



**Public Scoping Issue Analysis
Grand Canyon National Park
Fire Management Plan and
Environmental Impact Statement**

Prepared for

**Grand Canyon National Park
Grand Canyon, Arizona**

By

**Wildland Fire Associates
and
SWCA Environmental Consultants**

March 2004

TABLE OF CONTENTS

INTRODUCTION..... 1

PUBLIC SCOPING 1

 2001 Public Scoping..... 2

 2003 Public Scoping..... 2

REVIEW AND EVALUATION OF SCOPING COMMENTS..... 2

ATTACHMENTS

A 2001 Scoping Letter

B Notice of Intent

C 2003 Scoping Letter Comment Form Mailing List Press Release

D 2003 Public Meeting Posters/Handouts

E Public Scoping Comments Summary (2001 and 2003)

INTRODUCTION

In May of 2001, the National Park Service (NPS) sent a general scoping letter (Attachment A) to interested public, affected agencies and known groups on Fire Management programs to be undertaken at Grand Canyon National Park (GRCA) for the purpose of preparing an Environmental Assessment (EA). Based upon public comments received and issues raised during internal NPS scoping, the NPS elevated the level of environmental analysis to an Environmental Impact Statement (EIS). On September 16, 2003, the NPS issued a Notice of Intent (NOI) in the *Federal Register* for the preparation of an EIS for the Fire Management Plan (FMP) for GRCA (Attachment B). The NOI stated, "This effort will result in a new wildland fire management plan that meets current policies, provides a framework for making fire-related decisions, and serves as an operational manual." Wildland Fire Associates (WFA) and SWCA Environmental Consultants (SWCA) were retained by GRCA to help develop the EIS and to organize and manage a second round of public scoping, which included a scoping letter and comment form sent to interested public, affected agencies and known groups; press releases; and a series of open house meetings (Attachment C).

The 2001 scoping letter was sent to interested public, affected agencies and known groups notifying them of the NPS intent to prepare an Environmental Assessment to analyze fire management activities. The letter informed the recipients of the project's intended actions including Prescribed Fires, Wildland Fire Use, and Mechanical Fuel Reduction. The letter also described several existing conditions in the park that have led to increased fire potential such as overcrowded forests and pre-park activities.

The 2003 scoping letter was sent to inform the public that the NPS intended to prepare an EIS to analyze fire management activities within the GRCA. The more in-depth, 2003 scoping letter informed the recipients of the purpose and need for the intended actions, intent of management plan to be used for long and short term planning, and the goals and objectives of the proposed plan. Specific goals and objectives to be achieved included ensuring human life, health, and safety and reducing the risk of wildland fire to occur near communities and developed areas. The 2003 letter also explained to the public how to be involved in scoping and stay involved throughout the planning process.

PUBLIC SCOPING

Scoping is required for National Environmental Policy Act (NEPA) compliance documents, including EISs, to determine the scope of the document; that is, what will be covered and in what detail. The scoping process must be open to the public; state, local, and tribal governments; and affected federal agencies. The objectives of scoping are:

- Involve as many interested parties as possible in the environmental review process.
- Provide clear, easily understood, factual information to potentially affected parties.
- Provide meaningful and timely opportunities for public input.
- Identify, consider, and evaluate significant issues raised by interested parties to assist in the preparation of the Grand Canyon FMP/EIS.
- Identify and eliminate from detailed study the issues that are not significant.
- Consider public comments throughout the decision-making and review process.

2001 Public Scoping

In May 2001, a scoping letter was sent to interested public, affected agencies, and known groups soliciting public input on Fire Management programs to be undertaken at GRCA (Attachment A). Eleven written responses to this letter were submitted to GRCA by e-mail, U.S. mail, and hand delivery.

2003 Public Scoping

The NPS sent out press releases and a second scoping letter to interested public, affected agencies and know groups to initiate the 2003 scoping process (Attachment C); six of which were returned as undeliverable. WFA and SWCA organized and managed a series of five scheduled public meetings, which were held on the dates and in the communities listed below.

October 15, 2003	Kanab, Utah
October 20, 2003	Page, Arizona
October 21, 2003	Grand Canyon, Arizona
October 22, 2003	Phoenix, Arizona
October 23, 2003	Flagstaff, Arizona

The meetings were structured as open houses. Information about the FMP/EIS process was presented through posters and handouts (Attachment D). NPS personnel were present to answer questions. Attendees were invited to submit written comments on a comment form provided (Attachment C), and an audio recorder was available to collect verbal comments.

GRCA received a total of 20 written responses in 2003 via e-mail, U.S. mail, and hand delivery, including those collected during the open house meetings.

REVIEW AND EVALUATION OF SCOPING COMMENTS

The NPS read through and responded to the 31 submissions received during the 2001 and 2003 public scoping period. SWCA reviewed and organized all submissions into four categories to facilitate handling, analysis, and archival storage (Table 3.1).

Table 3.1. Submissions received in response to FMP scoping efforts, by category and scoping period.

Document Category	Code	Comments Received during Scoping Period	
		2001	2003
E-Mail	E	8	11
Comment Form	F	n/a	7
Letter	L	3	2
Recorded Transcript	R	n/a	0

Specific comments within each submission received in 2001 and 2003 were identified and coded by document category (Attachment E, Table E.1). A total of 96 comments were identified within the 31 submissions (Attachment E, Table E.2); two separate pairs of submissions were counted as one submission each, as those responses were submitted jointly. Five submissions in response to the 2001 scoping letter and four responses received in 2003 did not provide comments relevant to the proposed action (Attachment E, Table E.1).

When the initial review process was completed, the comments made by the public during scoping were summarized as concern statements, which are listed below in Table 3.2.

Table 3.2. Summary of concerns raised during the 2001 and 2003 public scoping periods.

Concerns / Comments	Year	
	2001	2003
Planning Process and Direction		
The desired future condition for the forests in GRCA should be the perpetuation of park ecosystems and the restoration of natural fire regimes.		√
The FMP should focus on the minimum intervention necessary to achieve reintroduction of a natural fire regime.		√
The goals of the FMP should be to restore natural fire regimes, reduce wildlife risks to communities and developed areas, and promote human health and safety.		√
The FMP should explicitly describe how it will incorporate the “non-degradation” concept in Park management.		√
Only actions necessary to achieve the objectives set forth in the Park’s GMP and FMP are justified, and they must employ the minimum methods and techniques required.		√
The National Park Service should develop decision trees or algorithms within a GIS to determine the type, location, timing, intensity, and relative priority of active management needed to accommodate natural variability of fires across large contiguous tracts of forests.		√
FMP/EIS analysis should contain maps of “identified, undeveloped management areas” and should describe what qualifies these areas for wildland fire use or how areas not currently slated for wildland fire use may eventually qualify.	√	
The FMP/EIS should include maps of vegetation types, historical and current fire condition classes, burn units, roads, trails, and areas requiring special fire management consideration.		√
The FMP/EIS should include a structural ignitability assessment and mitigation plan for buildings located in developed areas within the Park.		√
The FMP should specify the range of conditions under which naturally ignited fires are allowed to burn, how this range relates to specific management objectives, and whether this range differs across forest types.	√	
The FMP should include monitoring and evaluation protocols for Wildland Fire Use, including suppression triggers.	√	
The FMP should include specific standards for mechanical treatments and the estimated acreage for each treatment type.	√	
The FMP/EIS should reference the Smoke Management Plan for Grand Canyon Village and Tusayan.		√
The FMP/EIS should clearly state the relationship of the upcoming Vegetation Management EIS to the FMP/EIS.		√
The FMP should include the practice of adaptive management.		√

Table 3.2, continued.

Concerns / Comments	Year	
	2001	2003
Planning Process and Direction , continued		√
The FMP/EIS should be data rich, include transparent analyses, and explain how these data and analyses relate to the goals and objectives of each alternative as well as of existing and related planning documents.	√	
The planning process for the FMP should specify a NEPA process for site-specific actions.		√
The FMP should address how noxious/invasive plants have altered fire regimes.		√
Fire Management Activities		
Given similar effectiveness at achieving an objective, wildland fire use should be favored over prescribed fire, and prescribed fire should be favored over mechanical treatment.		√
Naturally ignited fires should be allowed to burn where it is safe to do so.	√	
All human-caused fires should be suppressed.	√	
Naturally ignited fires should be permitted to burn where the effects of suppression have been minimal.		√
Naturally ignited fires should be allowed to burn within identified, undeveloped management areas according to pre-established protocols, burn schedules, and monitoring plans.	√	
Prescribed fire should be used, when absolutely necessary, to reverse the effects of suppression.		√
Prescribed fire should be used to the minimum extent required to prevent a landscape scale fire that would permanently destroy the natural vegetative regime.		√
Prescribed fire should be used in areas where natural fire is unsafe.		√
Prescribed burns should not be conducted during the summer, especially when any kind of wind is present.	√	
Mechanical fuel reduction should be used to modify vegetation structure to accommodate natural fire.		√
Mechanical fuel reduction should be used in areas that are susceptible to unnaturally large crown fires.		√
Thinning should be completed in the fall and winter.	√	
A drought index should be developed that overrides short-term fuel moisture values in burn decisions.		√
Wildland Urban Interface/Community Protection		
Mechanical fuel reduction should be implemented to mitigate the threat of wildland fires to structures.	√	
The NPS should evaluate the need for and potential effectiveness of fuels treatments that may reduce the risk of high-intensity wildfire to communities or high-use developed areas.		√
Some of the large trees in high-use areas should be removed and the wood should be sold.		√
Mechanical treatments and fire suppression may be needed around developed areas and along the border between the National Park and private lands.		√

Table 3.2, continued.

Concerns / Comments	Year	
	2001	2003
Wildland Urban Interface/Community Protection, continued		
Burns should be controlled to protect facilities, visitors, and residents.	√	
Cultural and Natural Resource Protection		
Naturally ignited fires should be allowed to burn unless historic structures are threatened.	√	
The goal of fire management activities should be to preserve natural resources and wildlife habitat.		√
The FMP EIS should identify all natural and cultural resources requiring special consideration and should outline mitigation measures for each resource.		√
Fuels treatments should be focused on the Wildland Urban Interface to avoid damaging adjacent forests through ineffective thinning projects.		√
Air Quality/Visual Resources		
Mechanical fuel reduction should be used in preference to fire because it does not affect air quality and visibility.	√	
Prescribed fires and wildland fires may create further problems with regard to air quality and visual acuity within GRCA, and daily weather conditions and air quality should be considered.	√	
The FMP/EIS should analyze the effects of the FMP on air quality in terms of visibility, public closures, and health impacts and should analyze the ability of the NPS to implement a fire plan within current air quality standards.		√
Implementing prescribed fires whenever the conditions are right alienates the public by reducing visibility in the Grand Canyon	√	
To limit the number of days there is smoke in the air, fires should be suppressed after a pre-defined number of fire days is reached.		√
Burns should not be permitted along main entryways to avoid an ugly introduction to the Park.		√
Wilderness		
Fire suppression in GRCA should not be based on fire suppression needs of adjacent federal lands managed for purposes other than wilderness.		√
Fire suppression should be limited to the developed non-wilderness areas of GRCA.		√
The FMP should follow the minimum requirement concept and should describe in a formal minimum requirement analysis how it will implement this concept in proposed wilderness areas.		√
A programmatic minimum requirement analysis is unsuitable for determining where and when exceptions to the Wilderness Act should be allowed, and all minimum requirement analyses for prescribed fire and/or fire recovery should be on a case-by-case basis.		√
FMP/EIS analysis should assess the impacts, including access needs, of fighting wildland fire in potential wilderness and identify locations where such a response is likely.		√
The FMP should include the prescriptions and procedures, including access needs, for implementing prescribed burns within potential wilderness.		√
Ecological restoration in proposed wilderness should be conducted only if it leads to the eventual release of the land to function on its own under more natural conditions.		√

Table 3.2, continued.

Concerns / Comments	Year	
	2001	2003
Wilderness, continued		
The use of fuel reduction to “restore” boreal forests is problematic and should be thoroughly analyzed and justified before implementing in the FMP.		√
Ecological Restoration		
Naturally ignited fires are the most cost effective and ecologically appropriate way to restore and maintain natural fire regimes	√	
Prescribed fire should be used in addition to natural fire to maintain and improve ecological health of forests when and where resource professionals determine such an approach is appropriate.	√	
The FMP should seek to restore natural processes rather than specific forest structures.		√
The FMP should seek to restore the presettlement conditions of the forest at GRCA.	√	
The FMP/EIS should articulate a conceptual approach to ecological restoration.		√
The FMP and EIS should articulate the range of structural objectives that may be considered in fire planning and how these relate to GRCA’s concept of ecological restoration.		√
Ecological restoration should be considered in proposed wilderness only if 1) the wilderness is a large landscape ecosystem that is on a clear trajectory of degradation that will continue without human intervention, 2) the wilderness is critical to the function of the larger ecosystem and the unnatural condition of the wilderness is a threat to the integrity of the larger landscape, or 3) there are rare or valued elements within the wilderness that are at risk without intervention.		√
In developing a fire plan for ecological restoration, The NPS should consider the high level of natural heterogeneity in ponderosa pine forests, the dynamic nature of ecosystems, biodiversity, scientific uncertainty, and the challenges of on-the-ground practices.		√
Social and Economic Conditions		
Rather than burning the resource, timber should be available for economically beneficial uses, such as providing small-diameter timber for hogan construction and providing firewood for native Americans to use on the reservations.	√	
Agency Coordination		
The NPS should develop a coordinated plan with the Kaibab National Forest that allows fire movement across jurisdictional boundaries.		√
The NPS should coordinate with the Forest Service to burn on the same days to reduce the number of days with smoke in the air.		√
The Fire Point road could be accepted as the primary firebreak between GRCA and adjacent National Forest.		√
Publication of the draft FMP/EIS should be widely advertised.		√

The primary issues identified through evaluation of the public comments were concerns related to ecological restoration of the GRCA through the use of natural fire, local impacts related to air and visual resource quality, cultural resource protection, Wildland Urban Interface (WUI)/ community protection, appropriate conditions for prescribed fire use, and overall management

and coordination procedures. These issues are similar issues and impact topics brought forward by the NPS' internal scoping process.

Many of the topics were directly related to the goals and objectives of the management plan and have been incorporated including reducing the risk of wildland fire in the WUI, using natural fire as a natural process to maintain park ecosystems, coordination with other federal, state, county, local and American Indian Tribal governments by collaborating with them in fire management, and maintaining wilderness areas as wilderness during fire management.

An extensive scoping effort was conducted for this project that included four public meetings in 2003 as well as the 2001 scoping effort. The 2003 scoping meetings were advertised through a press release from GRCA and announcements on local radio stations in each meeting location.

This scoping effort was successful and accomplishing all NPS stated requirements of public scoping (outlined in the NPS Director's Order 12 Handbook):

- (a) Determine Important Issues: Through public scoping and IDT issue identification, important issues were identified related to the fire management planning process, proposed activities, Wildland Urban Interface/community protection, cultural and natural resource protection, air and visual resource quality, wilderness ecological restoration, agency coordination.
- (b) Eliminate non-relevant issues: As shown in Table E.1 in Attachment E, all submissions were categorized by respondent, the date of comment, and individual comment identification numbers. Letters with more than one comment were split and given individual comment identification numbers. If the comment was not relevant to the project's purpose and need, goals and objectives, or fire management, the comment was recorded as "n/a" and not given a comment number.
- (c) Divide up assignments: Once comments were categorized, they were distributed among specialists for further evaluation and issue identification.
- (d) Identify relationships to other planning efforts: Through scoping, the public raised concern about this planning effort's coordination with other GRCA management documents such as the General Management Plan as well as Forest Service's fire management planning.
- (e) Define a time schedule of document preparation and decision-making: After submissions were received, comments were categorized, and issues were identified, the time schedule of draft and final FMP/EIS document preparation was revised.
- (f) "Size the Analysis Box": Scoping usually will help redefine or further identify a project's purpose and need, goals and objectives, or proposed activities. This scoping effort helped further refine the management plans' goals and objectives, especially with respect to cooperator collaboration, specifically with other federal, state, county, local and American Indian Tribal governments.

NPS