

**Decision Memorandum on Action and for Application of:**  
**Categorical Exclusion 1.12 – Hazardous Fuels Reduction Activities**  
**Andrus Prescribed Burn Ecosystem Restoration Project/Hazardous Fuels Reduction**

**US Department of the Interior**  
**Bureau of Land Management**  
**Parashant National Monument**  
**Mohave County, Arizona**

### **Project Description**

The Andrus Project is an effort to reintroduce moderate to high intensity fire into a pinyon-juniper/sagebrush woodland in order to reduce hazardous fuels and restore ecosystem function and condition. The treatment unit is within the Parashant National Monument near the BLM/NPS boundary. The 2,972 acre unit (attached map) is best characterized as pinyon, juniper, oak, shrubs, forbs, and grasses. The proposed treatment would be combined with a similar treatment on the adjacent NPS managed lands of the Monument.

Prior to initiating operations, BLM would conduct surveys and inventories of cultural and biological resources, as necessary. BLM would then prepare the units for burning, and then apply moderate to high intensity understory fire. BLM would rehabilitate surface disturbance after burning operations are completed. BLM would conduct post-treatment monitoring of treatment effects.

### Burn Preparation

BLM would use handtools, including chainsaws, to prepare the units for burning. Burn preparation consists of removing duff/litter concentrations and ladder fuels around significant features such as fences, signs, corrals, and sensitive cultural or biological resources. The units would not be thinned mechanically except within approximately 30 feet of such features (less than 5% of the project area). Crews would rake around these features, and cut, lop, and scatter smaller diameter, post-settlement trees and brush. Short sections of fireline would be constructed as necessary to prevent the spread of fire outside of unit boundaries. Fireline is not needed in most areas where bare soil, roads, or trails serve as an effective barrier. Where fireline is constructed (less than two miles for the project) it would be the minimum necessary – usually consisting of a 1-3 ft wide handline with a 10 ft wide sawline on each side. All stumps would be flush cut and camouflaged to reduce visual impacts.

Range and wildlife developments (e.g. fences, corrals) and the cabin at Tungsten Spring would be prepped to reduce their likelihood of damage from fire, and caution would be used during firing operations to ensure that developments are not damaged.

### Prescribed Fire

During the spring, summer or early fall, fire would be introduced into the unit using a combination of hand-held, vehicle-mounted, and/or aerial ignition devices, including helitorch and plastic sphere dispenser, in accordance with an approved burn plan. Managers would use a combination of ignition devices, patterns, and appropriate prescriptions to create a moderate to high intensity broadcast burn to remove woody species. The entire unit would not be ignited, and portions would be left untreated to create a diverse mosaic of vegetative conditions. Ignition patterns would be used to avoid cliffrose and other browse species along ridgelines to the extent possible.

This unit could be treated in cooperation with the NPS-administered portion of the Monument. BLM would analyze smoke production and dispersal patterns and apply for a Smoke Permit from the Arizona Department of Environmental Quality, and would not burn unless permitted by the State.

### Monitoring/Research

Prior to burning BLM would monitor fuel conditions on the units, measuring fuel moistures, and estimating fuel density. During the burn operations BLM would monitor fire behavior. BLM would implement pre-project

vegetation monitoring (including photo plots) to establish baseline grass/forb conditions and post-burn monitoring to evaluate treatment effectiveness (objectives).

There are ongoing USGS research efforts in the area, focusing mostly on the relationship between fire and cheatgrass. BLM would authorize non-intrusive USGS research efforts in the treatment unit.

### **Legal land description**

- ❑ T. 33 N., R. 10 W., secs. 7, 8, 9, 14-18
- ❑ T. 33 N., R. 11 W., sec 12 (Maps showing project location attached)

### **Purpose and Need for the Action**

Various studies have shown that sagebrush and pinyon-juniper vegetation communities have been negatively altered due to fire suppression activities during the last 50 years. Prescribed fire can be used to meet the resource management objectives of reintroducing natural processes in the area, restoring forest woodland and grassland communities, creating habitat mosaic, and reducing hazard fuel accumulation.

### **Purpose and Need**

The primary purposes of the vegetation treatment are to reduce hazardous fuels; restore fire as a natural process; restore natural fuel loadings and ecosystem structure in vegetative communities that have been altered by past management activities; increase biodiversity and promote the establishment of native grasses and forbs to aid in preventing soil erosion and increase wildlife forage; and, to restore wildlife habitat and increase potential habitat for sensitive species.

The goals of the project are:

Restore ecosystem function and condition

Reintroduce fire into the ecosystem

Remove/reduce hazardous fuels

Limit conflicts with visitors by avoiding burning during hunting seasons

Minimize impacts on cultural resources

Minimize impacts on wildlife and special status species (plants and animals)

Specific burn objectives are:

Reduce woody litter and duff by 10-50% immediately postburn

Reduce live trees and shrubs by 20-40% within two years postburn

Increase native grass and forb cover by 5-25% within five years postburn

Keep the prescribed burn within the Maximum Manageable Area

Limit smoke impacts on the Grand Canyon, private lands, and wilderness to levels permitted by ADEQ

Limit damage to structures such as fences to less than 5%

Limit damage to historic structures, nearby private lands, and structures on private lands to 0%

**Other agency involvements**

The National Park Service, Lake Mead NRA will conduct cultural inventories through an assistance agreement with BLM. The National Weather Service would provide weather forecast information. The State of Arizona Department of Environmental Quality would review applications for smoke permits and grant them, as appropriate.

**Plan Conformance**

The Proposed Action is consistent with the 1992 Arizona Strip Resource Management Plan, as amended. The Proposed Action was designed in conformance with all bureau standards and incorporates appropriate guidelines for specific required and desired conditions relevant to project activities.

FW04 In forest management activities, ensure protection of natural aesthetics, recreation, special status species, cultural resources, and other multiple-use values.

The proposed action is in conformance with the following decisions as found in the Arizona Strip District RMP Implementation Plan of 1992 (Shivwits):

AFFECTED RESOURCE	DECISION NUMBER
Forest Resources	FW02, 06, 07, 15
Woodland Resources	FW03, 09, 19
Grazing Management	GZ01, 21
Recreation Resources	RR06, 13-1,3
Special Status Species	TE01, 02, 03
Soil, Water, Air Resources	WS01, 16, 20
Wildlife Resources	WL02
Transportation/Access	TA03

The proposal is consistent with the Parashant Interdisciplinary Plan (BLM/NPS, 1997), which states:

**Objective C** *Restore fire regimes to highest priority designated areas (based on Ecological Site Inventory and other planning) within the Parashant Area by the year 2000. Restore to other areas on an ongoing basis.*  
*Rationale: Past and present fire suppression activities have resulted in unnatural ecosystem diversity and fuel build-up. Implementing this objective will restore the role of fire in the ecosystems.*

*Actions: C1. a. Prepare and implement Prescribed Fire Plans within one year of plan approval.*  
*Rationale: This action will provide methodology to restore the natural role of fire and use it as a tool to meet resource management objectives.*

The proposal is consistent with the National Monument Interim Management Guidance (BLM Instruction Memorandum No. 2002-008), which states:

**Vegetation Manipulation:** *Vegetation manipulation should proceed only when consistent with conservation and protection of the national conservation area or monument’s resources. Chaining and other vegetation manipulation methods that cause substantial surface disturbance shall not be permitted.*

The proposal is not inconsistent with the Proclamation for the Parashant National Monument (2000), which is silent on the issue of prescribed burning, but does direct the BLM and NPS to manage the Monument to protect Monument objects, which includes vegetation communities that are at risk from catastrophic wildfires and other threats.

## Compliance with the National Environmental Policy Act

The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 516 DM 2, Appendix 1, 1.12, because the project is outside Wilderness and Wilderness Study Areas (WSAs), does not include any herbicide or pesticide use, requires no permanent road construction and the sale of vegetative material is not the primary purpose. The area is in Condition Class 3. The proposed project involves 2,972 acres of hazardous fuels reduction and prescribed fire treatment.

The application of this categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects which may significantly affect the environment. These extraordinary circumstances are contained in 516 DM 2, Appendix 2, and will be addressed below in the Exceptions Review.

### Persons and Agencies Consulted

Arizona Game and Fish Department, Region II; Lake Mead NPS; grazing permittees were consulted.

### Decision and Rationale on Action

It is my decision to implement the proposal to inventory, prepare, burn, and rehabilitate the Andrus treatment unit. BLM will also monitor the project to determine if objectives have been met.

Inventory activities include surveys for cultural and biological resources, and pre-burn vegetation monitoring.

Preparation activities include the construction of fireline using hand tools, including chainsaws, and selective thinning of small diameter pinyon and juniper around pre-settlement trees (to remove ladder fuels). Burn activities include the application of fire in accordance with an approved Burn Plan, using a combination of ignition devices, patterns, and appropriate prescriptions to create a moderate to high intensity broadcast burn to remove woody species in a mosaic pattern. During the spring, summer or early fall, fire would be introduced into the unit using a combination of hand-held, vehicle-mounted, and/or aerial ignition devices, including helitorch and plastic sphere dispenser, in accordance with an approved burn plan. Rehabilitation includes obliterating firelines and staging/work areas. Ignition patterns would be used to avoid cliffrose and other browse species along the ridgelines to the extent possible.

Range and wildlife developments (e.g. fences, corrals) and the cabin at Tungsten Spring will be prepped to reduce their likelihood of damage from fire, and caution will be used during firing operations to ensure that developments are not damaged.

Vehicle use is limited to existing roads and trails to the extent possible consistent with safety (off-road travel could occur only where necessary to respond to an emergency or other critical need; any new route created would be immediately obscured and rehabilitated).

There are no anticipated significant impacts to any resource. In addition, I have reviewed the Plan conformance Statement and have determined that the Proposed Action is in conformance with the approved land use plan and that no further environmental analysis is required.

The action is necessary to attempt to restore fire as a natural process in the Grand Canyon – Parashant National Monument; to reduce abnormally high fuel loadings and ecosystem structure in vegetative communities that have been altered by past management activities; to increase biodiversity and promote the establishment of native grasses and forbs to aid in preventing soil erosion and increase wildlife forage; and, to restore wildlife habitat and increase potential habitat for sensitive species.

### Compliance and Monitoring

Measures will be taken to avoid impacts to cultural properties, special status species, wilderness, and visual resources. A qualified individual will be on site during all surface-disturbing activities to monitor compliance.

Project personnel will adhere to Condor conservation measures (attached) at all times.

No work will be started before a cultural resource inventory has been completed and any sites found evaluated and a suitable mitigative treatment applied to minimize impact to any cultural resource. No fire will be allowed on archaeological (historic or prehistoric) sites that may be susceptible to fire damage such as sites containing wooden structures, or features, and rock art. On all other sites any heavy fuels loads will be removed from the sites to keep surface ground fire temperatures low and reducing the potential for destructive thermal alteration of artifacts, rock, or disturbance of subsurface features by prolonged exposure to high temperatures.

If, in connection with this work, any human remains, funerary objects, sacred objects, or objects of cultural patrimony as defined in the Native American Graves Protection Act are discovered, the operation would cease in the area of the discovery. The discovery would be protected and operations would not resume until authorized by the Monument Manager.

Prior to initiation of burn operations, BLM prescribed fire managers will contact Arizona Game and Fish Department Region II and schedule burning to avoid conflicts with hunting (burning is not prohibited during a hunting season, but should be avoided if practicable).

**Implementation Date**

This project will be implemented on or after July 1<sup>st</sup>, 2007.

**Administrative Review or Appeal Opportunities**

The decision is subject to administrative appeal to the IBLA (see 43 CFR 4 for appeal rules and information).

**Contact Person**

For additional information concerning this decision, contact Tim Duck, Fuels Program Manager, Arizona Strip Field Office, 345 East Riverside Drive, St. George, Utah 84790, (435) 688-3238.

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Dennis Curtis

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Date

Monument Manager  
Parashant National Monument

**Attachments:**

- Location Maps
- Condor Mitigation

<b>Exceptions Review</b>		
<b>List of Exceptions</b>	<b>Specialist Signature/Date</b>	<b>Comments/Explanation</b>
1. Have significant adverse impacts on public health or safety.	Klein	
2. Have adverse effects on unique geographic characteristics, historic or cultural resources, park, recreation or refuge lands, wilderness areas, wild or scenic rivers, sole or principal drinking water aquifers, prime farmlands, wetlands, floodplains, or ecologically significant or critical areas, including those listed on the Department's National Register of Natural Landmarks.	Spotts Herron	
3. Have highly controversial environmental effects.	Spotts	
4. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.	Spotts	
5. Establish a precedent for future actions or represent a decision in principle about future actions with potentially significant environmental effects.	Spotts	
6. Be directly related to other actions with individually insignificant, but cumulatively significant environmental effects.	Spotts	
7. Have adverse effects on properties listed or eligible for listing on the National Register of Historic Places.	Herron	
8. Have adverse effects on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have adverse effects on designated critical habitat for these species.	Herder	
9. Require compliance with Executive Order 11988 (Floodplain Management), Executive Order 11990 (Protection of Wetlands), or the Fish and Wildlife Coordination Act. Will not have adverse effects on impaired waters.	Herder	
10. Threaten to violate a Federal, State, local or tribal law or requirement imposed for the protection of the environment.	Spotts Benson	
11. Project was identified through a collaborative framework as described in the 10 year Comprehensive Strategy Implementation Plan.	Duck	
12. Project will not involve the construction of new permanent roads or other infrastructure, or have adverse effects on inventoried roadless areas.	Folks	
13. Project will not include sales of vegetative material that do not have hazardous fuels reduction as their primary purpose, or require the use of herbicides or pesticides.	Duck	
14. Project will not exceed 1,000 acres for mechanical hazardous fuels reduction activities and will not exceed 4,500 acres for hazardous fuels reduction activities using fire.	Duck	

## Attachment

**Conservation Measures for Projects Constructed or Implemented  
by BLM Employees or Contractors Within the 10(j) Area  
AND  
For All BLM-Authorized Actions, Regardless of Proponent,  
Outside the 10(j) Area on the Arizona Strip**

CC1B. Immediately prior to the start of a permitted project, BLM will contact personnel monitoring California condor locations and movement on the Arizona Strip to determine the locations and status of condors in or near the project area.

CC2B. Where California condors visit a worksite while activities are underway, the on-site supervisor will notify the BLM wildlife team lead or condor biologist. Project workers and supervisors will be instructed to avoid interaction with condors. Project activities will be modified, relocated, or delayed if those activities could have adverse effects on condors. Operations will cease until the bird leaves on its own or until techniques are employed by permitted personnel which results in the individual condor leaving the area.

CC3B. Where condor nesting activity is known within 0.5 miles of activities that include operation of heavy machinery, BLM will direct the operator to cease equipment use during the active nesting season (February 1- November 30) as long as the nest is viable. Where feasible and consistent with NEPA, BLM may relocate operations to a site greater than 0.5 miles from the condor nest site.

CC4B. Where condors occur within 1.0 miles of activities that include blasting, BLM will require that blasting be postponed until the condors leave the area or are hazed away by personnel permitted to haze condors. Where condor nesting activity is known within 1.0 miles of the project area, BLM would cease blasting during the active nesting season (February 1- November 30) as long as the nest is viable. These dates may be modified based on the most current information regarding condor nesting.

CC5B. The project site will be cleaned up at the end of each day the work is being conducted (e.g., trash removed, scrap materials picked up) to minimize the likelihood of condors visiting the site. BLM staff will conduct a site visit to the area to ensure adequate clean-up measures are taken.

CC6B. To prevent water contamination and potential poisoning of condors, a vehicle fluid-leakage and spill plan will be developed and implemented for each project. It will include provisions for immediate clean-up of any hazardous substance, and will define how each hazardous substance will be treated in case of leakage or spill. BLM will use the first plan that is developed for a specific project as a template for a fluid-leakage and spill plan that would apply to each construction project. The plan will be reviewed by the BLM condor lead biologist to ensure condors are adequately addressed.

CC7B. Use of non-lead ammunition is strongly encouraged for activities involving the discharge of firearms.

For any operations using aircraft:

CC7B. Aircraft use along the Vermilion Cliffs, Paria Plateau, or any sites where condors are actively breeding or roosting will be minimized to the extent possible. Known active nest sites will be avoided.

CC8B. The BLM condor biologist or Wildlife Program Lead will contact the Peregrine Fund, as appropriate, immediately before operations involving aviation begin to check on possible locations of condors in the subject area.

CC9B. All BLM-authorized aviation personnel will be provided literature and/or instructed regarding condor concerns prior to conducting aerial operations.

CC10B. Aircraft will maintain and maximize safe flying separation distances from condors in the air or on the ground unless safety concerns override this restriction. If airborne condors approach aircraft, aircraft will give up airspace to the extent possible, as long as this action does not jeopardize safety. Aircraft will keep a minimum of 0.25 miles away from condors located on the ground.

For herbicide or other pesticide application:

CC11B. BLM will implement the protective measures for California condors that are contained in the March 2004 "Recommended Protection Measures for Pesticide Applications in The Southwest Region of the U.S. Fish and Wildlife Service."

Conservation Measures For Fire Operations:

CC12B. The Resource Advisor will contact the Peregrine Fund daily (at 520-606-5155 or 520-380-4667) to check on locations of condors during fire suppression or fuels treatment activities involving aviation. This information will be communicated to the Incident Commander and aviation personnel.

CC13B. Any presence of condors in the general area of an active fire will be reported immediately to the Resource Advisor, who will in turn advise the BLM condor biologist, as appropriate. The BLM condor biologist or the AZ Strip F.O wildlife team lead will be the primary contacts with the U.S. Fish and Wildlife Service and the Peregrine Fund when such contacts are needed regarding condor concerns.

CC14B. Fire dispatch will immediately notify the Peregrine Fund at either (208) 362-3811 or (928) 355-2270 whenever a fire or other event on the Paria Plateau is reported which may conceivably threaten the condor holding pens and facilities atop the Vermilion Cliffs.

CC15B. If condors arrive at any area of human activity associated with fire suppression or fuels treatment projects (wildland fire use, prescribed fire, vegetation treatments), the birds will be avoided. The assigned Resource Advisor or a qualified wildlife biologist approved by BLM will be notified, and only permitted personnel will haze the birds from the area.

CC16B. All District BLM fire personnel, including helicopter pilots, will be provided literature or instructed regarding condor concerns. Normally this will be done by the BLM condor biologist when the fire crews first come on and are trained on various subjects, including desert tortoise concerns. If additional pilots come on during the summer, fire dispatch will notify the BLM condor biologist (435 688-3224) so that they can also be briefed.

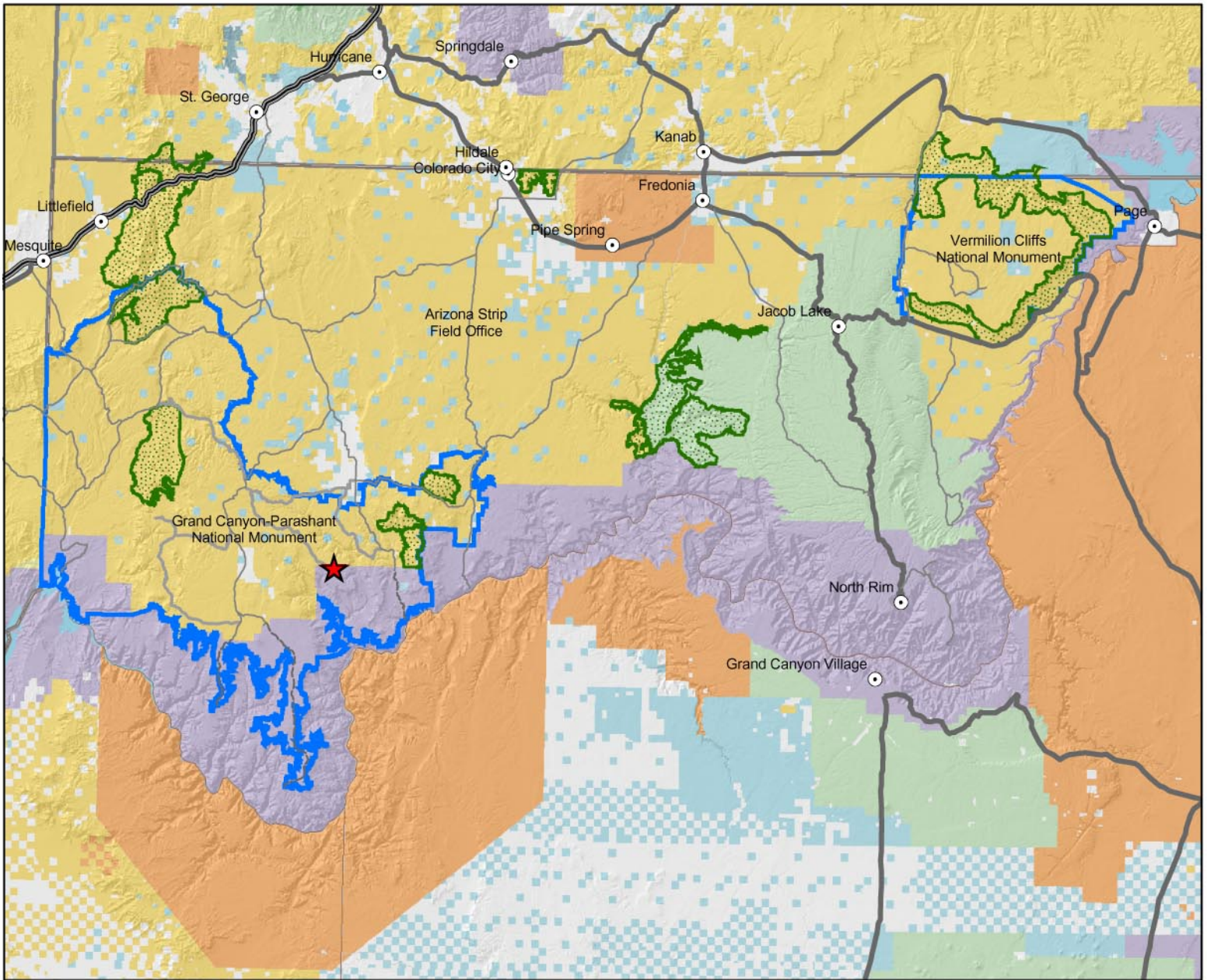
CC17B. All helicopter dip tanks containing water will be covered when not in use or personnel will be stationed nearby until a cover is in place.

CC18B. If any fire retardant chemicals must be used in areas where condors are in the vicinity, the application area will be surveyed and any contaminated carcasses will be removed as soon as practical to prevent them from becoming condor food sources.

CC19B. Smoke from prescribed fire projects will be prevented from negatively affecting condor holding pens and breeding, nesting, and chick rearing sites. A proposed prescribed fire will not be initiated, or an existing fire use event will be modified or terminated, in order to prevent or stop significant amounts of smoke, or smoke that will remain in place for an extended period of time, or chronic smoke events, from occurring in area(s) where condors are held or attempting to breed, nest, or rear chicks.

CC20B. BLM will adhere to the air quality standards set by the Arizona Department of Environmental Quality.

CC21B. All camp areas will be kept free from trash.



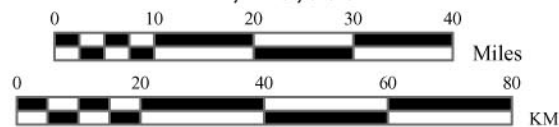
**Legend**

- |                       |                           |                       |                   |
|-----------------------|---------------------------|-----------------------|-------------------|
| Area of NEPA Project  | Bureau of Land Management | National Park Service | Interstate        |
| Designated Wilderness | State Lands               | Indian Lands          | Primary Routes    |
| Monuments             | Private Lands             | National Forest       | Secondary Routes  |
|                       |                           |                       | Light Duty Routes |
|                       |                           |                       | 4WD Routes        |

**Location Map**



1:1,220,000



**CAUTION:**

Land ownership data is derived from less accurate data than the 1:24000 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.

