

Memorandum for the Record

On 18 September 2014, compliance documentation was completed in order to perform restoration work in Zone A within ORPI and assessments of UVRs within ORPI and CPNWR. The compliance documentation includes a NEPA Categorical Exclusion (CE), a streamlined Section 106 assessment of effects for restoration in ORPI and a MRDG for actions proposed in ORPI and CPNWR wilderness. The MRDG intended to analyze the minimum tool requirements to perform road assessments for physical and cultural resources including mapping within ORPI and CPNWR and restoration only within ORPI Zone A. Zone A is defined as one set of UVRs, the first in a set of seven polygons within DOI-managed lands including ORPI, CPNWR and the BLM's Ajo Block. Zone A resides fully within ORPI in an area west of the Bates Mountains from the upper bajada to the park's western boundary. The PEPC # is 53471 and the full scope of the project is referenced within the PEPC documentation for the project.

EXISTING COMPLIANCE

The intent for the compliance documentation was to assess and map physical and cultural resources on ORPI and CPNWR lands and to determine the minimum tools necessary for wilderness access; begin restoration of UVRs within ORPI Zone A; and to test various applications and strategies to determine the best approach for large-scale restoration under PEPC# 27556. The FONSI and PA are in draft at the date of this memorandum. CE, Section 106 and MRDG documents were completed on 18 September 2014.

Considerations and Drivers

In accordance with the MRDG, vehicle access in wilderness was determined necessary due to the length of some UVRs and the ability to haul personnel, tools, food and water, gear, and supplies to project sites and to move an employee to a cool spot or evacuate personnel in the event of heat-related illness. Walking was the minimum tool for all shorter UVRs, however, many roads are multiple miles in length. The season in which much of the work was being done was still hot, with daily temperatures nearing 100°, and thus elevated concerns for health and safety of staffs combining strenuous physical work with walking long UVRs. Always considered is the presence of undocumented aliens within the project area and safety of staff – personnel distance from a safe zone (vehicle), distance and response time to the vehicle to ensure security for the vehicle and equipment on board and staff, and time required for staff to reach a vehicle in the event border interdiction activities necessitates an immediate evacuation from the work area.

ANALYSIS NOT CONSIDERED

Not considered within the original compliance documentation was the use of a truck to drag a wood beam on a UVR and to haul personnel and supplies in wilderness. Also, the CE chosen for the project was C.16 "Landscaping and landscape maintenance in previously disturbed or developed areas" but a

better choice would have been E.4 “Removal of non-historic materials and structures in order to restore natural conditions” as this CE more accurately reflects the restoration work and is more consistent with the intended exclusion of the small-scale restoration proposed. The action will result in no or minor impacts.

The MRDG failed to fully analyze the intended work. Within Step 1 of the MRDG, it was discussed that the MRDG would cover use of vehicles to assess UVRs and to perform restoration. Analysis of vehicles to perform assessments was fully examined in Step 2, however, failed to analyze performing some restoration with a truck – use of a drag, and hauling personnel and equipment in wilderness and performing restoration activities.

WORK IN EXCESS OF EXISTING DOCUMENTATION

On October 11, 2014 technicians were evaluating the efficacy of restoring 0.99 miles of UVR in Zone A by hand. The Class 2 route was deeply rutted and a field decision was made to attempt an alternative restoration technique test, attaching a wood beam to a truck and allowing the drag to erase the UVR. On October 21, 2014 a drag was used on a second UVR that was both rutted (Class 2) and braided (Class 3). A 0.24 mile section of this UVR was graded and leveled using a drag behind a vehicle. Between October 10 and October 23, 2014, 18 UVRs totaling 7.46 miles were restored. Sixteen of the UVRs (6.23 miles) were restored using hand tools alone. The pre and post restoration photos of the first UVR graded and leveled using a drag are attached at the end of this document.

This type of restoration application was not considered or analyzed in either the CE or the MRDG. The action was an isolated event and has not occurred since the initial test. Hauling personnel and equipment for restoration was not considered or analyzed in either the CE or MRDG and performing restoration activities was not analyzed in the MRDG.

EFFECTS OF ACCESS AND IMPLEMENTING THE ALTERNATIVE RESTORATION TECHNIQUE

There were no observed adverse effects to natural or cultural resources as a result of allowing vehicles to access UVRs in wilderness for restoration. Use of the drag did not adversely affect natural and cultural resources but did improve the efficacy of restoration efforts and improved the overall condition of the two UVRs resulting in a net beneficial gain for the area and endangered Sonoran Pronghorn by eliminating 1.2 miles of road from use, thereby knitting together two areas and reducing effects of habitat fragmentation.

FUTURE RELATED WORK

Should land managers decide that implementing alternative restoration efforts within ORPI in excess of approved compliance documentation will become necessary, prior to the programmatic compliance being in place, a new CE and MRDG will be developed to include the proposed activities.

Organ Pipe Cactus National Monument - Zone A
Class 2 UVR pre -restoration



Class 2 UVR post-restoration

