

**To:** Betenson, Matthew[mbetenso@blm.gov]  
**Cc:** Larry Crutchfield[lcrutchf@blm.gov]  
**From:** Hughes, Amber  
**Sent:** 2017-01-25T11:15:57-05:00  
**Importance:** Normal  
**Subject:** Re: Briefing Paper  
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Briefing Paper GSENM MMPA-EIS.docx

I incorporated your suggested changes Matt, I'll need more direction from you two in regards to #5 tribal consultation. I also called the SO to get an update on who is what position for the list at the very bottom of the list.

**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, Jan 25, 2017 at 8:58 AM, Betenson, Matthew <[mbetenso@blm.gov](mailto:mbetenso@blm.gov)> wrote:

Matt,  
Can you look at #5 on this briefing and paper and update as needed? I think some of the Consulting Party info could update it.

On Tue, Jan 24, 2017 at 5:16 PM, Betenson, Matthew <[mbetenso@blm.gov](mailto:mbetenso@blm.gov)> wrote:

Updated with a few edits...thanks for keeping everything moving!

On Mon, Jan 23, 2017 at 5:05 PM, Hughes, Amber <[ahughes@blm.gov](mailto:ahughes@blm.gov)> wrote:

I'm going cross eyed, if you could both give this a look over and provide feed back that would be awesome!

**Amber L Hughes**

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## **Briefing Paper**

### 1. State Office

Utah State Office.

### 2. What is the title of this notice?

Notice of Availability for a Draft Livestock Grazing Monument Management Plan Amendment and Associated Environmental Impact Statement (MMP-A/EIS) for the Grand Staircase-Escalante National Monument, Utah.

### 3. What are the key issues raised by the underlying decision documents for this notice?

Grand Staircase-Escalante National Monument (GSENM) has prepared a draft Environmental Impact Statement and Livestock Grazing Management Plan Amendment (MMP-A/EIS). It provides management direction for BLM lands in GSENM, as well as lands for which GSENM has administrative responsibility for livestock grazing, specifically portions of the BLM's Kanab and Arizona Strip Field Offices and National Park Service (NPS)-managed lands in Glen Canyon National Recreation Area (Glen Canyon).

The approved MMP-A/EIS would amend the 2000 GSENM Management Plan (MMP) to incorporate management of livestock grazing, and will supersede the existing Escalante, Paria, Vermillion, and Zion regional management framework plans (MFP) signed in 1981 and a subsequent plan amendment of the Escalante MFP completed in 1999, under which livestock grazing in GSENM is currently administered. Current land use plan decisions governing the management of livestock grazing in the GSENM provide an inadequate framework for future administration. The 2000 MMP established a grazing management process but did not make land use plan-level decisions for livestock grazing.

The MMP-A/EIS would make appropriate land use planning decisions, including establishing goals and objectives for livestock grazing and rangeland management. Establish broad-scale decisions that set the stage for site-specific implementation decisions, such as timing (season of use), duration (length of time), frequency of livestock grazing (how often), and magnitude (number of animal unit months (AUMs)) of livestock grazing. Identify where grazing uses are allowed, restricted, or prohibited (i.e., available or unavailable for livestock grazing). Identify grazing management practice and provide the land use plan level decisions needed to integrate livestock and rangeland management with the management of the GSENM objects and other resources.

This amendment could impact grazing permittees through temporary and permanent reduction of AUMs, loss of forage, potential restrictions on access and/or movement of livestock, and potential modification of range improvements.

The GSENM is under pressure from environmental groups to ensure current grazing practices are in conformance with the purposes for which the GSENM was established pursuant to the Presidential Proclamation 6920.

4. Who are the primary users affected by or parties interested in the underlying decisions or actions? What are their concerns?

The BLM's decision area for this planning effort is all of the BLM grazing lands that GSENM administers, including some lands in the BLM's Kanab Field Office (65,500 acres) and Arizona Strip Field Office (2,300 acres); the NPS - Glen Canyon (318,800 acres); along with 1,855,400 acres of GSENM. The total acres for the decision area include 2,242,000 acres. The planning area consists of 2,316,100 which include State and private lands.

GSENM manages 91 permits on 96 allotments; 79 active allotments are available for and managed for grazing; 17 allotments are wholly or partially unavailable. The people who have been granted grazing permits are strongly supported by local, county, and state government representatives who will be very sensitive to any reduction of AUMs. (b)(5) DPP

Environmental groups are also extremely interested in the management of GSENM: Wild Utah Project, The Wilderness Society, The Grand Canyon Trust, The Great Old Broads for Wilderness, and Western Watersheds Project, have established "Interested Party" status for many, and in some cases, all, of the GSENM's grazing allotments. A few of these environmental groups have also established monitoring plots on GSENM for comparison with GSENM range staff monitoring results. These groups may challenge that the supporting science used in the decision making process.

Conflicts between livestock and recreationist to GSENM are increasing and GSENM is receiving complaints about livestock use from recreational users.

Concerns include:

- Effects of livestock grazing management on GSENM proclamation-identified scientific and historical objects
- Effects of livestock grazing management on the resources and values for which Glen Canyon was established (e.g., public outdoor recreation use and enjoyment and scenic, scientific, and historical features)
- Lands available for livestock grazing in the decision area
- Forage currently available on an area-wide basis for livestock grazing and available for future anticipated demands
- Guidelines and criteria for future allotment-specific adjustments, such as the amount of forage available for livestock, season of use, or other grazing management practices
- Management of existing range improvement seedings and opportunities for future range improvements
- Effects of livestock grazing management on vegetation, including riparian vegetation
- Effects of livestock grazing management on soils, including biological soil crusts
- Effects of climate change and drought on forage availability
- Effects of livestock grazing management on local custom and culture
- Effects of livestock grazing management on the area's economy
- Effects of livestock grazing management on recreation
- Effects of livestock grazing on cultural resources

5. Is tribal consultation appropriate under E.O. 13175 or other authorities? Will the proposed action potentially impact tribes or tribal lands, or generate their interest? If so, what consultation or other communication/outreach are you planning?

GSENM invited local tribes, The Paiute Tribe of Utah and The Kaibab Band of Paiute Indians, to become a Cooperating Agency in May 2013. The Paiute Tribe of Utah formally declined, and the BLM received no response from the Kaibab Paiute Tribe. On October 25, 2013 and November 7, 2013, the BLM sent scoping letters to tribal governments providing initial notification of the MMP-A/EIS and information on the project. These letters were sent to six identified tribes with cultural ties to the decision area: Navajo Nation, San Juan Southern Paiute Tribe, Hopi Tribe, Pueblo of Zuni, Paiute Indian Tribe of Utah, and the Kaibab Paiute Tribe. The MMP-A/EIS will not directly impact tribal lands.

Further outreach and opportunities to comment on the draft MMP-A/EIS will be provided during general scoping and comment periods. Tribal concerns will be given due consideration.

6. Will this notice be controversial?

The notice will most likely be controversial; however, the BLM-Utah has done an extensive outreach effort. Coordination of the release of the Notice of Intent with state and local elected representatives, the Monument Advisory Committee, environmental groups, livestock permittees and interested stakeholders resulted in widespread support for moving ahead with the planning process.

This land use planning process has followed through on commitments at the state and local level to address issues and provide certainty for stakeholders by developing an MOU for Cooperating Agencies. On May 13, 2013 the BLM wrote to seven local, state, federal, and tribal representatives (mentioned above) to participate as cooperating agencies. Five agencies agreed to participate in the MMP-A/EIS process as designated cooperating agencies. Kane County, UT, Garfield County, UT, the State of Utah, and the USDA Natural Resources Conservation Service. The NPS is also a cooperating agency and has jurisdiction by law, and will be making its own separate decision for land within Glen Canyon based on this MMP-A/EIS. The US Fish and Wildlife Service did not respond.

7. What will the underlying decision or action change? (Summarize changes to policy, management practices, allowable uses, differences between draft and final, etc.)

Clear management direction is needed for livestock grazing within GSENM. Language found in the Monument's Proclamation related to grazing, the 1980's era Grazing Management Framework Plans, and the current Monument Management Plan has led to confusion of livestock grazing administration. This has led to strong concerns by parties on both sides of the issue. The management direction resulting from this planning effort will clarify livestock grazing use on GSENM for all stakeholders. Permit renewals will continue to be processed under existing authorities until a plan amendment establishes an appropriate basis from which to tier permit renewal decisions.

The BLM Utah State Director recommends Alternative E as the preferred alternative. Alternative E was evaluated after examining the effects analysis for all alternatives. It was determined to represent the best combination of decisions to achieve the goals and policies of the BLM; to

respond to the purpose and need; to meet statutory requirements; and to best resolve the issues pertinent to planning. Given that the Proclamation provides the BLM with the discretion to continue livestock grazing in balance with managing objects identified in the Proclamation, Alternative E provides a balance of livestock grazing that recognizes the importance of ranching to the local custom and culture with management of Monument objects and resources. Because of constraints imposed by wilderness study areas, which comprise over half of GSENM, existing management in the MMP, and ecological constraints, Alternative E is reflective of the amount of grazing that could reasonably occur while managing for other resources and uses.

The preferred alternative (Alternative E) consists of components (goals, objectives, and actions) of the other alternatives considered. During public review of this Draft MMP{ XE "Monument Management Plan, Grand Staircase-Escalante National Monument (MMP 2000)" }-A/EIS, the BLM is seeking constructive input on the proposals for managing resources and resource uses. After considering these comments, the BLM will develop a Proposed MMP-A to be evaluated in the Final EIS. The Proposed MMP-A/EIS can be any reasonable combination of objectives and actions from Alternatives A, B, C, D, and E presented in this Draft MMP-A/EIS.

8. Will this notice need communications materials, e.g., a press release, or a Communication Plan? If so, enclose these materials with the notice package submitted.

Yes, communication materials are included.

9. What are the reasons for the timing of the notice and the consequence, if any, of delaying or canceling the release?

The Utah State Director has made commitments to key stakeholders as to the timing for the release of the NOA in the summer of 2017.

10. How has this action been analyzed under the National Environmental Policy Act (NEPA)?

The NOI established a scoping period for the public and key stakeholders to take a part in the NEPA process to develop this MMP-A/EIS. What is currently available is the draft MMP-A/EIS and this notice to the Federal Register through a NOA will provide the public an opportunity to review and comment on the draft MMP-A/EIS.

11. Is there any additional pertinent, descriptive information that reviewers need to know or would increase understanding?

The National Riparian Service Team completed a Situational Assessment in 2012 and found “strongly differing philosophies present within the local community and among various regional and national interest groups. On the one hand, local ranchers and grazing interests feel severely threatened in terms of their economy, culture and customs as they face challenges to grazing on the Monument. On the other hand, environmental groups consider the GSENM, the largest and first National Monument managed by the BLM, as critical in charting a course of conservation and restoration of the nation’s “great places.”

On April 1, 2013, Utah’s Governor signed Utah HB382 establishing the Escalante Region Grazing Zone, encompassing all BLM and Forest Service land in Kane and Garfield Counties. This action amended the State of Utah Resource Management Plan for Federal Lands and established a State of Utah livestock grazing and rangeland management policy for the Grazing Zone which includes the entirety of GSENM.



12. List the names and positions of the people who have prepared, reviewed, and approved the notice and the underlying decisions and documents.

Cynthia Staszak, Monument Manager  
Matthew Betenson, Associate Monument Manager  
Larry Crutchfield, Monument Public Affairs Officer  
Amber Hughes, Planning and Environmental Coordinator

Debra Croft External Affairs Chief  
vacant, External Affairs  
Alan Bass, Lead Rangeland Management Specialist  
Pam Jarnecke, Branch Chief, Planning and Environmental Compliance  
Kerry Schwartz, Branch Chief, Resources  
Abbie Jossie, Deputy State Director for Natural Resources  
Anita Bilbao, Associate State Director  
Edwin Roberson, Utah State Director