

**Decision Memorandum on Action and for Application of:  
Categorical Exclusion 1.12-Hazardous Fuels Reduction Activities  
Pine Hollow Fuels Treatments/Hazardous Fuels Reduction  
CX-AZ-110-2007-0030  
US Department of the Interior  
Bureau of Land Management  
Arizona Strip Field Office  
Coconino County, Arizona**

**Description of the Proposed Action and the Purpose and Need for the Action**

The over-riding objectives for fuels reduction/rehabilitation are: 1) to determine the need for and to prescribe and implement treatments to minimize threats to life or natural resources and 2) to stabilize and prevent unacceptable degradation to natural and cultural resources resulting from the effects of soil erosion.

BLM proposes to rehabilitate a 1,000 acre parcel of public lands. Chaining in the early spring when the ground is wet allows the trees to be pulled out, then let it set until early July. This allows the trees to brown out but keeps the dry leaves from falling off. Burn it, which allows the fire to kill smaller trees which the chain bent over and rolled passed and did not remove or damage. Then in early fall, fly the seed on, followed by back chaining. Treatment of the described area (see attached map of proposed treatment) is proposed for early spring of 2008. The seed mix would be comprised of both native and non-native species of forbs, grasses and shrubs. Grazing would be deferred in the Pine Hollow allotment pasture that would be chained and burned for at least two growing seasons. One new temporary fence would be necessary to accomplish livestock grazing deferment. Erosion control structures would be constructed in drainages to prevent soil loss from the site until forbs, grasses and shrubs take hold and stabilize the soil.

Annual grass fuels of Bromus tectorum which invade and proliferate within this general area, generate high risk of wildfire through this Woodland type. Once ignited the dense canopy pinion/juniper will burn with such severity that soils are left barren and sterilized. With soils now exposed to wind and water erosion and invasion and proliferation of additional annual brome grass establishment, the site becomes dysfunctional and soil is lost from the site. These treatment areas are also within critical mule deer winter range which is in jeopardy without treatment.

The proposed action is to reduce the risk of wildfire to range improvements, vegetative community and damage to soil on the Buckskin Mountain by reducing tree density. Project implementation would take place by utilizing mechanical methods. These methods would be utilized to clear brush and reduce tree density.

Any opportunity to utilize the biomass created from this project is very limited due to the terrain. This would result in the majority of the downed trees being removed later through prescribed fire. Some slash, mainly smaller branches would be left on site to degrade naturally. The prescribed fire should be done in July (the trees are at their driest and the leaves have not fallen off yet) then the fire will carry; burning the area just the way the trees burn with a heli-torch, and will remove smaller trees and trees not uprooted or killed by the chain. Treatments identified above could be implemented in future years as maintenance treatments to maintain original project objectives.

The goals of the project are:

- Restore ecosystem function and condition
- Remove/reduce hazardous fuels
- Limit conflicts with visitors by avoiding burning during mule deer hunting season (July)
- Minimize impacts on cultural resources
- Minimize impacts on wildlife and special status species (plants and animals)

Specific prescribed burn objectives are:

- Reduce woodland litter and duff by 50-80% immediately post burn
- Reduce fuel loading of dead and down fuels <20” diameter by 50-80% immediately post burn
- Keep the prescribed burn within the Maximum Manageable Area
- Limit smoke impacts on class I airsheds in the Grand Canyon, nearby private lands, and wilderness areas to levels permitted by ADEQ
- Limit damage to structures such as fences to less than 5%
- Limit damage to historic structures, private lands, and structures on private lands to 0%

Fire Regime and Condition Class

Fire regime is 10% class I, 30% class II and 50% class III. The Condition Class is class 2

**SEED MIX**

Seed mix will compete with annuals and invasive species, they have been shown to establish in the area.

SPECIES	LBS/ACRE
Luna Pubescent Wheatgrass ( <i>Agropyron intermedium</i> )	2.00
Russian Wildrye ( <i>Elymus junceus</i> )	2.50
Thick Spike Wheatgrass ( <i>Agropyron dasystachum</i> )	1.00
GB Wild Rye ( <i>Elymus cinereus</i> )	1.00
Lewis Flax ( <i>Linum lewisii</i> )	.50
Western Wheatgrass ( <i>Agropyron smithii</i> )	1.00
Yellow Bluestem ( <i>Bothriochloa ischaemum</i> )	.25
Sidoats Gramma ( <i>Bouteloua curtipendula</i> )	.25
Indian Ricegrass ( <i>Oryzopsis hymenoides</i> )	.25
Forage Kochia ( <i>Kochia prostrata</i> )	.50
Yellow Sweetclover ( <i>Melilotus officinalis</i> )	.25
Ephraim Wheatgrass ( <i>Agropyron cristatum</i> )	1.00
Highcrest Crested Wheatgrass ( <i>Agropyron cristatum</i> )	1.00
Antelope Bitterbrush ( <i>Purshia tridentata</i> )	.50
Four Wing Saltbush ( <i>Atriplex canescens</i> )	.50
<b>TOTAL</b>	<b>12.5</b>

## 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 herbaceous vegetation monitoring to establish baseline grass/forb conditions and post-burn monitoring to evaluate treatment effectiveness (objectives) and determine seed mix success.

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.

## Maintenance of Fire/Prescribed Burn Re-entry

BLM would re-enter the unit and apply low intensity, understory prescribed burning as necessary to complete treatment, and reapply prescribed fire on a 30-50 year cycle to mimic historic fire regimes. (The seed mix is a fire retardant mix and it may be hard to get to reburn if tried to early)

## **Legal land description**

- Map showing project location attached.
- Portions of T 41, 42 N R 2E , 3E Sections 4, 5, 6, 7, 8, 9, 33

## **Plan Conformance**

This proposed action is in conformance with the Arizona Strip District RMP, December 1992 and the Arizona Statewide Land Use Plan Amendment for Fire, Fuels and Air Quality Management, September 2004.

WS01 Manage vegetation cover towards ecological stability and sound long-term protective soil cover using mechanical, chemical, biological or fire as tools for accomplishment.

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.

## **Compliance with the National Environmental Policy Act**

This proposed action qualifies as a categorical exclusion under 516 DM 2, Appendix 1 #1.12.

**1.12** Hazardous fuels reduction activities using prescribed fire not to exceed 4,500 acres, and mechanical methods for crushing, piling, thinning, pruning, cutting, chipping, mulching, and mowing, not to exceed 1,000 acres. Such activities: shall be limited to areas (1) in wild land-urban interface and (2) Condition Class 2 or 3 in Fire Regime Groups I, II, or III, outside the wild land-interface; shall be identified through a collaborative framework as described in “A Collaborative Approach for Reducing Wild land Fire Risks to Communities and the Environment 10-Year Comprehensive Strategy Implementation Plan;” shall be conducted consistent with agency and Departmental procedures and applicable land and resource management plans; shall

not be conducted in wilderness areas or impair the suitability of wilderness study areas for preservation as wilderness; shall not include the use of herbicides or pesticides or the construction of new permanent roads or other new permanent infrastructure; and may include the sale of vegetative material if the primary purpose of the activity is hazardous fuels reduction.

I considered the application of this categorical exclusion to be appropriate in this situation because there are no extraordinary circumstances potentially having effects which may significantly affect the environment. Please refer to the exceptions review table below. It has been reviewed to determine if any of the exceptions described in 516 DM 2, Appendix 2, apply.

### **Persons and Agencies Consulted**

Consultation with Arizona Game and Fish Department, United States Department of Agriculture Natural Resources Conservation Service and the Arizona Deer Association has taken place. It was agreed upon that the seed mix was adequate and that the species to be seeded represented a good range of forage plants for future mule deer browse. It was also agreed upon that cliffrose though important for re-establishment for mule deer forage, would not be reseeded due to seed availability and cost. Cliffrose should reseed naturally however, as it has done in other fuels treatments and should be well represented in the Pine Hollow area in years to come.

### **Decision and Rationale on Action**

I have decided to implement the proposal to inventory, prepare, chain, burn, seed, back chain and defer livestock use for 2 growing seasons on the 1,000 acre parcel of the Pine Hollow area located within the Coyote allotment. BLM will monitor the project area to see if resource objectives have been met. Inventory activities include surveys for cultural and biological resources. Rehabilitation of the project area includes aerial seeding of 1,000 acres, preceding the mechanical treatment activities. Mechanical treatment will include the use of 2 track vehicles dragging an anchor chain over the project area to drive the seed into the ground and remove trees. Erosion control will be accomplished through construction of erosion control structures. One new temporary fence will be necessary to accomplish livestock grazing deferment.

There are no anticipated significant impacts to any resource. The action is necessary to reduce and/or eliminate the threat of further degradation from the proliferation of annual brome species such as cheat grass. Without rehabilitation and fuels reduction of the treatment area the threat of catastrophic fire such as the Buzzard and Buckskin fires will increase and native species will be driven out of the ecological system. Since the site is critical mule deer winter range and mule deer rely solely on browse species for winter forage in the area, it is imperative that browse species be reestablished and the fire return interval be reduced. The action is also necessary to reduce the loss of soil and nutrients from the site by establishing perennial grass, forb and shrub cover.

The California Condor mitigation measures listed below will be followed:

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 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.

CC7B. Aircraft use, especially low level flights along the rim of the Vermilion Cliffs and flights near the condor release site at Vermilion Cliffs, will be minimized to the greatest extent possible in order to avoid disturbance to condors which may be present. 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 of at least 400 meters, in order to avoid, flying condors. Aircraft will also keep a minimum of 0.25 miles away from condors located on the ground unless safety concerns override this restriction.

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."

Measures will be taken to avoid impacts to cultural resources. 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 mechanized treatment will be allowed on archaeological (historic or prehistoric) sites that may be susceptible to damage. Such sites would include rock art, wooden structures or features. 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 discovery. The discovery would be protected and operations would not resume until authorized by the Field Manager.

If a listed species is observed, all work in the area would stop and would not be allowed to resume if activities would adversely affect the species. Consultation with the U.S. Fish and Wildlife Service would take place before further work is done.

These actions meet the need for action. 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.

### **Implementation Date**

This project will be implemented on or after Jan. 2008.

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Becky J. Hammond  
Arizona Strip Field Manager

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Date

## Administrative Review or Appeal Opportunities

This decision may be appealed, in accordance with 43 CFR 4.21, within 30 days of the date of the decision. Any notice of appeal must be filed in this office (at the below address); must be in writing and clearly state the reasons the decision is in error. A petition for a stay of decision during the time an appeal is being reviewed by the authorized official must accompany any notice of appeal. A petition for stay is required to show sufficient justification based on the following standards:

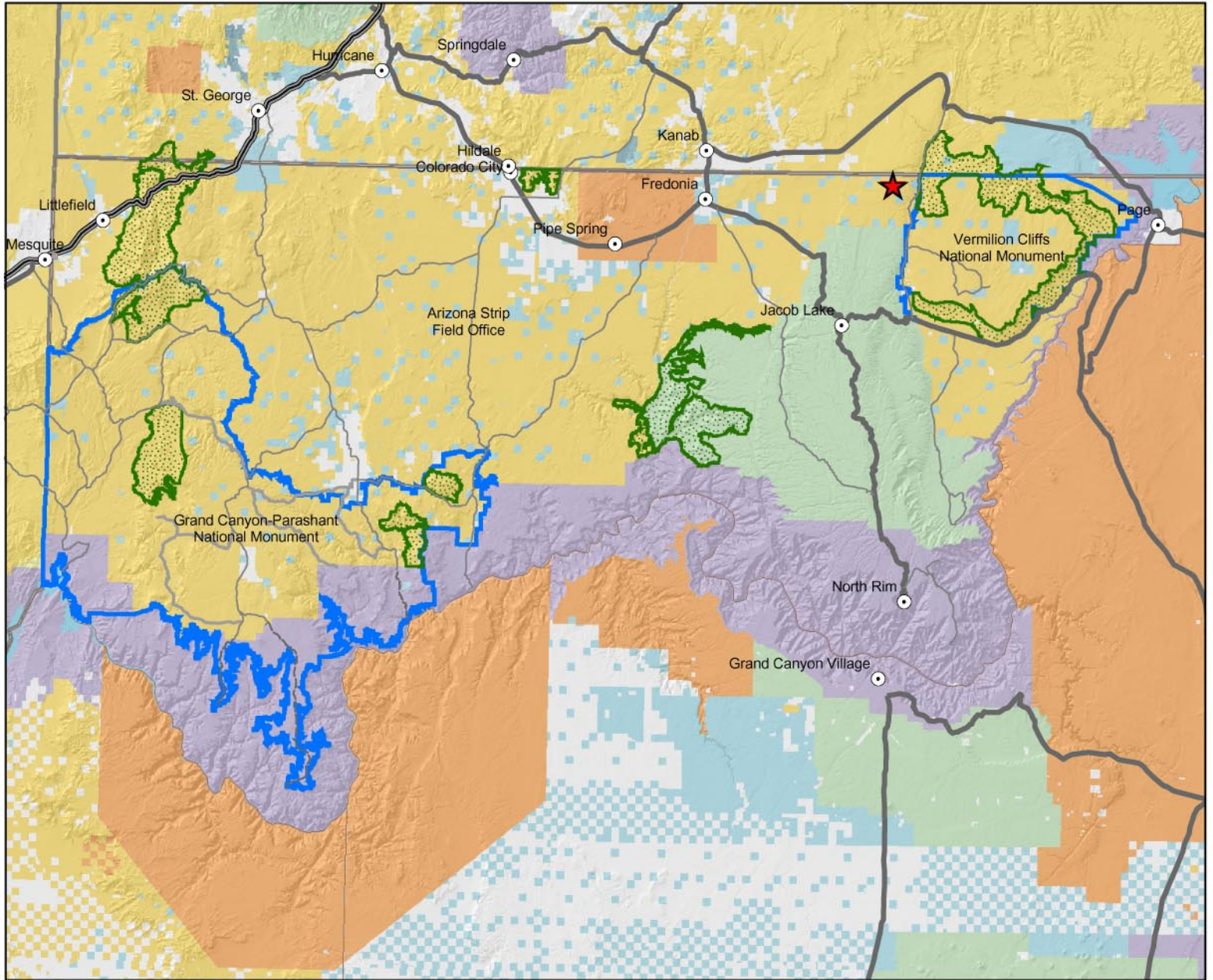
- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

## Contact Person

For additional information concerning this decision, contact Ben Ott, Rangeland Management Specialist, Arizona Strip Field Office, at 345 E. Riverside Drive St. George, Utah 84790-9000. Phone: (435) 688-3329

<b>Exceptions Review.</b> [Review the 12 exceptions which apply to individual actions within categorical exclusions. Environmental documents (EA or EIS) must be prepared for any actions involving these exceptions. The preparer coordinates with the appropriate specialists for review and surname for, in particular, #7 (historical/archaeological resources) and #8 (listed species), and others as appropriate. The comments/ explanation column may be used to document any pertinent information about the review.]		
<b>List of Exceptions</b>	<b>Specialist Signature/Date</b>	<b>Comments/Explanation</b>
1. Have significant adverse impacts on public health or safety.	B.Ott	No adverse impacts to public health or safety
2. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas.	M.Herder	No affect on geographic character, wilderness, drinking water aquifers, prime farmlands, wetlands, floodplains, migratory birds, national monuments or areas of critical environmental concern.
3 Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA Section 102(2)(E)].	B.Ott	No significant controversial environmental effects
4. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.	B.Ott	No uncertain environmental effects
5. Establish a precedent for future actions or represent a decision in principle about future actions with potentially significant environmental effects.	B.Ott	No precedent setting of future actions and does not represent a decision that has significant environmental effects
6. Be directly related to other actions with individually insignificant, but cumulatively significant environmental effects.	B.Ott	No cumulative effects No relation to other actions
7. Have adverse effects on properties listed or eligible for listing on the National Register of Historic Places.	B.Ott	No adverse affect on properties listed or eligible for listing in the National Register of Historic Places
8. Have adverse effects on species listed or proposed to be listed on the List of Endangered or Threatened	Plants L.Hughes	No adverse effect on plants

Species, or have adverse effects on designated critical habitat for these species.	Wildlife M. Herder	No adverse effect on wildlife
	Fisheries M. Herder	No adverse affect on fisheries
9. Violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment.	B.Ott	No violation of federal, state, tribal, or local law or any requirements for the protection of the environment.
10. Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898)..	B. Ott	No effect on minorities or low income populations. Is in compliance with executive orders.
11 Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007).	J.Herron	No effect on Indian sacred sites and is in compliance with all executive orders.
12 Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112).	L. Walker	Does not contribute to the spread of noxious weeds or the introduction of noxious weeds and is in compliance with all acts and executive orders.



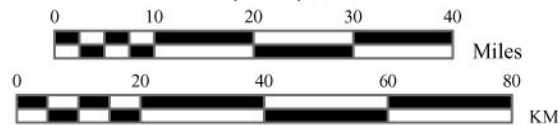
**Legend**

- |                       |                           |                       |                   |
|-----------------------|---------------------------|-----------------------|-------------------|
| 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



United States Department of the Interior  
 Bureau of Land Management  
 Arizona Strip District Office  
 Map created on July 30, 2007



**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.