

U.S. Department of the Interior Bureau of Land Management

Environmental Assessment UT- (UT-010-09-006 EA)
May, 2010

SAND DUNE WELL PIPELINE AND TROUGHS

Location: Within the Oak City Allotment (#04406) approximately 3 miles northwest of Oak City, Utah.

The legal location is as follows:

Township: 16 S.

Range: 5 W.

Sections 22, 26, 27, 28, 29, 32 & 35

Applicant/Address: Oak City Cattle Growers Association, c/o Vance Finlinson, P.O. Box 73, Oak City, Utah

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CHAPTER 1

INTRODUCTION AND NEED FOR THE PROPOSED ACTION

1.0 INTRODUCTION

The Bureau of Land Management (BLM) in cooperation with the Oak City Cattle Growers Association and the State School and Trust Lands Administration proposes to construct 6 miles of pipeline and 2 water troughs with storage tanks (each trough would have near it a storage tank) to distribute water in the Oak City Allotment. If approved this project would be constructed during 2010. An interdisciplinary team has reviewed the proposed action. Their review is included as Appendix A. The attached map (Appendix B) shows the location of this project.

1.1 NEED FOR THE PROPOSED ACTION

Provide water for livestock in the Oak City Allotment. The proposed trough locations would allow for more even utilization of vegetation by livestock grazing the allotment. A pipeline from the Sand Dune Well is needed to transport the water to the proposed trough locations and storage tanks are needed to provide water at the troughs when demand for water is above that which can be pumped and transported to the troughs through the pipeline. Improved vigor of desirable species on the allotment is also needed. More even utilization of the allotment may result in the desired improvement of desirable species. As grazing use becomes more evenly distributed, species preferred by livestock would more easily be maintained or increased in the more heavily used portions of the allotment.

1.2 CONFORMANCE WITH BLM LAND USE PLAN(S)

The proposed action is in conformance with the House Range Resource Management Plan, approved on October 8, 1987.

Although the proposed action and alternatives are not specifically mentioned in the plan, they are consistent with its objectives, goals, and decisions as they relate to the range program in that livestock distribution would be improved, which would result in more uniform utilization patterns.

House Range Resource Area Management Plan and Record of Decision; chapter two, page 27, paragraphs 24, 26 & 27:

Paragraph 24 "Continue to plan and install structural improvements, such as fences, water developments, cattleguards, etc. on a priority basis as funds become available. Projects must be environmentally acceptable. "

Paragraph 27 “Water Developments will be periodically inspected to ensure that they remain in usable condition. Preventive maintenance will be performed as needed.

House Range Resource Area Final Environmental Impact Statement and Proposed Resource Management Plan; Chapter two, page 60, Range improvements subpart, paragraph 1:

"Structural improvements would continue to be planned and installed to improve or facilitate management (e.g., livestock distribution, trespass, control, etc.)".

1.3 RELATIONSHIPS TO STATUTES, REGULATIONS AND OTHER PLANS

The proposed action and alternatives comply with the following laws and regulations:

- Taylor Grazing Act of 1934
- Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.)
- Public Rangelands Improvement Act of 1978
- National Environmental Policy Act of 1969
- 43 CFR 4100 Grazing Administration-Exclusive of Alaska
- All supplemental authorities listed in Appendix A of the National Environmental Policy Act Handbook (H-1790-1)

This proposed action is consistent with the standards and guidelines for grazing management in that the proposal would improve conditions which would support the desired plant species and maintain properly functioning ecological conditions.

CHAPTER 2 DESCRIPTION OF ALTERNATIVES

2.0 INTRODUCTION

The Environmental Assessment focuses on the Proposed and No Action alternatives. The No Action alternative is considered and analyzed to provide a baseline for comparison of the impacts of the Proposed Action. No other alternatives were required to address unresolved conflicts of available resources on public lands.

2.1 PROPOSED ACTION

The general location of the proposed action is in the northern portion of the Oak City Allotment approximately 3 miles northwest of Oak City, Utah

Construct approximately 4 miles of 1.5” SDR11 plastic pipeline and install 2 frost free water troughs and two storage tanks. One 10,000 gallon water storage tank would be installed near each trough. Frost free water troughs would be partially buried in the ground. An existing trough at the well location has become partially uncovered and more earthen material that is not likely to blow away would be hauled in to cover it. One frost free trough would be constructed approximately 1.8 miles north of Sand Dune Well near Collier’s Reservoir. Another frost free trough would be constructed approximately 2 miles southeast of Collier’s Reservoir. An existing frost free trough and buried storage tank are located at Sand Dune Well. The trough and storage tank have become partially uncovered and more earthen material that would not be likely to blow away would be hauled in to cover them. All water troughs are to be wildlife friendly and to include small mammal and birds ramps.

Frost free troughs are constructed of metal off site and are installed in a south facing slope (the trough is partially buried). A portion of the trough is not buried and remains open for livestock access to water. A storage tank is buried at a slightly higher elevation near the trough.

To minimize sediment delivery, removal of vegetation and other possible impacts to seasonal streams and/or washes and associated vegetation the pipe would be ripped into the ground by use of a ripper behind a bull dozer.

The pipeline would be kept functioning through routine maintenance. This may include replacement of portions of the pipeline, repairing of leaks, replacement and/or installation of valves, air vents, drains, filters, valve boxes, and other such items necessary to keep water flowing through the pipeline. Heavy equipment may or may not be required for pipeline maintenance.

Support equipment would include a transport for the bull dozer, ATVs, pickup trucks, and trailers for pipe transport.

Existing roads and trails would be used for travel to the maximum extent feasible unless otherwise authorized. During wet road conditions, any ruts deeper than four inches

remaining on the roads from the project would be repaired at the Authorized Officer's discretion.

Trash/debris would be removed from public land and discarded at an authorized facility.

The proposed project would be subject to valid prior existing rights-of-way (ROW). ROW holders would be contacted and coordinated with.

Equipment used in construction activities would be cleaned prior to entering the project area to prevent the spread of weeds.

The fire prevention stipulations found in Appendix C would be adhered to.

2.2 NO ACTION

Livestock would continue to water at existing locations. No new water developments would be constructed.

CHAPTER 3 AFFECTED ENVIRONMENT

3.0 INTRODUCTION AND GENERAL SETTING

The affected environment of the Proposed Action and No Action alternatives were considered and analyzed by an interdisciplinary team as documented in the Interdisciplinary Team Analysis Record Checklist, Appendix A. Included in the checklist are the Critical Elements of the Human Environment and resources of concern. The checklist indicates which resources of concern are either not present in the project area or would not be impacted to a degree that requires detailed analysis. Critical Elements of the Human Environment are those elements that are subject to the requirements specified in statute, regulation, or executive order, and must be considered in all EAs (BLM H-1790-1, Appendix 5).

Resources, including Critical Elements, which could be impacted to a level requiring further analysis are; 1) invasive and non-native species, and 2) livestock grazing. They are described in Chapter 3 and impacts on these resources are analyzed in Chapter 4 below.

Vegetation along the proposed pipeline is mostly cheatgrass and greasewood. However, there are some areas where a few perennial grasses may be found. These are Indian ricegrass, sand dropseed and three-awn. Scurf pea and mustard are also present. Elevation is between 4,660 and 5000 feet above sea level. Average annual precipitation for the area in which the pipeline and troughs would be constructed is approximately 10 inches. The allotment has historically been grazed by cattle November through May 10. The area in which the pipeline and troughs would be constructed is mostly flat ground with some sand dunes.

3.1 INVASIVE AND NON-NATIVE SPECIES

There are no known noxious weeds located within the project area.

3.2 LIVESTOCK GRAZING

The Oak City Allotment is located between Delta, Oak City and Lynndyl in Millard County, Utah. The Sevier River is the boundary on the northwest side of the allotment. Highway 125 goes through the middle of the allotment. Highway 50 is the boundary on the southwest side of the allotment and the road between Oak City and McCormick is the boundary on the southeast side of the allotment (see map Attachment 1).

There are a total of 35,364 acres within the allotment; 14,142 acres of public land, 19,675 acres of state land and 1,547 acres of private land.

The Oak City Allotment is grazed from November 1st through May 10th. There are three wells, a trough from the Clay Springs Pipeline and the Sevier River as sources of water for livestock. Grazing use is heavier around existing water sources and lighter further from them. Cattle normally range out approximately to a distance of 2 miles from water. An area in the northern portion of the allotment is 2 miles or more from water and receives only slight use.

CHAPTER 4

ENVIRONMENTAL IMPACTS

4.0 DIRECT AND INDIRECT IMPACTS

Resources which could potentially be directly or indirectly impacted by the Proposed Action were described in Chapter 3. Potential impacts to these resources are analyzed under the Proposed and No Action alternatives.

4.1 PROPOSED ACTION

This section analyzes the impacts of the Proposed Action to those resources described in the affected environment (Chapter 3 above)

INVASIVE AND NON-NATIVE SPECIES

Since there are invasive and non-native species in Millard County and none are known to exist in the project area there is the potential to introduce them into the area on equipment used in construction of the pipeline and troughs. To prevent this, the following mitigation would be adhered to:

- Equipment would be cleaned prior to entering the proposed project area to minimize the introduction of noxious/invasive weeds in other areas.

LIVESTOCK GRAZING

The proposed action would allow for improved management of the allotment. There would be two new water troughs for cattle grazing the allotment. The proposed trough locations are approximately 2 miles from each other and that same distance from existing water sources. Cattle normally range out about two miles from water. The proposed pipeline would transport water to proposed troughs where water is not available for livestock at the present time. By supplying water to this area livestock would be more evenly distributed over the allotment.

Utilization patterns would be improved as livestock distribution is improved. Portions of Oak City Allotment are not grazed as much as others. This results in areas which are over utilized and areas which could support more use. Installing these troughs at the proposed locations would encourage livestock to graze areas that are slightly or lightly grazed and reduce use of areas that receive heavier use.

As utilization patterns become more even through improved distribution of livestock desired forage species are more easily maintained or have the potential to increase. Increases in desired species are more likely to occur in areas that have been more heavily utilized in the past. With maintenance of desired species properly functioning ecological conditions are also maintained.

4.2 NO ACTION

If the proposed project were not constructed the need for the Proposed Action to improve livestock distribution and more evenly distribute grazing use of the allotment would not be met. There would be no environmental impacts from the Proposed Action since it would be denied.

INVASIVE AND NON-NATIVE SPECIES

The potential to introduce invasive and non-native species into the area would remain unchanged.

LIVESTOCK GRAZING

Livestock distribution and utilization patterns would remain as they currently are. The same portions of the allotment would continue to be slightly used and the areas that are currently heavily used would continue to receive that same amount of use. The ability to control where cattle are within the allotment would not be improved.

Since utilization patterns and livestock distribution would not be improved, desired forage species have the potential to decrease in areas more heavily utilized by livestock. With the decrease of desired species the potential for ecological processes to function improperly is increased.

4.3 CUMULATIVE IMPACTS

Cumulative impacts are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions.

Common activities in the area consist of livestock grazing, hunting, camping, wood gathering, wildlife viewing, mineral exploration, and OHV use. Except for OHV use, most of these activities have been occurring over the past 80-100 years.

Wildlife species within the area have experienced these types and levels of disturbance over the past 80-100 years. Mineral activity including mining and exploratory drilling for oil and gas and seismic exploration has declined since the 1980's. Recently OHV use and seismic exploration have increased. The other activities may not be expected to increase during the foreseeable future.

CHAPTER 5 PERSONS, GROUPS, AND AGENCIES CONSULTED

5.0 PUBLIC CONSULTATION

During preparation of the EA, the public was notified of the proposed action by posting on the Utah BLM Environmental Notification Bulletin Board (ENBB) on 2/12/2009. No one has contacted the BLM in response to this notice. The process used to involve the public included sending letters to the School and Institutional Trust Lands Administration, Utah Division of Wildlife Resources and Millard County Planning and Zoning. Meetings with the permittees and the state School and Institutional Trust Lands Administration were also held to discuss the project (see Table 5.1). A public comment period was not offered because very little interest in the proposal has been expressed.

Table 5.1 List of Persons, Agencies and Organizations Consulted

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Oak City Allotment Grazing Permittees Vance Finlinson, Jim Lamont, Dee Jay Finlinson, Around Back Ranch (Spence Butler), J.B. Lovell Family Trust, and Monte Nielson	To develop the project proposal.	Selected trough locations and determined that the portion of the permittees proposal which would bring water from Oak City to the pipeline at Sand Dune Well would not be part of this project. The permittees would contribute to the project.
School and Institutional Trust Lands Administration (Ron Torgerson)	To develop the project proposal. One of the trough locations and much of the pipeline would be on state school trust lands.	Determined that they would contribute to the project. Selected trough locations and determined that the portion of the permittees proposal which would bring water from Oak City to the pipeline at Sand Dune Well would not be part of this project.
UDWR	Consult with UDWR as the agency with expertise on impacts on game species.	No Response.
Millard County Planning and Zoning	Consult with the county planning and zoning to identify any concerns the county may have.	No Response.

An interdisciplinary team analyzed the impact of the proposed action upon the various resources. Their analysis is attached (Appendix A) and was incorporated into the environmental assessment. The table below shows which specialist analyzed which resources.

Table 5.2 List of Preparers

Name	Title	Responsible for the Following Section(s) of this Document
Matt Rajala	Natural Resource Specialist – NEPA Coordinator	Impact analysis for air quality, environmental justice, soils, prime & unique farmlands, floodplains, and socioeconomics.

Bill Thompson	Rangeland Management Specialist	Used the analysis of the various specialists to prepare the environmental assessment. Impact analysis for wetlands/riparian zones, range management, livestock grazing, and Rangeland Standards and Guidelines
David Whitaker	Rangeland Management Specialist	Impact analysis for T&E plant species, vegetation including special status species other than FWS candidate or listed species.
Jim Priest	Wildlife Biologist	Impact analysis for wildlife, T&E animal species, and fish & wildlife including special status species other than FWS candidate or listed species
Eric Reid	Rangeland Management Specialist	Impact analysis for wild horses
Steve Bonar	Outdoor Recreation Planner	Impact analysis for wilderness/WSA, Areas of Critical Environmental Concern, wild & scenic rivers, recreation, wilderness characteristics, and visual resources.
Clara Stevens	Realty Specialist	Impact analysis for lands and access
Jerry Mansfield	Geologist	Impact analysis for paleontology, energy resources, and geology and mineral resources/energy production.
Justin Johnson	Fuels Specialist	Impact analysis for fuels/fire management
Misty Haines	Archeologist	Impact analysis for cultural resources
Joelle McCarthy	Archeologist	Impact analysis for Native American religious concerns
RB Probert	Biological Science Technician	Impact analysis for invasive, non-native species
Brent Crosland	Range Technician	Impact analysis for woodland/forestry and Wastes (hazardous & solid).
Paul Caso	Rangeland Management Specialist	Impact analysis for water quality & watershed
Wendy Wilding	Fire Prevention & Education Specialist	Impact analysis for Prevention/Education (Fire)

APPENDICES

APPENDIX A
INTERDISCIPLINARY TEAM ANALYSIS RECORD CHECKLIST

Project Title: SAND DUNE WELL PIPELINE AND TROUGHS

Charge Code:

NEPA Log Number: UT-010-09-006

File/Serial Number:

Project Leader: Bill Thompson

Project Description: Construct approximately 4 miles of 1.5" SDR11 plastic pipeline and install 3 frost free water troughs. One 10,000 gallon water storage tank would be installed near each trough. Frost free water troughs would be partially buried in the ground. An existing trough at the well location has become partially uncovered and more earthen material that is not likely to blow away would be hauled in to cover it. A new frost free trough would be installed approximately 1.8 miles north of Sand Dune Well near Collier's Reservoir. Another frost free trough would be installed approximately 2 miles southeast of Collier's Reservoir.

Pipe would be ripped into the ground by use of a ripper behind a bull dozer.

Support equipment would include a transport for the bull dozer, ATVs, Pickup Trucks, and trailers for pipe transport.

MANAGEMENT REVIEW OF PROPOSAL:

Field Office Manager	Date Reviewed	Comments
Eric Reid	10/29/08	At a meeting held on 12/16/2008 it was agreed that a back flow preventer would be installed where the line from Oak City joins our pipeline at Sand Dune Well and that the line from Oak City to the Well would be authorized under a right of way issued to the applicant (Oak City Grazers Association).

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for significant impact analyzed in detail in the EA; or identified in a DNA as requiring further analysis

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section C of the DNA form.

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Determination	Resource	Rationale for Determination*	Signature	Date
NI	Air Quality	Impacts resulting from the proposed project are not sufficient to warrant further analysis.	/s/ Matt Rajala	2/4/2009
NP	Areas of Critical Environmental Concern	There are no ACEC's within the project area.	/s/SBonar	2-25-09
NP	Cultural Resources	No Historic properties present	/s/ Joelle McCarthy	3-23-09
NI	Environmental Justice	The nature of the proposed action does not present any foreseeable impacts to environmental justice.	/s/ Matt Rajala	2/4/2009
NI	Farmlands (Prime or Unique)	The nature of the proposed action does not present any foreseeable impacts to Farmlands.	/s/ Matt Rajala	2/4/2009
NI	Floodplains	The nature of the proposed action does not present any foreseeable impacts to Floodplains.	/s/ Matt Rajala	2/4/2009
PI	Invasive, Non-native Species	See attachment for mitigation	/s/R.B. Probert	2/2/09
NP	Native American Religious Concerns	No concerns identified	/s/ Joelle McCarthy	3-23-09
NP	Threatened, Endangered or Candidate Plant Species	There are no known federally-listed plants within the proposed well and pipeline project	/s/DWhitaker	1/12/09
NP	Threatened, Endangered or Candidate Animal Species	There are no federally listed threatened or endangered species known within or near the site of the proposed action.	/s/ J. Priest	4-2-09
NP	Wastes (hazardous or solid)	All hazardous materials used or produced must be reported to the FFO. They must be removed and disposed in an appropriately permitted disposal facility. Solid waste must be removed and properly disposed	/s/ BCrosland	2/9/09
NI	Water Quality (drinking/ground)	This proposal will not affect water quality.	/s/ PCaso	2/27/09
NI	Wetlands/Riparian Zones	There are no riparian or wetlands in the project area.	/s/ Bill Thompson	1/28/2009
NP	Wild and Scenic Rivers	There are no wild & scenic rivers within the FFO.	/s/SBonar	2-25-09
NP	Wilderness/WSA's	There are no wilderness/WSA's within the project area.	/s/SBonar	2-25-09
NI	Rangeland Health Standards and Guidelines	Water development would improve range conditions which is in compliance with rangeland Health Standards and Guidelines.	/s/ Bill Thompson	1/28/2009
PI	Livestock Grazing	Livestock distribution would be improved which would improve range conditions on the allotment.	/s/ Bill Thompson	1/28/2009
NI	Woodland / Forestry	No Impact to Forestry	/s/ BCrosland	2/9/09
NI	Vegetation including Special Status Plant Species other than FWS candidate or listed species	There are no known special status plants on the BLM lands on which the pipeline and trough project is proposed. Given the few acres that are to be disturbed and since the pipe will be ripped in, no significant negative impacts to vegetation are anticipated.	/s/DWhitaker	1/12/09
NI	Fish and Wildlife Including Special Status Species other than FWS candidate or listed species e.g. Migratory birds.	BLM special status species that could be found in Juab County that could potentially utilize the environment within the vicinity of the proposed action include golden eagle (<i>Aquila chrysaetos</i>), bald eagle (<i>Haliaeetus leucocephalus</i>), burrowing owl (<i>Athene cunicularia</i>), Ferruginous hawk (<i>Buteo regalis</i>), greater sage-grouse (<i>Centrocercus urophasianus</i>), and kit fox	/s/ J. Priest	4-2-09

Determination	Resource	Rationale for Determination*	Signature	Date
		<p>(<i>Vulpes macrotis</i>). Migratory birds that may utilize this area include the black-throated gray warbler (<i>dendroica nigrescens</i>), Brewer's sparrow (<i>Spizella breweri</i>), broad-tailed hummingbird (<i>selasphorus platycercus</i>), loggerhead shrike (<i>Lanius ludovicianus</i>) northern harrier (<i>Circus cyaneus</i>), pinyon jay (<i>Gymnorhinus cyanocephalus</i>), prairie falcon (<i>Falco mexicanus</i>), and sage sparrow (<i>amphispiza belli</i>).</p> <p>General wildlife species that could be found to utilize sagebrush/steppe and juniper habitat types within the vicinity of the proposed action include mule deer (<i>Odocoileus hemionus</i>), pronghorn antelope (<i>Antilocarpa Americana</i>), mountain lion (<i>Felis concolor</i>), blacktail jackrabbits (<i>Lepus californicus</i>) and coyote (<i>Canis latrans</i>)</p> <p>Stipulations:</p> <ol style="list-style-type: none"> 1. All water troughs are to be wildlife friendly and to include small mammal and birds ramps. 2. Impacts to seasonal streams and/or washes and associated vegetation is to be minimized to as much as practical. 3. Sediment delivery generated by construction activity to the seasonal stream and/or washes is to be minimized to as much as particle. 4. Removal of vegetation within seasonal streams and/or washes is to be minimized to as much as practical. 		
NI	Soils	There would be some temporary disturbance of the soils from the project but the disbursement of livestock and better management of the allotment would benefit soils. Overall the proposed project presents no impacts that warrant further analysis.	/s/ Matt Rajala	2/4/2009
NI	Recreation	There would be no impacts to casual recreation use in the project area.	/s/SBonar	2-25-09
NI	Visual Resources	There would be no impacts to the VRM Classifications in this project area.	/s/SBonar	2-25-09
NI	Geology / Mineral Resources/Energy Production	No current mining activity. Future minerals action can be accomplished with mitigation	/s/JMansfield	03/17/2009
NI	Paleontology	No known significant fossils in the area	/s/JMansfield	03/17/2009
NI	Lands / Access	The proposed action would not affect access to public land. If the proposed project crosses an existing road, the crossing should be coordinated with the entity affected (Millard County, ROW holder, or material site permittee, etc.) and the road crossing should be bladed smooth. See attached Realty/Access Report for mitigation measures and ROWs in the project area.	/s/CStevens	1/27/2009
NI	Fuels / Fire Management	No impact to Fire or Fuels	/s/JJohnson	10/22/2008
NI	Socio-economics	The proposed project presents no foreseeable impacts to socio-economics.	/s/ Matt Rajala	2/4/2009

Determination	Resource	Rationale for Determination*	Signature	Date
NP	Wild Horses and Burros	There are no wild horses within project area	/s/Eric Reid	1/28/09
NP	Wilderness characteristics	There are no identified wilderness characteristics within the project area.	/s/SBonar	2-25-09
NI	Prevention/Education (Fire)	See Fire Stipulations	Wwilding	4/3/09

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
NEPA / Environmental Coordinator			
Authorized Officer			

APPENDIX B

APPENDIX C FIRE PREVENTION STIPULATIONS

The holder or its contractors will notify the BLM of any fires and comply with all rules and regulations administered by the BLM concerning the use, prevention and suppression of fires on federal lands, including any fire prevention orders that may be in effect at the time of the permitted activity. The holder or its contractors may be held liable for the cost of the fire suppression, stabilization and rehabilitation. In the event of a fire, personal safety will be the first priority of the holder or its contractors. The holder or its contractors will:

1. Operate all internal and external combustion engines on federally managed lands per 36 CFR 261.52, which requires all such engines to be equipped with a qualified spark arrester that is maintained and not modified.
2. Carry shovels, water, and fire extinguishers that are rated at a minimum as ABC -10 pound on all equipment and vehicles.
3. Initiate fire suppression actions in the work area to prevent fire spread to or on federally administered lands. If a fire spreads beyond the capability of workers with the stipulated tools, all will cease fire suppression action and leave the area immediately via pre-identified escape routes.
4. Notify the **Central Utah Interagency Fire Center** at **435-896-8404** immediately of the location and status of any escaped fire or call **911**.
5. Notify the **BLM** of the incident.
6. When welding, grinding, cutting or conducting other similar, spark-producing work, choose an area large enough to contain the sparks that is naturally free of all flammable vegetation or remove the flammable vegetation in a manner compliant with the permitted activity. If adequate clearance cannot be made, wet an area large enough to contain all sparks prior to the activity and periodically throughout the activity to reduce the risk of wildfire ignition. Regardless of clearance, maintain readiness to respond to an ignition at all times. In addition, keep a shovel per person and at least one fire extinguisher as specified earlier (#2) on hand during this activity.