

**United States Department of the Interior**  
**U.S. Fish and Wildlife Service**  
**2321 West Royal Palm Road, Suite 103**  
**Phoenix, Arizona 85021-4951**  
**Telephone: (602) 242-0210 FAX: (602) 242-2513**

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July 2, 2008

Memorandum

To: Superintendent, Grand Canyon National Park, Grand Canyon, Arizona

From: Field Supervisor

Subject: Addendum to the Biological Opinion for the Grand Canyon National Park Fire Use Program

Thank you for your May 30, 2008, letter regarding the subject biological opinion which was finalized and issued on June 11, 2003. The life of the wildland fire use program covered by the biological opinion is five years which ends June 2008. Grand Canyon National Park (GRCA) is currently developing a new Fire Management Plan (FMP), and the GRCA target for completion of formal consultation on the new plan is January 2009. Your May 30 letter requested an extension of the timeframe of the original program and biological opinion through the time period necessary for completion of the formal consultation on the new FMP.

During the requested extension period, GRCA will continue to manage the wildland fire use program as described in the August 13, 2002, Biological Evaluation for Wildland Fire Use. That management includes, among many other provisions, a commitment by GRCA to limit the combined amount of high and moderate-high severity fire to no more than fifteen percent of the annual wildland fire use acreage that occurs in Mexican spotted owl (MSO) habitat and critical habitat, and to limit the total wildfire use acreage to no more than 20,000 acres of MSO habitat annually. In addition, there are several other conservation measures, reasonable and prudent measures, terms and conditions, and conservation recommendations in the 2003 biological opinion that apply to the MSO and several other species.

According to the May 30 letter, GRCA will continue to follow and implement the 2003 biological opinion (including all conservation measures, reasonable and prudent measures, and terms and conditions for all of the species addressed by the biological opinion and appendices) for the period of the requested extension.

In order to determine if the wildland fire use program has been within the scope of the biological evaluation and biological opinion, we reviewed annual fire reports that GRCA prepared under requirements of the biological opinion. For the most part, the reasonable and prudent measures and terms and conditions of the biological opinion have been implemented through 2007.

However, review of the fire reports and our records suggests that implementation of term and condition 4.2 of the 2003 biological opinion could be improved. We recommend that you work with us to design and implement fire effects monitoring that will meet term and condition 4.2.

The following table summarizes the results of GRCA wildland fire use since 2003. The fire reports are not completely clear regarding MSO habitat acreages for the Powell, Poplar, and Dragon fires. However, those fires were included in the GRCA fire reports, and the figures represent our current understanding of MSO habitat affected by the fires.

For each year, the amount of MSO habitat affected by wildland fire use was less than 20,000 acres. The amount of MSO habitat that sustained moderate-high and high severity fire was greater than fifteen percent in 2003 (21%) and 2004 (31%). From 2003 through 2006, the overall amount of higher severity fire in MSO habitat was eighteen percent. However, except for the Poplar and Bright fires, the higher severity for each of the other eight fires was eleven percent or less. Severity results for 2007 are not yet available.

Figures in the table are for the entire Poplar Fire. Only 7,102 acres of that fire were wildland fire use before it was declared a wildfire; the amount of higher severity fire during wildland fire use is unknown. The Bright Fire burned primarily at low to moderate intensity except for the conditions of one day that resulted in higher severity fire.

Year	Wildland Fire Use	MSO Habitat Burned (acres)	MSO Habitat Burned at Moderate-High and High Severity (acres)	Percent of MSO Habitat Burned at Moderate-High and High Severity
2003	Powell	2,897	85	3
2003	Big	442	31	7
2003	Poplar	11,213	3,169	28
2003	Rose	2,900	322	11
<b>2003</b>	<b>Total</b>	<b>17,452</b>	<b>3,607</b>	<b>21</b>
2004	Marble	24	0	0
2004	Saffron	94	0	0
2004	Quartz	432	37	9
2004	Bright	896	416	46
<b>2004</b>	<b>Total</b>	<b>1,446</b>	<b>453</b>	<b>31</b>
2005	Dragon	7,925	845	11
2005	Marble	148	1	1
<b>2005</b>	<b>Total</b>	<b>8,073</b>	<b>846</b>	<b>10</b>
<b>2006</b>	<b>None of concern</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>
2007	Roosevelt	4,959	unknown	unknown
<b>2007</b>	<b>Total</b>	<b>4,959</b>	<b>unknown</b>	<b>unknown</b>
<i>2003-06</i>	<i>Grand Total</i>	<i>26,971</i>	<i>4,906</i>	<i>18</i>

We agree that extension of the original program through 2009 is appropriate because the program has generally been within the scope of, and GRCA will continue to fully implement, the terms of the original biological evaluation and biological opinion. With this memorandum, the 2003 biological opinion is so amended.

If we can be of further assistance, please contact Bill Austin (x102) or Brenda Smith (x101) at (928) 226-0614.

/s/Shaula Hedwall for

Steven L. Spangle

cc: Director, Science Center, Grand Canyon National Park, Grand Canyon, AZ  
Carmen Sipe, Grand Canyon National Park, Grand Canyon, AZ  
Shaula Hedwall, Fish and Wildlife Service, Flagstaff, AZ  
Chief, Habitat Branch, Arizona Game and Fish Department, Phoenix, AZ

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