

**To:** Matthew Betenson[mbetenso@blm.gov]  
**Cc:** Kate Krebs[kate.krebs@empssi.com]  
**From:** Hughes, Amber  
**Sent:** 2017-03-09T18:20:11-05:00  
**Importance:** Normal  
**Subject:** Re: DD comment response for WO comments  
**Received:** 2017-03-09T18:20:13-05:00  
[201701 GSENM ADEIS WO-Cmt ALL response2 \(1\).docx](#)

Kate,

Attached below is an updated version for comment # 10 as well as spelled out here that Matt would like to have added.

The CEQ reg direct that an EIS "...shall briefly specify the underlying P&N to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13).

This manual is discussed further down in 1.6.I

All action alternatives conform with Manual 6220.

The Monument proclamation (6920) contains a clause related to livestock grazing. Ramifications of this language for BLM discretion of livestock management for the protection of objects is described in Chapter 1.

Chapter 2, Management actions describes alternative's C D and E incorporate science and research. The existing MMP also provides guidance and science research direction. Also this is discussed at Science GSENM on p 2 16

**Amber L Hughes**

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"Between stimulus and response there is a space. In that space is our power to

choose our response. In our response lies our growth and freedom" Viktor E Frankl

On Wed, Mar 8, 2017 at 2:34 PM, Hughes, Amber <[ahughes@blm.gov](mailto:ahughes@blm.gov)> wrote:

Matt,

Please look at comment # 10 and let us know if you have any additional information.

**Amber L Hughes**

\*\*\*\*\*

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1.	Various	Use Search to find locations and correct	Mayberry	Please do not refer to grazing preference in terms of AUMs. Under current regulation, preference establishes priority for obtaining a permit, it does not establish the amount of grazing use. See definition in 4100.0-5. Permitted Use, Active Use and Suspended Use identify the AUMs that are authorized for grazing.	A	Global change made
2.		General Proclamation	Brian Novosak	Recommend providing the full text of the proclamation as an appendix	A	Proclamation added at beginning of EIS document.
3.		general	Deb Salt	I did a quick review of the document for involvement Old Spanish NHT. In the history section, the "Spanish Trail" is mentioned, and notes that the trail may be located at the southern border of GSENM.  Comment: Beyond the history section, the Old Spanish National Historic Trail (NHT) appears to receive no specific treatment in the document. If the Old Spanish NHT is located within the boundary of the analysis area, the trail must be addressed in accordance with BLM manual 6280. Otherwise, a negative declaration should be made within the document to confirm for the reader that it is outside the analysis area.	M	Added the following text to the beginning of Chapter 3: A portion of the designated corridor of the Old Spanish National Historic Trail is within the planning area and primarily follows Highway 89. The route in the vicinity of the designated corridor was used for one round-trip before it was abandoned for a northerly route. Because it was only used one time, no trail remnants or associated sites are present. The primary concern for the designated corridor is visual impacts. There would be no visual impacts from livestock grazing that would affect the experience of travelers along the designated corridor seeking to experience the Old Spanish National Historic Trail. Therefore, this topic is not discussed further in this document.
4.		General	C. Bailey	Nice job on the Wild and Scenic Rivers sections in chapters 3 and 4.	n/a	Thank you.
5.		General	Wick	Overall: I did a quick overview of the document before digging into specifics. Since 40% of the	A	Added the following text to Chapter 3: Pre-FLPMA livestock developments (range improvements) may continue to be used and

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				<p>monument is designated as WSAs, discussion of the WSA non-impairment requirement and the 6330 manual seems like it should be given comparable treatment to the monument proclamation as it can place more sideboards on management &amp; especially consideration of an alternative that expands grazing or range improvements within the WSA portion of the NM so that they don't comply with these policies.</p> <p>The monument proclamation and the Glen Canyon proposed wilderness requirements/sideboards are explicitly described within the alternatives and chapters 3 and 4 as are requirements of a number of grazing/vegetation related manuals. By simply referencing the 6330 (and 40) manuals I believe it will give a false impression to readers we have broader discretion/sideboards than we actually do within the WSA/wilderness parts of the planning area.</p>		<p>maintained in the same manner and to the same degree as such use was being conducted on October 21, 1976. New range improvements may only be approved if they meet the nonimpairment standard or one of the exceptions to the nonimpairment standard. The nonimpairment standard states that the use or facility must be temporary and cannot create new surface disturbance. If new range improvements meet the standard, they can be allowed. Grazing use can also be increased in WSAs beyond what was permitted on October 21, 1976, provided that such use meets the nonimpairment standard or one of the exceptions. Grazing in WSAs is also subject to BLM policies. Grazing can be reduced in WSAs if, for example, the rangeland is failing to achieve standards for rangeland health and grazing management practices are determined to be the significant causal factor (BLM 2012). The nonimpairment standard is described in detail in BLM Manual 6330, Section 1.6.C (page 1-10; BLM 2012). Policies for grazing management in WSAs are described in BLM Manual 6330, Section 1.6.D.3 (page 1-16; BLM 2012).</p>
6.		General	Wick	<p>Please separate wilderness and wilderness study area discussions throughout the document/analysis. They are managed under differing laws and policies and we <u>do not</u> want to give the incorrect impression that the BLM is managing WSAs as de-facto wilderness. WSAs are managed under section 603 (and 202) of FLPMA so as not to impair</p>	A	<p>Separated out in Chapters 3, 4, and the summary of impacts tables. Added reference to appropriate management tools.</p>

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				<p>their suitability for Congressional Wilderness Designation; Wilderness is managed under the Wilderness Act of 1964 and specific legislation designating the area to protect wilderness character - as well as the wilderness management plan for the area and the Congressional Grazing Guidelines (see: <a href="http://www.wilderness.net/grazing#">http://www.wilderness.net/grazing#</a>)</p> <p>There are differing sideboards for allowable uses such as vehicle use &amp; different yardsticks for measuring impacts yes there is some overlap in how we manage &amp; identify impacts between the two, but there are substantial differences that need to be discussed as well.</p>		
7.		General	Kristy Swartz, Fire & Aviation	<p>Wildland Fire Management was not analyzed adequately.</p> <p>In reviewing the scoping report, fire management, alteration of fire regimes, and the effects of grazing on wildfire occurrence and spread were identified by the public (many of these comments are not summarized under Fire Management and are sprinkled through the other summaries including Biological/Ecological Resources, Climate Change, Economics, Grazing, Vegetation (General), General Comments, and Grazing Implementation).</p> <p>Recommend including analyses that address relevant issues identified by</p>	A	Included a section on Wildland Fire Management in Chapters 3 and 4.

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				the public during scoping.  I recommend the EIS address how the range of grazing alternatives would affect: ✓ Ability to protect values at risk from fire ✓ Fire Return Interval, ✓ Fire Occurrence ✓ Fire Spread ✓ Fuel Loading (Wildfire Potential/Wildfire Hazard) ✓ Ability to manage fires		
8.		General	Tim Fisher WO410 NM/NCA	No Purpose or Need identified in the plan using grazing as a resource management tool such as to deter noxious weed / fire /etc. Will the plan and grazing be used as a Resource Management tool? If so should be identified.	R	Using livestock grazing as a management tool is not a livestock grazing program issue; it is a vegetation or fire management issue and thus is outside the scope of this MMP-A.
9.		General	Sally Butts WO410	The overview RMP questions identified in the draft coordination IM that are normally expected to be addressed in RMP review have been streamlined for the GSENM DRMP-A/EIS and follow:  <u>General</u> 1. Are all National Conservation Lands units that are located within the planning area identified and impacts on those lands addressed in the RMP-A alternatives? 2. Are management actions identified in the RMP that limit or exclude land use activities that are incompatible with the		1. 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. 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. 3. Yes 4. Yes 5. No. All grazing activities in WSAs would be consistent with BLM manual 6330. 6. No. All grazing activities in WSAs would be consistent with BLM manual 6330. 7. Yes

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				<p>management of National Conservation Land units and other related special areas?</p> <p><u>National Monuments</u></p> <p>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.</p> <p>4. Are all land use planning decisions in the RMP consistent with the purposes and objectives of the designating proclamation that established the GSENM?</p> <p><u>Wilderness Study Area</u></p> <p>5. Do alternatives establish new discretionary uses in WSAs that would impair the suitability for wilderness designation?</p> <p>6. Do the alternatives introduce changes in manner and degree to grandfathered livestock grazing uses within WSAs?</p> <p>7. Do the alternatives otherwise meet the non-impairment standard described in Manual 6330 -- Management of BLM Wilderness Study Areas?"</p> <p><u>Wilderness</u></p> <p>8. If motorized use is necessary in order to maintain livestock management structures and installations in the wilderness, are</p>		<p>8. Yes</p> <p>9. The inventory is from the past Utah state-wide effort. This has been discussed with Bob Wick.</p> <p>10. No</p> <p>11. 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.</p> <p>12. Yes, eligibility and suitability studies were completed for the MMP/EIS.</p> <p>13. Yes, impacts on suitable segments are disclosed in Chapter 4.</p> <p>14. N/A</p> <p>15. N/A</p>

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				<p>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?</p> <p><u>Lands with wilderness characteristics</u></p> <p>9. Does the FO have a complete, updated inventory of lands with wilderness characteristics? Yes, No, or Partial?</p> <p>10. Have external organizations provided inventory information and has that information been acknowledged in the RMP?</p> <p>11. Do alternatives consider impacts to wilderness characteristics? If not, provide an explanation about how future project-level actions and analyses would consider impacts.</p> <p><u>Eligible and Suitable VWSR</u></p> <p>12. Have VWSR eligibility and suitability evaluations been conducted and are they current? Yes or No?</p> <p>13. Are impacts to eligible and suitable VWSR segments considered in the RMP-A? If not, provide an explanation about how future project-level actions and analyses would consider impacts.</p> <p><u>National Scenic and Historic Trails</u></p>		

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				<p>14. Has an inventory of National Trail resources, qualities, values, and associated settings and the primary use or uses been conducted? Yes or No?</p> <p>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.</p>		
10.	ES-5	ES.2 Purpose of and the Need for the MMPA.	Tim Fisher WO410 NM/NCA	<p>The GSENM Grazing Plan "Purpose" should integrate the 6220 Manual where its focuses on grazing to include:</p> <p>1. Where consistent with the designating legislation or proclamation, livestock grazing may occur within Monuments and NCAs.</p> <p>2. Grazing management practices will be implemented in a manner that protects Monument and NCA objects and values unless otherwise provided for in law.</p> <p>3. The BLM will use Monuments and NCAs as a laboratory for innovative grazing techniques designed to better conserve, protect, and restore NLCS values, where consistent with the designating legislation or proclamation.</p>		<p>Matt/Amber to respond and edit document as necessary. Any edits to this section in the Executive Summary should also be made in Chapter 1.</p> <p>The CEQ reg direct that an EIS "...shall briefly specify the underlying P&amp;N to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13).</p> <p>This manual is discussed further down in 1.6.1</p> <p>All action alternatives conform with Manual 6220.</p> <p>The Monument proclamation (6920) contains a clause related to livestock grazing. Ramifications of this language for BLM discretion of livestock management for the protection of objects is described in Chapter 1.</p> <p>Chapter 2, Management actions describes</p>

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						alternative's C D and E incorporate science and research. The existing MMP also provides guidance and science research direction. Also this is discussed at Science GSENM on p 2-16
11.	ES-07	12-18	Mayberry	These lines repeat the bullet above on lines 4-11	A	Lines 12-18 deleted
12.	ES-11	13-17	Mayberry	Recommend adding a statement regarding whether the suspensions of grazing use came primarily before creation of the monument, or if by agreement rather than decision (if known)	A	Added the following statement: These suspensions primarily occurred by decisions prior to establishment of GSENM. Also added to Chapters 2 and 3.
13.	ES-12	16-19	Mayberry	Suggest edit for clarification: "This alternative would reduce grazing to below average actual use, which is 41,343 AUMs based on a 19-year average (1996-2014). There are several allotments that would be unavailable under this alternative where the permittee currently takes nonuse in most years, which contributes to an average actual use that is much lower than active use, which is 76,957 AUMs."	A	Change made and change tracked through to Chapter 2.
14.	ES-15 and ES-30 2-5 and 2-76	Table ES-2 and Table ES-3 Vegetation Table 2-1 and Table of Comparative Summary of Environmental Consequences	Mayberry	You may need to be prepared to explain the difference between "Acres available per AUM" (Table ES-2 and Table 2-1) and "Acres per AUM" (Table ES-3 and Table of Comparative Summary). Some readers may not realize the difference between stocking rate and carrying capacity.	M	Row headings checked for consistency and discussion of density removed from the Summary Impacts tables. Please see Section 4.1.2 on page 4-4 beginning at line 34 for the supporting rationale as to why this was done.
15.	ES-20 And 2-	Table ES-2, Alternative C	Mayberry	"When grazing occurs during the growing season, at a minimum	A	The text in the summary tables in ES and Chapter 2 reads: When grazing occurs during

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	10	And Table 2-1, Alternative C		there will be 6 weeks between the date of when grazing use begins ends(?) one year and the date of when grazing use begins the following year. If this is not possible in a particular area, the area will be rested every other year. During winter grazing, use rest rotation and do not graze an area more than two out of three years." Or does the original mean a six-week deferment of the starting date in the second year? If so, I would suggest replacing the sentence with: "When grazing occurs during the growing season, there will be a minimum six week deferment of the date grazing begins on the following year."		the growing season, there will be a minimum 6 week deferment between the date of when grazing use begins one year and the date of when grazing use begins the following year. If this is not possible in a particular area, the area will be rested every other year.  The text in the detailed alternative table provides an example and now reads: In GSENM and Glen Canyon, when grazing occurs during the growing season, there will be a minimum 6 week deferment between the date of when grazing use begins one year and the date of when grazing use begins the following year (for example, Year 1, grazing during the growing season starts on March 1; Year 2, grazing during the growing season starts April 15). Avoid grazing an area at the same time every year. If this is not possible in a particular area, the area will be rested every other year (for example, Year 1, grazing during the growing season; Year 2, rest; Year 3, graze during the growing season).
16.	ES-25	Table ES-2, Alternative C	Mayberry	When voluntarily relinquished or otherwise retired, grazing preference may be eliminated in allotments or pastures with 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).	A	Change made and tracked through to Chapter 2.
17.	ES-30 and ES-31	Table ES-3 Alternative D	Mayberry	Both of the following statements appear in the section on vegetation impacts for Alternative D. "Therefore, because more livestock would be on the landscape, there is		Impacts analysis for Alternative D has been revised for consistency.

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				an increased likelihood that grazing would impact vegetation, making it increasingly difficult to meet BLM Utah Rangeland Health Standards in GSENM and Glen Canyon and additional NPS desired vegetation standards in Glen Canyon, compared with Alternative A.” and “Changes in livestock management and the use of a variety of vegetation treatment methods would reduce the impact of grazing on vegetation and improve the likelihood for meeting BLM Utah Land Health Standards in GSENM and Glen Canyon and additional NPS rapid assessment methods in Glen Canyon compared to Alternative A.”		
18.	ES-33	Table ES 3 row I	Wick	See general comments 1 and 2 above -- “wilderness characteristics” by definition only applies to WSAs the name is very similar to “wilderness character” protection in designated wilderness but they have very important differences related to management and allowable uses. Please separate throughout.	A	Separated discussion throughout.
19.	ES-33	Table ES-3 Alternative A	Mayberry	“There are six livestock grazing allotments in the decision area that do not meet Standard I, and livestock grazing was determined to be the cause on all six allotments. In these allotments, 379,400 acres (17 percent of the decision area) would continue to be available for livestock grazing	A	Added text from Alternative B to Alternative A; also changed in Chapter 2. (Since 2006, the BLM, in coordination with permittees, has made changes in the six allotments, resulting in progress toward meeting standards.)

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				(BLM GIS 2014). but grazing would be managed or adjusted to make significant progress toward achievement of the Standard"  or add this passage from Alternative B:  "Since 2006, the BLM, in coordination with permittees, has made changes in the six allotments, resulting in progress toward meeting standards. f Need to be clear that livestock grazing management will still be in compliance with regulation rather than let reader presume that we will continue to manage in a way that precludes meeting Standard I		
20.	ES-34	Table ES-3 Alternative A	Mayberry	Same as preceeding comment. No action alternative does not preclude following regulation.	A	Added the following text to Alternative A (also changed in Chapter 2): Since 2006, the BLM, in coordination with permittees, has made changes in the six allotments, resulting in progress toward meeting standards.
21.	ES-37	Table ES-3 Alternatives A and C Recreation Impacts	Mayberry	I am confused by the discussion on density and intensity of impacts. In my mind, 50 acres per AUM means more acres are available and impacts would be less intense than Alternative C where there are 25 acres available per AUM. Under Alternative A, more area would be available for grazing and livestock use would be more widely distributed than under Alternative C. In addition, Alternative A appears to use the level of grazing under	M	Discussion of density removed from the Summary Impacts table. Please see Section 4.1.2 on page 4-4 beginning at line 34 for the supporting rationale as to why this was done.

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				average actual use, but Alternative C uses active AUMs.		
22.	1-16	11	Mayberry	Too many 9's in the date	A	Changed to 1996
23.	1-17		Mayberry	Suggest adding Public Rangelands Improvement Act, 1978 to the list of authorities	A	Added: "Public Rangelands Improvement Act of 1978 (43 USC Section 1901-1908)"
24.	1-17	24	Damone	I suggest this list should include NAGPRA and AIRFA.	A	Added.
25.	1-17	Section 1.6	wick	Add Congressional Grazing Guidelines for Designated Wilderness (see: <a href="http://www.wilderness.net/grazing#">http://www.wilderness.net/grazing#</a> ) and the Paria Canyon/Vermilion Cliffs Wilderness enabling legislation -- and Wilderness Plan if it has any decisions that would affect grazing	M	Added the Arizona Wilderness Act of 1984 (Public Law 98-406) establishing the Paria Canyon-Vermilion Cliffs Wilderness to Section 1.5.4. Added Appendix A of the Committee on Interior and Insular Affairs of the House of Representatives accompanying HR 2570 of the 101st Congress (commonly called the Congressional Wilderness Grazing Guidelines) to Section 1.5.4 Added the Paria Canyon-Vermilion Cliffs Wilderness Plan to Section 1.7.
26.	1-18		Mayberry	Suggest adding Public Rangelands Improvement Act, 1978 to the list of authorities	A	Added: "Public Rangelands Improvement Act of 1978 (43 USC Section 1901-1908)"
27.	1-19	36-37	Mayberry	Recommend using the definition for land health standards from Handbook 4180-1: "Standards of land health are expressions of levels of physical and biological condition or degree of function required for healthy lands and sustainable uses, and define minimum resource conditions that must be achieved and maintained." Desired conditions may be higher level than the minimum required for ecosystem component functionality.	A	Paragraph revised to: "These standards and guidelines were developed in accordance with 43 CFR, Part 4180, to provide for conformance with the Fundamentals of Rangeland Health (above). Through conformance and attainment of Utah's Standards and Guidelines, the Utah BLM ensures that the Fundamentals of Rangeland Health are met. Standards of land health are expressions of levels of physical and biological condition or degree of function required for healthy lands and sustainable uses, and define minimum resource conditions that must be achieved

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						and maintained. Desired conditions may be a higher level than the minimum required for ecosystem component function. Guidelines are the grazing management approaches, methods, and practices that are intended to achieve a standard."
28.	1-19	38	Mayberry	Guidelines are the grazing management approaches, methods, and practices that are intended to achieve a standard.	A	Change made
29.	1-21	19	Damone	I suggest this list include the 8100 (cultural resources) and 1780 (tribal consultation) Manuals and Handbooks	A	Added the following bullets, and the corresponding references to end of chapter: <ul style="list-style-type: none"> <li>• Manual 8100, The Foundations for Managing Cultural Resources (BLM 2004). This manual is intended as a reference source to provide BLM managers with basic information and general summary guidance for managing cultural resources.</li> <li>• Manual 1780, Tribal Relations (BLM 2016a). This manual defines the policies, roles and responsibilities, and standards for BLM tribal relations and government-to-government tribal consultation within a comprehensive framework of those legal authorities affecting this relationship.</li> <li>• Handbook H-1780-1, Improving and Sustaining BLM-Tribal Relations (BLM 2016b). This handbook addresses a broad range of legal authorities and agency programs of interest to tribes and also highlights BLM responsibilities.</li> </ul>
30.	1-27	12	Damone	This could be a place to minimally introduce the draft programmatic agreement related to cultural resources that will be completed in	M	Added to Section 1.6.1 under Other.

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				ass iati ith the EIS		
31.	2-006	Table 2-1 row 1	wick	"Maintain and/or restore with native and nonnative species; allow new seedings using native and nonnative plants consistent with BLM Manual 1745." Add consistent with manuals 6330 (6340 too) also have a more detailed discussion of any grandfathered pre-FLPMA seedings in WSAs and wilderness in chapter 3 to provide a baseline for what would be permissible, particularly under alternative D where the primary purpose is to increase livestock forage/stocking. Looks like approx. 4600 acres were treated in WSAs in the past are these pre FLPMA, were they native seedings, mechanical or hand?	A	<p>Added reference to 6330 and 6340 in Chapter 2.</p> <p>Added the following footnote in Chapter 3 related to the 4,600 acres of treatment: Most of the 4,600 acres of seedings in WSAs are rehabilitation treatments for fire, for example the treatment in the Lake allotment, or oil well exploration sites and not historical seedings for livestock forage. On Figure 3-2 I, those seedings on the edges of WSAs are more likely to be historical seedings for livestock forage and those seedings in more central portions of WSAs are more likely to be rehabilitation treatments.</p> <p>Added the following text regarding the nonstructural range improvements in WSAs: Nonstructural range improvements for forage production (historical seedings) were all originally done by mechanical means, primarily chaining. They also used nonnative seed, either crested wheatgrass or Russian wildrye.</p> <p>Also add map of existing seedings to Chapter 3.</p>
32.	2-020 and 3-7	18	Ulloa	Introduction or maintenance of nonnative species should be qualified in some form. BLM has a Native Seed Strategy that guides future seeding treatments.	M	No change here because this is the BLM Utah Rangeland Health Standards. Because the Native Seed Strategy is not BLM policy, it is not included. This document does reference BLM Manuals 1740 and 1745 and Handbook H-1740-2, though.
33.	2-021	18	wick	Add highlighted text: "... potential effects on lands with wilderness	A	Added the following text: These future site-specific NEPA documents will include a

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				<p><i>characteristics have been analyzed in subsequent site-specific NEPA documents.” (This needs inserted into the above discussion: The analysis will include reasonably foreseeable cumulative effects from implementing this plan. Also, the analysis will have a range of alternatives including at least one that minimizes or does not impact inventoried wilderness characteristics)</i></p> <p>Note: I know you are not identifying site specific treatments as part of this amendment, but we need to be sure to look at cumulative impacts which would most likely be caused by non-native and mechanical seeding under alt D and an associated RFD for how extensive the treatments would be.</p>		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.
34.	2-022	28-30	Mayberry	<p>“If the determination documents that land health standards are not being achieved and a significant causal factor for failure to achieve is livestock or grazing management practices, action must be taken to correct the identified issues.”</p> <p>Suggested edit uses language from regulation</p>	A	Change made
35.	2-022	30-32	Mayberry	<p>WO IM 2009-007 directs use of the NEPA process to analyze alternatives that will help determine significant causal factors, and potential actions (developed in consultation with permittees and others) to correct the causal factors. Ideally, no additional NEPA would be needed.</p>	A	Changed sentence to read, “There are a number of actions that resource managers can to correct issues contributing to not meeting land health standards.”

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36.	2-026	22-27	Kristy Swartz, Fire & Aviation	In reading through the document I'm unclear if direction from the September, 2005 Land Use Plan Amendment for Fire and Fuels Management (UT-USO-04-01) was brought forward into the No Action Alternative. This amendment provided updated Goals and Objectives for Fire Management, described Desired Wildland Fire Conditions, and identified areas where fire may be restored to the ecosystem as well as where the use of fire was not appropriate.  I suggest that this be more explicitly included in the EIS.		Amber will get from Cedar City. Awaiting further instruction.  Because we are not changing decisions related to fire management, this should be a nonissue, with, perhaps, the exception noted in the other fire-related comment on Alternative A.  Please make this response the response
37.	2-027 and 28		Mayberry	"This alternative would reduce grazing to below average actual use, which is 41,343 AUMs based on a 19-year average (1996-2014)." The Active AUMs in this reduced grazing alternative are higher than the average actual use (41,343 AUMs) in the no action alternative. They are lower than the <u>Active AUMs</u> in the no action alternative. The average actual use in this alternative is projected to be lower than the average actual use in the no action alternative. The section on Analytical Assumptions (4.1.1 page 4-3, lines 12-16) says analysis is based on active permitted use. Section 4.3.4 (page 4-23, lines 13-16) indicates analysis of effects are based on the projected average actual use for this alternative rather than the	A	Changed text in Chapter 2 (Section 2.4.3) to read: Under this alternative, the active AUMs would be reduced to below active AUMs under current management (Alternative A). Projected average actual use would also be reduced to below current average actual use, which is 41,343 AUMs based on a 19-year average (1996-2014).  Confirmed text in Section 4.1.1 is accurate. Deleted paragraph in Section 4.3.4; this should have been removed globally in favor of a general assumption in Section 4.1.1.

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				permitted active use, which is greater than the current average actual use. There appears to be conflict in the statements about the level of use that is analyzed in Alternative C.		
38.	2-036	29 2.5.4 Science and Research-based Alternative	Tim Fisher WO410 NM/NCA	GSENM considers the first and second tier of the M6220 and the draft appears to consider the third tier "laboratory for innovative grazing techniques" via Science and Research-based Alternative as an exclusive alternative and decided not to review. With this alternative not being forwarded it implies not using the monument as a laboratory for innovative grazing. Although other alternatives have elements of laboratory for innovative grazing techniques but not highlighted as such until the table page ES-26 Science GSENM. Within the description of 2.4.5 Alternative E BLM and NPS Preferred add a line to highlight use of the monument lands for laboratory for innovative grazing should suffice.	A	Added a statement to Sections 2.4.4 (Alternative D) and 2.4.5 (Alternative E). This is also brought forward in the same sections in the Executive Summary.
39.	2-064	Alt A, RM-6 (MMP, p 27)	Kristy Swartz, Fire & Aviation	This text likely should be replaced or at least reconciled with the 2005 Utah Fire and Fuels LUPA and the Desired Wildland Fire Conditions ((Table 2.1), p. 2-5 thru 2-9, 2005 Utah LUPA) described there which addresses the use of fire (natural and management ignited) by vegetation type		Amber will get from Cedar City. Awaiting further instruction. <i>Note: What Amber sent is not the LUPA file so cannot be correlated with this comment.</i>  <i>I'm looking into finding this document.</i>

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40.	2-082 + 3-110+ 4-72 +	Recreation 3.5 Recreation 4.7 Recreation	D.Morgan	<p>The discussion of recreation settings, objectives and outcomes in the Analysis section uses different terminology than the Affected Environment section.</p> <p>The current monument plan was done under the old recreation planning guidance; therefore the analysis should address the impacts to the achievement of those objectives. There should be consistency in the usage of terms throughout the document.</p> <p>You may want to consider an update to the SRMAs to comply with the current recreation policy. Or if that is not within the scope of this plan amendment, base the analysis on the objectives as defined in the current RMP.</p> <p>Overall, there should be a statement in the analysis and environmental consequences as to whether or not the objectives of the SRMAs can be achieved in each alternative. If not, the alternative should include 1) a new SRMA objective, 2) a change to an ERMA, or 3) removal of the designation.</p> <p>Please contact <a href="mailto:dmorgan@blm.gov">dmorgan@blm.gov</a> for questions or assistance!</p>	M	Per WO direction, updating the MMP with new RMA objectives is outside the scope of this livestock grazing amendment. Chapter 4 is revised so that terminology is consistent with Chapter 3 and objectives from existing plans.
41.	2-095	Figure 2-1	Brian Novosak	Recommend putting "yes" "no" at decision points (e.g., the choice between Alt A,D&E or Alt C)	R	No change. The figure already includes "yes" and "no" where relevant. "Yes" and "no" are not applicable after "analyze following in

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						descending order of priority," because it is not a decision point, but rather shows the distinction between the alternatives.
42.	3-074	08, 9	Ulloa	routine monument operations increase weeds. Add a BMP to use clean equipment to prevent introduction of non-native species.	R	BMPs are added as terms and conditions to site-specific projects.
43.	3-151	29	Ulloa	SSA-5 which addresses vegetation restoration in SS habitats. Add a BMP stating that only native species will be planted in SS habitats' when restoring (seeding). Appropriate site specific species will be identified during the project planning process.	R	This section provides the relevant plan-level guidance with respect to special status species and livestock grazing practices. The BLM may implement additional BMPs for site-specific projects.
44.	3-190	33	Damone	The end of this section is a good place to describe the background behind the formulation of the programmatic agreement related to cultural resources and its intended purpose.	A	Included suggested paragraph related to the PA.
45.	3-195	25	Damone	The description on PFCY should be expanded to generally describe the individual classes within the PFYC.	A	Added descriptions of the individual PFYC classes.
46.	3-196	Table 3-26	Damone	Suggest changing the column labeled "Potential" to the "PFYC Class" of the geologic formation.	A	Change made.
47.	3-207	30	wick	<i>"On lands with wilderness characteristics, there are paved public roadways and unpaved public and administrative use routes."</i> These types of maintained roads would normally disqualify an area as having wilderness characteristics the inventory should be updated to remove them from the units or this section rewritten to show that	M	Paragraph deleted

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				everything except primitive routes are excluded from the units themselves (they could be cherrystemmed)		
48.	3-211	08	wick	Please see my comments 1 and 2 above untrammelled and natural are not part of the wilderness characteristics definition so are not used to analyze impacts to WSAs as they are for wilderness please separate discussion. The remainder of the discussion looks good for WSAs	A	Change made.
49.	4-025, 4-026	30-33 39-41 (similar suggestion)	Mayberry	"Based on the forage model described in <b>Appendix D</b> , estimated forage use (or allocation) would decrease by 33 percent, compared with Alternative A. A maximum of 92,389 AUMs would be permitted, 63,144 of which would be active (18 percent decrease in active AUMs, compared with Alternative A).	M	Revised all to "estimated forage production" under discussion of applicable alternatives in Section 4.3.
50.	4-032	32	Ulloa	Introducing new genetic material. This statement does not seem to follow the Native Seed Strategy.	A	This sentence has been deleted.
51.	4-053 and others, such as 4-66 for water resources, page 4-84, etc	13-18	Mayberry	"There are six livestock grazing allotments in the decision area that do not meet Standard I, and livestock grazing was determined to be the cause on all six allotments: Circle Cliffs, Coyote, Mollies Nipple, Soda, Upper Paria, and Vermilion. Impacts on soil would occur as described under <i>Nature and Type of Impacts</i> . Because livestock grazing would not occur, these six allotments have a higher potential for	A	Changed globally.

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				meeting Standard I more quickly under Alternative B than under Alternative A." By regulation, livestock grazing use will be managed to achieve or make progress toward achieving land health standards, so all alternatives will "have potential" to meet all the standards. Some alternatives may allow quicker achievement than other alternatives. The next paragraph in the document says this better. Please review this statement for other resources and standards.		
52.	4-072	General Recreation Comment	D. Morgan	The analysis should state whether or not the SRMA objectives will still be met under each alternative. To be more specific I would analyze the (1) the impact on the current physical, social and operational recreation settings and (2) whether the corresponding rec objectives and niches to be served would be realized.	M	Revisions made to address impacts on SRMA objectives. However, the analysis does not provide an itemized analysis of impacts on each SRMA objective. Also, for consistency, the analysis was not updated to discuss impacts on the physical, social, or operation settings. Rather, it focuses more broadly on user experience impacts, particularly changes in setting that would affect the quality or quantity of those experiences.
53.	4-118	31	Ulloa	Add Native Seed Strategy after manual number.	M	Added the name of Manual 1745 after first use on page 4-95, line 23. Did not add Native Seed Strategy because it is a strategy, not BLM policy.
54.	4-120	Alt. E Special Status Species	Brian Novosak	The BLM SSS Manual 6840 requires BLM to manage SSS to conserve and recover ESA species and initiate proactive conservation to eliminate threats to BLM-SSS. Alt. E discloses that the negative impacts to SSS will be the same or increase (Section 2.8); while at the same time the species and their habitats are	M	Added an impact common to all alternatives that management would not conflict with the BLM SSS Manual. Revised impacts under the alternatives (Chapter 4) and the impact summary table (Chapter 2.8) as applicable.

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				declining (Sections 3.7.2 and 3.8.2). Therefore, these management actions violate BLM policy. Recommend amending the management actions to those that would meet the objective of 6840 Manual.		
55.	4-137	34 - 37	John McCarty	<p>"Visual contrast ratings would be required for proposed projects in VRM Class I and II area, in areas that were inventoried as high sensitivity, and areas that were inventoried as scenic quality A on BLM-managed lands. They may also be used for other projects where it would be the most effective design or assessment tool."</p> <p>There have been two IBLA stays on BLM proposed projects because of a lack of a "hard look" at impacts to visual resources. Both were in Utah.</p> <p>The basis for the plaintiff's assertion was the absence of Contrast Rating documentation. The IBLA supported the plaintiff and placed a stay on both projects for a future final decision on adequacy.</p> <p>It may be worth reconsidering when contrast ratings are to be required. I would encourage doing a contrast rating unless it can be demonstrated that the project is out of view from any possible Key Observation Point.</p>	A	Changed to: Visual contrast ratings would be required for all proposed projects unless it can be demonstrated that the project is out of view from any possible Key Observation Point. They may also be used for other projects where it would be the most effective design or assessment tool.
56.	4-155	Alt A discussion	wick	If current management and developments were considered in	A	Added to end of Alternative A discussion: "While the potential for impacts on lands

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				the inventory where the units were found to have wilderness characteristics & you are using this as your baseline, I would emphasize that in general there would be very minimal impacts with this alternative as compared to current conditions maybe some associated with new range improvements? (suggestion)		with wilderness characteristics may occur as described above, overall, the magnitude of these impacts from current grazing management is minimal.
57.	4-158	10	wick	<i>"Alternative D emphasizes the use of structural and nonstructural range improvements for the management of livestock, as compared with Alternative A."</i> I can't find an RFD in the document for a range of acres that may undergo veg treatments under this and other alternatives. This can have a major impact on wilderness characteristics especially repeated mechanical treatments/seedings. I know you can't pinpoint specific locations in this unit-wide analysis, but there needs to be an order of magnitude discussion, especially for cumulative impacts. If its somewhere else, you can just reference in this section.		This analysis states that the magnitude of impacts under Alternative D would be greater than under Alternative A. The types of impacts are described under the heading Nature and Type of Effects. A discussion of which alternative is "the most" or "the least" is not included in Chapter 4 because all alternatives need to compare back to Alternative A and the change from current condition [see CEQ 40 Questions, #3; BLM NEPA handbook, Section 6.6.2]. A comparison among the alternatives has been added to the summary comparison of impacts in Chapter 2.
58.	4-165	08	wick	<b>"4.16 BLM WILDERNESS AND WILDERNESS STUDY AREAS AND NPS PROPOSED WILDERNESS"</b> Again, please split WSAs/Wilderness out there is no discussion of management/impact analysis of designated BLM wilderness if there are no impacts, cover in the front of the document and leave BLM wilderness out of the discussion.	A	Discussion separated into separate sections.

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59.	4-168	20	wick	The impact analysis needs to be discussed with 1976 as the baseline for WSAs and 1984(?) for Paria Canyon Wilderness Act. Looking at the WSAs -- under all alternatives we need to show that the grazing will not exceed the impacts permitted for grandfathered uses (same manner and degree) or otherwise any changes will meet the non-impairment criteria. Its hard to tell if the increased grazing acreage, AUMs and veg treatments would exceed these parameters in any of the alternatives without more information. It seems like alternative D might not meet non-impairment.	M	Because we have to meet the nonimpairment standard, Alternative D would not allow grazing to impair wilderness characteristics. For the wilderness, grazing would not be allowed to increase and there would be no new structural range improvements, so there would not be impacts on the wilderness area. Text revised to state this.
60.	Glossary		Mayberry	All definitions that cite the regulations at 43 CFR 4100 need to use the definitions in the 1995 version. That version was last printed in October 2005 Federal Register. Any version of the 4100 regs found on-line or in Federal Register printed after October 2005 is the enjoined version and not valid. The 1995 regulations and definitions refer to "Conservation Use" which was invalidated by the Tenth Circuit Court, but all other portions of the 1995 regulations are the currently in effect. (You have a good footnote on page 3-5) Definitions in the Glossary for the following terms need to be addressed: Active Use Grazing Lease (you might note that Utah does not have any public lands	A	Glossary definitions have been revised for the indicated terms with definitions contained in Attachment I to IM No. 2009-109.  Added clarification in Section 3.1 that there are no grazing leases in the decision area.

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				that qualify for a grazing lease as defined in 43 CFR 4100.0-5)(Is the Park Service grazing authorized by Permit or Lease?) Grazing Permit Grazing Preference Suspension Temporary nonuse		
61.	N/A	N/A	John McCarty	I have no other comments, except to offer a compliment to its well-written nature. Good work.	n/a	Thank you.

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