

2.0 CHAPTER 2 ALTERNATIVES

The BLM manages public lands and resource values according to the principles of multiple use and sustained yield. Alternative development in the DRMP/DEIS occurred to address the needs of present and future generations while, at the same time, adhering to the Proclamation requirement that Monument objects be protected. This approach resulted in a reasonable range of alternatives though a more narrow range than that found in most BLM plans. Appendix L describes the five alternatives evaluated in detail in the DRMP/DEIS. While this PRMP/FEIS briefly describes all alternatives developed through the analysis process, it narrows the focus of alternatives to the No Action, Preferred Action and the Proposed Plan.

One of the goals of the PRMP/FEIS process is to ensure a consistent, coordinated approach to managing lands within the Monument, in accordance with the Proclamation and all other regulatory guidance and standards. To accomplish this, management goals and objectives are described for each resource, resource use, and special designation area. Major themes and management actions for the most emphasized issues within the alternatives are presented in the following sections.

The No Action Alternative is Alternative I, Alternative V is the Preferred Alternative and Alternative VI is the Proposed Plan. Some management actions would be the same under all of the alternatives; thus, they are listed as “common to all” actions in Table 2-2.

2.1. Alternative Development

The development of the five alternatives in the DRMP/DEIS (Appendix L) included a public scoping process that allowed interested members of the public, Native American tribes, special interest groups, and resource and land use agencies, to comment on the appropriate scope of issues to consider in the planning process for the Monument. The formal scoping period began April 24, 2002. The BLM provided an extended public scoping period between April 2002 and November 2003 to allow ample opportunity for public comment and involvement in the initial stages of planning. During this time, BLM staff reviewed the issues identified during initial scoping and collected pertinent resource information for the Monument. This resource information is summarized in the Analysis of the Management Situation (AMS) (BLM 2005b).

Scoping issues described in Chapter 1, along with all appropriate laws, guidance, and standards, were used to establish management goals and objectives. A reasonable range of management actions (alternatives) were created to address these goals and objectives while, at the same time, allowing managers to meet the Proclamation mandate to “protect the objects of the Monument.” In developing and refining alternatives, the BLM sought to accomplish three things: 1) to create a reasonable range of implementable alternatives, in accordance with NEPA and FLPMA guidance; 2) to ensure that all of the alternatives would be consistent with the Proclamation; and 3) to comply with applicable Federal, State, and local laws and regulations.

Once preliminary environmental consequences were analyzed for Alternatives I through IV, the Monument Manager pulled aspects of each alternative together into a fifth alternative called the Preferred. The development of the Preferred Alternative was consistent with the BLM Land Use Planning Handbook (BLM 2005a) which states, “If the combination of potential planning decisions are drawn from different alternatives, then those potential planning decisions should be compiled into a new alternative (identified as the Preferred Alternative) and the impacts analyzed accordingly.” Based on input received during review of the Draft RMP/FEIS, adjustments and clarifications were made to the Preferred Alternative which resulted in Alternative VI, The Proposed Plan.

2.1.1. Resource Considerations for Developing Alternatives

Fluid Mineral Development and the Protection of Cultural Resources

A common thread throughout the action alternatives is the protection and management of cultural resources and their setting within the landscape of the Monument. The Monument Proclamation refers to the “intertwined natural and cultural resources” and emphasizes how this “offers an unparalleled opportunity to observe, study, and experience how cultures lived and adapted over time in the American Southwest.” This recognition of the extraordinary value of the interrelationship between cultural resources and the natural environment reinforces the responsibility to consider future management of the Monument for the long-term public benefit and from a perspective that also considers and preserves these relationships and connections.

The importance of the cultural resources in a landscape context, and the challenges of management and preservation have long been recognized by the BLM and resulted in the development and implementation of several innovative cultural resource management plans in the 1980’s; most notably: “Anasazi Cultural Multiple-Use Area of Critical Environmental Concern Management Guidelines” (1986a BLM) and the “Mockingbird Mesa Cultural Resource Management Plan” (1986c BLM).

The cultural resources management objectives for surface disturbing activities/development proposals on the Monument are:

- Avoid direct, indirect, and cumulative impacts to historic properties (objects of the Monument) to the maximum extent possible.
- Ground disturbance must be kept to the smallest footprint possible.
- Prevent landscape fragmentation to the maximum extent possible.
- Maintain visual quality.

The management goal is to manage cultural resources so as to preserve the cultural resources, their interrelationships and their physical setting to the maximum extent possible; while also managing according to provisions of the Proclamation for honoring valid existing rights, issuing new fluid mineral leases under certain conditions, and continuing grazing under permit.

In order to realize these objectives, the preferred management strategy is avoidance of cultural resources with adequate physical buffers to protect the surface and subsurface resources and the associated setting; as well as nearby cultural resources and their settings in areas of high site density. This includes avoiding direct impacts, and minimizing indirect and cumulative impacts to the maximum extent possible. Early and careful planning, and use of all available technologies and design criteria to avoid cultural resources and minimize disturbance and visual fragmentation of the landscape will be necessary to accomplish this. Should avoidance not be possible, mitigation, denial of components of/or entire proposals would also be viable management options.

Fluid Mineral Development and Cultural Resources Management

In order to realize the management objectives for historic properties and their settings, as well as the social and environmental relationships they contain, the development of existing fluid mineral leases will be carried out using the Best Management Practice (BMP) strategy entitled “Geographic Area Development Plan (GADP),” described in BLM Instruction Memorandum No. 2003-152. A GADP is the result of comprehensive development planning for a potential or defined oil and gas field or a portion of a geographic area within a field that meets the environmental and cultural resource management needs of the BLM, and honors the leaseholder’s valid existing rights. The Monument Proclamation requires that existing lease

rights be honored in ways that do not create new impacts on the cultural resources and other objects the Monument was established to protect. By increasing the geographic scale of planning, the GADP will facilitate the identification by the BLM and the permit applicant of locations for proposed developments that minimize the direct, indirect, and cumulative effects of development on cultural resources and their setting.

The GADP requires operators to submit a multi-year plan of development for a potential or defined oil and gas field(s) or a portion of a field. The BLM will identify an appropriate scale for resource information collection; and a Class III archaeological inventory will be done at the proponent's expense.

Once the cultural resource inventory and other relevant natural resource data gathering for the area has been completed; site densities and spatial distributions of the cultural resources will be evaluated by the BLM. Areas containing no cultural resources, or a low site density, and scattered settlement pattern will be identified as potentially suitable for oil and gas development. Areas with high site densities and/or settlement clusters (numerous sites located in proximity to each other), would be identified as not suitable for oil and gas development. This information along with the Monument cultural resources management objectives for surface disturbing activities/development proposals, and BMPs will form the basis for the GADP. The GADP then becomes a reference document that serves as the guidance and basis for submission of individual "Applications for Permits to Drill" (APDs) or multiple APD package submissions. (NOTE: Since cultural resource professionals do not all concur with our definition of cultural "communities", where this concept was used in the DRMP/DEIS, it is now referred to as "settlement clusters". A definition of settlement clusters is included in the text of this plan as well as in the glossary).

Pre-APD planning by the proponent and BLM resource personnel and managers will be essential to successfully locating and designing developments that meet Monument cultural resource management objectives and utilize BMPs to allow development where preservation of the integrity of cultural resources, their spatial relationships, and physical setting can be accomplished. The objective of pre-APD planning is to use the GAPD information and resource specialists input to produce viable APD proposal(s). This process will resolve issues prior to submitting the APD(s) and eliminate or reduce delays in processing. The efficiencies realized by this process will be advantageous to both the proponent and the BLM.

Appendix M outlines the specific GAPD and fluid mineral cultural consideration process, and the Field Office requirements for conducting archaeological inventory on the Monument.

Future Oil and Gas Leasing and Cultural Resources Management

Oil and gas leasing is considered an "undertaking" subject to Section 106 compliance. All new lease areas on the Monument will be offered for sale with a "No Surface Occupancy" (NSO) stipulation that prohibits physical occupancy and surface disturbance within the lease area. As a result it is expected that lease sales with the NSO stipulation will be determined an Undertaking "that does not have the potential to cause effects on historic properties" per 36 CFR 800.3(a) and (a)(1).

Section 106 compliance will be completed at the APD stage to consider potential effects to historic properties within the "area of potential effect."

Recreation Management

The BLM designates Special Recreation Management Areas (SRMAs) to manage unique recreation opportunities within the Monument. These areas present exceptional opportunities for recreation and for cultural resource interpretation, which provide important benefits to local

communities and other users of public lands. Therefore, it is important to specifically manage these areas with the goal and objective of preserving the distinctive character and setting of the Monument. In accordance with the BLM Land Use Handbook, Section II, the BLM must identify and designate SRMAs, including their recreation “niches,” recreation management objectives, character setting conditions, and management strategy. The SRMAs proposed in this PRMP/FEIS would be managed to protect the natural setting that supports outstanding opportunities for primitive recreation as well as for two specific types of cultural resource recreation experiences: unique cultural SRMAs that provide front country (developed) visitor experiences, and unique backcountry SRMAs where Monument visitors can experience cultural and natural resources through self-discovery (an outdoor museum type of experience). Within the SRMAs, there are recreation management zones (RMZs). The purpose of RMZs is to designate areas for specific recreation activities.

The final step in developing recreation guidance in this PRMP/FEIS is to outline implementing actions (future plans for on-the-ground management), that are designed to achieve management objectives and to set prescriptions. Implementing actions are designed to integrate all recreation program complexities and appropriately balance them to achieve approved objectives and prescriptions. The complete detailed analysis of the recreation resource component of this plan can be found in Appendix C.

2.2. Alternatives Considered but Not Analyzed

Some issues raised during the scoping process were considered, but not carried forward for further analysis. As discussed throughout the Canyons of the Ancients Scoping Report (BLM 2004a), these issues were generally resolved by their appropriate classification into one or more of the following classifications:

- those that would be resolved through policy or administrative actions;
- those already required by law;
- those that were already being addressed, or would be addressed independently of the current planning process; and
- those determined to be beyond the scope of the current planning process.

There was general interest in developing two primary issues into alternatives: no new oil and gas leasing and no new livestock grazing. These alternatives garnered a great deal of interest during the scoping process and are discussed in detail below.

No New Oil and Gas Leasing

It was concluded that closing the Monument to all oil and gas leasing would not meet the purpose and need of this PRMP/FEIS and therefore, this issue was not carried forward into alternative analysis. The Proclamation that established the Monument (Appendix A) explicitly addresses and directs management of oil and gas leasing:

“Because most of the Federal lands have already been leased for oil and gas, which includes carbon dioxide (CO₂), and development is already occurring, the Monument shall remain open to oil and gas leasing and development; provided, the Secretary of the Interior shall manage the development, subject to valid existing rights, so as not to create any new impacts that interfere with the proper care and management of the objects protected by this proclamation; and provided further, the Secretary may issue new leases only for the purpose of promoting conservation of oil and gas resources in any common reservoir now being produced under existing leases, or to protect against drainage.”

While the Proclamation specifically states that the Monument shall remain open to oil and gas leasing, a settlement agreement related to the Mail Trail Seismic Project halted new leasing until the Monument Plan was complete (SJCA v. Gale Norton 2002). This deferment is analyzed in the No Action Alternative. By law, the BLM must, at a minimum, lease for drainage purposes; therefore, closing the Monument to new leases was outside the scope of the planning process.

No Livestock Grazing

Under the NEPA, agencies must study, develop, and describe appropriate alternatives to recommended courses of management action in any proposal that involves unresolved conflicts over use of available resources. No issues or conflicts have been identified during this process that would require the complete elimination of livestock grazing across the Monument for their resolution. Conflicts between livestock grazing and other resources were addressed in the alternatives, with adjustments made with regard to stocking levels, seasons-of-use, grazing management activities, and forage allocation levels.

Likewise, the FLPMA requires that public lands be managed on a “multiple use and sustained yield basis” (FLPMA Sec. 302[a] and Sec. 102[7]), and includes livestock grazing as a principal or major use of public lands. While multiple use does not require that all lands be used for livestock grazing, complete removal of livestock grazing on the entire Monument would not meet the principle of multiple use and sustained yield.

Therefore, closing the Monument to all livestock grazing would not meet the purpose and need of this PRMP/FEIS, which must be conducted in compliance with the Proclamation, NEPA, the Taylor Grazing Act, and the FLPMA; therefore, this issue was not carried forward into analysis.

2.3. General Description of Alternatives

The alternatives analyzed in the DRMP/DEIS were numbered I through V (Appendix L). Alternative I is the No Action Alternative, and under this Alternative there would be no change from current management. Alternatives II through IV represent a range in management goals and objectives. In general, Alternative II emphasizes the protection of cultural resource values (including Native American tribal values), by protecting cultural resource settlement clusters, individual sites, and isolated finds. This alternative also emphasizes natural resource protection and enhancement. Alternative III emphasizes the protection of cultural resource settlement clusters and sites, along with natural resource values while, at the same time, providing for resource use and development. Alternative IV emphasizes cultural resource settlement clusters and site protection, along with natural resource values while, at the same time, encouraging resource use and development. Alternative V is the Preferred Alternative and was developed using a combination of management actions from Alternatives I through IV. Based on further analysis and public comment, Alternative VI, the Proposed Plan was developed.

This section summarizes the five alternatives analyzed in detail in the DRMP/DEIS and the sixth alternative discussed in this PRMP/FEIS. These alternatives were developed to analyze management goals and objectives within a reasonable range of management actions, and to assist decision makers and the public in understanding the potential consequences and benefits of alternative scenarios. Considerations in the formulation of the alternatives include the following:

- The alternatives intended to represent a reasonable range of alternatives with an associated array of management actions.
- No alternatives were analyzed that would clearly conflict with existing laws or regulations, or the Proclamation.

- Fluid Mineral leasing consistent with the Proclamation and the FLPMA.
- Wild and Scenic River (WSR) eligibility and suitability analyses. Management of stream segments found to be both eligible and suitable for WSR designation is consistent with such a designation, regardless of the alternative (see Appendix B).
- Requirements for access management analysis are being met through the transportation assessment portion of the PRMP/FEIS.

Not all management actions described under each alternative would specifically be permitted by adoption of that alternative through the planning process. For example, although some oil and gas development would be allowed under most of the alternatives, actual development would occur only after an area has been leased, and proposed well locations, route and pipeline alignments, and other facility plans have gone through the permitting process and review, including site-specific NEPA analysis. Furthermore, while the assumptions associated with the alternatives represent reasonable projections of what could occur, it is impossible to predict with certainty the precise outcome of any of the alternatives due to the large number of variables involved. Actual development may differ substantially from the scenarios presented.

Under all of the alternatives, any action or development must be consistent with applicable Federal, State, and local laws and regulations. Nothing presented in the following impact analysis of the alternatives should be construed as exempting activities from applicable legal or regulatory requirements.

The following sections generally describe the six alternatives analyzed in terms of resources and resource uses that were found to be most important to the BLM, cooperating agencies, other public land agencies, special interest groups, Native American tribes, and the public. These important resource issues include: the protection of cultural resources on a landscape scale, the management of livestock grazing to achieve Public Land Health Standards, the proactive management of oil and gas exploration and development, and the development of a recreation/transportation system that would protect Monument objects while, at the same time, meet public needs. Additional information regarding specific alternative management actions for alternatives I through V are detailed in Appendix L. Table 2.2 summarizes Management Actions for the three alternatives of focus in this PRMP/FEIS, the No Action, Preferred Alternative, and the Proposed Plan.

2.3.1 Alternative I (No Action)

Alternative 1 represents the “No Action Alternative” required by the NEPA process. The alternative constitutes “no action” in the sense that it represents “no change from current management,” but not in the sense that it represents “no change from current conditions.” As described in Chapter 1, current management actions were assembled from the San Juan/San Miguel RMP (BLM 1985) with its amendments; the Anasazi ACEC Plan Management Guideline (BLM 1986a); and the Monument Proclamation, BLM Director’s Interim Management Policy for Bureau of Land Management Monuments and National Conservation Areas (BLM 2001a), BLM Colorado State Director’s Guidance for Canyons of the Ancients National Monument (BLM 2001b), the Secretary of the Interior’s Management of the Canyons of the Ancients National Monument (USDOI 2001a), and the Interim Management Guidance for Oil and Gas Leasing and Development of the Canyons of the Ancients National Monument (BLM 2001c). Under this alternative, cultural resource sites would continue to be developed for visitation and for interpretation.

Under this alternative, there would be no new issuance of oil and gas leases (although existing leases would not be affected). While the Proclamation specifically states that the Monument

shall remain open to oil and gas leasing, a settlement agreement related to the Mail Trail Seismic Project halted leasing until the Monument Plan was complete (SJCA v. Gale Norton 2002). This deferment is analyzed in the No Action Alternative. However, by law, the BLM must, at a minimum, lease for drainage purposes which was also stated in the Proclamation. Livestock grazing (see Map 3) would be based upon a calculation of 8,492 AUMs. The No Action Alternative for the recreation/transportation system (see Maps 4 and 5) is based on the last official decision made in the San Juan/San Miguel RMP ROD (BLM 1985), consisting of seven recreation and transportation facilities and 149 miles of routes. Since user-created routes have developed since the 1985 RMP decision, this does not necessarily represent what the actual situation is on the ground. Approximately 25,976 acres of the planning area would be managed as closed, and 139,359 acres would be managed as limited to OHV travel. This alternative does not include the development of a comprehensive transportation plan, which the Proclamation mandates.

2.3.2 Alternative II

This alternative maximizes cultural resource protection by avoiding impacts to cultural resource settlement clusters, sites, and isolated finds. This management strategy maintains large blocks of undisturbed land that provide information on not only individual sites and artifacts but also on their interconnectedness (i.e., how they relate to each other). Alternative II would develop the outdoor museum concept for self-discovery of cultural and natural resources. This outdoor museum concept would provide a backcountry experience to visiting publics. In addition, 13 cultural sites would be developed and visitation would be facilitated through the use of developed routes and interpretive signs. The development of these cultural resource sites would enhance the visitor experience. Under this alternative, standing wall features would be thoroughly documented, and then they would be allowed to deteriorate naturally, under erosive forces. A Cultural Resources Advisory Panel would be given the task to develop research goals and methods for these resources in the Monument.

To protect against drainage, it is estimated that up to 880 acres would be available for new fluid mineral leases. Livestock grazing would be managed to reduce conflicts between livestock grazing and recreational activities, and to protect cultural resources by closing five livestock grazing allotments (124 AUMs). Under Alternative II, rangeland allocation would be calculated at 6,437 active, with 2,055 suspended AUMs. Management would achieve Public Land Health Standards (see Appendix D) by emphasizing a reduction of authorized use, by adjusting the duration and extent of spring livestock grazing, and by implementing rest-rotation grazing schedules.

Alternative II would promote an undeveloped recreation strategy, with minimal facilities and infrastructure developed to support recreation and transportation use. The focus of use would be incidental visitors and local residents. A minimal number of access routes would be maintained and most existing user-created routes would be closed and reclaimed. The recreation/transportation system would include 139 miles of motorized, non-motorized, and mechanized routes. Approximately 38,598 acres would be managed as closed, and 126,737 acres would be managed as limited to OHV travel where travel is restricted to routes.

2.3.3 Alternative III

This alternative emphasizes the protection of cultural resource settlement clusters and sites and natural resource values while, at the same time, providing for resource use and development. This management strategy would maintain large blocks of undisturbed land, although not as large as Alternative II, and would provide for the retrieval of information on not only individual sites and artifacts, but also on their interconnectedness (i.e., how they relate to each other).

Alternative III would develop the outdoor museum concept of self-discovery of cultural and natural resources. In addition, 13 to 25 sites would be developed and visitation would be facilitated through the use of developed routes and interpretive signs. Under this alternative, standing wall features would be thoroughly documented, and then they would be allowed to deteriorate, under natural erosive forces. The BLM would develop research goals and methods for cultural resources that would undergo peer review by cultural resource experts.

Under this alternative, approximately 3,021 acres would be available for new oil and gas leases; however, these would be limited to areas within the McElmo Dome Unit boundary. Livestock grazing would be managed to reduce conflicts between livestock grazing and recreational activities, and to protect cultural resources by closing five livestock grazing allotments. Calculated stocking allocation would be approximately 8,368 AUMs. Management would achieve Public Land Health Standards by implementing the reduction of authorized use, by adjusting the duration and extent of spring livestock grazing, and by implementing rest-rotation grazing schedules.

Under Alternative III RMZs and SRMAs would be identified and managed. A destination recreation strategy would be promoted, with some facilities and infrastructure developed to support recreation and transportation use for regional visitors. Some existing user-created routes would be closed and reclaimed. The recreation/transportation system would include 189 miles of motorized, non-motorized, and mechanized routes. Approximately 25,976 acres would be managed as closed, and 139,359 acres would be managed as limited to OHV travel where travel is restricted to routes.

2.3.4 Alternative IV

Alternative IV emphasizes the protection of cultural resource settlement clusters and sites and natural resource values while, at the same time, encouraging resource use and development. This management strategy would maintain large blocks of undisturbed land, although not as large as Alternative II, and would provide for the retrieval of information on not only individual sites and artifacts, but also their interconnectedness (i.e., how they relate to each other). Alternative IV would develop the outdoor museum concept of self-discovery of cultural and natural resources. In addition, 13 to 25 sites would be developed where visitation would be facilitated through the use of developed routes and interpretive signs. Stabilization would be the preferred preservation method for standing walls. Monument staff would develop and determine research goals and methods for cultural resources.

Under this alternative, approximately 24,462 acres would be available for new oil and gas leases. Rangeland allocation would be calculated at 8,492 active AUMS, with an additional 1,692 AUMs suspended. Management would meet Public Land Health Standards by adjusting the duration and extent of spring livestock grazing and by implementing rest-rotation schedules.

RMZs and SRMAs would be identified and managed under this alternative. A destination recreation strategy would be promoted. Development of destination points and facilities would be emphasized for the use of national and international visitors. Most existing BLM routes would be maintained, with no user-created routes closed or reclaimed. The recreation/transportation system would include 213 miles of motorized, non-motorized, and mechanized routes. Approximately 25,976 acres would be managed as closed, and 139,359 acres would be managed as limited to OHV travel where travel is restricted to routes.

2.3.5 Alternative V (Preferred)

Alternative V is the Preferred Alternative and was developed using a combination of management actions from Alternatives I through IV. This alternative emphasizes the protection

of cultural resource settlement clusters and sites, and provides for the protection and enhancement of natural resources. This management strategy would maintain large blocks of undisturbed land, although not as large as Alternative II, and would provide for the retrieval of information on not only individual sites and artifacts, but also their interconnectedness (i.e., how they relate to each other). Alternative V would develop the outdoor museum concept of self-discovery of cultural and natural resources. In addition, 13 to 25 cultural sites would be developed for public use. This includes publicizing these locations while, at the same time, implementing minimal stabilization and interpretive signage, infrastructure, and visitor services. Visitors would be encouraged to discover all other sites within the Monument on their own. Under this alternative, standing wall features would be thoroughly documented, and then they would be allowed to deteriorate naturally, under erosive forces. The Monument Manager would have the discretion to authorize stabilization. Research goals and methods for these resources in the Monument would be developed by Monument staff with peer review.

To protect against drainage, it is estimated that up to 880 acres would be made available for oil and gas leases, permitting 2 wells in approximately 20 years. Livestock grazing would be managed to reduce conflicts between livestock grazing and recreational activities, and to protect cultural resources by closing five livestock grazing allotments (124 AUMs). Under Alternative V, rangeland allocation would be calculated at 6,437 active AUMs, with an additional 2,055 AUMs suspended. Management would meet Public Land Health Standards (see Appendix D) by emphasizing a reduction of authorized use, by adjusting the duration and extent of spring livestock grazing, and by implementing rest-rotation grazing schedules.

Alternative V would promote an undeveloped recreation strategy, with minimal facilities and infrastructure developed to support recreation and transportation use. The SRMAs would focus on a variety of marketing niches and would provide for a blend of users, including local residents, as well as incidental, regional, national, and international visitors. A mixture of access routes would be maintained, including 169 miles of motorized, non-motorized, and mechanized routes. Many existing user-created routes would be closed and reclaimed. Approximately 38,598 acres would be managed as closed, and 126,737 acres would be managed as limited to OHV travel where travel is restricted to routes.

2.3.6 Alternative VI (Proposed Plan)

The Proposed Plan is analyzed as Alternative VI in this PRMP/FEIS. While the Proposed Plan closely resembles the Preferred Alternative (Alternative V), there are some minor differences based on comments received during review of the DRMP/DEIS. For example, law enforcement efforts in Alternative VI place a greater emphasis on partnerships and cooperating with other agencies. In addition, the Sand Canyon/Rock Creek SRMA is managed as a front country rather than a backcountry experience. Suspended livestock grazing AUMs are cancelled under this alternative. Alternative VI also includes a change in route designations and mileages, with greater detail added to wildlife restrictions, air quality requirements, cultural resources research and protection requirements, and aspects of the visual resources management description. Additional minor changes are included in the description of Alternative VI in Table 2.2. These changes fall within the range of alternatives analyzed in the DRMP/DEIS. Since the release of the Draft RMP, acquired land has been added to the Monument increasing acreage figures used in Alternative VI.

Alternative VI emphasizes the protection of cultural resource settlement clusters and individual sites, and provides for the protection and enhancement of natural resources. This management strategy would maintain blocks of undisturbed land and would provide for the retrieval of information on not only individual sites and artifacts, but also their interconnectedness (i.e., how they relate to each other). Alternative VI would develop the outdoor museum concept of self-

discovery of cultural and natural resources. In addition, 13 to 25 cultural sites would be developed for public use. This includes publicizing these locations while, at the same time, implementing minimal stabilization and interpretive signing, infrastructure, and visitor services. Stabilization would primarily be considered where human impact is accelerating structural deterioration. The Monument Manager would have the discretion to authorize stabilization. Monument Staff, with peer review, would be given the task of developing research goals and methods for these resources in the Monument.

To protect against drainage, it is estimated that up to 880 acres would be made available for oil and gas leases, permitting 2 wells in approximately 20 years. Livestock grazing would be managed to reduce conflicts between livestock grazing and recreational activities, and to protect cultural resources by closing five livestock grazing allotments (124 AUMs). Under Alternative VI, rangeland allocation would be calculated at 6,437 active AUMs, with 2,055 AUMs cancelled. Management would meet Public Land Health Standards (see Appendix D) by emphasizing a reduction of authorized use, by adjusting the duration and extent of spring livestock grazing, and by implementing rest-rotation grazing schedules.

Alternative VI would promote an undeveloped recreation strategy, with minimal facilities and infrastructure to support recreation and transportation use. The Special Recreation Management Areas (SRMAs) would focus on a variety of marketing niches and would provide for a blend of users, including local residents, as well as incidental, regional, national, and international visitors. A mixture of access routes would be maintained, including 172 miles of motorized, non-motorized, and mechanized routes. Many existing user-created routes would be closed and reclaimed. Approximately 39,543 acres would be managed as closed, and 126,737 acres would be managed as limited to OHV travel where travel is restricted to routes.

2.3.7 Major Differences between the Draft and Proposed Plans

Public comment during review of the DRMP/DEIS showed a need for greater clarification on several topics. Therefore, greater detail was placed in the Cumulative Effects analysis for each resource in Chapter 4. In particular, context within the Reasonable Foreseeable Future Analysis (RFD) was placed in the PRMP/FEIS. In addition, for the general purpose of this PRMP/FEIS, the word “road” in the DRMP/DEIS has been changed to “route”. As per BLM Instruction Memorandum No. 2008-014, the definition of a route is “a group or set of roads, trails and primitive roads that represent less than 100% (excludes non-designated routes) of the BLM transportation system”. In general, components of the transportation system are described as “routes”. All designated routes within the Monument are identified on the attached transportation map. Travel off a designated route is considered “cross-country” or “off-road”.

Since the completion of the DRMP/DEIS, a parcel of land was acquired through a land exchange which expands the acreage proposed in the McElmo RNA as well as the total acres of the Monument. This change is reflected in the PRMP/FEIS.

Several appendices have been added that provide greater detail on specific analyses such as Wild and Scenic Rivers, Visual Quality Management, Cultural Resource Evaluation and Standards, Summary of Transportation Routes, Areas of Critical Environmental Concern Evaluation, the role of the National Landscape Conservation System (NLCS), and Consultation with the Fish and Wildlife Service.

Public comment related to protection of esthetic values and energy development showed the need for clarification with regard to Visual Resource Management within the Monument. The use of the term “cultural communities” was changed to “settlement clusters” with additional details provided.

Sections added to the document include Section 2.4: Monitoring, Evaluation, and Adaptive Management; and Chapter 5, Consultation and Coordination.

2.4. Monitoring, Evaluation, and Adaptive Management

Based on the sensitivity of resource decisions involved, RMPs are required to establish intervals and standards for monitoring and evaluation (43 CFR, 1610.4-9). There are two basic types of monitoring (and subsequent evaluations of the monitoring processes): implementation monitoring and effectiveness monitoring.

Implementation Monitoring

Implementation monitoring of land use planning decisions is used to determine if actions proposed to be taken are being, or have been, *actually* implemented. For example, the Monument's PRMP/FEIS states that there will be lists or action plans developed within a certain time period following the signing of the Record Of Decision (ROD). In such a case, implementation monitoring would track to see that this actually occurs. Implementation monitoring is completed at least annually, and is tracked in a log or report that is then made available to the public. Results of this evaluation may be used to develop annual budgets.

Effectiveness Monitoring

Implementation monitoring determines if actions are being taken (and if standards and guidelines are being followed). Effectiveness monitoring goes further by evaluating if the on-the-ground actions being taken are indeed achieving the desired goals (and if the objectives of the standards and guidelines are being met). Effectiveness monitoring requires the collection of necessary data/information to evaluate the effectiveness of land use planning decisions. For example, data would be collected to ensure that range conditions move toward meeting the Colorado Public Land Health Standards and Guidelines for Livestock Grazing Management (BLM 1997a). Details of this type of monitoring strategy may include indicators of change, acceptable thresholds, methodologies, protocols, and/or timeframes.

Evaluation

Results of implementation and effectiveness monitoring will be evaluated for the Monument to determine whether land use plan decisions, and the associated NEPA analyses:

- are still valid and relevant, and address current issues;
- are effective in achieving (or are moving toward achieving) desired outcomes;
- include any decision(s) that need to be revised;
- include any decision(s) that need to be dropped from further consideration, and/or;
- include any areas that require new decisions.

The evaluation should determine if mitigation measures are being effective, and/or if additional information or data should be incorporated.

Adaptive Management

Adaptive management is the process of requiring results from ongoing monitoring and evaluation to guide future management actions. Adaptive management is a "feedback loop" that allows information obtained through the monitoring and evaluation of management actions to provide information on necessary changes that could further improve management. The Adaptive Management loop is as follows:

Action → Monitoring → Evaluation → Adjustment → Action

Ultimately, the goal of this adaptive management process is to move toward desired future conditions. Through adaptive management, decisions, actions, and results are carefully documented and communicated to others so that the knowledge gained through experience is passed on.

Wherever feasible, the adaptive management strategy (which generally involves planning, implementation, monitoring, and evaluation), will be applied to both land use planning and implementation decisions for the Monument.

Table 2-1 outlines the general types of monitoring that will be incorporated into the management of various Monument resources and/or resource uses.

Table 2-1 Resource Monitoring			
Resource	Purpose	Type of Monitoring	Time Interval
Air Quality	Maintain air quality.	State and Federal Air Quality Standards; Federal viewshed classes	Ongoing
Cultural Resources	Determine impacts and effectiveness of mitigation measures.	Sections 106 and 110 of the National Historic Preservation Act (NHPA)	Project specific; ongoing
Fuels and Fire Management	Prevent potential wildfire hazards, and rehabilitate successfully following a burn.	State and Federal Air Quality Standards; wildland-urban interface (WUI) concerns; wildfire rehabilitation	Project specific
Soil Resources	Maintain ground cover; provide wildlife habitat, and reduce impacts to water quality.	Colorado Public Land Health Standards; stipulations; Conditions of Approvals (COAs); Best Management Practices (BMPs); mitigation measures	Project specific; ongoing
Wildlife	Locate and protect species and their habitat.	Colorado Public Land Health Standards; stipulations; COAs; BMPs; mitigation measures; conservation plans; water quality	Project specific; ongoing
Vegetation	Manage for visual quality, soil stabilization, wildlife habitat, and ecosystem health.	Colorado Public Land Health Standards; stipulations; COAs; BMPs; mitigation measures	Project specific; ongoing
Visual	Maintain visual quality.	Visual Resource Management (VRM) classification inventory; stipulations; COAs; BMPs; mitigation measures	Project specific

Table 2-1 Resource Monitoring			
Resource	Purpose	Type of Monitoring	Time Interval
Water	Maintain water quality for domestic and non-domestic purposes.	State Water Quality Standards	Project specific; ongoing
Lands and Realty	Manage encroachment, and ensure that development meets standards and mitigations measures.	Boundary compliance; BMPs; mitigation measures	Project specific Ongoing
Minerals	Minimize impacts to other resources.	Stipulations; COAs; BMPs; mitigation measures	Project specific
Livestock grazing	Maintain forage for wild and domestic ungulates, secure ground cover and soil stability, and reduce noxious weed infestations.	Colorado Public Land Health Standards; long-term trend(s); annual use and compliance; noxious weed management	Project specific; ongoing
Recreation	Manage for permit requirements, maintain wilderness characteristics, and manage proper use for particular Special Recreation Management Areas (SRMAs).	Special Recreation Permit (SRP) requirements; Wilderness Study Area (WSA) requirements; SRMA objectives	Project specific; ongoing
Transportation	Manage user-created routes for resource protection, and manage route uses to reduce user conflicts and enhance public safety.	Compliance with designated transportation system	Project specific; ongoing
Areas of Critical Environmental Concern/Research Natural Areas (ACECs/RNAs)	Maintain ecological integrity, maintain research potential, and protect valuable resources.	Research; resource protection	Project specific; ongoing
Public Safety and Law Enforcement	Ensure public safety, protect and manage resources, and ensure hazard prevention.	Compliance with laws and regulations	Project specific; ongoing