

To: Butts, Sally[sbutts@blm.gov]
Cc: Peter Mali[pмали@blm.gov]; Timothy Fisher[tjfisher@blm.gov]; Robert Wick[rwick@blm.gov]; Bailey, Cathi M[c1bailey@blm.gov]; Salt, Deborah A[debsalt@blm.gov]
From: Nelson, Britta
Sent: 2017-03-28T09:51:06-04:00
Importance: Normal
Subject: update re: WO410 follow up comments on GSENM Grazing RMPA Response to WO Comments
Received: 2017-03-28T09:51:52-04:00
 GSENM DRMPA WO410 Review Summary 032817.docx

Hi Sally, I left a VM as well. The summary of the WO410 review of the GSENM DRMP-A comment resolution has been updated to include the responses to the list of questions from the draft coordination IM. The three items listed below (identified in the WO410 review summary) have been identified by WO410 as remaining follow up items for Utah and include the items we discussed and correction to the event/even language. Please let me know if there are further comments or if this is good to submit to WO210. Thanks.

1. GSENM comment: (b)(5) DPP
[REDACTED]. Utah rejected the comment (b)(5) DPP
[REDACTED]
[REDACTED] WO410 follow-up comment:
(refers to all three NM/NCA program comments): (b)(5) DPP
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
2. GSENM comment: (b)(5) DPP
[REDACTED]
[REDACTED]
[REDACTED] Utah accepted the comment, (b)(5) DPP
[REDACTED]
[REDACTED] WO410 follow-up comment: (b)(5) DPP
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
3. National Trails comment: (b)(5) DPP
[REDACTED]
[REDACTED]

(b)(5) DPP
 [REDACTED] Utah modified
 the comment, (b)(5) DPP
 [REDACTED]
 [REDACTED] WO410 follow-up comment: (b)
 [REDACTED] (S)
 [REDACTED] DP
 [REDACTED] P

Britta Nelson, M.P.A., Program Analyst
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 303.236.0539

On Fri, Mar 24, 2017 at 3:42 PM, Nelson, Britta <bknelson@blm.gov> wrote:

Utah also answered the list of questions. I didn't list them in the summary but can. I don't see any issues to follow up on for these. They listed n/a for the trails questions but Deb's follow-up addresses this.

Here is the comment and response clipped in:

General

1. 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.

2. 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.

National Monuments

3. 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.

4. 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.

Wilderness Study Area

5. 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.

6. 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.

7. Do the alternatives otherwise meet the non-impairment standard described in Manual 6330 --

Management of BLM Wilderness Study Areas?"

RESPONSE: Yes.

Wilderness

8. 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.

Lands with wilderness characteristics

9. 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.

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

RESPONSE: No.

11. 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.

Eligible and Suitable WSR

12. 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.

13. 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.

National Scenic and Historic Trails

14. 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

15. 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

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On Fri, Mar 24, 2017 at 3:13 PM, Nelson, Britta <bknelson@blm.gov> wrote:

Sorry about that! Here is the updated comment:

GSENM comment: (b)(5) DPP
 Utah rejected the comment (b)(5) DPP
 WO410 follow-up
 comment: (b)(5) DPP

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On Fri, Mar 24, 2017 at 2:09 PM, Butts, Sally <sbutts@blm.gov> wrote:

Britta, there's something a bit off in #1 and the two times that the word "event" is used. Can you check the quoted text? I think it's supposed to be "even." Thanks, Sally

On Fri, Mar 24, 2017 at 2:23 PM, Nelson, Britta <bknelson@blm.gov> wrote:

Hi Sally - attached is a summary of the WO410 review of the GSENM DRMP-A comment resolution. The three items listed below (identified in the WO410 review summary) have been identified by WO410 as remaining follow up items for Utah and include the items we discussed. Also attached are the comment responses. Please let me know if you have edits or additional feedback and I will provide a response to WO210. Thanks.

1. **GSENM comment:** (b)(5) DPP
 Utah
 rejected the comment (b)(5) DPP
 WO410 follow-up comment: (b)(5) DPP

(b)(5) DPP [Redacted text block]

2. **GSENM comment:** (b)(5) DPP [Redacted text block]
Utah accepted the comment, (b)(5) DPP [Redacted text block]

WO410 follow-up comment: (b)(5) DPP [Redacted text block]

3. **National Trails comment:** (b)(5) DPP [Redacted text block]
Utah modified the comment, (b)(5) DPP [Redacted text block]
WO410 follow-up comment: (b)(5) DPP [Redacted text block]

(b)(5) DPP

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On Thu, Mar 16, 2017 at 4:22 PM, Nelson, Britta <bknelson@blm.gov> wrote:

National Conservation Lands Programs - the response to WO comments on the GSENM RMP-A are attached. Please let me know by March 23 if the responses are satisfactory or if follow up is needed.

In addition, the WO410 BP on the review has been shared with you.

Thanks.

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

From: **Hathaway, Ryan** <rhathaway@blm.gov>
Date: Thu, Mar 16, 2017 at 10:36 AM
Subject: GSENM Grazing RMPA Response to WO Comments
To: BLM WO RMP REVIEW TEAM <blm_wo_rmp_review_team@blm.gov>

WO RMP Reviewers,

Please find the response to your comment on the GSENM RMPA at the below sharepoint. Any questions or concerns feel free to follow up with me! A pre-brief is going to be scheduled in the somewhat near future, so stay tuned!

[GSENM Response to WO Comments](#)

Ryan

Ryan Hathaway
Planning and Environmental Analyst
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Sally R. Butts, J.D., Acting Division Chief

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