

To: Staszak, Cynthia[cstaszak@blm.gov]
Cc: Matthew Betenson[mbetenso@blm.gov]
From: Ginn, Allison
Sent: 2017-02-06T12:23:13-05:00
Importance: Normal
Subject: Re: Questions re: GSENM Grazing DRMP-A
Received: 2017-02-06T12:23:19-05:00

I'm sorry to hear that- I can echo your frustrations. I had about an hour long call with Britta on 1/30. I discussed at length the history behind the Grazing EIS and that we were only opening up a very small portion of the MMP for amendment.

Britta also sent these 20+ questions on the Cedar City RMP (which was, at least, a more appropriate planning effort for such questions) and I expressed my (and Pam J's) concerns that WO seems to be attempting to absolve themselves of a focused and thorough review of land use planning documents and also promoting a one-size-fits-all approach to their reviews. Nearly all of these questions are answered in the briefing presentation and on the table of contents of the documents.

If it relieves you at all, we only received 14 comments from WO 410 on the CCFO DEIS and none were fatal flaws.

Regards,

Allison Ginn
National Conservation Lands Program Lead
BLM Utah State Office
801-539-4053

On Mon, Feb 6, 2017 at 9:21 AM, Staszak, Cynthia <cstaszak@blm.gov> wrote:

Yes we will need your help on this. I just got off a very frustrating call with Nikki, Sally & Peter. They started asking all of the questions on the list below. I explained to them the same things that you had....this is a targeted plan amendment. They don't seem to understand that this is not a full RMP. I even had to go over the entire LWC discussion with them; thus the copy of the Briefing Paper that I forwarded.

Sally was going to consolidate the Program Leads questions and send them to me. Then I will set up a call.

Cindy Staszak
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On Mon, Feb 6, 2017 at 9:14 AM, Ginn, Allison <aginn@blm.gov> wrote:

Cindy-

FYI- I did frontrun potential issues with Britta and Bob prior to the kickoff last week.

Additionally, WO 410 is developing a new checklist (below) for RMPs that I am less than enthused about. It is supposed to be formally issued in an IM in the near future and we will be responsible for providing answers in advance of WO briefings for all land use planning documents.

I don't anticipate many comments regarding lwc from Bob or Peter, but I'll assist in crafting responses as necessary. Would you like to schedule a coordination meeting?

Regards,

Allison Ginn
National Conservation Lands Program Lead
BLM Utah State Office
801-539-4053

----- Forwarded message -----

From: **Ginn, Allison** <aginn@blm.gov>

Date: Mon, Jan 30, 2017 at 3:38 PM

Subject: Re: Questions re: GSENM Grazing DRMP-A

To: "Nelson, Britta" <bknelson@blm.gov>

Cc: Robert Sweeten <rsweeten@blm.gov>, Mark Conley <mconley@blm.gov>, "Bailey, Cathi M" <c1bailey@blm.gov>, "Salt, Deborah A" <debsalt@blm.gov>, Peter Mali <pmali@blm.gov>, Sally Butts <sbutts@blm.gov>, Robert Wick <rwick@blm.gov>, "Sieber, Skye" <ssieber@blm.gov>, Pamela Jarnecke <pjarnecke@blm.gov>, Aaron Curtis <acurtis@blm.gov>

Britta-

Because of the nature of the targeted plan amendment (Grazing EIS), most of the questions are not applicable (i.e., we are not making allocations or planning decisions for lands with wilderness characteristics, WSRs, NHT corridors, etc.). However, WO program leads will want to review the analysis of impacts to respective resources.

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.

Peter, Bob and BLM-Utah staff had multiple conversations regarding the potential need for updates to the lands with wilderness characteristics inventory. Ultimately, 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.

I am attaching USTO comments and GSENM responses for the state-level review, in case that assists in focusing your review. If there are additional questions after tomorrow's briefing, I'm happy to answer them. Thanks!

Regards,

Allison Ginn
National Conservation Lands Program Lead
BLM Utah State Office
801-539-4053

On Mon, Jan 30, 2017 at 2:50 PM, Nelson, Britta <bknelson@blm.gov> wrote:

Hi Allison and Rob, the National Conservation Lands division will be participating in the GSENM Grazing DRMP-A review and in the review kick-off briefing tomorrow. Can information be provided for the following questions to aid in the 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 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

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