

To: Sally Butts, Peter Mali  
From: Bob Wick, Tim Fisher, Deb Salt, Cathi Bailey, Britta Nelson  
Date: March 28, 2017  
Subject: WO410 follow-up on Utah's response to WO comment on GSENM DRMP-A/DEIS

The WO410 programs have reviewed the response to comments on the GSENM DRMP-A/DEIS and have the following feedback:

1. **Wilderness Study Area (WSA) Comment:** (b)(5) DPP  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Utah accepted the comment, (b)(5) DPP  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
2. **Wilderness and WSA Comment:** (b)(5) DPP  
[REDACTED]  
[REDACTED] Utah accepted the comment (b)(5) DPP  
[REDACTED]
3. **Wilderness and WSA Comment:** (b)(5) DPP  
[REDACTED] Utah accepted the comment, (b)(5) DPP  
[REDACTED]  
[REDACTED]
4. **Lands with wilderness characteristics comment:** (b)(5) DPP  
[REDACTED]  
[REDACTED]  
[REDACTED] ). Utah  
modified the comment (b)(5) DPP  
[REDACTED]  
[REDACTED]
5. **Lands with wilderness characteristics comment:** (b)(5) DPP  
[REDACTED]  
[REDACTED]  
[REDACTED] Utah accepted the  
comment, (b)(5) DPP  
[REDACTED]  
[REDACTED]  
[REDACTED]
6. **Lands with wilderness characteristics comment.** (b)(5) DPP  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Utah rejected the comment, indicating that (b)(5) DPP  
[REDACTED]

(b)(5) DPP [REDACTED]

- [illegible]

- [illegible]

9. **GSENM comment:** (b)(5) DPP [REDACTED]  
[REDACTED]  
**Utah accepted the comment,** (b)(5) DPP [REDACTED]  
[REDACTED]  
**WO410 follow-up comment:** (b)(5) DPP [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

10. National Trails comment: (b)(5) DPP  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Utah modified the

comment, (b)(5) DPP

WO410 follow-up comment: (b)(5) DPP

11. **Wild and Scenic Rivers (WSR) comment: No issue.** The BLM found 32 river segments totaling 240 miles suitable in the 2000 GSENM Management Plan; the DRMP/DEIS documents current conditions and potential minimal impacts to the existing suitable WSR segments; and assumptions outlined in this targeted plan amendment provide assurances that "the values for which these river segments were found eligible and suitable are not compromised until Congress makes a decision regarding WSR designation."

12. **Repsones to National Conservation Lands questions from coordination IM**

- Are all National Conservation Lands units that are located within the planning area identified and impacts on those lands addressed in the RMPA alternatives?  
RESPONSE: Yes, NCL units are identified and impacts are addressed in Chapter 4. Because this is specifically a livestock grazing amendment, direction for NCL units is not included in the alternatives.
- Are management actions identified in the RMP that limit or exclude land use activities that are incompatible with the management of National Conservation Land units and other related special areas?  
RESPONSE: Because this is specifically a livestock grazing amendment, direction for NCL units is not included in the alternatives. Consideration was given to these areas in developing the alternatives and impacts are described in Chapter 4.
- Do alternatives consider impacts to the resources, objects, and values for which the GSENM was designated? If not, provide an explanation about how future project-level actions and analyses would consider impacts.  
RESPONSE: Yes.
- Are all land use planning decisions in the RMP consistent with the purposes and objectives of the designating proclamation that established the GSENM?  
RESPONSE: Yes.
- Do alternatives establish new discretionary uses in WSAs that would impair the suitability for wilderness designation?  
RESPONSE: No. All grazing activities in WSAs would be consistent with BLM manual 6330.
- Do the alternatives introduce changes in manner and degree to grandfathered livestock grazing uses within WSAs?  
RESPONSE: No. All grazing activities in WSAs would be consistent with BLM manual 6330.
- Do the alternatives otherwise meet the non-impairment standard described in Manual 6330 -- Management of BLM Wilderness Study Areas?"  
RESPONSE: Yes.
- If motorized use is necessary in order to maintain livestock management structures and installations in the wilderness, are the alternatives drafted to determine the method that least impacts wilderness character while remaining consistent with the rule of practical necessity and reasonableness in supporting the livestock grazing program?  
RESPONSE: Yes.
- Does the FO have a complete, updated inventory of lands with wilderness characteristics? Yes, No, or Partial?

RESPONSE: The inventory is from the past Utah state-wide effort. This has been discussed with Bob Wick.

- Have external organizations provided inventory information and has that information been acknowledged in the RMP?

RESPONSE: No.

- Do alternatives consider impacts to wilderness characteristics? If not, provide an explanation about how future project-level actions and analyses would consider impacts.

RESPONSE: The alternatives do not consider impacts because the impact analysis in Chapter 4 does that. In addition, language in Section 2.2.1 states: Prior to authorizing surface disturbing activities, including nonstructural range improvements, the BLM will ensure that wilderness characteristics inventories are current and potential effects on lands with wilderness characteristics have been analyzed in subsequent site-specific NEPA documents. These future site specific NEPA documents will include a range of alternatives, including at least one that minimizes impacts on or does not impact lands with wilderness characteristics. The analysis in will include reasonably foreseeable cumulative effects from implementing this plan.

- Have WSR eligibility and suitability evaluations been conducted and are they current? Yes or No?

RESPONSE: Yes, eligibility and suitability studies were completed for the MMP/EIS.

- Are impacts to eligible and suitable WSR segments considered in the RMP-A? If not, provide an explanation about how future project-level actions and analyses would consider impacts.

RESPONSE: Yes, impacts on suitable segments are disclosed in Chapter 4.

- Has an inventory of National Trail resources, qualities, values, and associated settings and the primary use or uses been conducted? Yes or No?

RESPONSE: n/a

**WO410 follow-up captured under the response to the NSHT program comment.**

- Are impacts to the National Trail resources, qualities, values, and associated settings and the primary use or uses considered? If not, provide an explanation about how future project-level actions and analyses would consider impacts.

RESPONSE: n/a

**WO410 follow-up captured under the response to the NSHT program comment.**