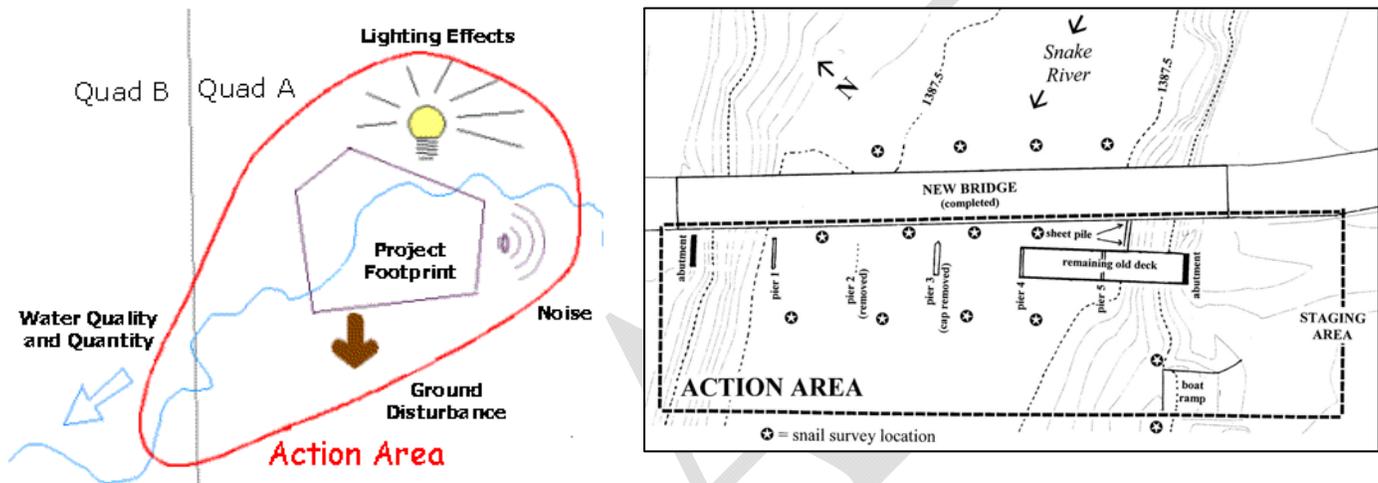


## Description of the Action

(written by Action Agency *with the assistance of the FWS & other interagency partners*)

The draft action description should be shared electronically throughout this step and should include:

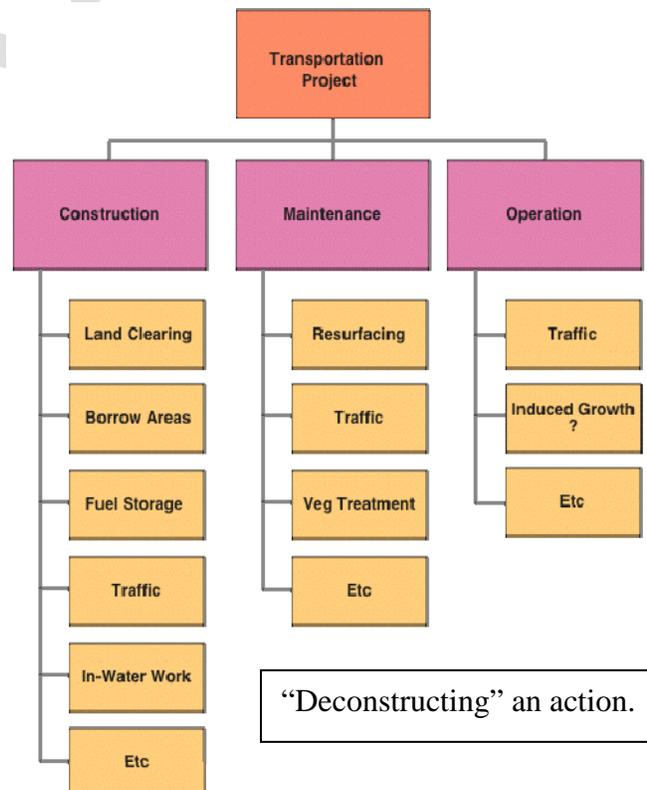
1. Maps of the project footprint, action area, including associated areas (e.g., staging areas, borrow sites, etc.), and access roads. For example:



2. A complete description of all aspects of the proposed project, including the identification of

- Avoidance BMPs
- Minimization BMPs
- Mitigation BMPs

The action should be “deconstructed” into its component parts. For example, activities associated with construction of a building may include constructing a road to the facility, clearing habitat on the building site, developing staging and fuel storage areas, implementing stream crossings, etc. Each of these aspects of the project could have different potential impacts. By “deconstructing” the proposed project into its component parts, it becomes much easier to organize and evaluate



the potential impacts of the project as a whole.

Describe the anticipated steps involved in the action in expected or logical order and include diagrams that are useful. The intent of the proposed action section is to describe *what* will be built, *how* it will be constructed, and *how* it will be maintained. For example: 1. Dewater by.... 2. Remove old bridge by.... 3. Remove old abutments by... 4. Construct new abutments... 5. In-water equipment will be..... 6. Order of magnitude of quantities... Include description of actions for the entire action area (including interrelated and interdependent actions). Describe criteria for off-site use areas which minimize potential effects. If the contractor proposes an alternative construction method other than that described in the BE/BA, concurrence from the Services is required.

List the BMPs identified above, in three separate sections (avoidance, minimization, mitigation). These BMPs should be directly copied into the monitoring checklist, and should include a separate column that identifies criteria that indicate when a BMP has been successfully implemented. For example:

BMP type	BMP	Success criteria
minimization	Employ typical erosion-control measures and BMPs throughout the project area in accordance with the Project Storm Water Pollution Prevention Plan (SWPPP)	BMP is successfully implemented when 100% of surface flow permeates fencing (i.e., no flow goes under, around, or over fencing).
minimization	Use the minimum permanent night lighting needed to fully achieve operational purposes at fences, barriers, and surveillance sites. At fences, barriers and related sites; shield and direct lights into the designated security zone. Use no brighter than 1.5 foot candles for lights reaching any adjacent federally listed habitat. This is important for large and medium animals, bats, and birds.	BMP is successfully implemented when light reaching any adjacent federally listed habitat is no greater than 1.5 foot candles.
minimization	Design light poles and other pole-like structures to discourage roosting by birds, particularly raptors that may use the poles for hunting perches.	BMP is successfully implemented when birds cannot gain purchase on structures for longer than 5 seconds
minimization	To prevent entrapment of wildlife species during emplacement of vertical posts/bollards, cover all vertical fence posts/bollards that are hollow (i.e., those that should be filled with a reinforcing material such as concrete) to prevent wildlife from entrapment. Deploy covers from the time the posts or hollow bollards are erected to the time they are filled with reinforcing material.	BMP is successfully implemented when caps cover 100% of opening and are permanently affixed.

If a BMP is included that identifies the need for revegetation with a native seed mix, be as specific as possible about the species composition of that mix. For example:

minimization	<p>When revegetating site 62A, include only the following species in a seed mix of no fewer than five species. Distribute immediately upon completion of construction in the area:</p> <ol style="list-style-type: none"> <li>1. <i>Agropyron spicatum</i> (spiked wheatgrass)</li> <li>2. <i>Poa sandbergii</i> (steppe bluegrass)</li> <li>3. <i>Festuca idahoensis</i> ( Idaho fescue)</li> <li>4. <i>Stipa comata</i> (needle grass)</li> <li>5. <i>Elymus cinerus</i> (giant wild rye)</li> <li>6. <i>Distichlis stricta</i> (creeping salt grass)</li> <li>7. <i>Camassia quamash</i> (camas)</li> <li>8. <i>Eriogonum heracleoides</i> (desert buckwheat)</li> <li>9. <i>Eurotia lanata</i> (winter fat)</li> </ol>	<p>BMP is successfully implemented when</p> <ol style="list-style-type: none"> <li>1) disturbed area of site 62A has been reseeded and</li> <li>2) vegetation persists for two years.</li> </ol>
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### 3. Monitoring Plan, including:

- **reporting format (BMP checklists, weekly summary reports, and final project reports) – see checklist example below**
- **due dates (as appropriate; some projects may require more frequent reporting than others and should be specified in the monitoring plan)**
- **requirement for notification of pre-project planning meetings**
- **project start dates**

Include the actual monitoring checklist that will be used by environmental monitors as an appendix. Include instructions to post to IPaC or to a website at the end of each week without delay. For example:

**Monitoring Checklist –Project 62A**  
**Enter information into IPaC each Friday**

GENERAL INFORMATION			
Today's Date:	Fence Segment # (Or Tower #) <i>(Fill out before including in Description of Action in BA)</i>	Fence or Tower Type: <i>(Fill out before including in Description of Action in BA)</i>	
Nearest Border Monuments and other location description including land ownership: <i>(Fill out before including in Description of Action in BA)</i>		Type of Work Occurring on Inspection Date: <input type="checkbox"/> Pre-construction clearing <input type="checkbox"/> Construction <input type="checkbox"/> Post-construction <input type="checkbox"/> Other: _____	
USBP Sector: Tucson		USBP Station and Zone: <i>(Fill out before including in Description of Action in BA)</i>	
Date Present Type of Work Began:	Date Next Phase Begins:	Last Inspection Date:	Next Inspection Date:
Contractor:		Biological Monitor:	
Weather Conditions at Time of Inspection: <input type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snowing <input type="checkbox"/> Drifting <input type="checkbox"/> High Winds Temperature: _____			

SITE CHARACTERISTICS	
Approximate Slope of Work Site: <i>(If variable state range)</i>	Predominant Soil Texture:
Erodibility Hazard: <input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	Type of Stream (s) Present: <input type="checkbox"/> Perennial <input type="checkbox"/> Intermittent <input type="checkbox"/> Ephemeral <input type="checkbox"/> N/A
Distance to nearest water body: Type (Stream, pond, lake, wetland, tank, etc.):	Describe plant communities (list top 3 dominant species for each):
Federally listed plants on-site (within inspected portion of impact corridor). <i>(Fill out before including in Description of Action in BA)</i>	
Federally listed fish or wildlife on-site. <i>(Fill out before including in Description of Action in BA)</i>	
Federally listed species that may migrate through area: <i>(Fill out before including in Description of Action in BA)</i>	
State listed species on-site: <i>(Fill out before including in Description of Action in BA)</i>	BLM/USFS Species of Concern on-site: <i>(Fill out before including in Description of Action in BA)</i>
State listed species that may migrate through area: <i>(Fill out before including in Description of Action in BA)</i>	BLM/USFS Species of Concern that may migrate through site: <i>(Fill out before including in Description of Action in BA)</i>

CONSTRUCTION BMP MONITORING			
	BMP or Action	Success Criteria <i>(from previous table)</i>	BMP IN PLACE? Comments
1	Employ typical erosion-control measures and BMPs throughout the project area in accordance with the Project Storm Water Pollution Prevention Plan (SWPPP)	BMP is successfully implemented when 100% of surface flow permeates fencing (i.e., no flow goes under, around, or over fencing).	<input type="checkbox"/> Yes <input type="checkbox"/> No If no, describe action needed:
2	Use the minimum permanent night lighting needed to fully achieve operational purposes at fences, barriers, and surveillance sites. At fences, barriers and related sites; shield and direct lights into the designated security zone. Use no brighter than 1.5 foot candles for lights reaching any adjacent federally listed habitat. This is important for large and medium animals, bats, and birds.	BMP is successfully implemented when light reaching any adjacent federally listed habitat is no greater than 1.5 foot candles.	<input type="checkbox"/> Yes <input type="checkbox"/> No If no, describe action needed:
3	Design light poles and other pole-like structures to discourage roosting by birds, particularly raptors that may use the poles for hunting perches.	BMP is successfully implemented when birds cannot gain purchase on structures for longer than 5 seconds	<input type="checkbox"/> Yes <input type="checkbox"/> No If no, describe action needed:
4	To prevent entrapment of wildlife species during emplacement of vertical posts/bollards, cover all vertical fence posts/bollards that are hollow (i.e., those that should be filled with a reinforcing material such as concrete) to prevent wildlife from entrapment. Deploy covers from the time the posts or hollow bollards are erected to the time they are filled with reinforcing material.	BMP is successfully implemented when caps cover 100% of opening and are permanently affixed.	<input type="checkbox"/> Yes <input type="checkbox"/> No If no, describe action needed:
5	When revegetating site 62A, include only the following species in a seed mix of no fewer than five species. Distribute immediately upon completion of construction in the area: 1. <i>Agropyron spicatum</i> (spiked wheatgrass) 2. <i>Poa sandbergii</i> (steppe bluegrass)	BMP is successfully implemented when  1) disturbed area of site 62A has been reseeded and  2) vegetation persists for two years.	<input type="checkbox"/> Yes <input type="checkbox"/> No If no, describe action needed:

<ol style="list-style-type: none"> <li>3. <i>Festuca idahoensis</i> ( Idaho fescue)</li> <li>4. <i>Stipa comata</i> (needle grass)</li> <li>5. <i>Elymus cineris</i> (giant wild rye)</li> <li>6. <i>Distichlis stricta</i> (creeping salt grass)</li> <li>7. <i>Camassia quamash</i> (camas)</li> <li>8. <i>Eriogonum heracleoides</i> (desert buckwheat)</li> <li>9. <i>Eurotia lanata</i> (winter fat)</li> </ol>		
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**4. Long-term maintenance activities, and operations that would not occur but for this project.**

Last, but not least, this information must also be included as a part of the project’s action description.

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It is very important to reach a common understanding on the action description among all resource agencies involved, as it forms the basis for all other sections of the Biological Assessment (BA). All agencies need to have a clear description of the proposed action in order to fulfill their responsibilities in the environmental review process.

It is understood that designs may change throughout project development. As long as this step remains collaborative, each agency is more likely to be able to accommodate these changes and provide necessary responses in a timely fashion, thus minimizing the potential for future delays.