

Uinkaret Mountains Landscape Restoration Project

Scoping Report

Prepared by
U.S. Department of the Interior
Bureau of Land Management
Arizona Strip District

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BLM

Grand Canyon Parashant Monument and Arizona Strip Field Office, St. George Utah



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1.0 Summary of Public Scoping Activities

1.1 Introduction

The Bureau of Land Management (BLM) is preparing an Environmental Impact Statement (EIS) for the Uinkaret Mountains Landscape Restoration Project (UMLRP) in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, and the Federal Land Policy and Management Act (FLPMA) of 1976, as amended. The project area is approximately 60 miles southwest of Fredonia, Arizona, and consists of approximately 128,500 acres of public land in the Uinkaret Mountains area (including Mount Trumbull and Mount Logan) of Mohave County, Arizona. Approximately 70 percent of the area is within Grand Canyon-Parashant National Monument and about 30 percent is within the Arizona Strip Field Office. The project is designed to implement direction contained in the Grand Canyon-Parashant National Monument and Arizona Strip Field Office RMPs, approved January 29, 2008.

The BLM completed an evaluation of existing resource conditions throughout the project area. Based on these evaluations, areas were identified where one or more of the Standards for Rangeland Health (RMPs 2008) were not being met. The BLM will use the information from the evaluation in the continued development of the Uinkaret Mountains Landscape Restoration Project and will ensure that the project is designed to implement direction contained in the Grand Canyon-Parashant National Monument and Arizona Strip Field Office Resource Management Plans (RMPs) approved January 29, 2008.

The primary goals of this project are to:

- ◆ Restore the vegetative landscape to the range of natural variability in the Uinkaret Mountains
- ◆ Provide an integrated vegetation management strategy to federal lands in the project area, as directed by the Grand Canyon-Parashant National Monument and Arizona Strip Field Office RMPs (2008)
- ◆ Focus and integrate BLM and local management efforts in the project area, and provide a foundation for developing a coordinated management strategy with partner agencies, stakeholders, American Indian Tribes, and the public.

The focus of the project is to: (1) protect cultural, biological and physical resources and human values (including Monument objects, for which the Monument was created); (2) improve landscape-scale biodiversity, ecosystem function, and fire resiliency; and (3) work collaboratively with others to develop a vegetation management strategy on lands administered by the BLM within the project area.

As part of the development process for the EIS, the BLM held public scoping from October 21, 2014 through December 18, 2014 to allow the opportunity for public comment on the proposal. Comments could be submitted in writing, by electronic mail, hand delivered, or by facsimile to the BLM NEPA Coordinator. In addition, the BLM held two public scoping meetings, one in St. George, Utah (November 12) and one in Flagstaff, Arizona (December 3). Written comments were also accepted at these meetings.

The scoping process was initiated by the publication of a Notice of Intent (NOI) to Prepare an Environmental Impact Statement in the Federal Register. Letters and email notifications were also sent to the project mailing list and news releases were published in local newspapers announcing the scoping period and the public meetings.

1.2 Public Notices and News Releases

On October 21, 2014, an NOI was published in the Federal Register (Volume 79, Number 203, pages 62954 - 62955) requesting comments to be submitted within 30 days of the date of the notice (or by November 20, 2014) or 15 days after the last public meeting. Because the Flagstaff meeting was held on December 3, the scoping period was extended to December 18. A news release was published on October 21 announcing the scoping period and the public meeting scheduled to be held in St. George, Utah on November 12. A second news release was issued on November 6 announcing the cancelation of a public meeting in Mesquite, Nevada and a third news release was published announcing the December 3 public meeting in Flagstaff, Arizona.

The Grand Canyon Parashant and the Arizona Strip Websites were updated with this information and letters and email notifications were sent to the people, organizations and other agencies on the project mailing list as well.

1.3 Public Meetings

The first public meeting was held in St. George, Utah at the Lexington Hotel and Conference Center on November 12, from 4 pm to 6 pm. The second meeting was held in Flagstaff, Arizona at the Embassy Suites Hotel on December 3, from 4 pm to 6 pm. Both meetings were conducted in an open-house style. Informational displays were provided and BLM staff was available at each information table to answer questions and provide project information. A welcome table was set up where participants were greeted, asked to sign in, and provided copies of the NOI, copies of the first news release issued with information on how to comment, and a detailed project description with a map. Comment forms were also available. A project PowerPoint presentation was set up to run on a continuous loop on a laptop computer at a table as well. There were no formal presentations made.

2.0 Comment Statistics

The BLM received a total of 43 comment submittals (letters, comment forms, emails, faxes) on the proposed Uinkaret Mountains Landscape Restoration Project. As shown in Table 1, out of these 43 submittals:

- 3 were duplicate submittals
- 23 were identical form letters
- 1 was a form letter 'plus' meaning it had some unique content in addition to the form letter
- 3 were 'master' form letters meaning these were coded as the representative sample of the content in the other form letters
- 13 (30 percent) of all submittals were determined to have solely unique content

Out of the 40 unique submittals, most (93 percent) came from the United States but there was one submittal each from Belgium, Canada and Slovenia. All submittals were read carefully and a total of 376 individual comments were identified out of all of the submittals (Table 1). These individual comments were then sorted into subject categories/overall themes for use by the project interdisciplinary team (Table 2). For each submittal received, there may have been several comments, each coded separately based on subject. This form of analysis allows for specific

comments to be captured and then grouped under the umbrella of a general resource issue. It also allows for cross-referencing and comparison. All categories were assigned by one staff person and validated by another, and each distinct comment was entered into the comment database.

All categorized comments were provided to the interdisciplinary team in spreadsheet format¹ for review, and then discussed during interdisciplinary team meetings held on January 21 and February 12. Information in this spreadsheet was used to gather initial ideas from the team on how best to utilize the public input on preliminary concerns. That input was then used to prepare this report.

Table 1. List of Commenters

| Individual/Organization | Commenter Number ¹ | Letter Type | Number of Individual Comments |
|---|---|---------------------------|--------------------------------|
| Jean Public | 1 | Unique | 2 |
| Jeffrey Bean | 2 | Master form | 7 |
| Various Individuals | 3, 5, 6, 9-12, 14-18, 21, 23, 25-30, 35 | Form | 0 ² |
| Center for Biological Diversity | 4 | Unique | 103 |
| Blue Ribbon Coalition, Inc. | 7 | Unique | 2 |
| Littlefield Hurricane Valley Natural Resource Conservation District | 8 | Unique | 4 |
| Josh Wilson | 13, 20, 31, 34 | Unique, Form, Master Form | 15 |
| Washington County Commission | 24 | Unique | 4 |
| Colin McNamara | 32 | Form Plus | 4 |
| Arizona Game and Fish Department | 33 | Unique | 18 |
| Gavin Heaton | 37 | Unique | 10 |
| Arizona State Land Department | 38 and 42 | Master Form, Unique | 2 |
| The Wilderness Society, Western Watersheds Project, Sierra Club and Center for Biological Diversity | 39 | Unique | 173 |
| Shivwits Band of Paiutes | 40 | Unique | 16 |
| Parashant Partnership | 41 | Unique | 14 |
| Hopi Tribe Cultural Preservation Office | 43 | Unique | 2 |
| TOTAL | 40 non-duplicate submissions | | 376 individual comments |

¹ – the duplicate submittals (letters 19, 22, and 36) were not considered further and were removed from the table above

² – comments contained within form letters were counted in the master form and form plus entries

¹ available in the project record

Table 2. Comment Subject Breakdown

| Subject | Quantity | Percent |
|--|-----------------|----------------|
| Four Forest Restoration Strategy | 1 | 0.27 |
| Adaptive Management | 1 | 0.27 |
| Air Quality – Dust | 1 | 0.27 |
| Analysis – General | 5 | 1.33 |
| Old Growth/Large Tree Retention | 7 | 1.90 |
| Analysis – Roads | 1 | 0.27 |
| Attachments provided | 9 | 2.39 |
| Best Available Science | 2 | 0.53 |
| Chaining | 1 | 0.27 |
| Clarify and Revise | 2 | 0.53 |
| Comment Period Extension | 1 | 0.27 |
| Consultation/Areas of Interest | 2 | 0.53 |
| Cooperating Agencies | 8 | 2.13 |
| Desired Future Conditions | 1 | 0.27 |
| Ecological Health | 1 | 0.27 |
| Ecological Restoration Institute Publication | 1 | 0.27 |
| Fire Regimes/Fuels/Wildfire | 12 | 3.20 |
| General | 3 | 0.80 |
| Goals/Purpose/Need/Project Focus | 9 | 0.53 |
| Grazing/Livestock/Range | 6 | 2.40 |
| Habitat | 3 | 0.80 |
| Landscape Assessment/Inventory | 3 | 0.80 |
| Mailing List Updates | 5 | 1.33 |
| Maintenance of Existing Projects | 4 | 1.06 |
| Mexican Spotted Owl | 3 | 0.80 |
| Mitigation | 1 | 0.27 |
| Monitoring | 5 | 1.33 |
| Natural Process | 3 | 0.80 |
| NEPA – general | 1 | 0.27 |
| Non-Native Species | 5 | 1.33 |
| Pinyon-Juniper | 4 | 1.06 |
| Ponderosa Pine | 5 | 1.33 |
| Potential impacts | 6 | 1.60 |
| Prioritize Actions | 1 | 0.27 |
| Protection | 4 | 1.06 |
| References Cited | 180 | 47.87 |
| Reseeding | 4 | 1.06 |
| AZ Strip Resource Mgmt. Plan | 2 | 0.53 |
| GCPNM Resource Mgmt. Plan | 5 | 1.33 |

| Subject | Quantity | Percent |
|------------------------------------|-----------------|--------------------|
| Socioeconomics | 3 | 0.80 |
| Soil Health and Water Resources | 8 | 2.12 |
| Stakeholders/Public Involvement | 10 | 2.66 |
| Treatment – Mechanical | 2 | 0.53 |
| Treatment – General | 10 | 2.66 |
| Tribal Concerns/Cultural Resources | 12 | 3.20 |
| Vegetation Mgmt. Strategy | 1 | 0.27 |
| Wildlife Habitat/Big Game | 3 | 0.79 |
| TOTAL | 376 | 100 percent |

3.0 Preliminary Concerns

As described in the BLM NEPA Handbook (2008), scoping is the process that is used to solicit input on potential issues, impacts, and alternatives, as well as the extent to which those potential issues and impacts will be analyzed. Scoping can also assist in identifying actions by others in and around a project area that may have a cumulative effect with the proposed action. Scoping helps to begin identifying incomplete and unavailable information and evaluating whether that information is essential to a reasoned choice among alternatives.

Table 3 that follows identifies the concerns or suggestions raised by the public. Table 4 identifies those comments that were related to the development of alternatives.

Table 3. Scoping Comment Concern Summary

| Concern or Suggestion |
|---|
| Air Quality |
| Proposed activities have the potential to generate dust and this can adversely affect air quality |
| Climate Change |
| Proposed activities have the potential to generate dust and this has implications to climate change |
| Proposed activities have the potential to increase ecological resiliency in the face of climate change |
| Climate change has the potential to impact the success of vegetation treatments in the project area |
| Cultural Resources |
| Proposed activities have the potential to adversely impact cultural resources, including archeological resources |
| Proposed activities have the potential to impact culturally-important plants (including old growth) and these should be maintained and protected |
| Chaining and mastication in particular can adversely impact cultural areas |
| Identify all traditional use areas, Traditional Cultural Properties, and ensure they are considered in alternative development |
| Notify tribes prior to burning in order to collect native plants of interest |
| Ecological Health |
| Utilize rapid ecoregional assessment (REAs) to identify how to connect and protect resources at the landscape scale. Consider ecological connectivity in the analysis |

| |
|--|
| Concern or Suggestion |
| Livestock Grazing |
| Grazing after proposed vegetation treatments and seeding has the potential to impede the success of treatments and adversely impact soil recovery and increase invasive species spread |
| Include land health assessments and other grazing management information in the EIS |
| Consider livestock grazing as part of cumulative impacts; grazing can cause juniper to expand and decrease water infiltration |
| Purpose and Need/Objectives/Framework |
| Clarify whether this is a programmatic or site-specific analysis |
| Incorporate the ERI publication "Wildlife Habitat Values and Forest Structure in Southwestern Ponderosa Pine: Implications for Restoration" into this planning effort. |
| The goal of this project should be to restore wildlife and ecological processes |
| The goal of this project should be to restore the project area and to ensure success of the investment |
| The goal of this project should be to restore the long-term viability of species (flora and fauna) |
| The project should focus on increasing the abundance of deer and pronghorn |
| The project should focus on returning natural fire and self-sustaining ecological processes to the landscape; this area is a fire dependent ecosystem |
| Focus on solutions to problems and not on treating symptoms of damaging land uses |
| Focus activities on recovery of areas that have been deforested |
| Focus on retaining naturally occurring forest disturbances and not on mechanical treatments and burning |
| Ensure this project is economically feasible and sustainable |
| Monument Objects |
| Proposed activities have the potential to impact monument objects; identify all monument objects and ensure they are protected |
| Consider the approach used for monument objects provided in the Sonoran Desert National Monument RMP |
| References and Literature Cited |
| Multiple references provided and literature cited |
| Requests |
| Extend the scoping comment period |
| Please arrange a field trip |
| Continue coordination with all stakeholders and tribes |
| Ensure best available science is used and describe supporting science in the analysis |
| Continue coordination with landowners, ranchers in the area |
| Consider coordination with the public and ensure hunters and recreationists in the area consulted |
| Socioeconomics |
| Proposed activities have the potential to impact the protection of communities through use of fire; ensure this is considered |
| Proposed activities have the potential to impact State Trust Lands; this should be considered and all permits and authorizations obtained |
| Soil and Water |
| Proposed activities have the potential to adversely impact biological soil crusts |
| Adopt Belknap et al. 2001 management prescriptions for biological soil crusts |
| Ground disturbing activities have the potential to impact resources and should be minimized |
| Proposed activities have the potential to generate dust and this can adversely affect nutrient cycling, soil |

Concern or Suggestion

fertility, water holding capacity, and biological soil crusts

Proposed activities have the potential to increase soil erosion; maintaining a healthy understory will minimize soil erosion

Vegetation

Proposed activities have the potential to generate dust and this can adversely affect vegetation

Assess and display impacts of the proposal on late succession (i.e. old growth) and ensure appropriate protection of old growth and large trees

Proposed activities have the potential to increase the introduction and spread of non-native cheat grass and other invasive plants and noxious weeds

Proposed activities have the potential to impact native plant communities through fire, logging, grazing and increases in non-native species

Ensure native seed mixes are used to promote native vegetation restoration and include seed mix list in EIS

Wilderness Characteristics/Designated Wilderness

Proposed activities have the potential to adversely affect roadless and wilderness characteristics

Lands with wilderness characteristics should be free from intervention

Designate transition zones to mitigate the 'island effect' of treatments

Ensure a minimum requirements analysis is done prior to proposing any treatments in Wilderness

Wildlife

Proposed activities have the potential to adversely impact species that rely on closed-canopy forests (e.g. squirrels)

Proposed activities have the potential to adversely impact species' hiding cover

Proposed activities have the potential to impact the long-term viability of species

Proposed activities have the potential to impact self-sustaining populations of Kaibab squirrels

Proposed activities have the potential to impact wildlife viability

Proposed activities have the potential to reduce the recruitment of large snags and logs and this can adversely impact wildlife habitat

Proposed activities have the potential to impact wildlife forage

Focus treatments on maintaining wild ungulate populations and maintaining hiding cover, existing water sources, and understory vegetation

Special Status Species

Proposed activities have the potential to adversely impact Mexican spotted owls; ensure analysis does not focus solely on occupied PACs but on forest structure throughout the project area

Proposed activities have the potential to impact viability of special status species; ensure EIS discloses locations and viability for MSO, flycatcher, peregrine falcons, and all listed and special status plants

Proposed activities have the potential to impact rare plants and they should be maintained and protected; minimize use of heavy equipment and limit cross-country travel

Proposed activities have the potential to impact northern goshawk habitat and other species associated with closed-canopy forests

Table 4. Scoping Comments Related to Alternative Development

| Concern or Suggestion Related to Alternatives |
|---|
| Consider the Four Forest Restoration Initiative project strategy as an alternative to the proposed action |
| Consider Arizona Game and Fish Department's 20/20 Strategic Plan in the development of the project |
| Consider the Four Forest Restoration Initiative project's old growth and large tree retention strategy as part of this proposal |
| Preserve all archeological resources in situ; ensure all sites are inventoried and avoided. |
| Prioritize fuel treatments where little resource investment will provide fire resilient stands; consider low-productivity sites first |
| Use fire as the primary restoration tool |
| Use unplanned wildland fires to meet goals; integrate community protection into restoration |
| Use a patchwork of treatments, with some areas left intact to provide stability during droughts or other events |
| Prioritize treatment of sage habitat and consider restoration success, importance to wildlife and cheatgrass introduction/spread as factors; and prioritize ecosystem restoration |
| Leave a range of forest structure on the landscape to protect wildlife habitat |
| Consider removing elk and cattle to improve deer and pronghorn habitat |
| Prioritize treatments that accomplish multiple objectives |
| Consider an alternative that retains all trees larger than 16 inches in diameter |
| Prioritize maintenance of past treatments. For example, along County Road 5 and the Temple Trail west of Mt Trumbull and Mt Logan. Also consider past Mt Trumbull restoration treatments as well. |
| Develop a comprehensive monitoring plan and consider utilizing untreated control plots |
| Minimize chaining and chemical treatments in sage and pinyon juniper woodlands; emphasize fire instead |
| Ensure native seed is used in any restoration activities and that genetically engineered seed is not used |
| Ensure treatments minimize introduction and spread of cheatgrass |
| Ensure mechanical treatments in pinyon juniper are considered; specifically consider treating the area to the east of Sink Valley along county road 717 |
| Incorporate regional mitigation strategy into the project |
| Leave the land natural and do not implement project |
| Consider the Arizona Game and Fish Department's Deer Management Plan in development of the proposal |
| Retain the option to use all treatment methods identified in the RMPs. |
| Do not construct any new permanent roads as part of this project and if temporary roads are needed, they are decommissioned and restored after use |
| Do not use pesticides or herbicides |
| Focus on non-mechanized treatments |
| Consider treating vegetation when climate conditions are optimal |
| Minimize the use of chaining and mastication and focus on chain saws for tree cutting if needed |
| Do not use Tebuthiuron in culturally important areas |
| Do not use herbicides/pesticides in the area of traditional use areas and Traditional Cultural Properties. |
| Ensure livestock grazing is removed for at least 3 to 5 years after treatment in sage habitats |
| Consider past treatments and why they failed or require re-treating and carry this forward into the proposal |
| Consider minimizing treatments in areas where biological soil crusts occur, and salvaging this sensitive resource prior to treatment and then replacing it after |

An important eventual outcome of scoping is clearly defining issues for analysis, and determining how these issues should be used to generate alternatives to the proposed action, develop project design features, and provide the Responsible Official with a reasoned choice among alternatives via the analysis presented in the environmental impact statement (EIS).

An issue has a cause and effect relationship with the proposed action or alternatives; is within the scope of the analysis; has not been decided by law regulations or previous decision, and is amenable to scientific analysis rather than conjecture (BLM NEPA Handbook 2008, page 40).

While many concerns and suggestions may come to our attention during scoping, not all of them warrant further analysis as issues. Concerns raised during scoping should be analyzed in the EIS as key issues if they are needed to make a reasoned choice between alternatives, relate to the purpose and need for action, are associated with a significant direct, indirect or cumulative impact, or show where more analysis is needed to determine the significance of impact.

The preliminary concerns and suggestions shown in Table 3 and alternative suggestions in Table 4 will be further reviewed and considered by the interdisciplinary team and the Responsible Official as the project progresses. They will be used in refining the purpose and need for action, developing alternatives and project design features, and finalizing the list of relevant issues that will be analyzed in detail in the EIS.

4.0 Comments Not Evaluated in this EIS

While most concerns and suggestions raised by the public during scoping had relevance to the project and will be considered further by the interdisciplinary team as the project moves forward (as described in Table 3, Table 4 and the section above), there were several comments that were clearly not within the scope of the analysis or did not point clearly to environmental effects, project objectives, or alternatives. These are described in the following statements.

- Commenters suggested obliterating all roads within the project area. Decisions on delineating defined travel management network are outside the scope of this analysis – those decisions are made during development of travel management plans. Since no decisions on changing the designations of existing roads are proposed as part of this project, this comment was not considered further.
- A couple of commenters suggested we conduct a GIS (geographical information system)-based roadless analysis in the project area to determine if an updated Lands with Wilderness Characteristics (LWC) inventory is necessary. Because we are not anticipating the construction of any new permanent or temporary roads as part of this project, this is outside the scope of the analysis. However, concerns regarding wilderness characteristics and overall roadless characteristics are included in Table 3 as a preliminary issue. As the project details are fully developed, including whether any new permanent or temporary roads are necessary, this concern will be reconsidered.
- One commenter suggested that vegetation treatment goals should focus on the attainment of potential natural communities (PNC) as a benchmark of success. The BLM manages for a range of seral stages, not just PNC. The BLM uses desired plant community (DPC) objectives to establish vegetation composition objectives, which may include PNC but also includes a mosaic of lower seral stages as well.
- Several commenters suggested various ways treatments should be prioritized and the criteria to use. These are captured in Table 3 and will be considered further in the development of

alternatives. However, not all suggestions had relevance to the community types present in the project or would achieve the purpose and need for action.

- Several commenters raised concerns with livestock grazing management and the desire for more information to be provided in the EIS on current and past grazing practices in the project area. While some of these grazing-related concerns are included in Table 3 and considered preliminary issues (for example, BLM recognizes the need to consider how livestock management pre-and post-treatment has the potential to impact the success of treatments and can influence cumulative impact analysis), decisions on levels of grazing use are outside the scope of this analysis. Those decisions are made during the grazing permit renewal process.
- Several commenters expressed concern with the development of additional artificial water sources for wildlife and the impacts this could have on wildlife. Because no new water sources are proposed as part of this project, this comment was not considered further.
- Several commenters expressed agreement or support for the proposal and these are documented in the project record.
- Several commenters cited literature, provided lists of references, or provided attached documents that they felt were applicable to the project and the analysis. All of these citations, references and attachments are not listed here, but are part of the project record and have been provided to the interdisciplinary team. Each resource specialist on the team will review them for relevance to the project and use them, as appropriate, in the development of alternatives, issues, and the impacts analysis.

5.0 Future Steps in the EIS Process

The BLM will use the comments collected during scoping to further define issues and to develop a range of alternatives to address those issues. The impacts that could result from implementing the alternatives will be analyzed and documented in a draft EIS.

The draft EIS will be made available for public review and is currently scheduled for publication in October 2015. The availability of the draft EIS for comment will be announced in the Federal Register and published in local and regional media. All those on the project mailing list will be notified directly as well. Public comments on the draft EIS will be accepted for 45 days, during which public meetings will be held. The BLM will consider all comments received on the draft EIS in preparing the final EIS and will include a response to all substantive comments received on the draft EIS in the final EIS.

At this time, the final EIS is expected to be issued in July 2016. The availability of the final EIS will be announced in the Federal Register and published in local and regional media, and all those on the project mailing list will be notified directly. A Record of Decision documenting the Responsible Official's selection of an alternative for implementation will be made no sooner than 30 days after the date the Notice of Availability of the final EIS is published in the Federal Register.