#### Grand Staircase-Escalante National Monument

Bureau of Land Management
US Department of Interior

#### Livestock Grazing Plan Amendment EIS NEWSLETTER #3 - Preliminary Alternatives - Dec. 2014

#### Dear Friends and Neighbors,

We are seeking public comments on the preliminary alternatives for the Grand Staircase-Escalante National Monument's Livestock Grazing Monument Management Plan Amendment and Associated Environmental Impact Statement (MMP-A/EIS). Comments will be considered as we develop the Draft MMP-A/EIS that will replace existing grazing management decisions.

We requested comments during the scoping period in December 2013 and January 2014. The preliminary draft alternatives were developed using that public feedback, in close coordination with the State of Utah, Kane and Garfield Counties, and the National Park Service. The preliminary alternatives propose different scenarios for managing livestock and rangelands in the planning area. The five preliminary alternatives are briefly summarized here and more information is available on the Monument's Livestock Grazing Plan Amendment website at *http://blm.gov/pgld*.

Requesting comments on the preliminary alternatives is an extra step to BLM's usual planning process. During scoping we heard many opinions related to livestock grazing from suggestions to close the entire area to grazing to making the entire area available for grazing. We are asking for your thoughts and ideas now to ensure that the range of alternatives in the Draft MMP-A/EIS include comprehensive livestock management options based on factors that are important to you, our stakeholders.

Please submit comments on the preliminary alternatives by January 20, 2015.

We look forward to hearing from you.

Sincerely,

Cynthias Staayah

Cynthia Staszak Monument Manager Grand Staircase-Escalante National Monument

The BLM is an agency in the US Department of the Interior that manages approximately one-quarter billion acres – more than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. Approximately 27 million acres of BLM administered lands make up the collection of National Conservation Lands, also known as the National Landscape Conservation System. These include BLM



National Monuments, National Conservation Areas, Wilderness Areas, Wilderness Study Areas, and National Scenic and Historic Trails. The mission of the National Conservation Lands is to conserve, protect, and restore these nationally significant landscapes that are recognized for their outstanding cultural, ecological, and scientific values.

# The Planning Area and Decision Area

The planning area includes all public lands within Grand Staircase-Escalante National Monument (GSENM) and public lands for which GSENM has livestock grazing administration responsibility. This includes Bureau of Land Management (BLM) lands within the Monument and additional lands within portions of the Kanab Field Office and the Arizona Strip Field Office as well as lands managed by the National Park Service (NPS) in Glen Canyon National Recreation Area (Glen Canyon NRA). Small areas of additional state, municipal, and private lands also border or are contained within the planning area.

GSENM's decision area for this planning effort includes all BLM lands within the Monument and BLM lands for which the Monument has livestock grazing management responsibility. The decision area for NPS includes lands within Glen Canyon NRA for which GSENM has livestock grazing administration responsibility. The decision area does not include state, municipal, or private lands.

### **Cooperating Agencies**

The BLM invited eligible federal agencies, state and local governments, and Native American tribes to participate as cooperating agencies. These agencies were invited to participate because they have jurisdiction by law or have special expertise. Five agencies agreed to serve as cooperating agencies:

- NPS Glen Canyon National Recreation Area
- State of Utah
- Garfield County
- Kane County

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Natural Resources Conservation Service

The cooperating agencies have been actively involved in the alternative development process.



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# Why Are We Amending the Management Plan?

BLM - GSENM is preparing a Livestock Grazing Monument Management Plan Amendment (Amendment or MMP-A) and associated Environmental Impact Statement (EIS). We are amending the MMP to integrate livestock grazing with the management of other resources on BLM-managed lands in GSENM. We will also consider lands for which GSENM has administrative responsibility for livestock grazing in Glen Canyon NRA and the BLM Kanab and Arizona Strip Field Offices. NPS is participating as a Cooperating Agency to ensure the values and purposes for which Glen Canyon NRA was established are integrated into livestock management decisions.

Currently, livestock grazing is guided by four Management Framework Plans that were completed in the 1980s. In the years since, the Monument Management Plan became effective, new information has become available, new policies have been established, and existing policies have been revised. We are amending the Monument Management Plan to address these changes, along with emerging concerns and changing circumstances. Some of these changes are:

- Establishment of GSENM in 1996
- Acquisition by BLM of thousands of acres of land in the GSENM boundary as part of the exchange with the State of Utah in 1998
- Issuance of new BLM policy and guidance for National Conservation Lands
- Establishment of the Utah BLM Standards for Rangeland Health and Guidelines for Livestock Grazing Management
- BLM emphasizing the use of science as a basis for land management
- Spread of invasive species
- Substantial and continuing increases in visitation to GSENM and the surrounding BLM and National Park Service managed lands

This newsletter briefly describes the preliminary alternatives that were developed after we heard from you during scoping last year.

The preliminary alternatives propose different means for integrating livestock grazing with management of other resources.

#### What Will the Amendment Do?



This plan amendment will provide for the comprehensive management of livestock grazing in and around GSENM. The amendment will identify all lands where GSENM administers livestock grazing as available or unavailable for that use. The amendment will also include guidelines and criteria for future allotment-specific adjustments in the amount of forage available for livestock, season of use, or other grazing management practices, as required by the BLM's *Land Use Planning Handbook*.

This amendment will also provide flexibility to adapt to new and emerging issues and opportunities through adaptive management of both landscape-scale decisions and implementation-level decisions for livestock grazing based on new information and monitoring.

#### **Common Acronyms**

BLM - Bureau of Land Management NPS - National Park Service GSENM - Grand Staircase-Escalante National Monument Glen Canyon NRA - Glen Canyon National Recreation Area MMP - Monument Management Plan MMP-A - Monument Management Plan Amendment EIS - Environmental Impact Statement



# Why are Alternatives the Heart of the EIS?

Alternatives are the heart of the EIS because they provide the greatest amount of information for decision making. The range of alternatives includes various options for meeting the purpose and need for the action and, together with the analysis of impacts of each alternative, provides a basis for choice among options by the decision maker and the public. The decision made at the end of the planning process is derived from the range of alternatives.

Once the BLM has obtained input on the range of alternatives described here and decides which alternatives to analyze in detail in the EIS, these alternatives will be studied equally to assess impacts and effective mitigation measures.

The National Environmental Policy Act of 1969 (NEPA) was adopted to ensure that environmental and social impacts of actions carried out, approved, or funded by the federal government are carefully examined. The NEPA requires that federal agencies develop a range of reasonable alternatives that "must be rigorously explored and



objectively evaluated" in environmental studies. What constitutes a range of reasonable alternatives depends on the nature of the proposal and the facts in each case. A "No Action" alternative must be included in the range to be studied. In this case, the No Action alternative would mean no change from current management direction or level of management intensity.

Each preliminary alternative includes desired outcomes (goals and objectives) and the allowable uses and actions anticipated to achieve those outcomes. Considering a range of alternatives helps the BLM and its stakeholders understand the various ways of addressing the planning issues and different scenarios for managing livestock grazing in the planning area. Some alternatives, including the No Action alternative, may be developed for detailed study, while others are considered but not analyzed in detail. Reasonable alternatives analyzed in detail meet the purpose and need for action and can be feasibly carried out based on estimated cost, logistics, technology, and social and environmental factors.

# What Determined the Range of Alternatives?

Many people have an interest in how livestock grazing is managed in this region. Some of their opinions are similar and some are completely opposite. For example, the BLM received suggestions to do everything from closing the entire area to grazing to opening the entire area to grazing. Some stakeholders believe that grazing enhances the diversity and productivity of the natural environment, while others believe it is destructive to natural resources. Because livestock grazing is a practice that has been central to the local economy for more than one hundred years, some people feel very strongly that it should continue uninterrupted, while other interests think that the environmental values for which GSENM was established should take precedence over livestockgrazing.

The BLM has used this framework to create a range of alternatives that reflect a range of approaches to address the issues related to grazing management. Some early suggestions for alternatives were considered not reasonable and are not proposed to be studied further in the EIS. In addition to the issues concerning the public, the BLM is required by law to consider the many uses of the land and ways they interact with each other. The need to balance livestock grazing with other uses is reflected in the proposed range of preliminary alternatives.



#### What did BLM Hear During Scoping?

Public scoping meetings and workshops were held in December 2013 and January 2014, during which the BLM asked for ideas from the public. A scoping report was prepared (available on the project website at *http://blm.gov/pgld*) that summarizes what people told us. After scoping, the BLM began creating alternatives to consider in the EIS. Based on the comments received, the BLM, along with the cooperating agencies, developed a range of preliminary alternatives that include different ways of managing livestock and rangelands in the decision area.

During the public scoping process, people offered many suggestions on things that should be considered in evaluating how the GSENM, Glen Canyon NRA, and surrounding areas should be managed for livestock grazing in the future. In some cases, different people had widely different views about how these issues should be addressed. The BLM has considered the range of comments received during scoping in developing the proposed range of alternatives.

Understandably, the BLM received the most comments directly related to livestock grazing management practices and forage availability. Some of the other most frequently-heard concerns included impacts on soils, effects on the local economy and lifestyle of long-time ranchers, compatibility of grazing with area recreation, and concerns about natural, biological, and cultural resources. Objects and Values, Glen Canyon NRA Values and Purposes, noxious weeds and nonnative invasive plants, paleontological resources, public health and safety, special designation areas, tribal interests and Native American religious concerns, and visual resources.

Two alternatives were submitted by stakeholders for consideration. Both of these alternatives included similar concepts such as protecting biological soil



crusts, establishing ungrazed reference areas, restoring native ecosystems, and conducting science on the Monument. Additional information provided by commenters, such as scientific studies, will assist in the documentation of the affected environment and effects analysis in the EIS.

Other concerns identified by the public included impacts or conflicts associated with air quality, fire management, GSENM



### What Do the Preliminary Alternatives Include?

Brief summaries and maps of each alternative are provided below. For more detailed information, please see http://blm.gov/pgld.

#### **Alternative A**

Alternative A is the No Action alternative and is a continuation of current management direction contained in the 2000 Monument Management Plan, the four BLM Management Framework Plans, and the 1999 Grazing Management Plan for the Glen Canyon NRA. Livestock grazing would continue at current permitted levels. Areas currently closed to livestock grazing would remain unavailable to grazing. BLM must consider this alternative.



#### **Alternative B**

Alternative B was developed in response to comments that suggested that most or all of GSENM and Glen Canyon NRA be closed to grazing due to impacts on natural ecosystems, cultural and historic resources, and recreation. Under Alternative B, livestock grazing would be discontinued in GSENM and Glen Canyon NRA. Permittees would receive a 2-year notification that livestock grazing would be discontinued. Permittees would be provided compensation for improvements. Areas in the Kanab and Arizona Strip Field Offices would remain available for grazing.



#### Alternative C

Alternative C was developed primarily in response to the Sustainable Grazing Alternative received during scoping. This alternative reduces the acres available for livestock grazing and the amount of forage allocated to livestock compared with current management. Alternative C establishes large ungrazed 'reference areas' over time; these areas can be used to enhance scientific study, especially the study of natural recovery in the absence of livestock grazing and the study of effects of livestock grazing compared to similar areas that are not grazed. This alternative emphasizes management that prioritizes native species diversity. Existing rangeland seedings would be restored for the purpose of ecosystem health with a preference for using locally derived native species. Areas that are currently unavailable and unallotted would remain unavailable to



livestock grazing. This alternative seeks to resolve some areas of livestock/recreation conflict by closing a few high use recreation areas to livestock grazing.

Alternative C includes an objective to establish a variety of ungrazed reference areas across 20 percent of the decision area; over time the acres identified as unavailable will increase to an estimated 451,300 acres while available acres would be reduced to an estimated 1,805,300 acres.

To achieve this objective, GSENM or Glen Canyon NRA allotments or pastures that are voluntarily relinquished or otherwise retired, may be put into non-use considering any of the following or combinations of the following criteria:

- Areas that would serve as valuable reference areas.
- Vegetation types that are either not represented or are underrepresented in the decision area that are ungrazed.
- Monument objects that are not compatible with or are impacted by livestock grazing (e.g., biological soil crust, riparian areas, declining native plant or wildlife species).
- Significant cultural resources, such as districts, sites, buildings, structures, and objects.
- Significant opportunities to conserve or restore historical, cultural, soil health, biological soil crust, fish, wildlife, riparian,

vegetation and/or water quality resources.

- Riparian areas, springs, and hanging gardens that have potential to be impacted or are currently impacted by livestock grazing.
- Moderate to high recreation values that are compromised by livestock grazing.
- Populations or habitat for special status species.

#### **Alternative D**

Alternative D recognizes the historic and cultural importance of the livestock industry while emphasizing healthy landscapes to support multiple uses. It is designed to be consistent with State and County ordinances and plans. Livestock management actively promotes rangeland health through adaptive management principles. This would be accomplished by restoring existing rangeland seedings using a variety of treatment methods and doing additional range improvements to increase forage. More acres are available for livestock grazing and more forage is allocated to livestock compared with current management. Alternative D also prioritizes livestock grazing management over recreation in certain zones in GSENM, but prioritizes recreational use over livestock in other zones in GSENM. Comments that discussed the importance of grazing to local communities helped guide the development of this alternative.



#### Alternative E

Alternative E emphasizes sustainable use through livestock management designed to ensure rangeland health standards are achieved and land health is improved. Most closed areas remain unavailable; two areas would be made available. Some unalloted areas would be made unavailable. Slightly fewer acres are available for grazing and less forage is allocated to livestock compared with current management. Existing seedings would be restored for the purposes of ecosystem health and for forage production. Some livestock/recreation conflicts would be reduced by changing the season of use for livestock grazing or limiting access by livestock. Comments that influenced this alternative include suggestions that grazing should continue but that changes in management practices were needed to promote land health and improve user experiences.



### **Comparison of Alternatives**

	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
Theme	Continue current management direction. Livestock grazing continues at current permitted levels. Areas currently closed remain unavailable for grazing.	Discontinue livestock grazing on GSENM and Glen Canyon NRA with two-year notification. Permittes provided compensation for improvements. Areas in Kanab and Arizona Strip Field Offices remain available for grazing.	Emphasize restoring native species diversity. Livestock grazing managed to ensure little to no impact to resources. Changes in grazing systems (e.g. season of use, intensity, rotation) considered before implementing range improvements. Areas currently unavailable and unallotted remain unavailable. Additional areas identified as unavailable for grazing.	Recognize historic and cultural importance of the livestock industry while emphasizing healthy landscapes to support multiple uses. It is designed to be consistent with State and County ordinances and plans. Livestock management actively promotes rangeland health through adaptive management principles and innovative livestock practices. Some suspended AUMS and unavailable allotments returned to active use as conditions improve.	Emphasize sustainable use through livestock management designed to ensure rangeland health standards are achieved and land health is improved. Most areas unavailable remain unavailable; two areas would be made available. Some unalloted areas would be made unavailable.
Area (acres) an	d AUMs Available for G	Grazing			
Total Available:	2,102,900	67,800	1,935,400	2,137,000	2,068,500
Available (no restrictions):	2,088,300	67,800	1,920,100	2,122,400	2,032,400
Forage Reserve:	14,600	0	0	14,600	20,700
Trailing Only:	0	0	0	0	15,300
AUMs:	106,202 (76,957 active/ 29,245 suspended)	3,125	~40,000 - 45,000	~106,000	~75,000
Area (acres) Un	available for Grazing				
Total Unavailable:	139,400	2,174,400	306,900	105,400	173,800
GCNRA	88,600	318,900	129,600	88,300	109,900
unavailable:	(Harveys Fear, Navajo Bench, Spencer Bench, Escalante River)		(Harveys Fear, Lake, Navajo Bench, Spencer Bench, Escalante River, Rock Creek Mudholes, Lower Warm Creek, Fortymile Ridge)	(Harveys Fear, Navajo Bench, Spencer Bench, Escalante River)	(Harveys Fear, Lake, Navajo Bench, Spencer Bench, Escalante River, Fortymile Ridge)



#### How Do the Alternatives Address the Issues Identified During Scoping?

Each alternative is a different approach to addressing the scoping issues. The alternatives vary in the acres available for livestock grazing, forage allocated for livestock, the approach to managing existing rangeland seedings, opportunities for future range improvements, and the approach to reducing conflicts between livestock grazing and other uses in the decision area. These variations in management approaches would have a corresponding variety of impacts on GSENM Objects and Values and Glen Canyon NRA Values and Purposes, local custom and culture, the area's economy, and the ability of the BLM to sustain the level of use when confronted with climate change and drought.

All alternatives must follow applicable laws, regulations, and policies. The existing MMP includes information relevant to livestock grazing that would not be changed by any alternative (see the Detailed Narrative of Alternatives). The existing Glen Canyon Grazing Management Plan also includes goals, objectives, and









actions that would not be modified by any alternative. A description of features common to all alternatives is included in the Detailed Narrative of Alternatives found on the project website: *http://blm.gov/pgld*.

### How Will BLM Evaluate the Alternatives?

In coordination with the cooperating agencies, the BLM team will assess the physical, biological, economic, and social effects of implementing each alternative considered in detail, including the No Action alternative. The assessment will include scientific data, comparative research, technical expertise and experience, professional judgment, and socioeconomic information provided by stakeholders.

During the scoping process, we heard many comments related to analyzing the effects of the alternatives. The BLM heard that they should carefully study the effects of livestock grazing on:

- GSENM proclamation-identified scientific and historic objects and values
- resources and values for which Glen Canyon NRA was established (public outdoor recreation use and enjoyment, scenic, scientific and historic features)
- vegetation, including riparian vegetation, noxious weeds or nonnative plants
- soils, including biological soil crusts
- local custom and culture
- regional economy
- recreation
- public health and safety

The BLM also heard that the impacts of climate change and drought on forage availability should be considered. The BLM will also assess impacts on water resources, air quality, fish and wildlife, special status species, paleontological resources, visual resources, wild and scenic rivers, tribal interests, and BLM wilderness study areas and NPS proposed wilderness. The analysis will look at the direct, indirect, and cumulative impacts of each alternative on these resources. The results of these studies will be described in the Draft EIS.



#### What's Next?

After deciding which alternatives will be analyzed in detail in the Draft EIS, the BLM will begin assessing the impacts of alternatives. Based on public comments received and an analysis of the alternatives' impacts, a preferred alternative will then be selected. The analysis of the alternatives, including the preferred one, will be included in the Draft MMP-A/EIS. When the Draft MMP-A/EIS is published, GSENM will announce its availability for public review and comment. After announcing the Draft MMP-A/EIS is ready for review, GSENM will host public meetings to answer your questions, discuss the contents of the Draft MMP-A/EIS, and accept comments. You will have at least 90 days to provide comments. The Draft MMP-A/EIS is slated to be published in 2015.

#### **Livestock Grazing Plan Amendment Process Timeline**



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### When are Comments Due?

The BLM is requesting that comments on the preliminary alternatives be submitted by **January 20, 2015.** You can still submit comments at any time during the planning process, but comments received by January 20 will be reviewed and used to revise the preliminary alternatives to ensure the alternatives that are analyzed capture the wide variation in stakeholder values.

The BLM will review comments received during the preliminary alternatives scoping period and use them to refine the alternatives that will be studied in detail in the Draft EIS. The BLM has not made a decision about a preferred alternative.



For more information, please visit the GSENM Livestock Grazing Plan Amendment Webpage:

http://blm.gov/pgld

You can email, fax, or mail your comments.

**Email:** BLM\_UT\_GS\_EIS@blm.gov

Fax: (435) 644-1250

Mail: Bureau of Land Management

Grand Staircase-Escalante National Monument

669 S. HWY 89-A

Kanab, UT 84741

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment, including personal identifying information, may be made publicly available at any time. While you can ask us to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Please provide comments by January 20, 2015.

You don't need to be an expert to have an impact on decisions. The public brings a different dimension to the BLM's assessment of alternatives that science does not. The things that are valued by stakeholders and the community must be considered in developing a preferred alternative. You can help us most by letting us know which parts of these alternatives best meet your needs and concerns, and which parts are least important to you. We welcome any and all comments.

Please reference "GSENM Livestock Grazing Plan Amendment" when submitting comments.

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Wilderness Areas, Wilderness Study Areas, and National Scenic and Historic Trails. The mission of the National Conservation Lands is to conserve, protect, and restore these nationally significant landscapes that are recognized for their outstanding cultural, ecological, and scientific values.