

**DECISION MEMORANDUM**  
**Las Cienegas National Conservation Area (LCNCA) Secondary Road Maintenance**  
**DOI-BLM-AZ-G020-2014-0017-CX**

U.S. Department of the Interior  
Bureau of Land Management  
Tucson Field Office, Las Cienegas National Conservation Area

**Project Description**

This would be a project to maintain the secondary roads on Las Cienegas National Conservation Area (LCNCA). The work would take place on the 902 and 903 roads at Las Cienegas.

The work on the 902 road would mostly be maintaining existing rolling dips. Rolling dips are low impact ditch structures that channel water off the road. Some of the maintenance on the 902 road would include expanding the lead outs from the rolling dips. Lead outs extend from the rolling dips and dissipate water across the landscape through slowing down the flow of water off the road.

The work on the 903 road would be construction of 12-15 new rolling dips approximately every 300 to 500 feet depending on the terrain. Rolling dips would consist of constructing a lead out on the downslope side of the road. The lead out would be ten feet wide at the top of the lead out and 100 feet long at most (1000 square feet at most). The dirt would be piled up in a berm in the road to divert water off the road into the lead outs. There might also be a slight depression in the road to channel water off the road and into the lead out.

The work would take place in late May and June. The Force Account would be conducting the work on this project. The construction would require a bulldozer, backhoe, water buffalo, dump truck, water truck, and a service truck. Cultural clearances would be conducted before implementation of this project. The existing road will not need to be widened to bring in any of the above equipment to the sites of the proposed road maintenance.

A Class III cultural resource survey was completed for the project on May 6, 2014 and no sites were located. Standard cultural stipulations are included as part of the decision. Hydrological input on project design was also provided during the May 6, 2014 field visit, based on principles of water harvesting from roads. A threatened and endangered species clearance was completed on June 3, 2014. The determination was that the project will have no effect on listed species and no adverse modification of critical habitat.

**Approval and Decision**

Based on a review of the project described in the attached Categorical Exclusion documentation and field office staff recommendations, I have determined that the project is in conformance with the Las Cienegas Resource Management Plan (approved July 2003) and is categorically excluded from further environmental analysis. It is my decision to approve the action as proposed with the following stipulations/mitigation measures:

- Standard cultural stipulations apply (see attached).
- Construction of rolling dips will not disturb or displace any night-blooming plants such as saguaro, century plant or other agaves.

## Administrative Review or Appeal Opportunities

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4. Public notification of this decision will be considered to have occurred on the date this document is posted. If an appeal is taken, your notice of appeal must be filed at Tucson Field Office, 3201 E Universal Way, Tucson AZ 85756 within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition (pursuant to regulation 43 CFR 4.21 (58 FR 4939, January 19, 1993) (request) for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the Office of the Solicitor (Department of the Interior, Office of the Field Solicitor, Sandra Day O'Connor U.S. Court House #404, 401 West Washington Street SPC44, Phoenix, AZ 85003-2151) (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

### Standards for Obtaining a Stay

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.

Approved By: /s/ Karen Simms, acting for  
Viola Hillman, Field Manager

06/24/2014  
Date