

**United States Department of the Interior**  
**Bureau of Land Management**

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**Determination of NEPA Adequacy**  
 NEPA # DOI-BLM-AZ-A010-2022-0012-DNA

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**Lower Hurricane Valley Water Catchments**

***Location:***

Gila and Salt River Meridian, Arizona

Clay Spring Allotment	T. 40 N., R. 11 W., Sec. 29
Lower Hurricane Allotment	T. 39 N., R. 11 W., Sec. 13 T. 40 N., R. 10 W., Sec. 17
Mainstreet Allotment	T. 35 N., R. 11 W., Sec. 5 T. 37 N., R. 11 W., Sec. 7 T. 37 N., R. 11 W., Sec. 34 T. 37 N., R. 9 W., Sec. 3

**December 2023**

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## Determination of NEPA Adequacy (DNA)

### U.S. Department of the Interior Bureau of Land Management

**Office:** Arizona Strip Field Office

**Project number:** DOI-BLM-AZ-A010-2022-0012-DNA

**Tracking Number:** N/A

**Proposed Action Title/Type:** Lower Hurricane Valley Water Catchments

#### **Location/Legal description:**

The proposed catchment sites are located in Mohave County, Arizona, approximately 20 miles south of St. George, Utah.

#### Gila and Salt River Meridian, Arizona

Clay Spring Allotment	T. 40 N., R. 11 W., Sec. 29
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#### **A. Description of the Proposed Action**

The Bureau of Land Management (BLM), Arizona Strip Field Office, along with the grazing permittees, are proposing to construct seven water catchments with troughs and pipelines on three allotments. These allotments are Clay Spring, Lower Hurricane, and Mainstreet (see Attachment 1). The purpose of the proposed action is to encourage and achieve better livestock distribution within the allotments; it is not to increase permitted use or increase animal unit months. This improved livestock distribution would enhance rangeland vegetation by accelerating plant succession while increasing plant diversity and vigor. Water distribution in these allotments is limited because the existing reservoirs are unreliable, lack in water storage capabilities, and leak due to the soils' inability to retain water. The catchment locations have been chosen in areas that would provide a reliable water source in the subject allotments and would allow water to also be piped to adjacent pastures allowing better livestock distribution and achieve better grazing management in all areas where this water would be provided, as shown on the attached map.

The Clay Spring, Lower Hurricane, and Mainstreet allotments are all meeting the applicable standards for rangeland health. Construction of the new water developments would still benefit

rangeland health by providing reliable year-round water sources in these allotments which would aid in keeping livestock dispersed throughout the allotments, resulting in more uniform utilization of forage (while not exceeding the maximum utilization level of 50%). The proposed action would provide reliable water sources and would ensure the permittees are able to implement their respective grazing systems.

The proposed catchment projects would also provide additional (reliable) water sources for wildlife (including pronghorn and mule deer). The *Arizona Strip Interdisciplinary Mule Deer Management Plan 2015-2019* (2015), which was developed jointly by the BLM and AGFD, states that “water distribution should be improved in [Unit 13B] by utilizing both cooperative projects and wildlife catchments”. The *Arizona Statewide Pronghorn Management Plan* (2009) identifies several management objectives, including objectives related to water availability. The proposed catchments fall within pronghorn and mule deer habitat. Thus, pronghorn and mule deer (along with other wildlife species) would benefit from the proposed catchments by improving water distribution and improving habitat use, which are also objectives contained within the Arizona Strip Field Office Resource Management Plan (RMP).

This DNA is tiered to the Arizona Strip Field Office Water Development Projects on the Arizona Strip, Mohave and Coconino Counties, Arizona environmental assessment (EA) (DOI-BLM-AZ-A010-2016-0027-EA). This EA, completed in 2017, evaluated the construction of water catchments and associated infrastructure in similar sites, with similar terrain, plant communities and wildlife. Although the EA referenced above was completed six years ago, it is still considered valid. Information gathered from the attached interdisciplinary Team Checklist confirms no new information has been identified since the EA was completed. Therefore, it can reasonably be concluded that there is no new information and/or new circumstances would substantially change the validity of the analysis for the new proposed action.

The Clay Spring Allotment is 12,924 acres, the Lower Hurricane Allotment is 23,572 acres, and the Mainstreet Allotment is 190,753 acres; these allotments are used year-round.

As stated above, the proposed water catchments with troughs would provide additional (reliable) water sources in the three stated allotments. The locations of the proposed catchments and associated infrastructure are shown on the attached map. Each catchment would have five basic structures: apron, storage system, pipeline, trough, and fencing. The apron would be made up of a plastic material, approximately two acres in size, that would shed water to a storage tank or lined pond. The storage tank or lined pond’s size would be approximately 80,000 gallons plus. A pipeline would be installed from the storage system to troughs. The pipeline would be made from plastic material and will be buried 18-24 inches into the soil using a ripper tooth attached to a track vehicle. The pipeline would be along a 15-foot-wide path; however, actual disturbance would only occur at the dozer tracks and a 12 to 16-inch point of impact from the ripper tooth. The proposed catchment on Clay Spring Allotment would have approximately 300 feet of pipeline. The two catchments on Lower Hurricane Allotment would include approximately 0.5 miles of pipeline, with 0.3 miles of pipeline following existing roads and 0.2 miles of new disturbance (or 0.03 acres). The four catchments on the Mainstreet Allotment would include approximately 9.5 miles of pipeline, with 6.2 miles following existing roads and 3.3 miles of new disturbance (or 0.53 acres). The water troughs would be placed at locations that would allow the

water to flow from the storage system to the trough; each trough would have a float valve to prevent overflowing. The troughs would be available to livestock and wildlife. A wildlife escape ramp would be placed and secured in each trough at the time of installation. Each apron and storage system would have a fence built around it to prevent animals from entering the storage structure. The acres of new disturbance that would be associated with the construction of the water development(s) in each allotment are listed below in Table 1

**Table 1. Acres of Disturbance**

<b>Allotment Name</b>	<b>Proposed Project</b>	<b>Acres Disturbed</b>	<b>Total Acres of Allotment</b>	<b>Percent of Allotment</b>
Clay Spring	1 catchment	2 acres	12,924	0.015%
Lower Hurricane	2 catchments 0.5 miles of pipeline • 0.3 miles along existing roads • 0.2 miles cross-country	4.8 acres	23,572	0.02%
Mainstreet	4 catchments 9.5 miles of pipeline • 6.2 miles along existing roads • 3.3 miles cross-country	19.5 acres	190,753	0.010%
<b>TOTAL ACRES DISTURBED</b>		<b>26.3 acres</b>		

The proposed action includes future maintenance activities for the life of the catchments and associated infrastructure, which is expected to be at least 20-50 years. The exact maintenance requirements are not known but are expected to include annual inspections and replacing or patching material when repairs are needed, and annual inspections of the pipelines to each trough, which includes digging to find and repair leaks or clogs in the pipe. In addition, rangeland monitoring (to evaluate compliance, utilization, composition, and long-term trend) would continue in the allotments and would also include inspections of the cross-country pipeline routes to determine if public use is occurring such that the route is becoming a new “road” and therefore if additional mitigation (beyond concealment of the route using natural materials as barriers) is necessary.

**Project Design Features**

The proposed action would be subject to the following project design features in order to minimize the impacts of the proposed action to social and natural resources.

**Cultural Resources**

- Any surface or sub-surface archaeological, historical, or paleontological remains discovered during construction, operation or maintenance activities shall be left intact. Photographing/filming, collection, excavation, defacement, and/or damage to any archaeological, historical, or paleontological remains is prohibited. Obtaining and

sharing locational information (i.e., geospatial data, location drawn on map) other than with the BLM – Arizona Strip District is also prohibited. This information is confidential and protected under the Archaeological Resources Protection Act (16 USC 470aa-mm, 43 CFR 7).

- If, in connection with operations, any human remains, funerary objects, sacred objects, or objects of cultural patrimony, as defined in the Native American Graves Protection and Repatriation Act (25 USC 3001 et seq., 43 CFR 10), are discovered, the permittee shall stop construction activities in the immediate area of the discovery, protect the remains and/or objects, and immediately notify the BLM Authorized Officer. The permittee shall continue to protect the immediate area of the discovery until notified by the BLM Authorized Officer that activities may resume. Collection, photographing/filming, and/or additional disturbance of any human remains and/or objects is prohibited. The locational information (i.e., geospatial data, location drawn on map) will be provided solely to the BLM Authorized Officer and the BLM Archaeologist. This information is confidential and is also protected under the Archaeological Resources Protection Act.

### Wildlife

- Construction would be limited to daylight hours to minimize impacts to wildlife.
- Open trenches have the potential to trap and injure wildlife. During construction of the water catchments, these risks would be mitigated by minimizing the length of time trenches are left open, providing escape avenues (lateral trenches) for wildlife when left overnight, and inspecting the trenches prior to backfill activities.
- The work crew chief must notify the BLM wildlife team lead if California condors visit the worksite while construction is underway. Project activities would be modified or delayed until condors vacate the area.
- If an active bird nest is located within the project area, the Arizona Strip Field Office Manager (or her designee) would be immediately notified to develop appropriate measures to avoid disturbance to the nesting birds.
- No hazing or harassment of wildlife is permitted.
- The project site would be cleaned up at the end of each day the work is being conducted (e.g., trash removed, scrap materials picked up); waste materials would be disposed of promptly at an appropriate waste disposal site. “Waste” means all discarded matter including, but not limited to, human waste, trash, garbage, refuse, oil drums, petroleum products, ashes, and equipment. “Waste” also includes the creation of micro-trash such as bottle caps, pull tabs, broken glass, cigarette butts, small plastic, food materials, bullets, bullet casings, etc. No micro-trash would be left at the project site to minimize the likelihood of condors visiting the site. BLM staff may conduct site visits to the area to ensure adequate clean-up measures are taken.
- Wildlife escape ramps would be secured in each trough before it is filled; water tanks would either have lids or wildlife escape ramps and floating bird ladders installed to prevent wildlife from becoming trapped.
- No smooth or barbed wire t-posts structures would be used to strengthen the integrity of

the troughs to keep them from moving. Instead, heavy equipment sized tires would be secured using concrete. This would facilitate ingress and egress of wildlife, particularly bat species.

- Any hollow metal and/or plastic (PVC) pipes and posts used or stored temporarily during construction or left permanently in place would be capped to prevent birds, small mammals, or reptiles from becoming entrapped.

### Soils

- Construction activities would be limited to periods when the soil and ground surface are not wet, in order to avoid soil compaction.
- During construction, vehicular traffic would be restricted to existing roads or along the 15-foot-wide route of each proposed project.
- To minimize impacts to biological soils crusts, care would be taken during construction activities to avoid disturbance of this resource to the greatest extent practicable. This may involve slight adjustments for construction equipment access and/or final locations, within the areas “cleared” for cultural resources.

### Vegetation including Invasive Species

- Construction activities would be conducted in a manner that would minimize disturbance to existing vegetation by limiting vegetation thinning where possible.
- All efforts would be made to conceal each pipeline route where it leaves an existing road. Concealment would include placement of natural materials to create barriers and masking the pipeline route so that it does not become a new public road.
- Vehicles and equipment would be power washed off-site before construction activities begin to minimize the risk of spreading noxious weeds. This would include cleaning all equipment before entering the Arizona Strip. The project areas would be monitored for noxious weeds for two years following completion of the project.

### Hazmat

- At no time would vehicle or equipment fluids (including motor oil and lubricants) be dumped on public lands. All accidental spills would be reported to the authorized officer and be cleaned up immediately, using best available practices and requirements of the law, and disposed of in an authorized disposal site. All spills of federally or state listed hazardous materials which exceed the reportable quantities would be promptly reported to the appropriate agency and the authorized officer.

## **B. Land Use Plan (LUP) Conformance**

The proposed action is in conformance with the Arizona Strip Field Office RMP, approved on January 29, 2008. The proposed action is consistent with the following decisions contained within this plan.

The following decisions are from Table 2.11 in the RMP regarding Livestock Grazing:

- **DFC-GM-01:** Healthy, sustainable rangeland ecosystems will be maintained or improved to meet Arizona’s Standards for Rangeland Health (1997) and produce a wide range of public values such as wildlife habitat, livestock forage, recreation opportunities, clean water, and functional watersheds.
- **DFC-GM-02:** Livestock use and associated management practices will be conducted in a manner consistent with other resource needs and objectives to ensure that the health of rangeland resources is preserved or improved so that they are productive for all rangeland values. Where needed, public rangeland ecosystems will be improved to meet objectives.

The following decisions are from Table 2.4 in the RMP regarding Wildlife and Fish Management:

- **DFC-WF-03:** Forage, water, cover, and space will be available to wildlife of sufficient quality and quantity to support productive and diverse wildlife populations.
- **DFC-WF-04:** All waters will be safely available to wildlife.

It has also been determined that the proposed action would not conflict with other decisions throughout the plan.

**C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

Arizona Strip Field Office Water Development Projects on the Arizona Strip, Mohave and Coconino Counties Arizona Environmental Assessment, EA No. DOI-BLM-AZ-A010-2016-0027-EA, completed in February 2017.

**D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

The proposed action is similar to the proposed action analyzed in the Arizona Strip Field Office Water Development Projects on the Arizona Strip, Mohave and Coconino Counties Arizona EA. The EA analyzes constructing catchments, pipelines and troughs, which is the same as the proposed action in this DNA. The allotments addressed in the current proposed action are in the same general geographic area and have resource conditions similar to those for the allotments that were analyzed in the existing EA; one of the new proposed catchments is within the Mainstreet Allotment, which was included in the existing EA analysis. The allotments addressed in this DNA have the same type of vegetation, similar soils, and lack of reliable water sources as do the allotments analyzed in the EA. The need for reliable water, to provide for uniform utilization of forage across the pastures in the allotments included in the current proposed action,

is the same need analyzed in the existing EA. The new proposed action does not have substantial differences from the proposed action analyzed in the existing EA. See also Section A (above) for a discussion on the validity of the analysis within this EA for the current proposed action.

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

Yes, there were two alternatives analyzed in the existing EA – the proposed action and no action.

Under the no action alternative analyzed in the EA, the proposed catchments and troughs would not be constructed on BLM administered lands. The proposed action analyzed in the EA included the construction of water catchments and troughs, which is what is proposed in this DNA. The current proposed action would result in more uniform distribution of cattle within the allotments by providing reliable water sources at appropriate times for livestock to graze more evenly across each allotment. Reliable water sources at the proposed locations would ensure the permittees are able to implement their established grazing system, and benefit rangeland health. All of these factors were discussed and analyzed in the existing EA.

The environmental concerns, interests and resource values would be the same as described in the EA: vegetation, livestock grazing, and wildlife. The purpose of the new water catchments and troughs is the same as that for the catchments and troughs analyzed in the existing EA. The range of alternatives analyzed in the existing EA is therefore still appropriate under the current conditions and circumstances.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

Yes, the analysis in the existing EA is still valid. Since it was completed, no new changes have occurred, such as listing of new species or revision of the land health evaluation determination for each allotment, which would change the analysis of the new proposed action. As stated previously, although the existing EA was completed six years ago, it is still considered valid. Information gathered from the interdisciplinary team confirms no new information has been identified since the EA was completed. Therefore, it can reasonably be concluded that new information and/or new circumstances would not substantially change the validity of the analysis for the new proposed action.

The existing EA did not address potential impacts to biological soil crusts. However, to meet the objective contained within the Arizona Strip Field Office RMP concerning increasing organic soil crust cover, the current proposed action includes direction to minimize impacts to biological soil crusts to the greatest extent practicable. Thus, the analysis in the existing EA is valid for the current proposed action.



**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

Yes, the direct, indirect, and cumulative effects are the same as those identified in the Environmental Consequences section of the existing EA. For example, the beneficial effects of the current proposed action include:

- Providing more reliable water sources at appropriate times for implementation of the grazing system established in the AMP. This would provide for a more uniform distribution of livestock, which would promote more uniform utilization of forage; and
- Increasing yearlong water availability and distribution for pronghorn, mule deer, migratory birds, and other wildlife species. Increased yearlong water availability and distribution in Unit 13B is an objective stated in the *Arizona Statewide Pronghorn Management Plan* and the *Arizona Strip Interdisciplinary Mule Deer Management Plan 2015-2019*.

The adverse effects of the current proposed action include:

- Minor impacts to vegetation and wildlife would occur temporarily during construction and placement of the proposed water facilities; and
- Long-term impacts to vegetation in the footprint of the catchment and in the immediate vicinity of the new troughs. However, these long-term impacts would be limited in scope because:
  - The new troughs would be placed adjacent to the catchment areas or piped to adjacent pastures, allowing better livestock distribution, where the disturbance (which is small percentage of the total allotment area) would occur.
  - The majority of the new pipelines would be placed adjacent to existing roads where disturbance has already occurred. Actual disturbance associated with installation of the pipelines would only occur at the dozer tracks and a 12 to 16-inch point of impact from the ripper tooth. The catchments on Lower Hurricane Allotment and Mainstreet Allotment would include areas of new disturbance – Lower Hurricane Allotment would include approximately 0.5 miles of pipeline, with 0.3 miles of pipeline following existing roads and 0.2 miles (or 0.03 acres) of new disturbance; the catchments on the Mainstreet Allotment would include approximately 9.5 miles of pipeline, with 6.2 miles following existing roads and 3.3 miles (or 0.53 acres) of new disturbance. Best management practices have been incorporated into the proposed action to minimize long-term disturbance due to these pipeline segments.
  - High use near waters would be offset by better distribution of livestock grazing in the allotment from the proposed water sources – overall utilization would be more uniform throughout the pasture and would not exceed 50%.

These effects are the same as those described in the existing EA.

In addition, as with the project areas addressed in the existing EA, a Class III cultural inventory was conducted at the location of the proposed catchments, pipelines and troughs, that identified no cultural resources were present in the project areas, and confirmed no cultural resources would be adversely affected by the proposed action.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

Yes, a scoping letter for the EA was sent to the public, Tribal, Interagency, and county officials on August 10, 2016, inviting public comments on the proposed action. A total of six scoping comments were received. On November 1, 2016, a preliminary EA was sent to all interested parties inviting public comments on the document. A total of four comments were received. All comments received were considered and incorporated as appropriate (see Chapter 5 of the EA). The EA was made available on the BLM's ePlanning website. Public involvement and interagency review were, and continues to be, adequate for the current proposed action.

**E. Persons/Agencies /BLM Staff Consulted**

Gloria Benson, Tribal Liaison, Arizona Strip District Office  
Amber Hughes, Planning & Environmental Coordinator, Arizona Strip District Office  
Jon Jasper, Outdoor Recreation Planner, Arizona Strip Field Office  
Jace Lambeth, Special Status Plants, Arizona Strip Field Office  
Stephanie Grischkowsky, Wildlife Biologist, Arizona Strip Field Office  
Sarah Page, Archaeologist, Arizona Strip Field Office  
Gloria Benson, Tribal Liaison, Arizona Strip District Office  
Justin Reeve, Rangeland Management Specialist, Arizona Strip Field Office  
Rody Cox, Geologist, Arizona Strip Field Office  
Ken Shurtz, Surface Protection Specialist, Arizona Strip Field Office  
Morgan Noland, Soil Scientist, Arizona Strip Field Office  
Kendra Thomas, Realty Specialist, Arizona Strip Field Office  
Cody Goff, Fuels Specialist, Arizona Strip District Office  
Lorraine Christian, Arizona Strip Field Office Manager  
  
Tim Shurtliff, Arizona Game and Fish Department (AGFD) Field Supervisor  
Rob Nelson, AGFD Habitat Evaluation and Lands Program Manager  
Daniel Bullets, acting Environmental Program Director of the Kaibab Paiute Tribe (KPT)  
Martina Dawley, Cultural Staff for the Hualapai Tribe

## 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 the BLM's compliance with the requirements of the NEPA.

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Lorraine M Christian  
Date: 2023.12.13  
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Lorraine M. Christian  
Field Manager  
Arizona Strip Field Office

Attachment 1 – Lower Hurricane Valley Catchments Location Map



ID Team Checklist

**Lower Hurricane Valley Water Catchment DNA**

NP = Not present in the area impacted by any of the alternative

NI = Present, but not affected to a degree that detailed analysis is required

PI = Present with potential for impact – analyzed in detail (EAs)

NC = No Change (DNAs only) – actions and impacts are not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form

<b>Resource</b>	<b>Determination</b>	<b>Rationale for Determination</b>
Areas of Critical Environmental Concern	NP	None of the proposed project areas are within an area of critical environmental concern.
Environmental Justice	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Farmlands (Prime or Unique)	NP	There are no prime or unique farmlands within the Arizona Strip District.
Native American Religious Concerns	NI	The proposed action would not limit access to or ceremonial use of any known Indian sacred sites, or adversely affect the physical integrity of any such site.
Threatened, Endangered or Candidate Plant Species	NP	There are no BLM sensitive plant species, Threatened, Endangered or Candidate Plant Species or habitat known to occur within the proposed action area.
Threatened, Endangered or Candidate Animal Species	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Cultural Resources	NP	Class III (intensive-level) cultural resources inventories have been conducted within areas proposed for ground-disturbing activities. No cultural resources were identified. The proposed action would therefore have no adverse effect on any eligible property.
Invasive, Non-native Species	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Wastes (hazardous or solid)	NC	Measures to prevent the spillage of hazardous materials have been built into the proposed action (see Project Design Features). Actions and impacts are not changed from those disclosed in the existing NEPA document.

<b>Resource</b>	<b>Determination</b>	<b>Rationale for Determination</b>
Wetlands / Riparian Zones	NP	There are no wetlands/riparian zones within or near the project areas.
Wild and Scenic Rivers	NP	There are no wild and scenic rivers within or near the project areas.
Designated Wilderness	NP	There is no designated wilderness within or near the project areas.
Livestock Grazing	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Woodland / Forestry	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Vegetation	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Sensitive Plant Species	NP	There are no sensitive plant species or habitat known to occur within the proposed project areas.
Wildlife (including sensitive species and migratory birds)	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Soil Resources	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Recreation	NC	Within the northern portion of the Lower Hurricane allotments, lies a highly used OHV area. Catchments would not affect the recreational uses in this area.
Visual Resources	NI	The project areas are within areas designated VRM Class 3, in locations that would not attract the attention of the casual users and therefore would have no effects to the Class 3 VRM objects.
Geology / Mineral Resources / Energy Production	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Paleontology	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Lands / Access	NI	There are no land use authorizations issued within the project areas, nor are there any proposed land tenure

Resource	Determination	Rationale for Determination
		actions being considered in this area. The project would not affect access to the area.
Fuels / Fire Management	NC	Hazardous fuels prevention and mitigation actions and impacts are not changed from those disclosed in the existing NEPA document.
Socio-economic Values	NC	Actions and impacts are not changed from those disclosed in the existing NEPA document.
Wild Horses and Burros	NP	There are no wild horses or burros within the project areas, and no Herd Areas or Herd Management Areas exist within the project areas.
Lands Managed to Maintain Wilderness Characteristics	NP	There are no lands managed to maintain wilderness characteristics in or near the project areas.