

Worksheet

Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)

A. BLM Office: AZ130

Proposed Action Type: Conduct mechanical and prescribed fire fuels treatments on approximately 3,605 acres of Pinyon Pine-Juniper (P-J) forest encroachment in the Twin Points and Andrus Rim units (Attachment 1-4) in consultation with the Arizona Game and Fish Department.

Location of Proposed Action: Twin Points Unit: T. 31 N., R. 12 W., sec. 4, 5, 6, and T. 32 N., R. 12 W., Sec. 31, 32 and 33. Andrus Rim Unit: T. 33 N., R. 12 W., sec. 11, 12, 13, 14, 23, 24, and T. 33 N., R. 11 W., Sec. 18 and 19.

Description of the Proposed Action: These proposed vegetation treatments are identified in the Parashant Interdisciplinary Management Plan (EA-AZ-010-96-17) to achieve desired plant communities (DPC), ecosystem restoration, biodiversity, and to enhance the long-term vegetative resource. These proposed treatments include Pinyon-Juniper removal, and prescribed burns of jackpotted concentrations of debris. As plant succession progresses, in these treatment units, woody species dominate, resulting in heavy fuel loadings, lack of biodiversity, increased Pinyon-Juniper invasion, and ultimately a closed canopy Pinyon-Juniper monoculture with minimal species diversity. Only those areas of high soil potential, compatible slope and conducive climatic factors were identified for treatment. Mechanical vegetation treatments will only occur on BLM managed lands.

Pinyon Pine-Juniper Removal: The Arizona Strip-BLM Fuels Management Program is proposing a mechanical treatment in the 1,098-acre Twin Points Unit, and the 2,507-acre Andrus Rim Unit. Treatment will consist of the use of chainsaws to lop and scatter Pinyon- Juniper Encroachment. Black Brush, and cactus species located in the unit will not be treated. These units are located in the Grand Canyon-Parashant National Monument. Fuels reduction is the objective and potential improvement in plant community will result. Access will be from existing roads. Preparation activities include flagging and marking of any archeological sites, boundary, and any safety hazards.

Pinyon-Juniper removal will be conducted in areas of optimum vegetation producing potential that have lost the desired vegetation diversity due to aggressive invasion of post settlement (post 1890) Pinyon Pine and Juniper trees. These sites will be located in bottom lands and deeper soiled uplands. Tree removal will be done using chain saws to minimize impacts on other resource values in the treatment units.

Shallow soiled ridge tops and pockets of larger, older pre-settlement (pre 1890) trees within the target area will be flagged and not included in the mechanical treatment. Chain saws will be used in these areas to selectively remove post settlement trees in close proximity to older tree stands. The older trees will be left undisturbed. Disturbance will be limited to the identified treatment areas. Prior to any surface-disturbing activities, areas of proposed disturbance will be reviewed and cleared for cultural and T&E values by a qualified archeologist, and a qualified wildlife biologist. Any areas of cultural or T&E importance will be avoided and left undisturbed. Tree clearing will be designed using irregular boundaries to provide as much edge effect as possible for wildlife habitat improvement. No waste material resulting from project operations will be left on site.

After the targeted trees have been felled and have adequately dried, the cut material will be burned selectively, concentrating only on the jackpots of debris. These units will not be broadcast burned. Necessary burn and smoke management plans will be prepared in conjunction with monument staff. A buffer around each targeted treatment area will be established prior to ignition. If fires extend outside the target area into the buffer, extensive fire suppression measures will then be taken. Burning activity would normally occur during November or December, but may be conducted at other times (Spring burn window) so long as conditions are within the prescription window. A burn plan outlining burn specifications will be prepared for the treatment units. The treatment units will be burned as a Type II low complexity burn (minimal prescribed fire burn staffing, 1-Prescribed Fire Burn Boss Type 2, 1-Holding Specialist, 1- Firing Boss, 2-3 Person Ignition Team, and 5-10 Personnel on holding, staffing 2-Type 6 Engines), to remove heavy concentrations of debris leftover from thinning. This plan will include buffer zones, smoke management planning, as well as cultural and T & E clearances for each burn site. Refer to BLM Fire Management Policies and the Arizona Strip Fire Management Plan for further information.

Approximately 5 to 10 people with fire suppression training will conduct burning operations. Ignition of the burns will be done using the following method, a mix of diesel and gasoline with a drip torch. Fire suppression equipment (engines, water tenders, ATV's, etc...) will be on the scene at all times during burning operations, as required in the burn plan. Access to prescribed burn areas would be over established routes. No new roads will be constructed, although vehicles may need to drive cross-country to reach some targeted burn areas. This would be kept to a minimum. Fire lines will primarily utilize existing roads and two tracks. Burns will be conducted in a manner to create a mosaic pattern.

B. Conformance with Land Use Plan and Consistency with Related Subordinate Implementation Plans

Grand Canyon-Parashant National Monument Resource Management Plan (RMP). Date Approved 2008

The proposal is in conformance with the monument RMP because it is specifically provided for in the following decisions:

DFC-VM-03

Native vegetative communities will be protected, including those considered Monument objects. A mosaic of native perennial and noninvasive annual vegetative communities will be present across the landscape with diversity of species, canopy, density, and age class reflecting its local ecological site potential and naturally occurring habitat conditions.

DFC-VM-04

Vegetative communities will provide sufficient plant cover and litter accumulation to protect soils from wind and water erosion and enhance nutrient cycling and productivity, even during drought years.

DFC-VM-05

Ecological processes and functions will be protected, enhanced, and/or restored by allowing tools that are necessary and appropriate to mitigate adverse impacts of allowable uses and undesirable disturbances, and contribute to meeting the Standards for Rangeland Health and NPS Vital Signs and enhance Monument values.

DFC-VM-07

Each vegetation community is maintained within its natural range of variation in plant composition, structure, and function.

DFC-FM-02

Fire return intervals and natural disturbances will be appropriate for the ecological site.

DFC-FM-06

Fuel loads are maintained below levels that are considered to be hazardous.

MA-VM-02

Restoration and vegetation treatments will be authorized where protection of sensitive resources is ensured. Priority areas for restoration or vegetative treatment projects will be defined by ecological zone and major vegetation type and based on the following criteria:

- To increase indigenous rare or uncommon species;
- Where soil productivity has been reduced due to removal of soil organic matter or active erosion;
- Where vegetative cover is inadequate to prevent soil erosion;
- To improve habitat conditions for wildlife and/or special status species;
- To restore degraded, drought-stricken, weed infested, or otherwise unhealthy areas;
- To maintain previously treated areas;
- To achieve DPC objectives; and
- To meet activity plan objectives.

MA-VM-04

Treatment methods and tools appropriate to the land use allocation and protection of Monument objects can be authorized to achieve DFCs, DPCs, or Vital Sign standards. Treatment methods can include, but are not limited to mechanical, chemical, biological, and fire or any combination thereof. Vegetation treatments and uses will be monitored as part of an adaptive management process. Seed priming and other enhancement techniques can be used to increase germination rates. Treatments will be designed so that they do not encourage an increase in any invasive species.

DFC-VM-25

Healthy, diverse woodland communities will consist of a mosaic of trees, shrubs, grasses, and forbs. Mosaic patches can include stands of young and old pinyon-juniper, openings, wet meadows, seeps, and other interspersed shrub habitats. The communities will be composed of a variety of different height structures and age classes, with a thriving understory community of native grasses, forbs, and shrubs.

DFC-VM-26

To reduce the threat of catastrophic fire, ladder fuels and downed woody debris will be limited or not present. Woody debris will be present to stabilize soil and enhance vegetation recovery in restoration areas.

DFC-VM-27

Treatment objectives in the pinyon-juniper vegetation communities will focus on restoring the natural disturbance regime; increasing vegetative ground cover of native grasses, forbs, and shrubs; and removing non-native invasive species.

DFC-VM-28

Stands of pinyon-juniper will include a balance between tree, shrub, and perennial grass cover to support pinyon jay and mule deer. This mosaic will include stands of old growth pinyon-juniper to support juniper titmouse; large openings of grasses, forbs and shrubs to support mule deer and provide foraging habitat for raptors such as sharp-shinned hawk, northern goshawk, cooper's hawk, american kestrel, and red-tailed hawk; and areas of sparse to dense tree canopy cover to support pinyon jay.

DFC-VM-29

Individual old growth trees will be present and will be protected during treatment implementation.

MA-VM-22

Vegetation treatments can be used in the Great Basin Ecological Zone to enhance vegetative diversity, restore native plant communities, maintain or increase wildlife habitat, and reduce or eliminate hazardous fuels. Treatment priority areas will be where juniper canopy cover exceeds 40%, perennial grasses and forbs are less than 5%, and bare ground exceeds 50%.

MA-VM-23

Treatment preferences will use a combination of wildland fire, fire use, prescribed fire, mechanical, and chemical methods.

MA-VM-24

Up to 102,000 BLM acres and 34,000 NPS acres of pinyon-juniper habitat can be treated over the life of this Approved Plan (approx.50% of available habitat).

MA-WC-03

Restoration, vegetation treatments, wildlife management projects on BLM-administered lands, and other surface disturbing actions can be authorized in areas managed to maintain wilderness characteristics to achieve DFCs. (See Vegetation Management decisions.)

MA-WC-04

New projects or maintenance of existing projects that enhance wildlife habitat or other resources can be allowed, provided they can be designed to be substantially unnoticeable over time.

MA-WC-05

Natural processes will be primarily relied on to restore, over time, locations where human imprints are found. When natural process will not restore areas within a reasonable timeframe or when resource damage will continue, a mix of chemical, biological, mechanical, and fire tools will be used consistent with DFCs of areas managed for wilderness characteristics.

The proposal is consistent with the Parashant Interdisciplinary Management Plan (BLM/NPS, 1997), which states:

Objective C

Restore fire regimes to highest priority designated areas (based on Ecological Site Inventory and other planning) within the Parashant Area by the year 2000. Restore to other areas on an ongoing basis. Rationale: Past and present fire suppression activities have resulted in unnatural ecosystem diversity and fuel build-up. Implementing this objective will restore the role of fire in the ecosystems.

*Actions: C1. a. Prepare and implement Prescribed Fire Plans within one year of plan approval.
Rationale: This action will provide methodology to restore the natural role of fire and use it as a tool to meet resource management objectives.*

The Proclamation for the Parashant National Monument (2000), is silent on the issue of prescribed burning, but does direct the BLM and NPS to manage the Monument to protect Monument objects, which includes Pinyon-Juniper Pine forests that are at risk from catastrophic wildfires and other threats.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

Grand Canyon-Parashant National Monument Resource Management Plan (RMP). Date Approved 2008.

Arizona Strip District Fire Management Plan (FMP). Date Approved 2004.

BLM Arizona Statewide Land Use Plan Amendment for Fire, Fuels, and Air Quality Management. Date Approved 2003.

Parashant Interdisciplinary Management Plan-Management Actions Implementation (EA No. AZ-010-96-17) Date Approved 1997.

Parashant Interdisciplinary Management Plan. Date Approved 1997.

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Yes

Documentation of answer and explanation: The Grand Canyon-Parashant National Monument Resource Management Plan (RMP), (Approved 2008), Arizona Strip District Fire Management Plan (FMP), BLM Arizona Statewide Land Use Plan Amendment for Fire, Fuels, and Air Quality Management, Parashant Interdisciplinary Management Plan-Management Actions Implementation (EA No. AZ-010-96-17), and the Parashant Interdisciplinary Management Plan, all specifically mention these types of fuels treatments as part of the proposed management actions and alternatives.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances? Yes

Documentation of answer and explanation: The Parashant Interdisciplinary Management Plan-Management Actions Implementation EA (EA No. AZ-010-96-17) analyzed alternatives covering the reasonable range of proposals, including No Action. The EA was completed eleven years ago, and there

has been no substantive change in the environmental concerns, interests, values, or circumstances. The only change since The Parashant Interdisciplinary Management Plan-Management Actions Implementation EA (EA No. AZ-010-96-17) was signed in 1997, is the designation of the Grand Canyon-Parashant and Vermilion Cliffs National Monuments within the Arizona Strip District. The designation of these monuments has not changed the validity of the EA. The proposed guiding activities are consistent with the monument proclamations, the Arizona Strip Field Office Resource Management Plan, and the Grand Canyon Parashant National Monument Resource Management Plan (Approved 2008). The management guidance in these documents does not preclude this proposal from being authorized or conflict with the existing alternatives' analyzed in the Parashant Interdisciplinary Management Plan-Management Actions Implementation EA (EA No. AZ-010-96-17).

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action? Yes

Documentation of answer and explanation: The only change since the Parashant Interdisciplinary Management Plan-Management Actions Implementation EA (EA No. AZ-010-96-17) was signed in 1997, is the designation of the Grand Canyon-Parashant and Vermilion Cliffs National Monuments within the Arizona Strip District. The designation of these monuments has not changed the validity of the EA. The proposed guiding activities are consistent with the monument proclamations and Arizona Strip Field Office, Vermilion Cliffs National Monument Management and Grand Canyon Parashant National Monument Resource Management Plans (Approved 2008). The management guidance in these documents does not preclude this proposal from being authorized or conflict with the existing analysis. The Parashant Interdisciplinary Management Plan-Management Actions Implementation EA (EA No. AZ-010-96-17) is very thorough and comprehensive; there are no additional reports or assessments, no new monitoring data, no new listed (or proposed) species, and no new sensitive species known for the project area. This existing EA is also consistent with the new Monument Resource Management Plan (RMP), (Approved 2008), which considers and protects monument objects.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action? Yes

Documentation of answer and explanation: There has been no change in the methodology or analytical approach used to anticipate consequences since the original documents were developed. Analysis methods for this type of activity have not changed since the existing Parashant Interdisciplinary Management Plan-Management Actions Implementation EA (EA No. AZ-010-96-17) was issued. This existing EA considered all potential resource impacts to protect monument objects. It is in conformance with all new and existing EA's, and RMP's.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Yes
Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action? Yes

Documentation of answer and explanation: The Parashant Interdisciplinary Management Plan-Management Actions Implementation EA (EA No. AZ-010-96-17) has an excellent analysis of impacts, identified in the Environmental Impacts section of the EA. The nature of the proposed action is short-term and dispersed over a large area. The specificity of the existing analysis is adequate.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)? Yes

Documentation of answer and explanation: The Parashant Interdisciplinary Management Plan EA has an excellent cumulative impact analysis. Implementing fuels treatments on these BLM lands would not substantially change any cumulative impacts from what was described in the Parashant Interdisciplinary Management Plan-Management Actions Implementation EA (EA No. AZ-010-96-17). The cumulative impact analysis from the existing EA therefore, is still valid.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action? Yes

Documentation of answer and explanation: The existing Parashant Interdisciplinary Management Plan EA was widely distributed, including copies to agencies, organizations, and individuals. That public involvement and interagency review was, and continues to be, adequate for the current proposed action. No new public involvement or interagency review has been identified.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Tom Edgerton	Monument Manager	BLM Monument Manager
Jeff Bradybaugh	Monument Manager	NPS Monument Manager
Brian Bock	Fire Ecologist	AZ-Strip Fuels Mgmt. Program
Patrick Fleming	Fuels Program Manager	AZ-Strip Fuels Mgmt. Program
Whit Bunting	Range Mgmt. Specialist	Range Management
Dave Van Alfen	Archeologist	Cultural Resources
Tom Denniston	Wildlife Team Leader	Wildlife/Special Status Species
Luke Thompson	Wildlife Manager	Arizona Game & Fish Department
Richard Spotts	NEPA Coordinator	NEPA Compliance/Planning
Dianna Hawks	Team Leader	Recreation, Wilderness and Cultural Resources

F. Mitigation Measures: The following mitigation measures were identified and approved in the Grand Canyon-Parashant National Monument Resource Management Plan (RMP), Arizona Strip District Fire Management Plan (FMP), BLM Arizona Statewide Land Use Plan Amendment for Fire, Fuels, and Air Quality Management, and the Parashant Interdisciplinary Management Plan EA. These mitigation measures would be incorporated and implemented.

Monitoring: Restoration fuels treatments and all prescribed fire activities will be monitored and evaluated on an ongoing basis. Range management vegetation plots, wildlife monitoring, photo plot monitoring, and observations will be compiled for analysis to determine treatment effectiveness. Soil monitoring would be initiated to determine the effects of the treatment activities, or lack of activities, on soil erosion. Adaptive management principles will be applied throughout all phases of restoration treatments.

Thinning: Mechanical fuels treatment activities would only occur in P-J encroachment areas of the treatment units. Only post-settlement trees would be designated for cutting (pre-settlement, leave trees will be determined by Fuels Mgmt. Specialists, or Resource Mgmt. Specialists). Cut trees would be hand piled or jackpotted in treatment areas to facilitate burning, and to prevent large accumulations of fuels. Resource specialists and prescribed fire specialists will determine when removal of the cut trees is appropriate.

Prescribed Fire: Fuels treatment impacts, and other soil scars would be restored after the completion of treatment activities. Fire crews will construct control lines around snags, old growth trees, and large down logs, as appropriate on a case by case basis, where necessary. Critical wildlife habitat and rare plant habitat would be designated as fire suppression zones. “Light Hand” fire mgmt. techniques would be employed for all prescribed fire, and fuels management activities where determined appropriate after a minimum tool evaluation. Light hand techniques involve the use of minimum impact strategies and tactics (each treatment unit would be evaluated on a case-by-case basis to determine the appropriate tools, in this case we’re proposing the use of chainsaws). The appropriate tool would depend on the acreage of the treatment area, the location of the unit, the resource goal for that unit, the timing of the treatment, and the staff available for the treatment. These treatment units are located and designed to make use of natural and unnatural fuel breaks. Treatment unit boundaries utilize roads, natural fuel breaks, and natural features such as canyon rims, rocks and drainages. This avoids the use of constructed fire-lines; and most units will not require any perimeter fireline construction. Light hand tactics in these identified treatment units also exclude the use of bulldozers. Handlines are the only constructed fireline that will be used at the proposed treatment areas. Other light hand suppression actions include air attack using retardant lines, engines and helicopters using “wet-lines”, and “cold-trailing” the treatment unit perimeter instead of line construction.

Wildlife: Wildlife surveys would be conducted on potential nesting cavities. All areas where nesting sites, or critical wildlife habitat are found would not be treated. Maps of existing sites and habitat would also be consulted when making decisions and designating non-treatment zones. Fuels treatments would be monitored on the ground and a wildlife management specialist would be present as appropriate during treatment activities. No prescribed fire activities would take place if biologists determine that a fire would adversely impact wildlife habitat.

Threatened, Endangered, and Sensitive Species: No threatened or endangered species have been known to occur in the project area, though potential habitat does exist. Sensitive species have been found within the project area. Maps of existing and potential habitat would be consulted when planning and implementing the prescribed burn or mechanical treatment areas. Zones would be designated around

potential and known habitat for threatened, endangered, and sensitive species. Surveys will continue in the project area as directed by the Arizona Game and Fish, and BLM wildlife biologists. If more potential habitat is designated, these areas will also be designated as non-treatment zones. Surveys will be conducted for Mexican spotted owls and northern goshawks in all proposed treatment areas. The potential Mexican spotted owl habitat in the Shivwits region is classified by NPS wildlife biologists as dispersal areas or migrating habitat, rather than breeding areas. Preliminary surveys by NPS wildlife biologists found no Mexican spotted owls. Follow-up two-year surveys are planned starting this year 2008, in accordance with U.S. Fish and Wildlife Service protocol. The survey areas will be focused on Ponderosa Pine stands, slot canyons, and riparian zones. If Mexican spotted owls are found, all operations in that area will be halted until further consultations with the U.S. Fish and Wildlife Service (USFWS) are conducted.

Surveys for northern goshawks would be conducted in all areas in which treatment activities are planned. No activity would occur in areas where goshawks are nesting. Goshawk surveys will be coordinated by the Arizona Game and Fish, and BLM wildlife biologists. If goshawks are discovered in an area proposed for treatment, fire managers will consult with the participating wildlife biologists to determine an acceptable course of action, which may include delaying the treatment schedule or altering the location of the proposed treatment. It has been determined that the proposed action would have no effect on the bald eagle, since it is a transitory visitor to the area during migration.

Potential habitat for the California condor exists in the region, and biologists tracking the condors have reported them nearby. If condors are found inhabiting portions of the treatment area, those areas would be designated as non-treatment zones. In addition, the following mitigation measures will be adopted specifically for the protection of the California condor.

- ◆ If condors occur in the treatment area during mechanical treatment operations, activities within 300 feet of the bird will cease until it leaves on its own or until techniques are employed by permitted personnel which result in the individual leaving the area.
- ◆ All on-site personnel will be informed to avoid interacting with condors and to immediately contact the BLM wildlife biologist or BLM resource staff so they can inform the U.S. Fish and Wildlife Service or Peregrine Fund personnel.
- ◆ Open water sources such as “pumpkin” inflatable water storage tanks will be covered when not in use.
- ◆ If condors are located near the project area, weather conditions will be evaluated by Prescribed Fire Specialists and Resource Advisors to determine the potential for impacts from smoke on the condors. Prescribed fire will be avoided if weather conditions increase the impacts of smoke on condors.
- ◆ All the above criteria will be included in the burn plans for the treatment units.

In addition, formal consultation with the U.S. Fish and Wildlife Service (USFWS) would be conducted to finalize the determination of no effect, or not likely to adversely affect, threatened or endangered species. This will be completed before any treatment of the units begins.

Air Quality: Smoke management is critical within this region when managing any form of fire. Arizona Department of Environmental Quality (ADEQ) smoke management procedures, requirements, and recommendations will be followed during all phases of a prescribed fire, during any suppression activity, or during burning of treated vegetation debris. A burn plan will be submitted to ADEQ, and Monument Staff (BLM, and NPS), for approval. All required permits and accomplishment documentation (including smoke monitoring, daily burn requests, and accomplishment reports) will be completed and maintained in the project record.

Visual Resources: Under the proposed actions, management objectives would include requirements that the existing character of the natural landscape be retained. Any changes caused by the treatment of vegetation would repeat the basic elements (line, form, color and texture) found in the predominate natural features of the landscape.

Cultural Resources: Under all proposed actions archeological clearances will be completed prior to the initiation of project activities. Fire exclusion zones will be designated around known cultural and historic resources that could be adversely affected by the treatment of the identified units. In addition, a Cultural resource specialist will be on site to monitor fuels treatment activities, as appropriate. The cultural resource specialist would advise onsite fuels management personnel to prevent any impact to cultural resources. The onsite fuels management personnel will take appropriate action if a determination was made that fuels treatment activities would adversely impact cultural resources. The sites that are identified in the archeological clearance as being susceptible to erosion after burning will be monitored. Known cultural areas would not be treated. If previously unknown cultural resources are discovered, treatment would be discontinued in the area, and the cultural resource specialist will be notified.

Recreation: Monument visitors would be directed to alternate recreation sites and informed that fuels treatment activities, including prescribed fire, were taking place. This will be accomplished through the use of posted signs on roadways near the project area. Public service announcements and other outreach methods identified by the Arizona Strip District Public Affairs Officer will also be utilized.

Wilderness Characteristics: The Andrus Rim Fuels Treatment Unit (2,507 acres) is located within an area that has been assessed and found to have wilderness characteristics of naturalness and outstanding opportunities for solitude and primitive unconfined types of recreation. These lands are identified in the Grand Canyon-Parashant National Monuments Resource Management Plan for management aimed at maintaining those values. Among the desired future conditions for guiding management of these areas is the objective, "Areas where wilderness characteristics will be maintained will be ecologically sustainable and resilient to natural and human-caused disturbances" (DFC-WC-02).

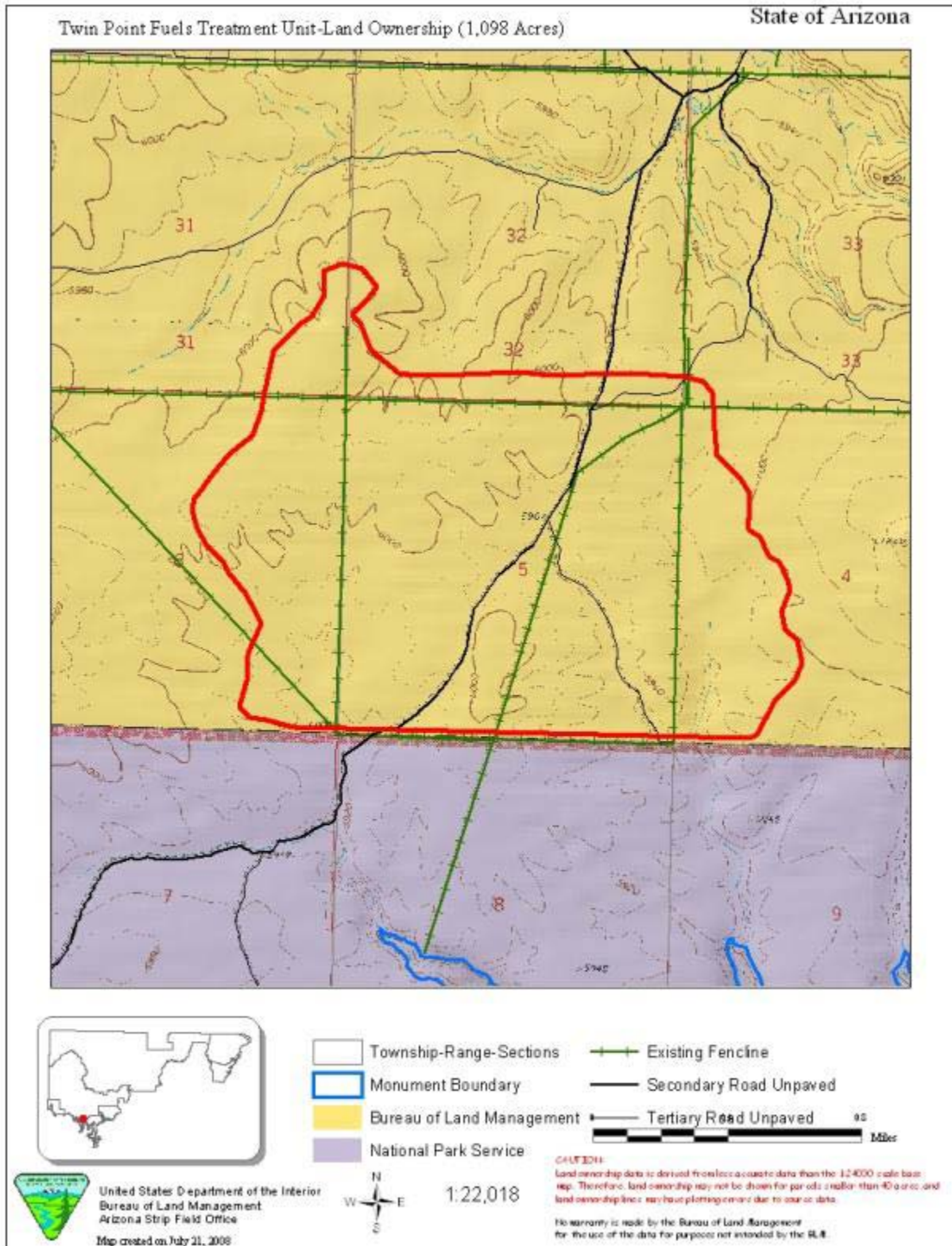
The proposed Andrus Rim Fuels Treatment Unit could therefore serve to enhance the ecological sustainability and resilience of the area, contributing to the possible future management of these areas for maintenance of wilderness characteristics. After an analysis of the impacts from the proposed fuels treatment on the units wilderness characteristics, it has been determined that the long term benefits of the treatments to the ecosystem and wildlife will outweigh any possible short term impacts that may occur. The following decisions from the Resource Management plan were used for this analysis (MA-WC-03, MA-WC-04, and MA-WC-05).

Safety: Fire crews would wear required personal protective equipment (PPE) at all times during any fuels treatment including prescribed burning. Mandatory PPE includes:

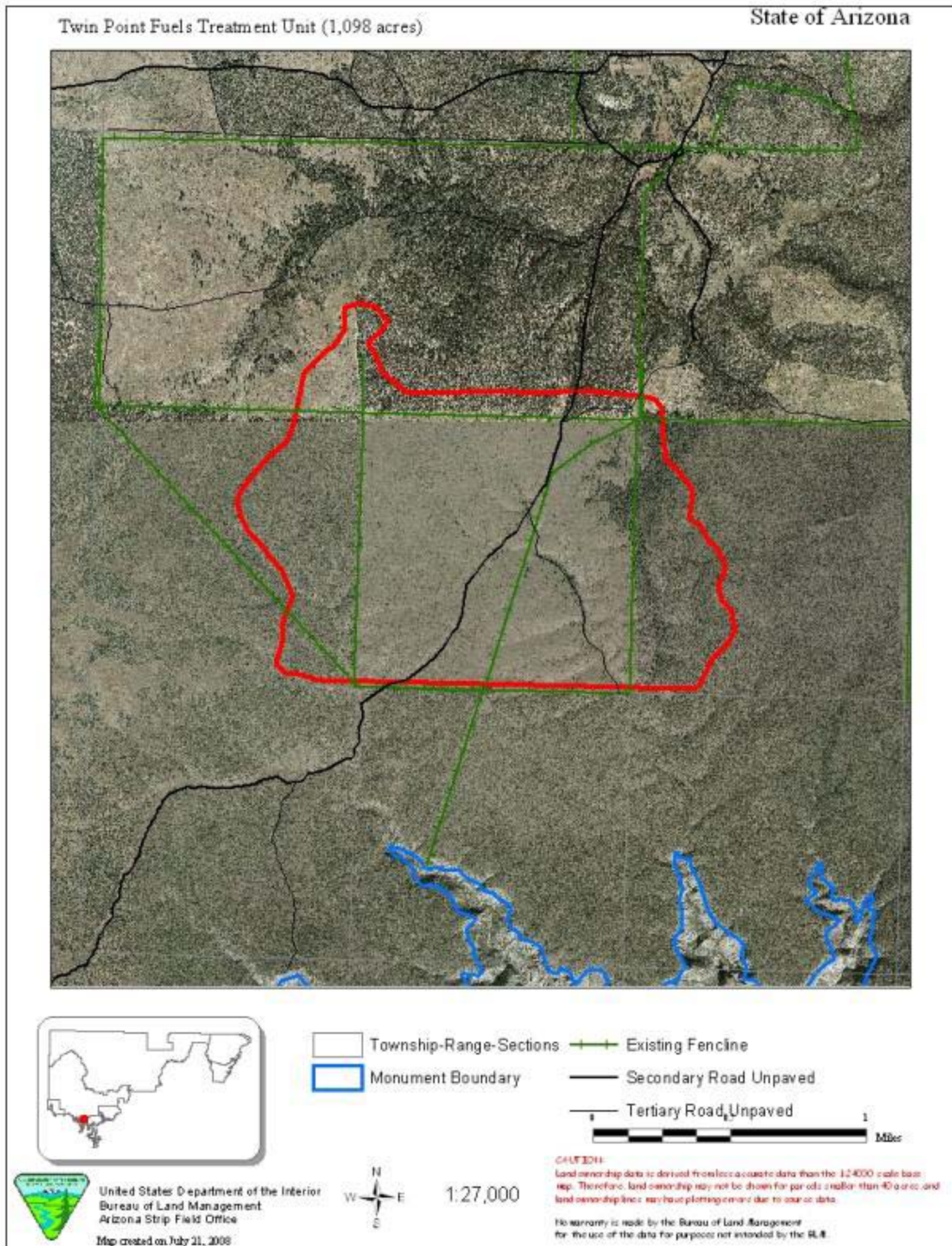
- 8-inch high, laced, leather boots with vibram lug soles
- Fire shelter
- Hart hat with chin strap
- Goggles/safety glasses
- Ear plugs
- Nomex shirts
- Nomex trousers
- Leather gloves
- Chainsaw Chaps

Burn plans associated with the identified fuels treatments would contain holding and wildland fire transition plans describing appropriate actions in the event the prescription is exceeded. All burn plans would address the need for alerting BLM neighbors and appropriate public officials to the objectives and timing of the planned burn and designate a specific individual as responsible for making these notifications. No fires would be ignited unless the responsible personnel determined immediately prior to the fire that optimum conditions to prevent the fire from exceeding prescription existed.

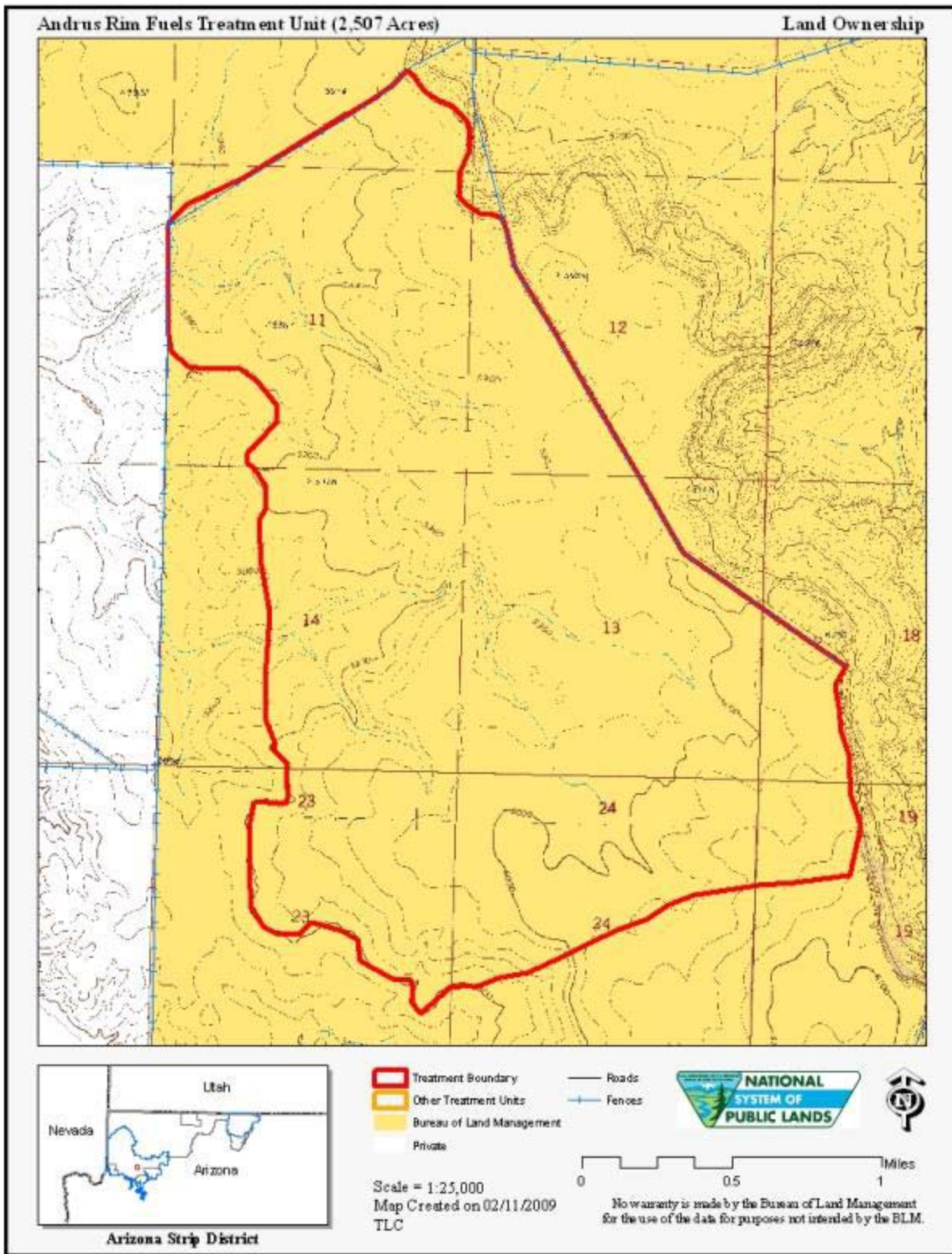
Attachment 1



Attachment 2



Attachment 3



Attachment 4



CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked.

Tom Edgerton, BLM-Monument Manager, Grand Canyon-Parashant National Monument.

Date