

Chapter 5 Consultation and Coordination

5.1 Introduction

This chapter describes consultation and coordination during FMP FEIS preparation. Consultation, coordination, and public involvement are integral to identifying relevant issues and concerns and to ensure issues are addressed. This was accomplished primarily through public meetings, informal and formal agency meetings, individual contacts, news releases, and Federal Register notices.

5.2 Public Scoping

Public scoping is part of the National Environmental Policy Act (40 CFR 1501.7) for preparing an environmental impact statement. Scoping helps determine the range of issues and opportunities used in developing alternatives and assessing environmental effects. The process used during public scoping, and consultation and coordination for the Final Grand Canyon Fire Management Plan Environmental Impact Statement, is described below.

In January 2001, new Federal Wildland Fire Management Policy was released. The new policy was a revision and update of the December 1995 Final Report of the Federal Wildland Fire Management Policy and Program Review. This document was accepted by the Secretaries of Interior and Agriculture. A National Fire Plan was also introduced and approved. This National Plan directed the NPS to expedite removal of hazardous fuels from Wildland-Urban Interface areas to provide immediate protection of natural and cultural resources, physical property, and facilities, both Federal and private.

In May 2001, the NPS sent a general scoping letter (Appendix B, Attachment A) to interested public, affected agencies, and known interested groups about the fire management program and projects to be undertaken at GRCA for the purpose of preparing a NEPA document. The letter informed recipients about the proposed updated Fire Management Plan and related projects including prescribed and wildland fire-use fires, and manual/mechanical fuel reduction. The letter also described several existing park conditions that have led to increased fire potential such as decadent forests and activities undertaken before Grand Canyon became a national park. Eleven written responses to this letter were received by GRCA through email, U.S. mail, and hand delivery. Based on comments and issues raised during internal scoping, the NPS elevated the level of environmental analysis from an Environmental Assessment to an Environmental Impact Statement.

A Notice of Intent to prepare an EIS was published in the Federal Register on September 16, 2003. Written responses from the scoping letter and comments from public meetings helped identify fire management issues and concerns, a reasonable range of alternatives, and which environmental impacts to address in the EIS.

On October 23, 2008, the National Park Service published a Notice of Availability (NOA) in the Federal Register which released the Grand Canyon National Park Draft Environmental Impact Statement and Assessment of Effect for the Fire Management Plan for public review and comment. The DEIS was designed to provide a comprehensive look at impacts to the human environment from fire activities at GRCA, and to evaluate various alternatives. The release of the DEIS initiated a formal 90-day public comment period, ending January 21, 2009.

5.2.1 Public Comment Meetings

As part of the scoping process Grand Canyon National Park organized and managed a series of public meetings. The public meetings were intended to provide an overview of the DEIS. There were a total of three meetings which were held in Kanab, UT (December 2, 2008); Flagstaff, AZ (December 3, 2008); and Tusayan, AZ (December 4, 2008). Approximately 28 people attended the meetings. A press release,

website updates (PEPC) and public meetings were used to request public input and to disseminate information about draft alternatives and their impacts.

5.2.2 Review and Evaluation of Public Comments

During the public comment period, the NPS received 10 submissions total from public meetings, via PEPC website, by email, and by regular mail from the public, agencies, organizations, and businesses. NPS conducted separate meetings with affiliated tribes regarding the DEIS and the Section 106 (NHPA) programmatic agreement (PA). Appendix K includes public comment submissions on the DEIS and formal agency responses. Substantive comments are addressed in the Final Environmental Impact Statement for the Fire Management Plan, as revisions in this (FEIS) text or as responses to comments addressed in Appendix K.

The NPS interdisciplinary planning team (IDT) read all comments and determined whether comments were substantive or nonsubstantive. Pursuant to the NEPA, responses were prepared for all substantive comments, and the content of this FEIS also demonstrates responsiveness to public input. The methodology consisted of:

A coding structure was developed in the PEPC database to help sort comments into substantive and nonsubstantive and then to separate them into general headings, as used in Appendix K, based on groupings from the EIS or issues/concerns brought forward through public comment.

As each submission was read, distinct comments were identified and given a code based on, among other things, the topics addressed and whether the comment was substantive or nonsubstantive (according to criteria set forth in Council on Environmental Quality regulations). Submissions could, and often did, contain several comments.

Each submission was added into PEPC as text. Substantive and non substantive text were pulled from the submission and entered into the comment database. For each comment in a correspondence, codes assigned by one IDT member were validated by another IDT member, along with the submission code and type, the name and address (if available), and the text of the comment, if substantive.

The database was used to help construct the substantive issues. Opinions, feelings, and preferences of one element or one alternative over another, and comments of personal and philosophical nature were all read and analyzed. All comments were considered, whether people voiced the same concern or a single person or organization raised a technical point.

The team analyzed the comments and then grouped comments with similar subject matter to prepare responses for each subject matter group. Some of the more detailed comments appear verbatim in this document, while others were summarized, reflecting the content of several similar comments. Responses to comments were collaborated with professionals in the respective fields (i.e., air quality, fire ecology, wildlife and habitat) for analysis and response. Comment summaries and responses were reviewed by the interdisciplinary planning team for accuracy and completeness.

Reading, coding, and analyzing comment letter contents assisted the team in determining if substantive issues raised by the public warranted further modification of alternatives or further analysis of issues and impacts. With information provided through the public review process, GRCA revised the adaptive management section, added more analysis to the cumulative impacts, and clarified the moderate high/high severity 30% cap for MSO restricted habitat.

Although the content analysis process attempted to capture the full range of public concerns, it is acknowledged that comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Further, public comment is not a vote-counting process; emphasis in this process was on comment content rather than number of times a comment was received.

Some of the major issues raised were:

- Cumulative impacts on resources combined with effects from Forest Service lands
- Adaptive management too vague
- Fire severity changes in the action alternatives
- Impacts to MSO critical habitat

For changes made to the FEIS based on the issues described above, please refer to the comment/response section in Appendix K.

5.2.3 Organizations and Agencies Consulted

During the NEPA decision-making processes, the NPS is required to consult with certain American Indian tribes, as well as Federal and state agencies and entities due to jurisdictional responsibilities (40 CFR 1502.25). This section documents these consultation and coordination efforts. Consultation was an ongoing effort through completion of the final document and agency decision.

5.2.3.1 Tribal Consultations

In keeping with provisions of the National Environmental Policy Act, National Historic Preservation Act, NPS Management Policies (NPS 2006), Executive Memorandum on Government-to-Government Relations with Native American Tribal Governments; Executive Orders 13007 and 13175; 512 Department of the Interior Manual 2; and Director's Order 71, Relationships with Indian Tribes, the NPS established regular consultation with American Indian Tribes to address issues and concerns related to the current revisions of the Fire Management Plan and the Programmatic agreement(PA) under the Section 106 consultation. The following American Indian tribes were consulted:

- Havasupai Tribe
- Hopi Tribe
- Hualapai Tribe
- Kaibab Band of Paiute Indians
- Navajo Nation
- Paiute Indian Tribe of Utah
- White Mountain Apache Tribe
- Yavapai-Apache Nation
- San Juan Southern Paiute Tribe
- Pueblo of Zuni
- Moapa Band of Paiute Indians
- Las Vegas Paiute Tribe

Following is a list of the tribal consultation that has occurred during the development of the EIS:

Formal Correspondence

- Jan 2007 Invitation to Pan-Tribal Meeting
- Feb 2007 Notes and copies of handouts from Pan-Tribal Meeting and invitation to April field trip
- Mar 2007 Prescribed Fire Plans for 2007 sent to all tribes
- Winter 2008 Distribution of DEIS to all tribes
- Jan 2008 NPS requests meetings with individual tribes

Pan-Tribal Meetings

- Feb 2007 Meeting in Flagstaff
Agenda: Overview of FMP, planning process, range of alternatives
Tribal Representatives: Moapa Band of Paiutes, Havasupai Tribe, Hualapai Tribe
- Apr 2007 Field Trip to South Rim burn areas
Agenda: Visit recent burns and discuss tribal concerns and interest
Tribal Representatives: Yavapai-Apache Nation, Cameron Chapter of Navajo Nation, Moapa Band of Paiute Indians, Kaibab Band of Paiute Indians
- Mar 2009 Meeting in Flagstaff
Agenda: Status of FMP, review of preferred alternative and tribal comments
Tribal Representatives: Havasupai Tribe, Navajo Nation

Requested meetings with and Correspondence from Individual Tribes

Havasupai

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| Feb 2007 | Presented overview at Tribal Council meeting, prior to Pan-Tribal meeting |
| Apr 2007 | Discussed preservation options for Havasupai homesites at consultation meeting on South Rim, along with other projects |
| Oct 2007 | Update on planning status at Tribal Council meeting |

Navajo

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| Jun 2006 | Field visit with Cameron chapter members to visit Navajo structural sites, discussed their concerns and recommendations for protection during fire, received follow-up letter expressing their concerns |
| Sept 2006 | Correspondence from NNHPD regarding preservation of sweatlodges and other Navajo structures during fire incidents |
| Oct 2006 | Tribal meeting at South Rim, additional discussion regarding preservation of sweatlodges |
| Mar 2008 | Meeting at NNHPD, concern about TCPs on South Rim Field trip with Cameron Seniors to visit Navajo structural sites |
| Apr 2008 | Map of burn project area emailed to NNHPD |
| Feb 2009 | Informational meeting at Bodaway/Gap, primary concerns are smoke impacts and access to wood, impacts to tribal resource such as piñon nuts |
| Apr 2009 | Field trip with Bodaway/Gap chapter members to South Rim burn areas |

Hualapai

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| Oct 2006 | Tribal meeting in Flagstaff, updated on planning process, asked for tribal concerns |
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Issues identified during tribal consultation included

- Smoke impacts to neighboring Navajo Nation chapters (Bodaway/Gap)
- Concern about impacts to fire-sensitive (combustible) traditional structures such as wickiups and sweatlodges
- Concern about vandalism to archeological sites from government and contract crews
- Conduct cultural sensitivity training for fire staff
- Incorporate indigenous fire management techniques
- Use tribal resource advisor to assess needs and impacts
- Opportunities to engage tribal youth in pre- and post-fire assessments and resources monitoring
- Interest in having tribal representatives monitor fire management activities
- Concern about access and impacts to traditional plant resources
- Concern about ecosystem vulnerability to invasive plants and bug kills, pre- and post-treatment
- Concern that prescribed fires are conducted within the natural range of variability, not operating outside natural ecosystem processes
- Support of prescribed fires to reduce threat of unwanted, high-severity fire and stimulate growth of certain ethnographically important plants
- Interest in contracts with tribal entities and tribal fire crews for hazard fuel removal and other fire management activities
- Interest in transfer of wood cut during hazard fuel removal to BIA for use as fuel

5.2.3.2 Arizona State Historic Preservation Office and Advisory Council on Historic Preservation

National Historic Preservation Act (NHPA) requires agencies to consult with the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) regarding

undertakings that may affect historic properties. Consultation regarding this plan was initiated on September 2003.

A letter was sent to ACHP in June 2008 to initiate consultation regarding the Draft Programmatic Agreement (PA). In September 2008, GRCA received a letter from the ACHP stating: "Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, 'Protection of Historic Properties' (36 CFR Part 800), does not apply to this undertaking." They did not believe that their participation in the consultation to develop this agreement was needed. However, if they received a request from the SHPO, an affected Indian tribe, a consulting party, or other party, they may reconsider. At the time of this printing of the FEIS no requests have been made for their participation by any party.

Draft Programmatic Agreement (PA) was sent to the SHPO in December 2008 and SHPO comments on the Draft PA were received in a letter dated January 23, 2009. Comments from the SHPO were very minor and changes will be in the PA prior to finalization. Once the American Indian tribes are afforded the opportunity to submit comments on the PA and supply a signatory then the SHPO will provide their signature. This will occur prior to a decision document being finalized.

5.2.3.3 U.S. Fish and Wildlife Service

Informal consultations have been ongoing with USFWS since August of 2008 when the initiation of affected species of concern was identified for analysis (see chapter 4 section 4.2.5 and section 4.2.2).

Since the distribution of the DEIS, GRCA has been continuing informal consultation with USFWS. Several meetings have occurred with USFWS to ensure that the two agencies are collaborating and issues are addressed. GRCA and USFWS engaged in meetings on the following dates: January 14, 2009, March 11, 2009, March 23, 2009, and April 22, 2009

With USFWS input, GRCA has made revisions to the DEIS and the Draft Biological Assessment (BA); including but not limited to an explanation on the use of adaptive management, clarification of MSO restricted habitat and a clarification on the 30% cap (moderate/high and high fire severity) in the Mexican Spotted Owl (MSO) restricted habitat and the mixed-conifer forest type.

In compliance with Section 7 of the Endangered Species Act of 1973, as amended, a Biological Assessment will be submitted to USFWS for formal consultation and consultation will be finalized prior to a decision document is completed.

5.3 Recipient List

There are approximately 60 entries with physical addresses on the mailing list for this FEIS. Compacts discs (DVDs) are being sent to all persons on the list with a physical mailing address. Some FEIS hard copies will be sent to agencies and those individuals who requested hard copies during the public comment period for the DEIS. In addition, the document is being posted on the Internet where it can be downloaded from the National Park Service Planning Environment and Public Comment website (PEPC) at: <http://parkplanning.nps.gov/grca>. Copies are also being made available in main libraries of cities listed below. A complete list of individuals receiving copies of the Final Environmental Impact Statement is on file a Grand Canyon National Park, Park Headquarters, Office of Planning and Compliance.

The following lists agencies, offices, and organizations to which this document is being sent (either hard copy or DVD). As requests for copies are received during public inspection of this document, the list will be updated.

Federal Agencies

Advisory Council on Historic Preservation
Department of Agriculture
 Kaibab National Forest
Department of the Interior
 Bureau of Indian Affairs
 Bureau of Land Management
 Arizona State
 Arizona Strip (Utah)
National Park Service
 Bryce Canyon National Park
 Canyonlands National Park
 Flagstaff Area Parks
 Grand Canyon-Parashant National
 Monument
 Glen Canyon National Recreation Area
 Intermountain Regional Office
 Lake Mead National Recreation Area
 Pipe Springs National Monument
 Zion National Park
U.S. Fish and Wildlife Service
U.S. Environmental Protection Agency

Arizona Congressional Delegation

Office of Senator John McCain
Office of Senator John Kyl
Office of Congressman Raul Grijalva
Office of Congresswoman Ann Kirkpatrick

Local Libraries

Flagstaff, Arizona
Phoenix, Arizona

Arizona State Agencies

Office of the Governor
State Historic Preservation Office
Department of Environmental Quality
Department of Transportation and Planning
Game and Fish Department

Indian Tribal Governments

Havasupai Tribe
Hopi Tribe
Hualapai Tribe
Kaibab Band of Paiute Indians
Navajo Nation
Paiute Indian Tribe of Utah
White Mountain Apache Tribe
Yavapai-Apache Nation
San Juan Southern Paiute Tribe
The Pueblo of Zuni
Moapa Band of Paiute Indians
Las Vegas Paiute Tribe

Regional, County, Local, and City Governments
(notified by press release)

City of Flagstaff
City of Fredonia
City of Kanab
City of Page
City of Williams
Coconino County Board of Supervisors

Organizations and Businesses

Arizona Wilderness Coalition
Grand Canyon Trust
Grand Canyon News
Center for Biological Diversity
Sierra Club
The Wilderness Society

General Public

Paul Friesema
Mark Belles
Bettina Bickel
Jan Curtis
Keith and Nancy Green
Uric Greer
Brent Hathaway
Mark Steffan
John VanKat

5.4 NPS Interdisciplinary Team and Preparers

The NPS Interdisciplinary Team (Table 5-1) met frequently throughout FMP FEIS development. Adaptive Management Services Enterprise Team (AMSET) listed below (Table 5-2) were preparers during early stages of the planning process from September 2005 through December 2007, including preparation of early drafts of this FEIS. However, AMSET has not been involved with document changes since that time.

Table 5-1 NPS GRCA FMP EIS Interdisciplinary Team Members and Preparers

| Name | Title | Responsibility | GRCA Unit |
|-----------------|---|---|--|
| Edward Bennett | Environmental Protection Assistant | Chapter 5, Bibliography | Office of Planning and Compliance |
| Jill Beshears | Environmental Compliance | Chapter 1-5, Appendix A-K | Office of Planning and Compliance |
| Carl Bowman | Natural Resources/Air Quality (Former) now in Interpretation and Resource Education | Chapter 1-5 | Division of Science and Resource Management |
| Windy Bunn | Fire Ecologist | Chapter 2, Chapter 4 | Division of Visitor and Resource Protection, Fire and Aviation Management Branch |
| Greer Chesher | Writer/Editor | Chapter 1-5, Appendix A-K, Bibliography | Office of Planning and Compliance |
| J. Grace Ellis | Lead Cultural Resource Specialist (Former) | Chapter 4, Appendix J | Office of Planning and Compliance |
| Rick Ernenwein | Outdoor Recreation Planner | Chapter 4 | Office of Planning and Compliance |
| Eric Gdula | Fire GIS Specialist | Chapter 1-4 | Division of Visitor and Resource Protection, Fire and Aviation Management Branch |
| Amy Horn | Park Archeologist | Chapter 1-5, Appendix J | Division of Science and Resource Management |
| Craig Letz | Deputy Fire Management Officer (Former) | Chapter 1-4 | Division of Visitor and Resource Protection, Fire and Aviation Management Branch |
| Chris Marks | Deputy Fire Management Officer | Chapter 1-5, Appendix A-K | Division of Visitor and Resource Protection, Fire and Aviation Management Branch |
| Carmen Sipe | Fire Wildlife Biologist (Former) | Chapter 4 | Division of Visitor and Resource Protection, Fire and Aviation Management Branch |
| Mary Rassmussen | Fire Ecologist (Former) | Chapter 1-5, Appendix A-K | Division of Visitor and Resource Protection, Fire and Aviation Management Branch |
| RV Ward | Wildlife Biologist | Chapter 1-5 | Division of Science and Resource Management |
| Gigi Wright | Editor | Chapter 1-5, Appendix A-K, Bibliography | Division of Visitor and Resource Protection |
| | | | Intermountain Regional Office |
| Linda Kerr | Fire Ecologist | Chapter 1-5, Appendix A-K | Division of Visitor and Resource Protection, Fire and Aviation Management Branch |
| Lisa Hanson | NEPA Specialist | Chapter 1-5, Appendix A-K | Division of Visitor and Resource Protection, Fire and Aviation Management Branch |

Table 5- 2 Adaptive Management Services Enterprise Team Members and Preparers

| Name | Job Position | Responsibility |
|-------------------------|-------------------------------|--|
| Gail Bakker | Hydrologist | Chapter 3, Chapter 4 |
| JoAnn Fites, Ph.D | Fire Ecologist/Fire Scientist | Chapter 3, Chapter 4, Appendix F, Appendix I |
| Ronald W. Hodgson, Ph.D | Fire Social Scientist | Chapter 3, Chapter 4 |
| Marian Kadota | Planning Forester | Chapter 3, Chapter 4, Appendix F, Appendix I |

| Name | Job Position | Responsibility |
|--------------|---|----------------------|
| Maeton Freel | Wildlife Biologist | Chapter 3, Chapter 4 |
| Carol Ewell | Ecologist | Chapter 3, Chapter 4 |
| Wendy Boes | Botanist | Chapter 3, Chapter 4 |
| Marty Dodds | Director Landscape Architect Services, Recreation Solutions | Chapter 3, Chapter 4 |