Appendix A –

BUREAU OF LAND MANAGEMENT
Arizona State Office

Statewide Land Use Plan Amendment

DETERMINING THE SCOPE
PROCESS SUMMARY

April 2003

This report documents comments and recommendations gathered from public meetings and other outreach activities conducted by the Bureau of Land Management's (BLM) seven field offices throughout the state of Arizona. These field offices include those in Phoenix, Safford, Tucson, Lake Havasu City, Yuma, Kingman, and St. George, Utah (Arizona Strip Field Office). These comments were collected and this scoping report prepared in accordance with NEPA requirements in preparation of the Arizona Statewide Land Use Plan (LUP) Amendments and Environmental Assessment (EA).

Completion of the LUP Amendments is expected by the end of 2004. Throughout the development of the LUP Amendments, the public, government agencies, and organizations are encouraged to review this scoping report along with other documents and information formulated during the planning process.

To provide comments and recommendations, contact the BLM through Sherry Hirst, Team Leader/NEPA Coordinator and Environmental Planner at the Kingman Field Office, or through Dave Mueller at the Arizona State Office in Phoenix.

www.blm.az.gov
AZ_STATEWIDE_LUP@blm.gov

TABLE OF CONTENTS

1.0 INTROCUCTION 1
1.1 Description of the Planning Area 1

2.0 PUBLIC INVOLVEMENT PROCESS 2
2.1 Public Meetings 2
2.2 Planning Worksheet 3
2.3 Publicizing BLM Activities on the LUP Amendment Process 3

3.0 PUBLIC SCOPING RESULTS 4
3.1 Summary of Meetings, Attendees, and Issues and Alternatives Raised in the Scoping Process 4
3.2 Summary of Reasons Why Meeting Attendees Value Public Lands 4
3.3 Issues Raised 5
Issue 1: The Impact of Fire Management on Livestock Grazing 6
Issue 2: Prescribed and Naturally-Occurring Burns 7
Issue 3: Hazardous Wildland Fuels and Fuels Reduction 8
Issue 4: Wildland-Urban Interface Fires 9
Issue 5: Air and Water Quality 9
Miscellaneous Resource Comments 10
General Comments about Meetings and BLM Efforts 11
3.4 Additional Suggestions for BLM Fire Management and Public Involvement 11

4.0 FIRE ISSUES RAISED AT OTHER ARIZONA PLANNING EFFORTS 12

1.0 INTRODUCTION

The Bureau of Land Management (BLM) has begun a statewide effort to amend its seven Land Use Plans (LUPs) in Arizona in order to provide a consistent approach to the management of fire across BLM lands, and coordinate this effort with other federal, state, and local land management entities, the tribes, and the public. The LUPs are six Resource Management Plans (the Phoenix, Kingman, Arizona Strip, Safford, Yuma, and Lower Gila South RMPs) and one Management Framework Plan (the Lower Gila North MFP).

This effort is being undertaken because LUP evaluations in 2001 for each of the field offices resulted in a finding that existing LUPs were consistently inadequate to address today's fire management concerns and issues. The LUPs did not address the use of prescribed fire as a management tool; the issue of hazardous fuel buildup; the wildland-urban interface (WUI) and special fire management procedures in these areas; or emergency fire rehabilitation plans, and generally favored suppression as a means of fire management. Catastrophic fires across the west and particularly in Arizona have forced a rethinking of previous fire management strategies and as such, each of the seven LUPs will be amended to incorporate new fire science, management direction and policies such as the National Fire Plan and the 2001 Federal Wildland Fire Management Policy.

1.1 Description of the Planning Area

The LUP Amendment/Environmental Assessment (EA) covers approximately 12 million acres of public lands consisting of 2 million acres of Ponderosa Pine, Pinion/Juniper woodlands, 10 million acres of South West desert vegetation, and 43,000 acres of riparian vegetation. Over 200 wildfires occur annually on BLM-administered lands within Arizona, with the recent ten year average of 235 wildland fires for 24,241 acres burned per year. Wildfires can threaten human life and property, and disrupt the proper functioning of hydrology, soils, plants, animals, and ecological relationships. The BLM's goal is to reduce the number of unplanned human caused wildfires, thus reducing the need, costs and risk incurred during fire fighting efforts. Other primary goals for BLM are, the reduction of hazardous fuels, providing for increased safety to the public and local communities, while reducing the need for rehabilitation of burned acres and, where needed, use prescribed or natural fires to maintain or improve Arizona's native habitats.

General Land Ownership in Arizona	Acres	Percent of Total
Bureau of Land Management	12,000,000	16.5%
Other Federal Agencies	18,704,000	25.6%
State of Arizona	9,335,000	12.8%
Indian Trust	19,910,000	27.3%
Private	12,982,000	17.8%

2.0 PUBLIC INVOLVEMENT PROCESS

The LUP amendment process has begun. Under the National Environmental Policy Act (NEPA), in accordance with BLM planning requirements (43 CFR 1600), policies, and handbooks, an Environmental Assessment (EA) is underway to analyze the potential impacts of the proposed management direction on critical elements and resources of the human environment such as wildlife habitat, livestock grazing, invasive plant species, socio-economics, and health and human safety. As part of the EA, wildlife biologists and range scientists from BLM, Dynamac, the U.S. Fish and Wildlife Service, the state, and other federal agencies have begun consultation procedures under section 7 of the Endangered Species Act (ESA) (16 USC §1536) to determine whether there may be an impact on endangered or threatened or candidate plant and animal species or their habitats through any potential actions the BLM might take.

To ensure that the most appropriate measures of managing wildland fire in Arizona are selected from numerous options and alternatives, BLM considers public input essential to the LUP Amendment process. BLM's planning regulations at 43 CFR 1600 set out specific procedures describing how to involve the public. In many instances, the BLM in Arizona is going beyond what is required to obtain input from as many diverse stakeholding parties as possible, and incorporate this public input into the EA, the Record of Decision, and the final LUP Amendment.

2.1 Public Meetings

The principle means by which BLM obtained public input was to host a series of eight open-house style meetings across the state. The meetings occurred during the first two weeks of March, and were held in Phoenix, Flagstaff, Tucson, Yuma, Safford, Kingman, Lake Havasu City, and St. George, Utah (Arizona Strip). The meetings were held in public locations between 6:00 to 9:00 p.m. More than 100 people attended at least one of the meetings.

An open house format was used for the public meetings. Information and educational materials were available for the public to review at their own pace and interact with BLM, Dynamac and The Nature Conservancy (TNC) staff in an informal setting. At every meeting, attendees were greeted, given a copy of the planning bulletin, provided with an overview of the meeting format, and invited to view the exhibits and ask questions. If they were not already on BLM's mailing list, they were also offered the opportunity to be placed on the mailing list to obtain future Planning Bulletins.

Exhibits and posters presented an overview of the BLM planning process and the NEPA process, firewise educational material, the Wildland-Urban Interface (WUI), the role of fire in a natural ecosystem, and invasive species. Maps of the community assessment area will be available for the participants to review and comment on. BLM, Dyanamac and TNC staff engaged the participants in discussions to identify values at risk from wildland fire, their perspective on proposed BLM actions to manage fire, and actions that could be undertaken to reduce the risk of wildland fire. The meetings were also an opportunity for the public to learn about the LUP amendment process, why BLM is undertaking the process, and general information about the benefits and/or dangers of fire in arid or semi-arid ecosystems, fire-resistant plants, and ways in which individuals could reduce the risk posed by wildfire to their homes and property. Attendees were asked to fill out a planning worksheet/survey form describing their ideas, suggestions, and

concerns about the LUP amendment process. The information that BLM obtained from members of the public who attended these meetings is the subject of this report.

2.2 Planning Worksheet

As mentioned above, at each public meeting attendees were asked to fill out a planning worksheet. Questions on the planning worksheet were:

1. What do you value about these public lands and why?
2. What resource objectives should be used to guide fire and fuels management activities?
3. How should the BLM work with your community to reduce wildland fire hazards?
4. How would you like to see the wildland fire suppressed, fuel treatments implemented, and/or air quality monitored, on BLM administered lands in Arizona or by specific BLM Field Office administered lands?
5. Is there anything else you want to tell us?

Respondents also had the opportunity to be added to BLM's mailing list. The planning worksheet was in the form of a postage-paid mailer. Responses could also be sent to BLM via e-mail at AZ_STATEWIDE_LUP@blm.gov. Additional planning worksheets will be included in future planning bulletins.

2.3 Publicizing BLM Activities on the LUP Amendment Process

BLM undertook activities to inform and obtain input from other Federal, state, Tribal and local agencies of the proposed LUP amendment process. The following describes other efforts BLM has undertaken thus far to publicize the LUP amendment process, and to obtain public input.

- BLM published a Notice of Intent (NOI) to amend the seven LUPs in the *Federal Register* on January 27, 2003.
- Planning Bulletin, volume 1, was mailed in mid-February to more than 3,500 names on BLM's statewide contact list. This Planning Bulletin introduced the LUP Amendment process to many various types of interested parties, and listed a schedule for public scoping meetings, which were to take place in March.
- BLM also publicized these meetings through published notices in the Arizona Republic (Phoenix), the Arizona Daily Sun (Flagstaff), Arizona Daily Star (Tucson), the Tucson Citizen, Eastern Arizona Courier (Safford), the Kingman Daily Miner, The Spectrum (St. George) and Today's News Herald (Lake Havasu City) newspapers, and by listing a meeting schedule on its website, www.az.blm.gov, under "Planning".
- News releases were sent to daily and weekly newspapers, radio and TV outlets statewide.
- Agencies were given the opportunity to participate and comment. In January and February, 2003, letters were sent by the BLM, Deputy State Director, to Arizona Federal, State, and County agencies, and to Tribal contacts. These letters provided background information on BLM's statewide fire, fuels and air quality LUP amendment process, and invited them to attend one of the public meetings or to contact BLM if they would like a separate meeting.
- In May 2003, Planning Bulletin #2 was mailed to each of BLM's 3,500 contacts, as well as new stakeholding parties that indicated at the meeting that they would like to be included on the mailing list.

3.0 PUBLIC SCOPING RESULTS

3.1 Summary of Meetings, Attendees, and Issues and Alternatives Raised in the Scoping Process

BLM, TNC, and Dynamac spoke with many individuals representing a wide variety of interests and viewpoints at each of the scoping meetings in March. Some individuals were very knowledgeable about fire issues and potential management concerns, and offered suggestions or ideas as to how they thought BLM should best manage certain areas to reintroduce fire to the landscape. Others came to the meeting for their own education regarding fire management on BLM lands in Arizona, and either declined to comment or were not yet ready to offer suggestions and voice their concerns before gaining more information about the LUP amendment process and what BLM proposed to do.

BLM heard from the following groups, which commented on the Arizona state LUP amendments either face-to-face at the scoping meetings, or responded via U.S. Post or email to BLM's Planning Bulletin #1, which was mailed to BLM's constituents statewide.

Groups from which BLM has Received Comments on LUP Amendment

Prescott National Forest
Kaibab National Forest
White Mountain Apache Tribe
Las Vegas Paiute Tribe
Mescalero Apache Tribal Historic Preservation Office
Bureau of Indian Affairs (BIA), Ft. Yuma Agency
Arizona Game and Fish Department
Yuma County
Laguna and Yuma Natural Resource Conservation Districts
Public Lands Foundation

3.2 Summary of Reasons Why Meeting Attendees Value Public Lands

As mentioned in Section 2.2 above, the first question meeting attendees were asked on the planning worksheet was, "What do you value about these public lands and why?" The following is a summary of their responses:

- Undeveloped character as wilderness or as rural lands
- Biodiversity and habitat
- Recreational experiences
- Habitat interactive experiences
- Contributions to the economy and development of resources and schools through grazing leases.
- Rich diversity of plants and animals
- Beauty of the valleys and mountains
- Public access
- Hunting
- Camping

3.3 Issues Raised

BLM equates land use planning with problem solving and issue resolution, as it must according to planning regulations 43 CFR Part 1600. An initial step in developing the LUP amendments is to identify relevant issues and concerns that are within the scope of the task BLM is seeking to accomplish, in this case, the reintroduction of fire to the ecosystem as a management tool. An issue is defined as an opportunity, conflict, or problem regarding the use or management of public lands. As discussed previously, at each public meeting BLM, Dyanamac and TNC staff engaged attendees in discussions on their perspective on proposed BLM actions to manage fire, and actions that could be undertaken to reduce the risk of wildland fire. The planning worksheet given to meeting attendees asked several open-ended questions regarding BLM's fire management activities. The following is a summary of the public's responses: BLM received many comments regarding how BLM should incorporate fire management into its existing LUPs. To ensure all comments were addressed in this summary report, these comments are listed below, grouped into areas of greatest concern, analyzed to determine whether the issues raised are within the scope of the LUP amendment process, and restated as an issue question to clarify needed decisions. The reasons that any comments may be determined to be outside of the scope of the current planning process are detailed in footnotes below the comment.

Although BLM listened to many different types of issues raised by the public, certain major concerns were raised frequently. The comments received were alternately approving or disapproving of past or current management practices, and were sometimes accompanied by suggestions for future fire management. Generally, these "recurring themes" consisted of concerns about the following: 1) the impact of fire management on livestock grazing; 2) prescribed and naturally-ignited burns; 3) hazardous wildland fuels and fuels reduction; 4) wildland-urban interface fires; and 5) air and water quality. The comments below were distilled from completed planning worksheets, from conversations between BLM staff and the public at the public meetings, and from meeting notes taken by the planning team.

Issue 1: The Impact of Fire Management on Livestock Grazing

Comment from Public	Within Scope?	Issue Question	Alternative Proposed?
Concern about the potential effects of BLM fire management on livestock grazing permits.	Yes	How will new fire management techniques affect grazing permits, if at all?	No
Concern that prescribed burns and allowing natural starts to burn will have at least a short term effect on livestock forage availability.	Yes	Will the increased use of fire as a management tool affect livestock forage, and if so, how shall BLM notify those potentially affected?	No
There should be less grazing on public lands in the west.	No[1]	N/A	No
Concerned that rangeland fires could reduce the amount of available forage for cattle.	Yes	How will the increased use of fire impact the amount of forage on leased grazing lands and adjacent property?	No
Livestock operations have contributed to the proper management of fires as well as maintaining native grasses, vegetation, and habitat. We hope BLM's new fire management plan will not make the same mistake the Forest Service has made in Arizona, Colorado and New Mexico—eliminating livestock grazing.	Yes	What is the appropriate level of grazing to maintain optimum fire conditions in an ecosystem?	No
Proper vegetative management will reduce widespread fuel and fire excesses. A most efficient and economical biological control is livestock grazing. We recommend liberal public access and that grazing on public lands is permitted as part of the plan.	Yes	Is grazing a viable form of biological treatment to control hazardous fuel loads?	No

[1] Livestock grazing on western public lands may have wildland fire management implications, but whether or not it should occur at all, or the extent to which it is permitted, is beyond the scope of this LUP amendment, which deals strictly with issues directly related to fire.

Issue 2: Prescribed and Naturally-Occurring Burns

Comment from Public	Within Scope?	Issue Question	Alternative Proposed?
The use of prescribed fires to improve natural resources is a good idea.	Yes	N/A	No
Support expanding the prescribed burning programs as well as thinning where appropriate. There needs to be a strong emphasis on fuels reduction via prescribed burning, in those areas where fuels are at unhealthy levels.	Yes	Where is prescribed fire appropriate?	No
Natural cyclic fire management practices based on historical data and current fuel loads [should be used to guide fire and fuels management activities]. Fires should be regular enough to keep flame lengths to a "creeping" or low level.	Yes	N/A	No
Would prefer NO suppression unless absolutely necessary.	Yes	When, if ever, is suppression necessary/should suppression be used as the optimum method of fire management?	Permitted fuelwood harvesting, grazing/mowing, and herbicidal applications determined appropriate by agency personnel and stakeholders, in addition to natural fire cycles.

Issue 3: Hazardous Wildland Fuels and Fuels Reduction

Comment from Public	Within Scope?	Issue Question	Alternative Proposed?
How will BLM maximize timber production while preserving scenic values?	Yes	How will BLM maximize timber production while preserving scenic values?	No
Concerned that big trees will be logged, that BLM's proposed action is just an excuse for doing more than what is really needed to reduce the risk of wildland fire, such as clearing out large parcels of land around houses based on WUI concerns.	Yes	How will BLM integrate hazardous fuels reduction with the need to maintain forested lands as forests (on BLM land, and in conjunction with adjacent USFS lands)?	No
Fire breaks (clear cuts) are a proper management tool.	Yes	N/A	No
Private logging companies should be required to reduce fuel loads before being awarded timber contracts	Yes	What is the best means of encouraging fuels reduction by private timber companies?	No
"I do not support the Bush administration's plan for wholesale for-profit logging"	Yes	N/A	"Scrap" the Bush 'healthy forest' plan and instead vastly expand existing wildland fire agencies, or else reviving something like the old Civilian Conservation Corps to do the thinning and prescribed burning.
Regarding the flooding of Wickenburg, we need to investigate tree trimming/fuelwood cutting along drainage into the Hassayampa River, and controlled burning.	Yes	What impact does fuels reduction have on flooding in watersheds where it is practiced?	No

Issue 4: Wildland-Urban Interface Fires

Comment from Public	Within Scope?	Issue Question	Alternative Proposed?
General concern for WUI fire issues.	Yes	How will the BLM manage fire in WUI areas in the LUP amendment?	No
We are not sympathetic to the individuals living in rural areas that are highly susceptible to wildfire. Government money should not be spent on protecting private property in fire-prone areas.	Yes	Is the protection of private property in fire-prone areas an appropriate expenditure of firefighting resources, and if so, at what level should BLM protect private property?	No

Issue 5: Air and Water Quality

Comment from Public	Within Scope?	Issue Question	Alternative Proposed?
BLM shouldn't undertake burns that will affect air quality during hunting season.	Y	When is the most appropriate time of year to conduct prescribed burns, so as to have the smallest adverse effect on air quality?	(Implied in comment): Undertake burns during other times of the year than hunting season.
On tribal lands, there can be fire and smoke that is a problem.	No[2]	N/A	No
Air quality monitoring should be sub-contracted to private business.	No[3]	Should BLM conduct air monitoring? To what extent and where should it be conducted?	No
Regarding the flooding of Wickenburg, we need to investigate tree trimming/fuelwood cutting along drainage into the Hassayampa River, and controlled burning.	Yes	What impact does fuels reduction have on water quality in watersheds where it is practiced?	No

[2] BLM does not manage fire on Tribal Lands in Arizona and therefore fire and smoke on tribal lands is not BLM responsibility.

[3] The issue of air monitoring for the purposes of the LUP amendment is whether and to what extent it should be done, not who should do it.

Miscellaneous Resource Comments

Comment from Public	Within Scope?	Issue Question	Alternative Proposed?
BLM should develop Fire Use areas adjacent to USFS Fire Use areas.	Yes	What BLM-managed lands are adjacent to USFS-managed Fire Use areas, and are they appropriate for designated Fire Use areas themselves?	Aqua Fria grasslands and the south end of the Bradshaws below the Prescott National Forest boundary.
Pursuant to the National historic Preservation Act (NHPA) and other related authorities, all BLM fire and fuels management planning should reflect clear and consistent consideration that fire is the single greatest threat to organic components of cultural, archaeological, and historical resources.	Yes	How does BLM minimize the impact of fire on historic and cultural resources?	The Amendments to the Land Use Plans should ensure that adequate steps are systematically taken to identify, document, and protect from fire all structures and sites that contain organic components, notably rockshelters, brush and wooden structures, sensitive plant species having cultural values, etc.
BLM must adequately address the environmental consequences of its fire management actions. (No specific environmental consequences mentioned).	Yes	What are the environmental consequences of each of BLM's fire management actions?	No
Fire policy should be based on sound ecological policies and science, with the main guiding objective being the preservation of biodiversity.	Yes	How can fire be managed to increase biodiversity? How does fire affect biodiversity in an ecosystem?	No
We are seriously disappointed that our government has refused to stand up to the silly notions of eastern environmentalists. Eliminating fires and livestock grazing has taken a grave toll upon the health of public lands and wildlife, citizens' homes and businesses and our government's credibility and ability to "manage".	Yes	N/A	No
Use fire to remove invasive species such as tamarisk. Let it burn all the way down so maybe the fire can kill some of it!	Yes	How can fire be used to control invasive species? How does BLM ensure that more invasive species will not overtake recently burned areas?	No

General Comments about Meetings and BLM Efforts

Comment from Public	Within Scope?	Issue Question	Alternative Proposed?
There is a heightened awareness of wildfire because of the large fires in Arizona last year. However, many people were present for information and were not yet prepared to discuss new management techniques or alternatives regarding fire reintroduction.	N/A	N/A	N/A
Universal public support for BLM being proactive about wildland fire management issues.	N/A	N/A	N/A
Using fire to manage ecosystems is a good idea.	N/A	N/A	N/A
Open forum meetings are an excellent forum	N/A	N/A	N/A
Better publicity is needed for the meetings.	Yes	How can BLM inform more people about public meetings?	No
How will BLM maximize timber production while preserving scenic values?	Yes	How will BLM maximize timber production while preserving scenic values?	No
Past fire suppression has led to problems.	Yes	N/A	N/A
Will the LUP amendments consider how fire will be managed within the monuments?	Yes	How does BLM ensure that management is consistent across public lands including national monuments?	N/A
The areas set aside by presidential proclamation should remain as public lands to be administered under the BLM's current multiple use concepts.	No	N/A	N/A
Concerned about representation of the Nature Conservancy being one of the main players or drivers of the LUP and EA Process.	Yes	Is there balanced representation of interests at the planning level?	Think about having a rep. From The Farm Bureau or Arizona Cattle Growers or some group that lives on the land.

3.4 Additional Suggestions for BLM Fire Management and Public Involvement

The following suggestions were provided by the public to BLM:

- Restrict camp fires during fire season
- Require spark arrester mufflers
- Interact with stakeholders first and foremost. Involve all local/federal agencies that have an interest in the affected resource.
- Look at the recent Mittry Lake fire area and note "how fast it will green up".
- Interact with stakeholders first and foremost. Involve all local/federal agencies that have an interest in the affected resource.

4.0 FIRE ISSUES RAISED AT OTHER ARIZONA PLANNING EFFORTS

In addition to this planning effort, BLM has several other land use planning efforts ongoing in Arizona. These include the Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Lake Havasu and the Arizona Strip BLM Districts, and the RMP/EIS for the Agua Fria National Monument/Bradshaw-Harquahala planning areas. The scope of these planning efforts was much wider, focusing on many issues such as public access, mineral development, recreation, visual resources, hazardous materials and solid waste, and others. Still, throughout the scoping process for each of these efforts, wildland fire management issues were raised on several occasions. As these comments may be relevant to the statewide LUP amendment for appropriate fire management practices, they are summarized below:

Fire Issues Raised Through the Scoping Process for the Agua Fria National Monument/Bradshaw-Harquahala Planning Areas:

- Debris and brush clearing programs need to be expanded.
- Return natural fire cycles.
- Return natural fire regime to mesa tops.

Through this planning effort, a fire management plan is being developed for the Agua Fria National Monument. BLM's fire management plan will be structured in accordance with the statewide fire plan amendment being developed concurrently.

Fire Issues Raised Through the Scoping Process for the Lake Havasu Field Office RMP/EIS:

- Is there a danger or risk to the public from field office-controlled burns and illegal burns on BLM lands? Is the current Fire Management Plan sufficient?

Fire Issues Raised Through the Scoping Process for the Arizona Strip Field Office RMP/EIS:

- Several comments urged returning fire to the ecosystem, mostly by letting fire run its course or a "let-burn" policy. Some stated that fire management practices should be allowed. One comment stated that fire, reseeding and land restoration should be allowed.
- Several people expressed concern about the build-up of high fuel loads, stating that logging and/or cattle grazing are effective methods of reducing high fuel loads. Over-regulation and past land management [were] also cited as causes of high fuel loads.
- Is there a need to change any present cultural use allocations based on new information, public demand, or research needs?
- Where are the WUI areas that are threatened by wildland fire on the Arizona Strip? What criteria will be used to prioritize these areas and how will future impacts from wildland fire be reduced?
- Where are other areas where wildland fire is not desired? What criteria will be used to prioritize these areas for future fuels treatments to reduce the negative impact of wildland fire?
- Where are the areas where wildland fire may be used to further resource objectives or achieve desired future conditions? What criteria will be used to prioritize or manage these areas effectively with wildland fire?

- How will areas of high priority for using prescribed fire as a management tool be identified and prioritized?
- Are there any general restrictions on fire management practices (including wildfire suppression and fuels management) needed to protect other resource values?