%.

Sullivan Tank Allotment																			
Key Area	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	
#1	38%	31%	51%	4%	31%		27%	35%	43%	5%	18%	43%			32%	27%	19%		
#2	38%	15%	51%	39%	31%		14%	35%	43%			43%							
#3	36%		34%	26%	7%			9%	3%	5%	9%			32%	24%	19%			
#4	31%	31%	51%	4%	3%		27%	21%	27%			19%		19%	27%	12%			
Actual AUMS (Potential AUMs*)					472 (761)	610	706 (1,307)	734 (1,049)	296 (344)	290 (290)	634 (1,761)	155 (180)		90	199	311 (486)	461 (854)	174 (458)	678 (2,260)

*Potential AUMs are developed using only the highest utilized key plant species. Authorized AUMs is equal to 456.

However, on the Sullivan Tank allotment the overall utilization for each key area for the evaluation period was - key area #1, 17%; #2, 21%; #3, 15%, and #4, 18%.

Water Sources

Under the Proposed Action, existing water sources such as reservoirs pipelines and troughs would continue to be used and would be wildlife friendly.

Threatened and Endangered (T&E) Species

The Proposed Action would not affect any listed threatened or endangered species, because there is no suitable habitat for any of these species on the allotments. The bald eagle, California condor, or peregrine falcon may occasional fly over and they may eventually forage within the allotments, however none of these species have been documented or observed doing so. Therefore, the Proposed Action or Alternatives would have little impact on an occasional fly over by a bald eagle, California condor, or peregrine falcon.

BLM Sensitive and State Species of Concern

The Proposed Action would have little impact on BLM sensitive and state species of concern. Sensitive species are usually rare within at least a portion of their range and specific sightings have not been recorded for the area. These species include the avian species, Ferruginous hawk, Black-crowned Night Heron, and snowy egret and sensitive bat species such as Townsend's big eared, spotted bats, small-footed myotis, fringed myotis, and big free-tailed bats. Terrain on this AMP area is too steep and broken to serve as suitable habitat for ferruginous hawks.

Wildlife

The Proposed Action would have no impacts on big game or the other non-game wildlife found on these allotments. The Hurricane Valley area east of these allotments, provides habitat for a herd of pronghorn antelope (*Antilocarpa Americana*). Pronghorn however, have not been observed in the Imlay/Sullivan Tank AMP. These allotments are not considered suitable habitat for pronghorn due to the abundance of sagebrush and juniper trees. It is unlikely that pronghorn occur on these allotments.

Mule deer (*Odocoileus hemionus*) occur in limited numbers on these allotments. However, the area is not considered prime mule deer habitat, and winter range is not considered limiting in this area. The area is included within Game Management Unit (GMU) 13B.

Migratory Birds

Executive Order 13186 requires BLM and other federal agencies to work with the U.S. Fish and Wildlife Service to improve protection for migratory birds. Implementation of the proposed

action is not likely to adversely affect any species of migratory bird known or suspected to occur on these allotments. No take of any such species is anticipated.

Soil

Attributes making up the soil resource should remain stable or improve through implementation of the Proposed Action and the enforcement of the Arizona Standards and Guides process for permitted livestock grazing within the Imlay and Sullivan Tank grazing allotments. Grazing rotations associated with the Proposed Action allow for seasonal plant rest and vigor, allowing ground cover and litter to increase, thus protecting the soil. Utilization levels are within that allowable and current species and ground cover trends are mostly up or static.

Cultural Resources

There would be no impact to cultural or historical sites as a result of renewing this grazing permit under the Proposed Action. Cultural resources project file AZ BLM-100-2002-12 for the Imlay grazing allotment, and AZ BLM-100-2004-15 for the Sullivan Tank grazing allotment contains review documentation of compliance with Section 106 of the National Historic Preservation Act. Great efforts are made to avoid these sites during allotment project implementation. Further, archaeological inventory, evaluation, and avoidance or mitigation recommendations are completed prior to all project initiation.

Visual Resources

No adverse impacts on visual resources have been identified.

Livestock Grazing

Under the Proposed Action, the forage preference would remain active and livestock grazing would continue.

Recreation Resources

Recreation in the area is primarily composed of driving for pleasure, recreational OHV use (Limited to Existing Roads and Trails), horseback riding, hiking, backpacking, camping, hunting, photography, and nature study. No impact to recreation is expected from the Proposed Action or Alternative A.

Noxious Weeds

Implementing the proposed action would result in similar dissemination of noxious weeds as occurs now by livestock grazing. Dissemination of noxious weed seeds by other means (i.e., recreational activities such as hiking, horseback riding, hunting, ATV's, vehicles, and by birds and other wildlife etc.) would continue, regardless of livestock grazing. Inventories for noxious

weeds are conducted annually and any noxious weeds would be treated in an effort to eradicate or control.

Socio/Economic

Implementing the proposed action would not change the socio/economic structure associated with the Arizona Strip. The social aspect of providing remote, unpopulated settings with moderate to high opportunities for solitude would continue.

Cumulative Impacts

Cumulative Impacts are tiered to the Arizona Strip RMP (1992), Environmental Consequences pages IV-36 to IV-38, and to chapter 3 of the Shivwits Grazing EIS (1980), which was adopted into the RMP. Unavoidable Adverse Impacts, Relationship between Local Short-term Uses of Man's Environment, Maintenance and Enhancement of Long-term Productivity, and the Irreversible and Irrecoverable Commitments of Resources were discussed.

Cumulative impacts occur when additional management facilities are added to those already present. Grazing plans set specific objectives and include rangeland improvements that are designed to maintain or improve wildlife habitat, watershed, and overall resource conditions, thus improving ecosystem health.

Past, present, and reasonably foreseeable actions within the analysis area would continue to influence range resources, naturalness, aesthetics, watershed conditions, and trends. The impact of land treatments targeting woody species, voluntary livestock reductions during dry periods and implementation of a grazing system have improved range conditions. The net result has been greater species diversity, improved plant vigor, and increased ground cover from grasses and forbs. No cumulative impacts are predicted to the range resource as a result of the Proposed Action.

Residual Impacts

Residual Impacts are tiered to the Arizona Strip RMP (1992), Irreversible and Irrecoverable Commitments of Resources page 172 of the Shivwits Grazing EIS (1980), which was adopted into the RMP. Though the Proposed Action does not propose any new fences, it does allow for the existence of present fence lines, which do create some restrictions of free passage, but do not prevent or prohibit passage of mule deer. Nor are other forms of wildlife using the area restricted by existing fences.

There are no residual impacts, as a result, of the Proposed Action to the vegetative resource. Future maintenance of existing vegetation treatments would likely take place and would not affect additional acres beyond that done previously. Residual impacts from maintenance activities would be improve watershed conditions, wildlife habitat, and rangeland resources over time.

Monitoring

The monitoring addressed in the proposed action (pages 8-9) is sufficient to identify changes in vegetation as a result of livestock grazing activities. In addition to those methods described, there are efforts in place to inventory for noxious weed establishment, as well as monitor treated areas for treatment effectiveness. BLM weed specialist has the lead on monitoring and treating noxious weeds on the Arizona Strip. Training on identification and treatment as well as ways to reduce the spread of weeds is provided to BLM employees and permittees.

Annual allotment compliance would be included in monitoring conducted on these allotments. Compliance monitoring would assure terms and conditions of the permit are being met. Compliance checks would also monitor any special conditions or mitigation included in Cooperative Agreements, Section 4 Permits, or other grazing regulations.

Mitigation

When noxious weeds are located, various methods are used for their control depending on the size of the infestation and growth stage of the plants. The methods include but are not limited to:

- Physical or mechanical
- Biological
- Chemical or Cultural

If vegetative monitoring indicates current livestock grazing practices are causing non-attainment of resource objectives, BLM would modify the terms and conditions of a grazing permit (i.e., number of cattle, turn out dates, removal dates, etc.) temporarily or on a more long-term basis. Most modifications are accomplished on a cooperative basis with the livestock permittee. However, if a permittee disagrees with BLM's assessment of the resource conditions or the necessary modifications, BLM may nevertheless issue a Full Force and Effect Grazing Decision to protect resources.

V. CONSULTATION AND COORDINATION

This EA was prepared by the Bureau of Land Management, Arizona Strip Field Office, 345 E. Riverside Drive, St. George, UT 84790. Phone (435) 688-3200. Public involvement for the Imlay part of the S&G evaluation began on January 15, 2003 and the Sullivan Tank portion March 31, 2004. Rangeland health issues were raised at the public scoping meeting; therefore, an assessment field trip to the allotments was conducted on August 27, 2003 for the Imlay allotment and June 30, 2004 for the Sullivan Tank allotment. The Rangeland Resources Team (RRT) that was appointed by the Arizona Resource Advisory Council assisted the Interdisciplinary Assessment Team (IAT). A final evaluation document was sent out for public review and comment to Individuals, Groups, and Agencies. Comments from Individuals, Groups, and Agencies, were considered in preparation of this EA.

Interdisciplinary Assessment Team (IAT)

Linda Price, Project Coordinator

Phil Seegmiller, Range/Grazing

John Herron, Archaeologist

Robert Smith, Soils, Watershed

Michelle Bailey, Wilderness/Recreation

Larry Gearhart, Wilderness/Recreation

Mike Small, Wildlife Biologist

Robert Price, Field Supervisor,

Arizona Game and Fish Department

Internal Reviewers:

Gloria Benson, Native American Coordinator

Tom Folks, Recreation

Laurie Ford, Lands/Realty/Minerals

Mike Small, Wildlife

John Herron, Cultural

Kathleen Harcksen, Assist. Monument Manager

Michael Herder, Wildlife

Linda Price, S&G Coordinator

Bob Sandberg, Range

Ron Wadsworth, Law Enforcement

Richard Spotts, Environmental Coordinator

Lee Hughes, T/E Plants

Dennis Curtis, GCPNM Manager

Ray Klein, GCPNM Supervisory Ranger



**UNITED STATES DEPARTMENT OF THE INTERIOR
GRAND CANYON-PARASHANT NATIONAL MONUMENT**

**345 East Riverside Drive
St. George, Utah 84790**

Phone: (435) 688-3345 Fax: (435) 688-3388

**In Reply Refer To:
(4110) (130)**

March 12, 2007

**Certified #
RETURN RECEIPT REQUESTED**

NOTICE OF PROPOSED DECISION

Dear interested public:

BACKGROUND/INTRODUCTION

On April 28, 1997, Arizona Standards for Rangeland Health and Guidelines for Grazing Administration (S&Gs) were approved by the Secretary of the Interior and adopted into all Land Use Plans in Arizona as indicated by the Decision Record for the Statewide Amendment.

The Standards and Guidelines (S&G) Assessment, was scheduled to take place during the year of 2003 for the Imlay allotment and 2004 for the Sullivan Tank allotment.

The 1998 LUP mailing list was used to determine what stake holders and interested publics may be interested in the Imlay (#4817) and Sullivan Tank (#4816) evaluations and to provide any allotment-specific resource data that would assist BLM in analyzing resource conditions on the allotments. In addition, all stakeholders and interested publics were invited to attend scoping meetings to help identify resource management issues for the allotment evaluations. The scoping meeting for the Imlay allotment was January 15, 2003, followed by a field visit on August 27, 2003. The issue-scoping meeting for the Sullivan Tank allotment was held on March 31, 2004, followed by a field visit on June 30, 2004.

Since the two allotments are covered by one allotment management plan (AMP), one evaluation was completed on the whole AMP area. The evaluation was completed by an interdisciplinary assessment team (IAT) of resource specialists from the Bureau of Land Management (BLM). The IAT also considered recommendations from the Rangeland Resource Team (RRT) through the land health assessment process. RRTs were established under the charter of the Resource Advisory Council and are involved during the S&G Assessment process for permit/lease renewals. Recommendations were considered from the RRTs, which represented a variety of commodity, environmental and recreational interests, to assist in the interdisciplinary assessment of Standards for Rangeland Health.

On August 15, 2005, the Imlay/Sullivan Tank rangeland health evaluation was signed. On August 22, 2005, the evaluation was sent out for a thirty-day public review and comment, to 75 individuals, groups and agencies. Comments from stakeholders and various interested publics along with analysis of the proposed action including terms and conditions for the grazing permit renewal were addressed by the interdisciplinary assessment team in EA-AZ-130-2006-0001 and Finding of no Significant Impact.

The Imlay/Sullivan Tank Standards Assessment and allotment evaluation was conducted in accordance with the direction set forth in the Washington Office Instruction Memorandum No. 98-91 for implementation of Standards for Rangeland Health and Guidelines for Grazing Administration. The evaluation revealed that renewing the grazing permits for a period of ten years conforms to the applicable land use plans and amendments.

About two thirds of the Imlay and Sullivan Tank allotments are within the Grand Canyon Parashant National Monument, the other third is within the Arizona Strip Field Office.

PROPOSED DECISION

In accordance with 43 CFR 4130.2, and based upon the allotment evaluation, consultation with affected permittees, interested publics, rangeland resource team and recommendations from the interdisciplinary assessment team, it is my proposed decision to authorize grazing permits, to the extent of 734 AUMs on the Imlay allotment, and 456 AUMs on the Sullivan Tank allotment, for a period of ten years in accordance with the following terms and conditions addressed in EA-AZ-130-2006-0001.

Grazing Permit:

Grazing preference, including active and suspended use								
Allotment Name	Allotment Number	Livestock			Active AUMs	Public Land (acres)	% Public Land	Susp. Pref. AUMs
		No.	Kind	Season of Use				
Imlay	4817	97	Cattle	10/01-05/31	736	15,534	95%	646
Sullivan Tank	4816	57	Cattle	10/16-06/15	456	13,390	100%	518

Terms and Conditions:

The following terms and conditions become effective upon acceptance of the permit.

- Livestock grazing will be in accordance with the Imlay/Sullivan Tank Allotment Management Plan (AMP), developed in 1988; and revised 1990.
- The season of use for the Imlay allotment will be from October 1st through June 15th. Season of use for the Sullivan Tank allotment will be from October 1st through June 15th.
- Livestock may be moved into or out of the allotment 7 days before or after scheduled move dates outlined in the AMP, but not before October 1st or later than June 15th.

- Billing for grazing use will be based on the Actual Use Report, which is due on or before July 1st each year.
- Associated maintenance of facilities and improvements relevant to the grazing operation will be required and authorized.

Monitoring:

- Desired Plant Community (DPC) and vegetation cover objectives as listed in the A&G Assessment will be monitored to determine trends.
- Monitoring utilization of upland key forage plant species over time on the allotment to ensure average utilization of key herbaceous forage species does not exceed 50%. Utilization goals and guidelines are stated for each key area. Utilization guidelines are intended to indicate a level of use to be achieved over the short and long term. Utilization data collected over a period-of-time will be used along with analysis of frequency, cover, structure, actual use reports, precipitation, and desired plant community data to determine if changes in levels of use and current management practices are necessary.
- Livestock use levels will be adjusted as necessary, based on the results of monitoring data, to balance the AUMs between the pastures of the Imlay/Sullivan Tank allotments.
- If measures of annual use indicate that the current grazing intensity or strategy is not being achieved or is inconsistent with achieving the desired resource objectives in key management areas as shown in the allotment evaluation, then BLM would modify the terms and conditions of a grazing permit (i.e., number of cattle, turn out dates, removal dates, etc.) temporarily or on a more long-term basis. Most modifications are accomplished on a cooperative basis with the livestock permittee. However, if a permittee disagrees with BLM's assessment of the resource conditions or the necessary modifications, BLM may nevertheless issue a Full Force and Effect Grazing Decision to protect resources.

RATIONALE:

The Imlay/Sullivan Tank Standards Assessment and evaluation were conducted in accordance with the direction set forth in the Washington Office Instruction Memorandum No. 98-91 for implementation of Standards for Rangeland Health and Guidelines for Grazing Administration. The evaluation supported issuance of a grazing permit, for a period of ten-years, which conformed to the applicable land use plans and amendments. The existing NEPA documentation adequately addresses the proposed action of renewing the 10-year grazing permit.

In accordance with Bureau policy and regulations, all applicable monitoring data were examined and evaluated in order to determine attainment and progress towards meeting Arizona Standards for Rangeland Health and other land use plan objectives. Analysis of data indicated that the Land Use Planning (LUP) Objectives are being met. LUP Objectives pertaining to DPC's are being met and they assure rangeland health, state water quality standards, and habitat for: endangered, threatened, and sensitive species, as well as other wildlife, is being maintained and improved. Issues identified at the public scoping meeting were analyzed in the assessment and it was determined that current management is not a factor in preventing attainment of standards. A review of the resource data revealed that the

allotment is making significant progress toward meeting the applicable standards for rangeland health. Standard #1 is being met on all 28,924 acres on the AMP area. Standard #2 is not applicable (there are no riparian areas in the allotment). Standard #3 pertaining to key area DPC objectives for the allotment is being met on all 28,924 acres.

The proposed action conforms to the Arizona Strip Resource Management Plan (Land Use Plan) dated January 31, 1992, as amended, and the Grand Canyon-Parashant National Monument Proclamation and interim management policy. Designation of the monument does not, in and of itself, require modification of the current grazing practices. The presidential proclamation states that “Laws, regulations, and policies followed by the Bureau of Land Management in issuing and administering grazing leases on all lands under its jurisdiction shall continue to apply...”. Therefore, the renewal of grazing permits within the Grand Canyon Parashant National is consistent with the Monument Proclamation. Under the Antiquities Act, BLM must protect objects identified in the presidential proclamations that establish national monuments. If BLM determines, through the current planning process or otherwise, that any monument objects are harmed by current management, then management (including permit conditions) will be modified accordingly.

The NEPA documentation covers the proposed action and alternatives, which constitute BLM’s compliance with the requirements of NEPA, and procedural requirements as, provided in the CEQ regulations. Based on the analysis of potential environmental impacts contained in the EA/FONSI, EA-AZ-130-2006-0001, public involvement throughout the analysis, and all other information available, impacts from implementing the proposed action are not expected to be significant. Further, the Proposed Action would allow for continued improvement to the health of public land resources, such as soil, water, vegetation, wildlife habitat, and wildlife and other resource values.

AUTHORITY

The authority for this decision is contained in Title 43 of the Code of Federal Regulations (C.F.R.), as amended, effective August 11, 2006, and as modified to reflect injunctive relief granted on August 11, 2006 in Western Watersheds Project V. Kraayenbrink, Civ. No. 05-297-E -BLW (D. Idaho) and Maughan v. Rosenkrance, Civ. No. 06-275-E-BLW (D. Idaho) and on September 25, 2006 in WWP v. Kraayenbrink Civ. No. 05-297 (D. Idaho), which states in pertinent subparts and sections:

4100.0-8 “The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and in accordance with applicable land use plans. Land use plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0–5(b).”

4110.2-4 “After consultation, cooperation, and coordination with the affected grazing permittees or lessees, the interested public and the state having lands or responsible for managing resources within the area, the authorized officer may designate and adjust grazing allotment boundaries. The authorized officer may combine or divide allotments, through an agreement or by decision, when necessary for the proper and efficient management of public rangelands.”

4110.3(a) “The authorized officer shall periodically review the grazing preference specified in a grazing permit or lease and make changes in the grazing preference as needed to: (1) Manage, maintain or improve rangeland productivity; (2) Assist in making progress towards restoring ecosystems to properly functioning conditions; (3) Conform with land use plans or activity plans; or, (4) Comply with the provisions of subpart 4180 of this part.”

4110.3-3(a)(1) “After consultation, cooperation, and coordination with the affected permittee or lessee, the interested public and the state having lands or managing resources within the area, the authorized officer will implement changes in active use through a documented agreement or by a decision.”

4120.3-1(a) “Range improvements shall be installed, used, maintained, and/or modified on the public lands, or removed from these lands, in a manner consistent with multiple-use management.”

4120.3-1(f) “. . . The decision document following the environmental analysis will be issued in accordance with §4160.1.”

4120.3-2 “(a) The Bureau of Land Management may enter into a cooperative range improvement agreement with a person, . . . for the installation, use, maintenance, and/or modification of permanent range improvements or rangeland developments . . .” “(b) Subject to valid existing rights, title to permanent range improvements such as fences, wells, and pipelines where authorization is granted after August 21, 1995 shall be in the name of the United States. The authorization for all new permanent water developments such as spring developments, wells, reservoirs, stock tanks, and pipelines will be through cooperative range improvement agreements. The authorized officer will document a permittee's or lessee's interest in contributed funds, labor, and materials to ensure proper credit for the purposes of §§4120.3–5 and 4120.3–6(c).”

4130.2(a) “Grazing permits or leases authorize use on the public lands and other BLM-administered lands that are designated in land use plans as available for livestock grazing. Permits and leases will specify the grazing preference, including active and suspended use. These grazing permits and leases will also specify terms and conditions pursuant to §§ 4130.3, 4130.3–1, and 4130.3–2.”

4130.2(b) “The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the interested public and the state having lands or responsibility for managing resources within the area before issuing or renewing grazing permits and leases.”

4130.2(d) “The term of grazing permits or leases authorizing livestock grazing on the public lands and other lands under the administration of the Bureau of Land Management shall be 10 years . . .”

4130.3(a) “Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to be appropriate to achieve management and resource condition objectives for the public lands and other lands administered by the Bureau of Land Management, and to ensure conformance with the provisions of subpart 4180 of this part.”

4130.3(c) “If any term or condition of a BLM-offered permit or lease is stayed pending appeal, BLM will authorize grazing use as provided in § 4160.4 with respect to the stayed term or condition.”

4130.3-1 “(a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, for every grazing permit or

lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment. (b) All permits and leases shall be made subject to cancellation, suspension, or modification for any violation of these regulations or of any term or condition of the permit or lease. (c) Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part.”

4130.3-2 “The authorized officer may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands.”

4130.3-2(g) “The percentage of public land use determined by the proportion of livestock forage available on public lands within the allotment compared to the total amount available from both public lands and those owned or controlled by the permittee . . .”

4130.3-3 (a) “Following consultation, cooperation, and coordination with the affected lessees or permittees, the interested public and the State having lands or responsible for managing resources within the area, the authorized officer may modify terms and conditions of the permit . . .”

4160.1(a) “Proposed decisions shall be served on any affected applicant, permittee or lessee, and any agent and lien holder of record, who is affected by the proposed actions, terms or conditions, or modifications relating to applications, permits and agreements (including range improvement permits) or leases, by certified mail or personal delivery. Copies of proposed decisions shall also be sent to the interested public.”

4160.2 “Any applicant, permittee, lessee or other interested public may protest the proposed decision under §4160.1 of this title in person or in writing to the authorized officer within 15 days after receipt of such decision.”

4180.2(c)(1) “The authorized officer shall take appropriate action as soon as practicable but not later than the start of the next grazing year upon determining that existing grazing management practices or levels of grazing use on public lands are significant factors in failing to achieve the standards and conform with the guidelines that are made effective under this section. Appropriate action means implementing actions pursuant to subparts 4110, 4120, 4130, and 4160 of this part that will result in significant progress toward fulfillment of the standards and significant progress toward conformance with the guidelines. Practices and activities subject to standards and guidelines include the development of grazing-related portions of activity plans, establishment of terms and conditions of permits, leases and other grazing authorizations, and range improvement activities such as vegetation manipulation, fence construction and development of water.”

RIGHT OF PROTEST AND/OR APPEAL

Any applicant, permittee, lessee or other affected interests may protest the proposed decision under 43 CFR 4160.1 in person or in writing to the authorized officer, Dennis Curtis, Monument Manager, Grand Canyon-Parashant National Monument, at 345 East Riverside Dr., St. George, Utah 84790, within 15 days after receipt of such decision. The protest, if filed, should clearly and concisely state the reason(s) as to why the proposed decision is in error.

In the absence of a protest, the proposed decision will become the final decision of the authorized officer without further notice. Any applicant, permittee, lessee or other person whose interest is adversely

affected by the final decision may file an appeal and petition for stay of the decision pending final determination on appeal under 43 CFR 4160.4, 4.21 and must follow the requirements set forth in 4.470 through 4.480 of this title. The appeal and petition for stay must be filed in the office of the authorized officer, as noted above, within 30 days following receipt of the final decision, or 30 days after the date the proposed decision becomes final as provided in §4160.3(a).

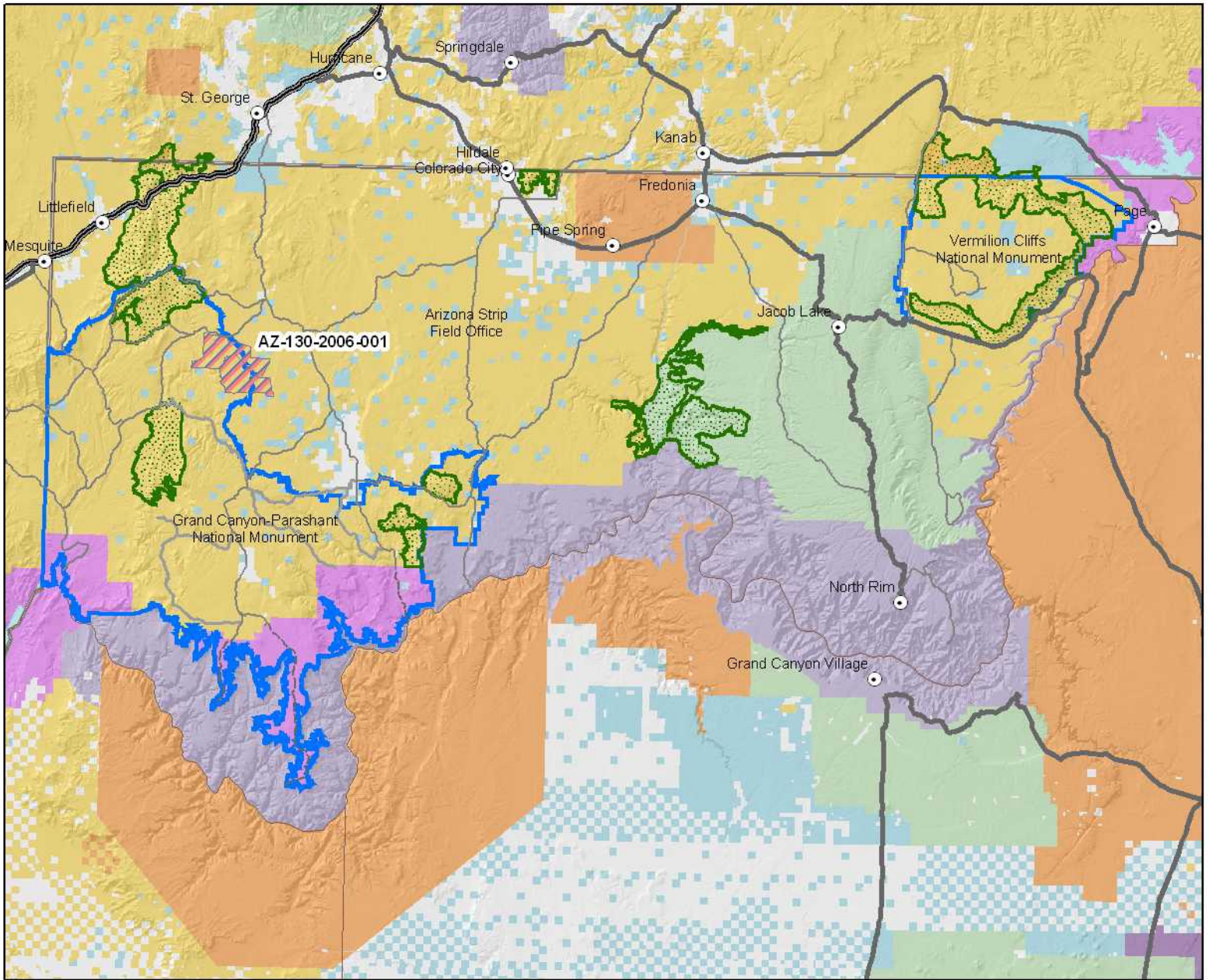
The appeal shall comply with the provisions of 43 CFR 4.470 and state the reasons, clearly and concisely, why the appellant thinks the final decision is in error. When filing a petition for stay, the appellant must show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied.
- (2) The likelihood of the appellant's success on the merits.
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors the stay.

As noted above the petition for stay must be filed in the office of the authorized officer.

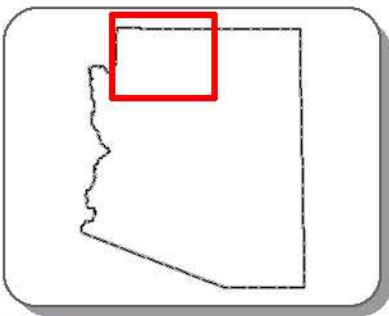
Sincerely,

/s/ Dennis Curtis
Dennis Curtis, Monument Manager
Grand Canyon-Parashant National Monument

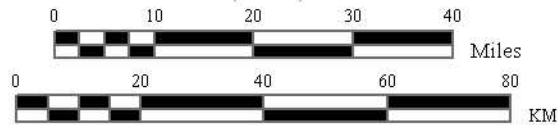


Legend

- | | | | |
|-----------------------|---------------------------|--------------------------|----------------------------|
| Area of NEPA Project | Bureau of Land Management | National Park Service | National Forest |
| Designated Wilderness | State Lands | National Recreation Area | National Forest Wilderness |
| Monuments | Private Lands | Indian Lands | Military Reservation |



1:1,223,589



CAUTION:

Land ownership data is derived from less accurate data than the 1:24,000 scale base map. Therefore, land ownership may not be shown for parcels smaller than 40 acres, and land ownership lines may have plotting errors due to source data.

No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

