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**From:** Nelson, Britta  
**Sent:** 2017-02-06T12:24:22-05:00  
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**Subject:** comments requested by 2/17/17 - review of GSENM Grazing DRMP-A/DEIS  
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National Conservation Lands Programs,  
 a WO admin review of the GSENM DRMP-A/DEIS is underway with comments requested to me by 02/17/17. As a reminder, the planning area is a National Monument that contains wilderness characteristics, NSHT, WSR, and WSA.

The WO410 GSENM DRMP-A/DEIS comment form and a copy of review file information (including UTSO comments and GSENM responses for the state-level review) can be found in the WO410 shared review files.

#### GSENM DRMP-A/DEIS

##### BLM Utah indicated:

1. because of the nature of the targeted plan amendment (Grazing EIS), most of the NLCS-related RMP questions are not applicable (i.e., Utah is not making allocations or planning decisions for lands with wilderness characteristics, WSRs, NHT corridors, etc.). WO program leads will want to review the analysis of impacts to respective resources.
2. GSENM released preliminary determinations on the ROVs in the AMS ([see Table 5-1 on page 38](#)). Impacts to potentially impacted ROVs were discussed in the individual resource sections of Chapter 4.
3. WO410 wilderness program and BLM Utah staff had multiple conversations regarding the potential need for updates to the lands with wilderness characteristics inventory. It was determined that the Livestock Grazing EIS/Plan Amendment is a focused plan amendment and lands with wilderness characteristics management decisions are not within the scope. Livestock grazing is considered to be compatible with wilderness characteristics and values. Updated inventory findings will be required prior to the analysis of site-specific surface disturbing activity at the activity level.

Please let me know if additional information is needed at this point. Thanks.

Britta Nelson, M.P.A., Program Analyst  
 National Conservation Lands (WO-410)

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On Fri, Jan 6, 2017 at 3:03 PM, Nelson, Britta <[bknelson@blm.gov](mailto:bknelson@blm.gov)> wrote:

National Conservation Lands, a WO admin review of the GSENM DRMP-A/DEIS is scheduled for January 30 through February 20 with a kick-off briefing scheduled for January 31. After receiving the review files from WO210 I will share them along with a WO410 comment form on google drive. WO410 commented previously on the range of alternatives. The planning area is a National Monument that contains wilderness characteristics, NSHT, WSR, and WSA.

Allison and Rob, can you provide answers to each of the following questions from your review of the GSENM DRMP-A/DEIS to help guide WO410's review?

#### General

- Are all National Conservation Lands units and other related areas that are located within the planning area identified and the management addressed in the RMP alternatives? If not, is there a stand-alone plan for that unit?
- Are mitigation standards identified for future land use activities that impact National Conservation Lands units and other related special areas?
- Are appropriate land use allocations and/or 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?
- Has the State Director been briefed on RMP alternatives and decisions regarding National Conservation Lands, lands with wilderness characteristics, eligible and suitable (pre-designation) Wild and Scenic River segments, and trails under study or recommended as suitable for designation?

#### National Monuments/National Conservation Areas and Similar Designations

- If this is a combined RMP, is there a unique set of decisions specific to the NM/NCA?
- Does the RMP identify the resources, objects, and values (ROV) for which the NM/NCA was designated, and how those ROVs will be managed?
- Are all land use planning decisions in the RMP consistent with the

purposes and objectives of the designating proclamation or Act of Congress that established the NM/NCA?

- Are new utility corridors or ROWs in the NM/NCA identified as exclusion or avoidance areas?

#### Lands with wilderness characteristics

- Does the FO have a complete, updated inventory of lands with wilderness characteristics?
- Is an inventory report included as an Appendix?
- Are decisions made for all lands with wilderness characteristics within the planning area?
- Is rationale included for decisions to (1) emphasize other multiple uses; (2) emphasize other multiple uses while applying management restrictions to reduce impacts to wilderness characteristics; and/or (3) protect wilderness characteristics over other multiple uses?
- Is a table included that summarizes acres inventoried; acres found to have wilderness characteristics; acres and the percentage of lands that fall within each of the categories identified in BLM Manual 6320, which include: 1) protection of lands with wilderness characteristics as a priority over other uses, 2) emphasizing other uses while applying management prescriptions to reduce impacts to wilderness characteristics, and 3) emphasizing other multiple uses as a priority over protecting wilderness characteristics; and rationale for "how emphasizing other uses while applying management prescriptions to reduce impacts to wilderness characteristics" will occur and wilderness character will be maintained?

#### Eligible and Suitable WSR

- Did the FO complete WSR eligibility inventories consistent with current policy requirements (MS 6400)?
- Did the FO complete suitability evaluations and determinations for all eligible streams using factors and criteria from M6400?
- Are suitable/nonsuitable decisions made for all WSR-eligible streams in the planning area?
- Is the WSR Study Report included as an Appendix and is it consistent with current policy?
- For segments determined not suitable, do other resource allocations protect the river values; and/or is rationale provided for not protecting the river values especially if implementation of the RMP will degrade or eliminate those river values?

#### National Scenic and Historic Trails

- Is the national trail management corridor allocation included in the alternatives?

- Does the plan include objectives and associated management actions, allowable uses, and restrictions to safeguard the nature and purposes of the trail?

#### Other RMP Issues

- Does the RMP include any unique issues (e.g., associated settlement agreement) or background (e.g., anomalies included in a National Monument proclamation) that affect the alternatives?
- Summarize how the unique issues or background affect the alternatives.

Please let me know if you would like to discuss. Thanks. Britta

[more details »](#)

#### **WO Review Kick-off Briefing: GSENM Grazing DRMP Amendment**

The WO admin review period for the Grand Staircase Escalante National Monument (GSENM) Grazing Draft RMP Amendment (DRMPA) will run from January 30 - February 20, 2017. To help inform your WO admin review, please attend this briefing for an overview of the GSENM Grazing DRMPA. I will send the DRMPA and presentation material in subsequent emails.

Please let me know if you have any questions.

- Fariba

When Tue Jan 31, 2017 9am – 10am Mountain Time

Where Call **(b) (5)** MST RM5005 Lowlands Conference Rm ([map](#))

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